NOTICE OF AVAILABILITY/NOTICE OF INTENT
MITIGATED NEGATIVE DECLARATION

Project Title: General Plan Amendment GPA 17-2504, Zone Change 17-3503 and Design Review

NOTICE IS HEREBY GIVEN that the City of Banning (City), as Lead Agency under the California Environmental Quality Act (CEQA), has prepared a Notice of Availability (NOA) and Notice of Intent (NOI) to adopt a Mitigated Negative Declaration (MND) for a proposed General Plan Amendment (17-2503), Zone Change (17-3503) and Design Review (17-7004) ("Project"). The MND has been prepared pursuant to CEQA and the CEQA Guidelines. Copies of available materials may be reviewed or obtained from the City's office at the address cited below.

Project Location and Description: The Project is located on the north side of Sun Lakes Boulevard between Sun Lakes Village Drive and Silver Lakes Avenue in the City of Banning. Assessor's Parcel Number (APN): 419-140-059.
The Project proposes to construct a medical office building on a vacant 3.31-acre site. The two-story building is proposed to have a gross floor area 36,174 square-feet and would include ancillary pharmaceutical and optical sales. The Project requires concurrent processing of a General Plan Amendment (GPA), Zone Change (ZC), and Design Review (DR).

Environmental Effects: The Initial Study Checklist determined that the proposed Project could result in potentially significant effects, but the Project Applicant will incorporate mitigation measures that would avoid or mitigate effects to a point where clearly no significant environmental impacts will occur. Mitigation has been included to address Aesthetics, Cultural Resources, Noise, Transportation / Traffic and Tribal Cultural Resources.

Public Review Period: The MND will be available for a 20-day public review period from **May 11, 2018 to May 31, 2018.**

Written comments on this MND should be addressed to:
City of Banning
Community Development Department
99 E. Ramsey Street, Banning, CA 92220
Attn: Patty Nevins, Community Development Director

A copy of the Public Review of the Mitigated Negative Declaration is available at the above address and at the Banning Public Library, 21 W. Nicolet Street, Banning CA 92220, as well as at the City Community Development Department's website at http://www.ci.banning.ca.us/DocumentCenterii.aspx?FID=19.

All comments must be received in writing at the address below no later than 5 p.m. on May 31, 2018. Comments received and issues and concerns raised will be evaluated to determine if the mitigation and project conditions of approval have adequately addressed the concerns. All comments received will be included as part of the record.

Public Meeting: This Project is tentatively scheduled for the June 6, 2018 Planning Commission hearing. The hearing commences at 6:30 p.m. and is held in the City Council Chambers, Banning City Hall, located at 99 E. Ramsey Street, Banning CA 92220. In that the Project requires a General Plan Amendment and Zone Change, the consideration by the Planning Commission is advisory in this matter and is included as a recommendation for the City Council to either approve, deny or modify the project.

BY ORDER OF THE COMMUNITY DEVELOPMENT DIRECTOR OF THE CITY OF BANNING, CALIFORNIA.

Patty Nevins
Community Development Director

Dated: May 8, 2018
Date Published: May 11, 2018

INITIAL STUDY &
MITIGATED NEGATIVE DECLARATION
No. 17-1504
FOR

Careage Medical Office Building
(GPA 17-2503, Zone Change 17-3503)

PREPARED FOR:
City of Banning
99 East Ramsey Street
Banning, CA 92220
Contact:
(951) 922-3130

CONSULTANT ASSISTANCE BY:

Lilburn Corporation
1905 Business Center Drive
San Bernardino, CA 92408
909-890-1818

May 2018

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APPENDICES

The following technical studies in support of this Initial Study are available to the public for review at the Community Development Department, Planning Division.

Appendix A – Biological Assessment
Appendix B - Phase I Cultural Resources Investigation
Appendix B – Report of Soils and Foundation Evaluations
Appendix C – Hydrology Study & Drainage Analysis
Appendix D – Noise Impact Analysis
Appendix E – Traffic Impact Analysis

CITY OF BANNING
INITIAL STUDY

Project Title: Careage Medical Office Building
(GPA 17-2503, ZC 17-3503, DR 17-7004, EA 17-1504)
Lead Agency Name: City of Banning Community Development Department
Planning Division
Address: 99 E. Ramsey Street
Banning, CA 92220

Contact Person: Sonia Pierce
Phone Number: (951) 922-3152

Project Sponsor: Careage HealthCare, Inc.
Address: 4411 Point Fosdick Drive, Ste. 203
Gig Harbor, WA 98335

Existing General Plan Designation: High Density Residential
Existing Zoning: High Density Residential / Affordable Housing Opportunity (HDR-20)

Proposed Banning General Plan Designation: Professional Office (PO)
Proposed Banning Zoning Designation: Professional Office (PO)

Zone Change: From High Density Residential – Affordable Housing Opportunity (HDR-20) to Professional Office (PO)

Project Location (Address/Nearest cross-streets): The 3.31-acre Project Site is located on the north side of Sun Lakes Boulevard between Sun Lakes Village Drive and Silver Lakes Avenue in the City of Banning (refer to Figure 1: Regional Location Map and Figure 2: Vicinity Map). The property is legally described as APN 419-140-059 and is within Section 12 of Township 3 South, Range 1 West, San Bernardino Base and Meridian.

Project Description: Careage HealthCare, Inc. is proposing to construct a medical office building (MOB) on a 3.31-acre site (see Figure 3: Site Plan). The two-story building (maximum 38 feet in height) is proposed to have a gross floor area of 36,174 square feet and would include the following uses: 30,977 square-feet for medical office; 2,579 square-feet for general office; 1,249 square feet for ancillary uses (pharmacy/ optical); and 1,369 square feet for a "presentation hall" for activities associated with the medical complex. The Site Plan shows 193 parking spaces in accordance with the Municipal Code, of which 8 would be handicap spaces.

The City of Banning designates zoning at the Project Site as High Density Residential-20/Affordable Housing Opportunity (20-24 du/acre. The Applicant has submitted an Application for a General Plan Amendment and Zone Change from High Density Residential to Professional Office.

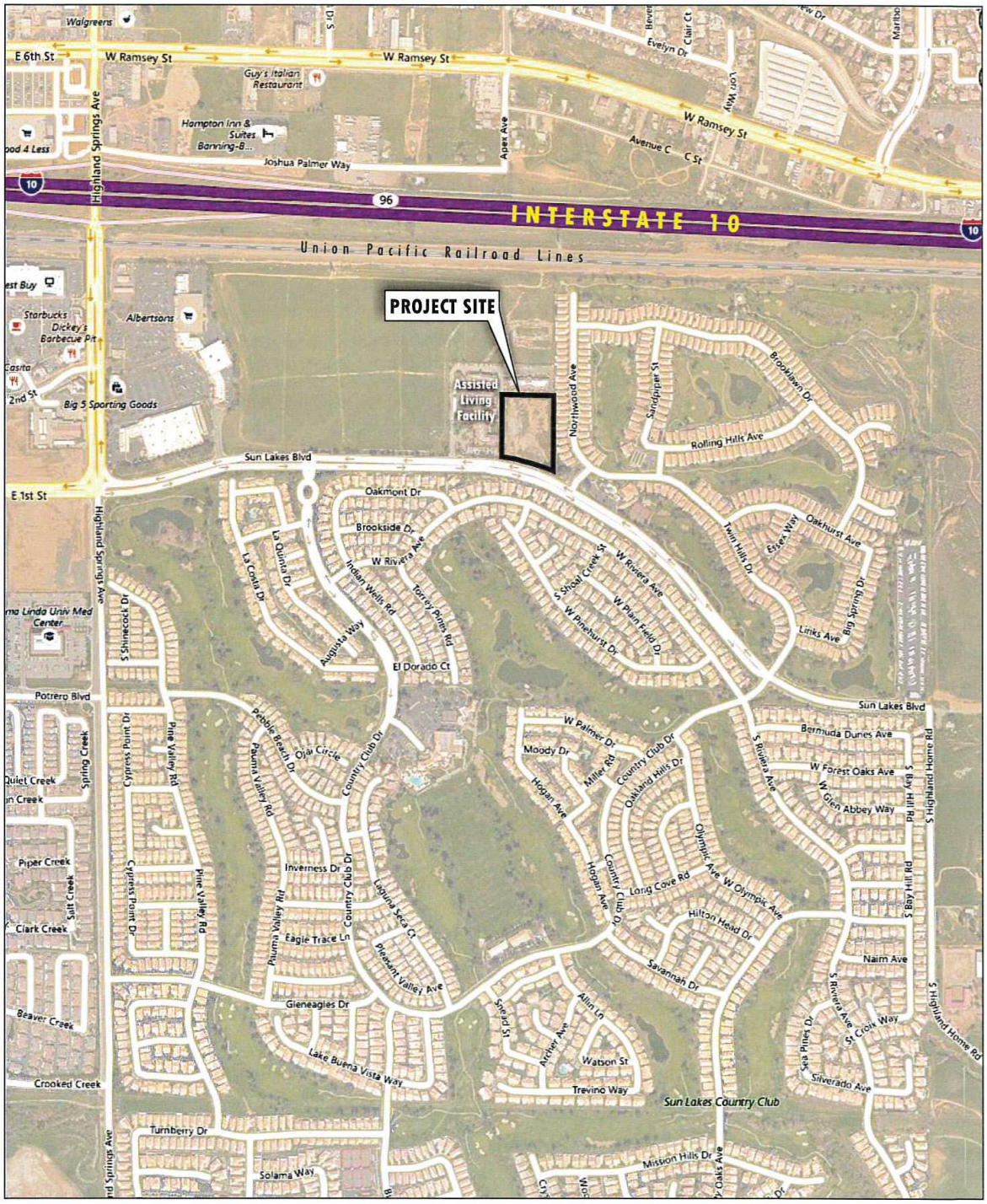
Surrounding Land Uses and Setting: The Project Site is vacant and is adjacent to the existing *"The Lakes Independent Living and Memory Care*" facility which is located to the north and the

west. Other surrounding development includes single-family low density residential use to the south and medium density residential use to the east. The Southern Pacific Railroad right-of-way is located approximately 795 feet north of the Project Site and I-10 freeway is approximately 1,000 feet north of the Project Site. The property is not within an Airport Influence Area, an Airport Compatibility Zone, a Historic Preservation Zone, a Fire Responsibility Area, or an Agricultural Preserve. It also is not located within a Cell Group of the Western Riverside County Multiple-Species Habitat Conservation Plan, or within a floodplain.

Prepared By:
LILBURN CORPORATION

REGIONAL LOCATION
Careage Healthcare
Banning, CA

FIGURE 1



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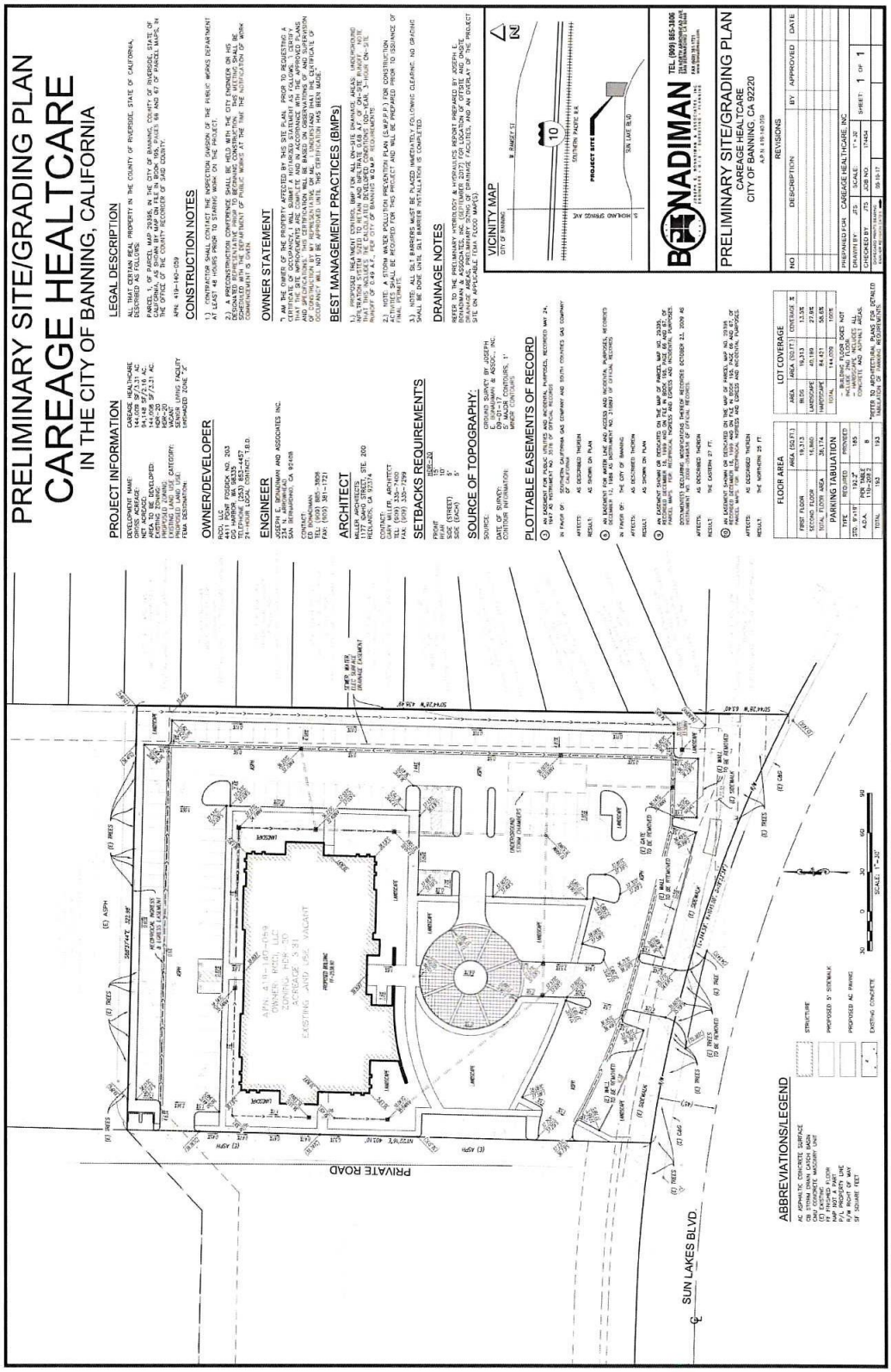
FEET

Prepared By:
LILBURN CORPORATION

PROJECT VICINITY
Careage Healthcare
Banning, CA

FIGURE 2



SITE PLAN
Careage Healthcare
Banning, CA

FIGURE 3

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☒ Aesthetics	☐ Agriculture Resources	☐ Air Quality
☐ Biological Resources	☒ Cultural Resources	☐ Geology /Soils
☐ Hazards & Hazardous Materials	☐ Hydrology / Water Quality	☐ Land Use/ Planning
☐ Mineral Resources	☒ Noise	☐ Population / Housing
☐ Public Services	☐ Recreation	
☒ Tribal Cultural Resources	☒ Transportation/Traffic	
☐ Utilities / Service Systems	☐ Mandatory Findings of Significance	

DETERMINATION

On the basis of this initial evaluation:

( ) I find that the Proposed Project COULD NOT have a significant effect on the environment. A NEGATIVE DECLARATION will be prepared.

(✓) I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by, or agreed to, by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

( ) I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

( ) I find that the Proposed Project MAY have a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standard and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

( ) I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects 1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and 2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Signature: Patty Nevins Date: 5/11/18
Patty Nevins, Community Development Director

EVALUATION OF ENVIRONMENTAL IMPACTS

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. *Would the project:*					
a)	Have a substantial effect on a scenic vista?	( )	( )	( )	(✓)
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?	( )	( )	( )	(✓)
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	( )	( )	(✓)	( )
d)	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	( )	(✓)	( )	( )

Impact Discussion:

a) **No Impact.** According to the City's General Plan, the Project Site is not within a scenic vista/scenic highway view corridor. Nearby streets include Sun Lakes Boulevard, and Highland Springs Avenue. Neither of these is designated as a scenic route in the General Plan. There are no scenic vistas that would be impacted by the Proposed Project, and therefore no impacts would result.

b) **No Impact.** The 3.31-acre Project Site is currently vacant and is located on the north side of Sun Lakes Boulevard between Sun Lakes Village Drive and Silver Lakes Avenue. The Project Site is surrounded by *"The Lakes Independent Living and Memory Care*" facility to the west, multi-family residential to the north, and single family residential development to the east and south (across Sun Lakes Boulevard). There are no designated State Scenic Highways within the vicinity of the Project Site. Similarly, there are no historic buildings on-site or in the vicinity that would be impacted as a result of the Project. No impacts would result.

c) **Less than Significant Impact.** The City of Banning designates the Project Site as High Density Residential-20/Affordable Housing Opportunity (20-24 du/ac) (HDR-20). The Project Proponent has submitted an Application for a Zone Change to Professional Office. This district allows professional offices and social services, and other similar uses; all with only ancillary retail. The project site is essentially level, presently vacant and has no significant vegetation or unique physical features. Because there are similar visual environs adjacent to the Project Site (i.e., *The Lakes Independent Living and Memory Care facility*); approval of the Proposed Project would not substantially alter the visual character of the area The proposed two-story building would consequently have a less than significant impact and no mitigation measures are necessary.

d) **Less than Significant with Mitigation.** The project site is currently vacant; thus no light or glare currently emanates from the site. The proposed project will create a new source of light and glare. Potentially sensitive receptors in the vicinity include: *The Lakes Independent Living and Memory Care* facility to the west, multi-family residential to the north, and residential development to the east and on the south side of Sun Lakes Boulevard. Lighting to be provided on-site would be typical of similar development, with no unusual features or characteristics.

A photometric plan has been prepared for the project. According to the photometric plan for the Project, the nearest sensitive receptor (residential to the east) is located approximately 45 ft. to the nearest light pole (measured to structures). At the eastern property line within this area would range from 0.0 to 0.8 lumens. (A lumen is a unit of luminous flux equal to the amount of light given out through a solid angle by a source of one candela intensity radiating equally in all directions,) On the western property line, lumens are shown to range from 0.0 to 1.6, and the assisted living facility would be approximately 90 feet from the closest light pole. On the north property line, where multi-family housing is located, lumens are shown to range from 0.0 to 1.2 lumens, and the closest structure would be approximately 60 feet from the closest light pole.

Residents to the west have in past expressed concerns regarding lighting. **Mitigation Measure AES-1** The final photometric plan Installation of lighting within the parking area and building entries shall be designed in a manner to control spillage of light from the Project Site, as required by the City of Banning Municipal Code. Attention will be made to assure no spillage of lights onto the residential properties to the west. The lighting plan must also comply with Title 24 of the California Uniform Building Code. Compliance with these regulations is a Condition of Approval. Consequently, impacts to sensitive receptors will be less than significant.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	( )	( )	( )	(✓)
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	( )	( )	( )	(✓)
c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	( )	( )	( )	(✓)
d) Result in the loss of forest land or conversion of forest land to non-forest use?	( )	( )	( )	(✓)
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest	( )	( )	( )	(✓)

Impact Discussion:

a, c, e) **No Impact.** The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data that inventories agricultural land resources in the State. Agricultural land is rated according to soil quality and irrigation status; the best quality land is classified as Prime Farmland. The maps are updated every

two years and the latest maps are available digitally through the FMMP interactive mapping viewer.

The Project site and vicinity was reviewed in the FMMP interactive map on November 3, 2017. The Project Site and vicinity is identified as urban built-up land. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is identified for the Project Site or in the immediate vicinity. Therefore, the Proposed Project would not result in the conversion of farmland designated of importance locally or statewide to a non-agricultural use. No impacts would occur.

b) **No Impact**. California Land Conservation (Williamson) Act of 1965 was adopted to regulate the conversion of farmland/agricultural land into non-agricultural use and control urban expansion. The Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to long term agricultural or open space use. No portion of the Project Site is contracted under the Williamson Act. Therefore the Proposed Project would not impact any Williamson Act Land Conservation Contract. Similarly, approval of the Proposed Project would not conflict with or change existing zoning for agricultural use, or a Williamson Act Contract. No impacts would result.

d) **No Impact**. The 3.31-acre Project Site is located on north side of Sun Lakes Boulevard between Sun Lakes Village Drive and Silver Lakes Avenue; approximately 1,000 feet south of the I-10 freeway. No portion of the Project Site is located within forest land. Consequently, approval of the proposed General Plan Amendment (GPA) and Zone Change (ZC) to allow site development would not result in the loss of forest land or convert forest land to a non-forest use. No impacts would result.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY. *Would the project:*				
a) Conflict with or obstruct implementation of the applicable air quality plan?	( )	( )	(✓)	( )
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	( )	( )	(✓)	( )
c) 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors?	( )	( )	(✓)	( )
d) Expose sensitive receptors to substantial pollutant concentrations?	( )	( )	(✓)	( )
e) Create objectionable odors affecting a substantial number of people?	( )	( )	(✓)	( )

Impact Discussion:

a) **Less than Significant.** The Project Site is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality issues and regulations within the SCAB. The Air Quality Management Plan (AQMP) for the basin establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the state and federal air quality standards. The most recent AQMP (2016 AQMP) was adopted by the SCAQMD on March 3, 2017. The 2016 AQMP incorporates the latest scientific and technological information and planning assumptions, including transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2016 Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories.

Conflicts with the AQMP would arise if Project activities resulted in a substantial increase in employment or population that was not previously adopted and/or approved in a General Plan. Large population or employment increases could affect transportation control strategies, which are among the most important in the air quality plan, since

transportation is a major contributor to particulates and ozone for which the SCAB is not in attainment.

The Proposed Project consists of a General Plan Amendment and Zone Change from High Density Residential to Professional Office. The Housing Element of the General Plan identifies the project site for build-out of 66 low income units at a maximum density of 20 dwelling units/acre, which would generate approximately 178 new residents. (SCAG, May 2017, average 2.7 residents per household, City of Banning). The proposed project is estimated to generate approximately 45-50 new jobs. A portion of future employees can be assumed to be drawn from the existing local labor pool and a portion may represent new residents. Consequently, the proposed General Plan Amendment and Zone Change would result in a minimal deviation from population and employment projections which form the basis of the AQMP.

An evaluation of potential air quality impacts related to buildout under the current General Plan and the Proposed Project was prepared. Table 1 and Table 2 illustrate operational emissions associated with the current General Plan/Zoning designations and the proposed project. Construction emissions were not modeled as they are short-term in nature, and measures will be required to minimize such impacts. (See discussion under Threshold 3 - b, c) As shown, neither operational impacts resulting from the existing General Plan/Zoning designations or the proposed project would exceed SCAQMD thresholds. Consequently, the proposed project would not result in a conflict or obstruction to the implementation of the AQMP and related impacts are considered **Less Than Significant.**

Table 1
Consistency with the AQMP
Operational Emissions
(Pounds per Day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
66 Apartments[1]	19.8	9.1	49.9	0.1	8.5	6.0
Proposed Project	3.0	17.5	23.5	0.0	7.0	2.0
SCAQMD Threshold	55	55	550	150	150	55
Significance	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.2016.3.2 Winter Emissions

Table 2
Consistency with the AQMP
Greenhouse Gas Operational Emissions
(Metric Tons per Year)

Source/Phase	CO_2	CH_4	N_20
66 Apartments	924.7	0.6	0.0
MTCO2e	**940.7**		
SCAQMD Threshold	3,000		
Significant	**No**		
Proposed Project	1,453.4	1.9	0.0
MTCO2e	**1,557.6**		
SCAQMD Threshold	3,000		
Significant	**No**		

Source: CalEEMod.2016.3.2 Annual Emissions.

b/c) **Less than Significant.** The Proposed Project's construction and operational emissions were screened using California Emissions Estimator Model (CalEEMod) version 2016.3.2 prepared by the SCAQMD. The emissions estimates incorporate Rule 402 and 403 by default as required during construction. The criteria pollutants screened for include: reactive organic gases (ROG), nitrous oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO_2), and particulates (PM_{10} and $PM_{2.5}$). In addition, reactive organic gas (ROG) emissions are analyzed. Two of the analyzed pollutants, ROG and NO_x, are ozone precursors. Both summer and winter season emission levels were estimated.

Construction Emissions

Construction emissions are considered short-term, temporary impacts and were modeled with the following parameters: site grading (mass and fine grading), building construction, paving, and architectural coating. Construction is anticipated to begin in early to mid-2018 and be completed in 2020. Estimated emissions generated by construction of the Proposed Project are shown in Table 3 and Table 4, which represent winter and summer construction emissions, respectively. As shown in Table 3 and Table 4, construction

[1] Dwelling unit count based upon RHNA Site Inventory allocation, 2014-2021 Housing Element, City of Banning General Plan.

emissions would not exceed SCAQMD thresholds. Impacts would be **Less Than Significant.**

Table 3
Winter Construction Emissions Summary
(Pounds per Day)

Source/Phase	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Site Preparation	4.7	48.2	23.1	0.0	9.8	6.2
Grading	2.9	30.7	17.4	0.0	4.7	3.0
Building Construction	3.2	26.8	20.9	0.0	2.4	1.7
Paving	1.7	12.8	13.0	0.0	0.9	0.7
Architectural Coating	20.9	1.9	2.2	0.0	0.2	0.2
Highest Value (lbs/day)	**20.9**	**48.2**	**23.1**	**0.0**	**9.8**	**6.9**
SCAQMD Threshold	75	100	550	150	150	55
Significant	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.2016.3.2 Winter Emissions.
Phases do not overlap and represent the highest concentration.

Table 4
Summer Construction Emissions Summary
(Pounds per Day)

Source/Phase	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Site Preparation	4.7	48.3	23.3	0.0	9.8	6.2
Grading	2.9	30.7	17.3	0.0	4.7	3.0
Building Construction	3.7	26.8	21.2	0.0	2.3	1.6
Paving	1.7	12.8	13.1	0.0	0.9	0.8
Architectural Coating	20.9	1.8	2.3	0.0	0.2	0.2
Highest Value (lbs/day)	**20.9**	**48.3**	**23.3**	**0.0**	**9.8**	**6.9**
SCAQMD Threshold	75	100	550	150	150	55
Significant	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.2016.3.2 Summer Emissions.
Phases do not overlap and represent the highest concentration.

Compliance with SCAQMD Rules 402, and 403

Although the Proposed Project does not exceed SCAQMD thresholds for construction emissions, the Project Proponent would be required to comply with all applicable SCAQMD rules and regulations, because the SCAB is in non-attainment status for ozone and suspended particulates (PM_{10} and $PM_{2.5}$).

The Project Proponent would be required to comply with Rules 402 nuisance, and 403 fugitive dust, which require the implementation of Best Available Control Measures (BACMs) for each fugitive dust source, and the AQMP which identifies Best Available Control Technologies (BACTs) for area sources and point sources. The BACMs and BACTs would include, but not be limited to the following:

1. The Project Proponent shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.

(a) The Project Proponent shall ensure that watering of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading activity on the site. Portions of the site that are actively being graded shall be watered regularly (3x daily) to ensure that a crust is formed on the ground surface and shall be watered at the end of each workday.

(b) The Project Proponent shall ensure that all disturbed areas are treated to prevent erosion until the site is constructed upon.

(c) The Project Proponent shall ensure that landscaped areas are installed as soon as possible to reduce the potential for wind erosion.

(d) The Project Proponent shall ensure that all grading activities are suspended during first and second stage ozone episodes or when winds exceed 25 miles per hour.

During construction, exhaust emissions from construction vehicles and equipment and fugitive dust generated by equipment traveling over exposed surfaces, would increase NO_X and PM_{10} levels in the area. Although the Proposed Project does not exceed SCAQMD thresholds during construction, the Applicant/Contractor would be required to implement the following conditions as required by SCAQMD:

2. To reduce emissions, all equipment used in grading and construction must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.

3. The Project Proponent shall ensure that existing power sources are utilized where feasible via temporary power poles to avoid on-site power generation during construction.

4. The Project Proponent shall ensure that construction personnel are informed of ride sharing and transit opportunities.

5. All buildings on the Project Site shall conform to energy use guidelines in Title 24 of the California Administrative Code.

6. The operator shall maintain and effectively utilize and schedule on-site equipment in order to minimize exhaust emissions from truck idling.

7. The operator shall comply with all existing and future California Air Resources Board (CARB) and SCAQMD regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.

Operational Emissions

The operational mobile source emissions were calculated using a Traffic Impact Analysis (TIA) prepared by Kunzman Associates, Inc. in April 2018. The TIA determined that the Proposed Project would generate approximately 1,259 total daily trips. Emissions associated with the Proposed Project's estimated vehicle trips were modeled and are listed in Table 5 and Table

6, which represent winter and summer operational emissions, respectively. As shown, both winter and summer season operational emissions are below SCAQMD thresholds. Impacts are anticipated to be less than significant, and no mitigation measures are required.

Table 5
Winter Operational Emissions Summary
(Pounds per Day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	0.9	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.0	0.0	0.0	0.0	0.0
Mobile	32.1	17.3	23.1	0.0	6.9	1.9
Totals (lbs/day)	**3.0**	**17.3**	**23.1**	**0.0**	**6.9**	**1.9**
SCAQMD Threshold	55	55	550	150	150	55
Significance	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.2016.3.2 Winter Emissions.

Table 6
Summer Operational Emissions Summary
(Pounds per Day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	0.8	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.0	0.0	0.0	0.0	0.0
Mobile	2.5	17.3	26.1	0.1	6.9	1.9
Totals (lbs/day)	**2.5**	**17.3**	**26.1**	**0.1**	**6.9**	**1.9**
SCAQMD Threshold	55	55	550	150	150	55
Significance	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.2016.3.2 Summer Emissions.

The Proposed Project does not exceed applicable SCAQMD regional thresholds either during construction or operational activities. Consequently, the associated impacts are considered to be Less Than Significant; and no mitigation measures are necessary.

d) **Less than Significant.** Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality. Adjacent existing sensitive receptors include residential structures located immediately to the east, north and the west of the project site. Localized significance thresholds (LST) are assessed, reviewed and compared to SCAQMD mass rate look-up screening threshold tables. LSTs represent the maximum emissions from a Project Site that would not cause an exceedance of the national or state standards. LSTs are based on the ambient concentrations of specific pollutants within the sensitive receptor area (SRA) and the distance to the nearest sensitive receptor. The thresholds for a 2-acre site with sensitive receptors located within 25 meters of property lines were used to analyze the proposed project and represent a worst-case scenario.

The project site is located within the Banning Airport-Source Receptor Area (SRA No. 29). In the case of CO and NO_2, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one

or more of these standards. If ambient levels already exceed a State or federal standard, then project emissions are considered significant if they increase ambient concentrations

by a measurable amount. This would apply to PM_{10} and $PM_{2.5}$, both of which are nonattainment pollutants (areas considered to have air quality worse than the National Ambient Air Quality Standards as defined in the Clean Air Act Amendments of 1970) or these two pollutants, the significance criteria are the pollutant concentration thresholds established in SCAQMD Rules 403 and 1301.

Table 7 shows the estimated emissions for the proposed construction and operational activities compared with appropriate LSTs. The data provided in Table 7 shows that none of the analyzed criteria pollutants would exceed the calculated local emissions thresholds at the nearest sensitive receptors consequently, a **Less Than Significant** local air quality impact would occur with approval of the proposed project, and no mitigation measures are necessary.

Table 7
Local Construction Emissions at Nearest Sensitive Receptors[1]
lbs/per day)

	NOx	CO	PM10		PM2.5	
Construction Emissions (Max. from Table 3 and Table 4)	48.3	23.3	9.8		6.2	
Operational Emissions (Max. Total from Table 5 and Table 6)	17.3	26.1	1.7		0.5	
Highest Value (lbs/day)	**48.3**	**23.3**	**9.8**	**1.7**	**6.2**	**0.5**
LST Thresholds	149	1,541	10*	3†	9*	2†
Greater Than Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres in SRA 29 Banning Airport.
[1]The nearest existing sensitive receptors are located adjacent to the north, east, and south of the project site; however, according to LST methodology any receptor located closer than 25 meters should be based on the 25 meter threshold.
* Construction emissions LST
† Operational emissions LST

e) **Less than Significant.** The Proposed Project will not involve activities typically associated with the emission of objectionable odors. Potential odor sources associated with the Proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities; and the temporary storage of solid waste (refuse) associated with the Projects' (long-term operational) uses. Standard construction measures such as those listed under Threshold b) and c) would minimize odor impacts resulting from construction activity. It should be noted that any construction odor emissions generated would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction activity. Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City of Banning's solid waste regulations. The Project would be also required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Consequently, odors associated with the Proposed Project construction and operations would be **Less Than Significant** and no mitigation is necessary.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. *Would the project:*				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	( )	( )	( )	(✓)
b) Have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	( )	( )	( )	(✓)
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	( )	( )	( )	(✓)
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	( )	( )	( )	(✓)
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	( )	( )	( )	(✓)
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community conservation Plan, or other approved local, regional, or State habitat conservation plan?	( )	( )	( )	(✓)

Impact Discussion:

In November 2017, Natural Resources Assessment, Inc. (NRAI) performed a General Biological Assessment under the requirements of the Western Riverside County Multiple Species Habitat Conservation Plan (MSCHP). This assessment is contained in Appendix A, which is available for review at the community Development Department, Planning Division. Findings are summarized in the following discussion.

a) **No Impact.** A data search for information on plant and wildlife species known occurrences within the vicinity of the Project Site has been conducted along with review of biological texts on general and specific biological resources, and those resources considered to be sensitive by various wildlife agencies, local governmental agencies and interest groups.

A field survey of the Project Site was conducted on October 15, 2017 and included an evaluation of Project Site's habitats, records of the general and sensitive biological resources present on-site, and taking representative photographs. The survey included habitat assessment surveys for resources covered under the MSHCP survey requirements. The Project Site was mapped by the MSHCP as disturbed/developed in both the 1994 and 2012 mapping.

The Project Site is predominantly composed of weeds and includes a mix of mostly native weeds including: telegraph weed (*Heterotheca grandiflora*), and doveweed (*Croton setiger*). Non-native weeds such as Russian thistle (*Salsola tragus*), short-pod mustard (*Hirschfeldia incana*) and red-stemmed filaree (*Erodium cicutarium*) also occur on-site. The weed-dominated plant community is found mostly at the southern and eastern boundaries of the Project Site. The presence of individual plants and a single red gum (*Eucalyptus camalduensis*) were observed along the eastern boundary as well, and indicates that this area is possibly receiving supplemental water from the adjacent residential development. Plants along the southern boundary are all annual weeds that mostly occur in low-lying areas where water collects.

During the field survey, no amphibian or reptile species were observed. A total of four bird species were observed and included: house finch (*Haemrohous mexicanus*), white-crowned sparrow (*Zonotrichia leucophrys*), Anna's hummingbird (Calypte anna) and house sparrow (*Passer domesticus*). No sign of mammal species (i.e., scat, tracks) was observed.

Section 6 of the MSHCP states that all projects must be reviewed for compliance with plan policies pertaining to Riparian/Riverine resources, Criteria resources, Narrow Endemic Plant Species, urban/wildlands interface, and additional survey needs as applicable. For the Proposed Project, the MSHCP required an assessment for Narrow Endemic Plant Species, presence of burrowing owl habitat, riverine and riparian habitats, as well as vernal pools and fairy shrimp habitat, and jurisdictional waters. The Narrow Endemic Plant Species identified as potentially present were Marvin's onion (*Allium marvinii*) and many-stemmed dudleya (*Dudleya multicaulis*).

The Yucaipa onion (*Allium marvinii*) is a perennial herb that flowers annually from an underground bulb. It is found in areas of clay soils within openings within chaparral habitats. It is known to occur from the Yucaipa and Beaumont area of the southern San Bernardino Mountains, at elevations ranging from 2300 to 3200 feet. The Yucaipa onion flowers from April through May and would not have been visible during the survey. Threats to the Yucaipa onion include invasion of historical habitats by non-native weeds, loss of habitat to development and the alteration of fire regimes. The alteration of fire regimes (mainly suppression) has resulted in formerly open areas preferred by this species becoming closed over. The Yucaipa onion is not listed as either endangered for threatened by the U.S. Fish and Wildlife Service (USFWS) or the California Department of Fish and Wildlife (CDFW). However, it is on list 1B.1 of the California Natural Plant Society (CNPS) Inventory.

No suitable heavy or clayey soils are present on-site. In addition, the site lacks the soils and plant community preferred by this species. Therefore, the Yucaipa onion is not expected to be present.

The many-stemmed dudleya (*Dudleya multicaulis*) is a perennial herb that grows from a corm. It is found usually on clay or similarly dense soils in chaparral, coastal scrub, valley and foothill grassland plant communities. It blooms from an elevation of 15 to 790 meters (50 to 2600 feet), and flowers from April through July; thus it would not have been visible during the survey. The species has been recorded from Los Angeles, Orange, Riverside, San Bernardino and San Diego counties, specifically the Temescal Mountains in Riverside County. It is threatened by clay mining, off-road activities, grazing, farming and development. It is not listed by the USFWS or the CDFW; however, it is on List 1B.2 of the CNPS Inventory. The Project Site has no suitable habitat or soils for this species. Many-stemmed dudleya is not expected to be present.

Habitat for the burrowing owl was assessed over the entire property in accordance with MSHCP "Burrowing Owl Survey Instructions." The assessment included looking for burrowing owl burrows, whitewash, pellets, animal remains and other burrowing owl indicators. The Project Site does not provide suitable habitat for burrowing owls, as there is no scrub cover and no burrows or other structures suitable for use by the burrowing owl. The Project Site is disturbed on a regular basis and is located in an area that experiences ongoing human disturbance. No burrowing owls are expected to use or nest on the Project Site.

The species objectives for the Stephens kangaroo rat (SKR) in the Western Riverside MSHCP were designed to incorporate the objectives and be consistent with the Long-Term Stephens Kangaroo Rat Habitat Conservation Plan (SKR Plan). Any projects that are within the MSHCP boundaries must meet the SKR Plan requirements. The project is not located within the SKR fee area; and therefore no impacts to this species would result.

The Proposed Project would not 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 CDFW or U.S. Fish and Wildlife Service. No impacts are anticipated to candidate, sensitive, or special status species and no mitigation measures are necessary.

b) **No Impact.** Riparian/Riverine Areas are defined by the MSHCP as "lands which contain habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close or depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year." The property is flat and shows no evidence of any regular flow. There is no riparian habitat that occurs on-site as defined in the MSHCP. The mulefat (*Baccharis salicifolia*) plants observed do not make a true riparian habitat, as they are scattered individuals on bare ground, do not occur along a drainage, and are likely present only because of runoff from adjacent residential properties. Similarly, there are no jurisdictional waters on-site. The mulefat plants observed along the eastern boundary do not make a true wetland habitat, as they are scattered individuals on bare ground, do not occur along a drainage, and are likely present only because of runoff from adjacent residential properties. Consequently, no impacts to riparian habitat or any other sensitive natural community are anticipated and no mitigation measures are necessary.

c) **No Impact.** Vernal pools are defined by the MSHCP as "seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands

indicators of hydrology and/or vegetation during the drier portion of the growing season. Evidence concerning the persistence of an area's wetness can be obtained from its history, vegetation, soils, and drainage characteristics, uses to which it has been subjected, and weather and hydrologic records." During the field survey, no indicators of vernal pool development were observed. Given the history of the Project Site, the currently highly disturbed surface, and the original sandy loam soils (unsuitable for pool formation), vernal pools are not present nor expected to occur in the future. Consequently, no impacts are anticipated to federally protected wetlands and no mitigation measures are necessary.

d) **No Impact.** Raptors and all migratory bird species, whether listed or not, receive protection under the Migratory Bird Treaty Act (MBTA) of 1918. The MBTA prohibits individuals to kill, take, possess or sell any migratory bird, bird parts (including nests and eggs) except per regulations prescribed by the Secretary of the Interior Department (16 U. S. Code 703). Additional protection is provided to all bald and golden eagles under the Bald and Golden Eagle Protection Act of 1940, as amended. State protection is extended to all birds of prey by the CDFW Code, Section 2503.5. No take is allowed under these provisions except through the approval of the agencies or their designated representatives.

At the time of the survey, the Project Site had very limited marginal nesting habitat for ground and tree nesting bird species. In addition, there is no shrub habitat. Trees and shrubs occur on adjacent properties, and may provide nesting habitat for species using these habitats.

Wildlife movement and the fragmentation of wildlife habitat are recognized as critical issues that must be considered in assessing impacts to wildlife. In summary, habitat fragmentation is the division or breaking up of larger habitat areas into smaller areas that may or may not be capable of independently sustaining wildlife and plant populations. Wildlife movement (more properly recognized as species movement) is the temporal movement of individuals (plants and animals) along diverse types of corridors. Wildlife corridors are especially important for connecting fragmented habitat areas.

The Project Site is in an area that is developed. Native habitats in the nearby surrounding areas are gone and habitat fragmentation in the general area is substantial. The Proposed Project will impact a previously impacted area and will not add significantly to additional fragmentation of habitat or affects to wildlife movement. Consequently, no impacts to the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors would result, and no mitigation measures are necessary.

e) **No Impact.** Currently, the City of Banning does not have a tree preservation policy or ordinance in place. As observed during the field survey conducted for the biological assessment, a single red gum tree was observed near the eastern boundary of the Project Site. It is anticipated that the tree would be removed during clearing/grading of the site. However, the Project Site would be landscaped in accordance with approved drought tolerant trees, shrubs and groundcover. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance would not result. Consequently, no impacts are anticipated and no mitigation measures are necessary.

f) **No Impact.** The Project Site is located within the MSHCP Conservation Area. As part of the Conservation Area, there is a concern with the identification of specific areas that are necessary to assemble a sufficiently large and diverse parcel to protect the resources of concern for that reserve. Each area has a designated conservation plan and is therefore referred to as an Area Plan. The smallest unit is the Cell, which individually form the basis for Cell Groups that make up Area Plans. The MSHCP defines [Criteria] Cells as "a unit within the Criteria Area generally 160 acres in size, approximating one quarter section," and Cell Groups as "an identified grouping of Cells within the Criteria Area."

All the Cells have been identified during the preparation of the MSHCP and form the basis for identifying areas of sensitivity. Areas outside Cells are generally not considered to have a high sensitivity for the species identified by the MSHCP, although they could have resources such as riparian habitat that are sensitive and require additional analysis. The Project Site is not located within or adjacent to any Criteria Cells. Consequently, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, and no mitigation measures are necessary...

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	( )	(✓)	( )	( )
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5?	( )	(✓)	( )	( )
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	( )	(✓)	( )	( )
d) Disturb any human remains, including those interred outside of formal cemeteries?	( )	(✓)	( )	( )

Impact Discussion:

In November 2017, a Phase I Cultural Resources Investigation was prepared for the Project by McKenna et al, which included an archeological records search, Native American consultation, paleontological overview, historic background research, and field survey. A copy of the report is contained in Appendix B, which is available for review at the community Development Department, Planning Division. Findings presented in the Cultural Resources report are outlined in the following discussion.

The City of Banning Planning Department has conducted notification and consultation with the Native American Historical Commission (NAHC) and area tribes, as required under SB 18 and AB 52. Discussion and mitigation language contained in this section reflect the results of those consultations.

a-b) **Less Than Significant with Mitigation**:

During the field survey conducted in November 2017, the Project Site was found to be void of native vegetation, and the surficial deposits were likely impacted by past farming and modern activities. The Project Site is surrounded by modern improvements (i.e., existing development, roadways, infrastructure, etc.).

Review of records indicated that improvements to the east were completed in 2002-03; to the west in 2003-04; and improvements to the north in 2011. Earlier aerials show the surrounding properties vacant and disked. Based on the historic development of the City and the agriculture uses that surrounded it, the Project Site was likely an old grain/hay field. No evidence was found to indicate the Project Site was ever subjected to significant improvements. The land was under cultivation into the 1960s and is currently vacant.

McKenna et al. completed a standard archaeological records search through the University of California, Riverside, Eastern Information Center, Riverside, California. Research indicated that the general area was subject to at least three prior studies and that a minimum of 25 cultural resources studies have been completed within one-mile of the Project Site. Two reports in 1981 and 1982 specifically referenced the Stewart Ranch, and confirm that the current study area is within the historic boundaries of the Old Stewart Ranch; however, no resources were recorded within the Project Site. Three cultural resources have been recorded within one-mile of the current project area. As defined, each of these resources is historic but are well outside the boundaries of the Project Site.

A review of historic maps shows the presence of an “Indian Trail” crossing Banning and leading to the mapped location of an “Indian Village.” This suggests the trail was a major route during the proto-historic period, and likely earlier. However, this trail does not occur within the vicinity of the Project Site. By 1897-1898, the USGS quadrangle covering the Banning area illustrates the presence of the railroad alignment north of the Project Site; however, no structures are indicated in the immediate vicinity of the Project Site. The 1956 USGS quadrangle illustrates the presence of the pipeline along the present-day alignment of Sun Lakes Boulevard suggesting the southern portion of the Project Site may have been impacted by excavations related to the installation of the pipeline. Sun Lakes Boulevard is a modern addition to the area.

No prehistoric or historic cultural resources were identified within the Project Site. However, the Project Site occurs within an area considered moderately sensitive for prehistoric archaeological resources, as the area is a part of the San Gorgonio Pass, which was a major pass used by the Native American populations. The Project Site is also within the boundaries of the historic Stewart Ranch, although not associated with any standing structures or structural remains. The Stewart building complex occurred approximately 0.5 miles west of the Project Site. Although unlikely, the younger alluvium on-site may yield evidence of prehistoric or historic archaeological resources. To ensure potential impacts are reduced to a less than significant level, the following mitigation measures shall be implemented:

CR-1: Prior to the issuance of grading permits, the developer shall enter into a Native American monitoring agreement with one of the consulting tribes for the project. The Native American Monitor shall be on-site during all initial ground

disturbing activities including clearing, grubbing, vegetation removal, grading and trenching. The Native American Monitor shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

CR-2 In the event of discovery of human remains during grading or other ground disturbance, work in the immediate vicinity shall cease and the landowner shall comply with State Health and Safety Code §7050.5 and Public Resources Code §5097.98. In the event human remains are found and identified as Native American, the landowner shall also notify the City Planning Department so that the City can ensure PRC §5097.98 is followed.

CR-3 If cultural resources are found during project construction, all ground-disturbing activities within 100 feet of the find shall be halted. A Registered Professional Archaeologist shall prepare a Cultural Resources Management Plan in consultation with the consulting tribes and the City Planning Department to include relinquishment of all artifacts through one of the following methods:

- **A fully executed reburial agreement with the appropriate culturally affiliated Native American tribe or band. This reburial area should be away from any future impacts. Reburial shall not occur until all cataloguing, analysis and any necessary special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be documented in a Final Report.**

- **Curation at a Riverside County Curation facility that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be provided in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.**

c) **Less Than Significant with Mitigation**: A paleontological overview was completed for the general area in 2004 and updated in 2017. The research confirmed that the area west of the Project Site consists of Mesozoic-aged granitic and meta-sedimentary rocks that are not conducive to yielding paleontological specimens. The County of Riverside GIS system identifies the Project Site and vicinity as being within an area of "Low Sensitivity" for paleontological specimens as it is dominated by the presence of metasedimentary deposits. However, older Quaternary alluvial deposits may be present in a shallow context and therefore, the Project Site does have a level of sensitivity. Nonetheless, previous development and infrastructure excavations in the surrounding area have failed to result in the identification of any fossil specimens. Therefore, the overall project area is not considered to be highly sensitive for fossil remains, but does have a potential to yield fossils in the event site preparation activities impact older alluvium. Consequently, to ensure potential impacts are reduced to a less than significant impact, Mitigation Measures CR-1 through CR-3 listed above shall be implemented:

d) **Less Than Significant with Mitigation**: Construction activities, particularly grading, soil excavation and compaction, could adversely affect unknown buried human remains. If remains are uncovered during excavation or site preparation, appropriate authorities would be contacted as required by State law. However, in the event remains are determined to be of Native American descent, Mitigation Measures CR-1 through CR-3 re shall be implemented. With mitigation, potential impacts to human remains are considered less than significant.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6. GEOLOGY AND SOILS. *Would the project*:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	( )	( )	( )	(✓)
ii) Strong seismic ground shaking?	( )	( )	(✓)	( )
iii) Seismic-related ground failure, including liquefaction?	( )	( )	(✓)	( )
iv) Landslides?	( )	( )	( )	(✓)
b) Result in substantial soil erosion or the loss of topsoil?	( )	( )	(✓)	( )
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	( )	( )	(✓)	( )
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	( )	( )	( )	(✓)
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	( )	( )	( )	(✓)

Impact Discussion:

In September 2017, a report of Soils and Foundation Evaluations was prepared by Soils Southwest, Inc. A copy of the report is contained in Appendix C, which is available for review at the Community Development Department, Planning Division. Findings presented in the technical study are outlined in the following discussion.

a)

i) **No Impact.** The San Gorgonio Pass Fault is the closest Alquist-Priolo Earthquake Fault Zone to the Project site as delineated in the latest State Earthquake Fault Zone maps and in Exhibit V-3 of the General Plan. The San Gorgonio Pass Fault is located approximately 2.5 miles north of Interstate 10. The San Gorgonio Pass fault zone is comprised of a series of north-dipping reverse and thrust faults connected by strike tear faults. The most recently active strands of faults occur at the base of the Banning Bench, in the north central part of Banning. The Highland Scarp along the western edge of the City is considered an active segment of the San Gorgonio Pass fault zone. The San Gorgonio Pass fault is capable of producing a maximum credible earthquake magnitude of 7.4 – 7.6 (M_{max}). The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone; therefore. Consequently, no impacts from fault rupture on-site are anticipated and no mitigation measures are necessary.

ii) **Less Than Significant Impact.** The Proposed Project involves the construction and operation of a medical office complex (MOB) that would predominantly provide medical services to seniors. While the Project Site may be subject to strong seismic groundshaking associated with area faults, any groundshaking that might occur on-site would be typical of the area in general. In addition, all structures must comply with seismic building standards contained in the California Uniform Building Code. Consequently, potential adverse impacts from exposure to strong seismic groundshaking are considered less than significant and no mitigation measures beyond compliance with applicable regulations are necessary.

iii) **Less than Significant Impact**. Liquefaction occurs primarily in saturated, loose, fine to medium grained soils in areas where the groundwater table is within 50 feet of the surface. During liquefaction, involved soils behave like a liquid or semi-viscous substance and can cause structural distress or failure due to ground settlement, a loss of load-bearing capacity in foundation soils, and the buoyant rise of buried structures. Three general conditions induce liquefaction; 1) strong ground shaking for a sustained period of time, 2) presence of unconsolidated granular sediments, and 3) occurrence of water-saturated sediments within 50 feet of the ground surface.

There is a low potential for liquefaction at the Project Site (Riverside County Parcel Report for APN 419-140-059). The Soils and Foundation Evaluation prepared by Soils Southwest, Inc. for the Project Site, also determined that the potential for liquefaction at the site is considered low due to the presence of cohesive silty, sandy soils encountered during exploration and historical groundwater depth in excess of 50 feet below grade. Consequently, potential adverse effects related to seismically induced ground failure including liquefaction are considered less than

significant and no mitigation measures beyond compliance with applicable regulations are necessary,

iv) **No Impact**. The City of Banning General Plan identifies an increased potential for landslides to occur where there is a high seismic potential, including areas with steep slopes and deeply incised canyons, rock with inherently weak components, or highly fractured and folded rock. The northernmost and southernmost portions of the City are described as highly susceptible to seismically induced slope failure due to the proximity to mountains and hillsides. Additionally, areas with slopes steeper than 15 degrees are described as generally subject to slope failure. Elevation at the Project site ranges from approximately 2,536 feet above mean sea level (amsl) at the northern end to approximately 2,544 feet amsl at the southern end; no hillsides with slopes greater than 15 degrees occur on-site or in the immediate vicinity. Consequently, no adverse effects related to on-site landslides are anticipated.

b) **Less than Significant Impact.** In September 2017, a Report of Soils and Foundation Evaluations was prepared by Soils Southwest, Inc. A copy of the report is on-file and available for review at the City of Banning Community Development Department. The purpose of the evaluation was to determine the nature and engineering properties of the near grade soils, and to provide geotechnical recommendations for foundation design, slab-on-grade, paving, parking, site grading, utility trench excavations and backfill, and inspections during construction. The evaluation included subsurface explorations, soils sampling, necessary laboratory testing, and engineering analysis. Field investigations included six (6) exploratory test borings to a maximum of 41 feet below the current grade surface. The report concluded that the Project Site is suitable for the proposed MOB provided that the recommendations presented in the report are incorporated into the Project and are implemented during site excavation and construction. Recommendations from the report would be incorporated into the Project final engineering designs and be included in final Project approvals as conditions of approval; therefore, less than significant impacts are anticipated.

c) **Less than Significant Impact.** The San Gorgonio Pass Fault is the closest Alquist-Priolo Earthquake Fault Zone to the Project Site as delineated in the latest State Earthquake Fault Zone maps and in Exhibit V-3 of the General Plan. The San Gorgonio Pass Fault is located approximately 2.5 miles north of Interstate 10. The San Gorgonio Pass fault zone is comprised of a series of north-dipping reverse and thrust faults connected by strike tear faults. The most recently active strands of faults occur at the base of the Banning Bench, in the central part of Banning. The Highland Scarp along the western edge of the City is considered an active segment of the San Gorgonio Pass fault zone. The San Gorgonio Pass Fault is capable of producing a maximum credible earthquake magnitude of 7.4 – 7.6 (M_{max}).

Elevations at the Project Site range from approximately 2,536 feet amsl at the northern end to approximately 2,544 feet amsl at the southern end; there are no hills or prominent landforms in the immediate vicinity. As concluded in the Soils and Foundation Evaluation, the potential for some total and differential settlements due to ground shaking may be expected; however, based on adjacent completed projects within the vicinity, earthquake induced settlement is considered to be within tolerable limits. Therefore, it is not

anticipated that implementation of the Proposed Project would result in soil that would become unstable as a result of the project or cause off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. No impacts are anticipated.

d) **No Impact**. Expansive soils (shrink-swell) are fine grained clay soils generally found in historical floodplains and lakes. Expansive soils are subject to swelling and shrinkage in relation to the amount of moisture present in the soil. Structures built on expansive soils may incur damage due to differential settlements of the soil as expansion and contraction takes place. Information about shrink-swell classes and linear extensibility is available in the Natural Resource Conservation Service (NRCS) soil survey reports. A high shrink-swell potential indicates a hazard to maintenance of structures built in/on/or with material having this rating. Moderate to low ratings lessen the hazard. According to the NRCS the Ramona sandy loam soils class occurs at the Project Site. As identified by the NRCS, Ramona sandy loam does not have limitations related to expansive soils. In addition, the Report of Soils and Foundations, prepared by Soils Southwest, Inc., concluded that on-site soils were found to be sandy in nature and are not considered expansive. The Project would implementation all recommendations included in the report as discussed in Section VI(b); therefore, no impacts related to expansive soils are anticipated.

e) No Impact. No septic tanks or alternative wastewater disposal is proposed. Upon approval of the Proposed Project, the MOB would connect to the City's sewer collection system that currently serves the immediate vicinity. No impacts from soils incapable of adequately supporting septic tanks or alternative wastewater disposal systems would result.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GREENHOUSE GAS EMISSIONS. *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	( )	( )	(✓)	( )
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	( )	( )	(✓)	( )

Impact Discussion:

a) Less than Significant. According to CEQA Guidelines Section 15064.4, when making a determination of the significance of greenhouse gas emissions, the "lead agency shall have discretion to determine, in the context of a particular project, whether to (1) use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use." In addition, CEQA Guidelines section 15064.7(c) provides that "a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts" on the condition that "the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

The Global Warming Solutions Act of 2006 requires that by the year 2020, the Greenhouse Gas (GHG) emissions generated in California be reduced to the levels of 1990. The City of Banning has not adopted its own thresholds of significance for greenhouse gas emissions. However, the City finds persuasive and reasonable the approach to determining significance of greenhouse gas emissions established by the South Coast Air Quality Management District (SCAQMD), within which the City is located.

Many gases make up the group of pollutants that are believed to contribute to global climate change. However, three gases are currently evaluated and represent the highest concentration of GHG: Carbon dioxide (CO2), Methane (CH4), and Nitrous oxide (N2O). SCAQMD provides guidance methods and/or Emission Factors that are used for evaluating a project's emissions in relation to the thresholds. A threshold of 3,000 MTCO2E (Metric tons of carbon dioxide equivalent) per year has been adopted by SCAQMD for non-industrial type projects as potentially significant for global warming (Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, SCAQMD, October 2008).

The proposed MOB would require earthmoving, structural building and other activities such as asphalt paving. The project's construction activities were screened for emission generation using the CalEEMod version 2016.3.2 emissions estimator model. Kunzman Associates, Inc. conducted a TIA for the Proposed MOB. The Proposed Project would generate approximately 1,259 daily trips. The modeled emissions anticipated from the Proposed Project compared to the SCAQMD threshold are shown below in Table 8 and Table 9.

Table 8
Greenhouse Gas Construction Emissions
(Metric Tons per Year)

Source/Phase	**CO_2**	**CH_4**	**N_20**
Site Preparation	9.1	0.0	0.0
Grading	11.3	0.0	0.0
Building Construction	211.8	0.0	0.0
Paving	16.7	0.0	0.0
Architectural Coating	3.4	0.0	0.0
Total MTCO2e	**233.5**		
SCAQMD Threshold	3,000		
Significant	**NO**		

Source: CalEEMod.2016.3.2 Annual Emissions.

Table 9
Greenhouse Gas Operational Emissions
(Metric Tons per Year)

Source/Phase	**CO_2**	**CH_4**	**N_20**
Area	0.0	0.0	0.0
Energy	125.8	0.0	0.0
Mobile	1,224.9	0.0	0.0
Total MTCO2e	**1,557.6**		
SCAQMD Threshold	3,000		
Significant	**NO**		

Source: CalEEMod.2016.3.2 Annual Emissions

As shown in Table 8 and Table 9, site activities and improvements would not exceed the SCAQMD threshold for GHG. Consequently, less than significant project related GHG impacts are r anticipated, and no mitigation measures are necessary.

b) **Less than Significant.** There are no GHG plans, policies, or regulations that have been adopted by the California Air Resources Board (CARB) or SCAQMD that would apply to the type of emissions source represented by the proposed project. It is possible that CARB may develop performance standards for project-related activities prior to project construction. In such an event, applicable performance standards would be implemented. The project, as proposed, does not conflict an existing applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Consequently, associated impacts would be less than significant, and no mitigation measures are necessary.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. HAZARDS AND WASTE MATERIALS. *Would the project:*	( )	( )	(✓)	( )
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident considerations involving the release of hazardous materials into the environment?	( )	( )	(✓)	( )
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4 mile of an existing or proposed school?	( )	( )	( )	(✓)
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	( )	( )	( )	(✓)
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	( )	( )	( )	(✓)

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	( )	( )	( )	(✓)
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	( )	( )	( )	(✓)
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	( )	( )	(✓)	( )

Impact Discussion:

a) **Less than Significant Impact.** Construction of the MOB would involve short-term use of petroleum-based fuels, lubricants, and other similar materials. The construction phase may also include the transport of gasoline and diesel fuel to the Project Site and onsite storage for the purpose of fueling construction equipment. Long -term operation of the proposed MOB would involve routine periodic use of pesticides, herbicides and fertilizers typically associated with landscape maintenance, a limited amount of bio-medical waste generation can also be anticipated with long term operations, in addition to routine use of cleaning solvents and similar substances associated with property maintenance necessary to a medical facility.

The Project Proponent would be required to submit all necessary applications for certification by the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) for the operation of the MOB. The Joint Commission's accreditation process would evaluate the Project's compliance with set standards and other accreditation requirements.

No activities using or generating an unusual amount of hazardous substances are anticipated. Use, transport, handling, and disposal of any hazardous substances must comply with all federal, State and local laws regulating their management and use. Consequently, potential impacts related to creating a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials are considered less than significant, and no mitigation measures aside from compliance with applicable regulations are necessary.

b) **Less than Significant Impact.** Please refer to the preceding threshold discussion (8-a.) Bio-medical and other medical facility wastes would be generated at the MOB as part of the day-to-day operations. The waste materials would not create a significant hazard to the public because they would be handled and disposed of in accordance with applicable regulations.

Other aspects of the proposed project, as has been noted, would utilize common products for cleaning and maintenance. No activities that would involve the use of explosive, acutely toxic or caustic substances that could result in accident or upset conditions are anticipated. Consequently, the risk of accidental release of hazardous materials is considered less than significant, and no mitigation measures beyond compliance with applicable regulations are necessary.

c) **No Impact.** No school facilities are located within a quarter mile of the Project site; therefore, no impacts are anticipated. Pass Christian Preschool, located approximately one-mile northeast of the Project Site, is the nearest school to the Project Site. Implementation of the Proposed Project would not emit hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or waste that would be a potential threat to the school. Consequently, no impacts to schools would result.

d) **No Impact.** The Project Site is not on any official list of hazardous materials sites. Pursuant to California Government Code Section 65962.5, the California Department of Toxic Substances Control (DTSC) compiles the Cortese List and updates it at least annually. The Cortese List includes hazardous waste facilities subject to corrective actions, land designated as hazardous waste property or border zone property, sites included in the abandoned site assessment program, and qualifying sites pursuant to Section 25356 of the Health and Safety Code. A copy of the most recent Cortese List was examined and the Project site is not identified on the list. Consequently, no impacts related to Government Code Section 65962.5 are anticipated.

e) **No Impact.** The Banning Municipal Airport is located approximately 4.5 miles east of the Project Site, at 600 South Hathaway Street, adjacent to the Southern Pacific Railroad and the I-10 freeway. The project site is also located outside the boundaries of the Banning Municipal Airport Land Use Plan, and is not subject to the jurisdiction of the Riverside County Airport Land Use Commission (ALUC.) The Proposed Project involves the construction and operation of a MOB, and as such, would not create conditions that would conflict with airport land uses or create an aviation safety hazard for people residing or working in the area. No impacts are anticipated.

f) **No Impact.** There are no private airstrips within the vicinity of the Project Site. The nearest airport, as noted previously, is the Banning Municipal Airport located approximately 4.5 miles east of the Project Site. Approval of the Proposed Project would not result in an aviation safety hazard for people residing or working in the Project area. No impacts are anticipated.

g) **No Impact**. The Emergency Preparedness Element of the General Plan identifies the potential for natural and man-made disasters that could affect the City and its Sphere of Influence. In 1996 the City adopted the Multi-Hazard Functional Planning Guidance document that includes: 1) the Banning Emergency Plan; 2) twelve functional annexes that describe emergency response organization; and 3) a listing of operational data such as resources, key personnel, and essential facilities and contacts. The City does not have an established evacuation route; however, depending on the location and extent of an emergency, major surface streets could be utilized to route traffic through the City. The I-10 Freeway and State Highway 243 to State Route 79 are also major regional access routes serving the City which could be used during disaster events.

Construction of the Proposed Project would not interfere with emergency response. Appropriate Banning Police Department, and Riverside County Sheriff's Department access standards must be adhered to allow adequate emergency access. Operation of the MOB would not interfere with emergency response or with any adopted evacuation plans. No impacts are anticipated.

h) **Less Than Significant Impact.** The California Fire Plan was established in 1996 and is a cooperative effort between the State Board of Forestry and Fire Protection and the California Department of Forestry (CDF). Using four main criteria, the system ranks the fire hazard of the wildland areas of the State. The criteria used for evaluation include: fuels, weather, assets at risk, and level of service (a measure of Fire Department's success in initial-attack fire suppression).

The City of Banning is divided into five fire threat zones: Extreme, Very High, High, Moderate, and No Fuel. . The project site is located within the High Fire Hazard Zone, which includes most of the developed central portion of the City along the I-10. In this zone, relief is minimal and hardscape (concrete, asphalt and structures) and landscaping vegetation predominate. This zone also includes most of the bed of the San Gorgonio River, where some vegetation is present seasonally. .

There are no significant areas of brush, grass or trees within the Project Area; the Project Site is surrounded by development and existing, paved roadways. Therefore, although located within a High Fire Threat Zone, construction and operation of the MOB would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Less than significant impacts are anticipated and no mitigation measures are necessary.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HYDROLOGY AND WATER QUALITY. *Would the project:* a) Violate any water quality standards or waste discharge requirements?	( )	( )	(✓)	( )
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	( )	( )	( )	(✓)
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	( )	( )	(✓)	( )

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	( )	( )	(✓)	( )
e)	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?	( )	( )	(✓)	( )
f)	Otherwise substantially degrade water quality?	( )	( )	(✓)	( )
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	( )	( )	( )	(✓)
h)	Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	( )	( )	( )	(✓)
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	( )	( )	( )	(✓)
j)	Inundation by seiche, tsunami, or mudflow?	( )	( )	( )	(✓)

Impact Discussion:

In September 2017, Joseph E. Bonadiman & Associates, Inc. prepared a Hydrology Study & Drainage Analysis for the Proposed Project. A copy of the report is contained in Appendix D, which is available for review at the Community Development Department, Planning Division. Findings presented in the technical study are outlined in the following discussion

a,f) **Less than Significant.** The Proposed Project would disturb approximately 3.31 acres and is therefore subject to the National Pollution Discharge Elimination System (NPDES) permit requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's General Construction permit include removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The purpose of a SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction.

The Regional Water Quality Control Board (RWQCB) has issued an area-wide NPDES Storm Water Permit for the County of Riverside, the Riverside County Flood Control and Water Conservation District, and the incorporated cities of the County. The City of Banning then requires implementation of measures for a project to comply with the area-wide permit requirements. A SWPPP is based on the principles of Best Management Practices (BMPs) to control and abate pollutants. The SWPPP must include BMPs so that construction of the Project would not pollute surface waters. BMPs may include, but are not limited to street sweeping of paved roads around the Project Site during construction, and the use of hay bales or sand bags to control erosion during the rainy season. BMPs may also include or require:

- The contractor to avoid applying materials during periods of rainfall and protect freshly applied materials from runoff until dry.

- All waste to be disposed of in accordance with local, state and federal regulations. The contractor to contract with a local waste hauler or ensure that waste containers are emptied weekly. Waste containers cannot be washed out on-site.

- All equipment and vehicles to be serviced off-site.

Preparation of a SWPPP as required by law and compliance with NPDES regulations would reduce the potential for storm water discharges during grading and construction from to a Less than Significant level. No other mitigation is necessary.

b) **No Impact.** The City of Banning is within the boundary of the Coachella Valley Hydrologic Unit. The Coachella Valley Groundwater Basin is underlain by several large subsurface aquifers, known as sub-basins, with boundaries that are generally defined by faults that restrict the lateral movement of water. The Basin extends from Banning easterly to the Salton Sea. The City of Banning is underlain by the San Gorgonio Pass Sub-basin. Within the City boundary, the San Gorgonio Pass Sub-basin is divided into a series of storage units: the Banning Canyon Storage Unit, the Banning Bench Storage Unit, the East and West Banning Storage Units, the Beaumont Storage Unit, and the Cabazon Storage Unit. To the west of the San Gorgonio Pass Sub-basin is the Beaumont Groundwater Basin. Groundwater basins are naturally recharged through the percolation of runoff, direct precipitation, subsurface inflow, and artificial recharge. The Banning Canyon area receives water from percolation of canyon flows through the gravelly soils of the canyon bottom. In addition, a stone ditch running southerly though the Banning Canyon provides intake areas to distribute water to spreading ditches, which interconnect with spreading ponds to enhance percolation. The San Gorgonio Sub-basin is also recharged naturally with runoff from the adjacent San Jacinto and San Bernardino Mountains. The Project Site is not designated as an area for groundwater recharge.

The City of Banning Public Works Department provides domestic water service to the City of Banning. The City owns and operates wells, reservoirs, and a distribution line system to deliver domestic water within the Banning planning area. The City provides municipal water service to an area of approximately 23 square miles, including approximately 30,500 people, via 10,650 metered service connections.

The Project Site would be serviced by the City Water Department. Water demand of the MOB, as estimated from actual water use records retrieved from another similar facility

owned by the Project Proponent, is expected to be approximately 109,200 gallons per month or 1.3 million gallons per year which is equivalent to 4.00 acre-feet per year. The Proposed Project when compared to the existing General Plan High Density residential land use designation on the Project Site, would generate less demand for water resources based on the assumption of 66 high density units. The Proposed Project would not substantially deplete groundwater supplies nor would it interfere substantially with recharge since it is not within an area designated as a recharge basin or spreading ground. No adverse impact is anticipated.

c-e) **Less than Significant**. The Drainage Analysis conducted by Bonadiman & Associates identified off-site (tributary) drainages areas, existing on-site drainage areas, developed conditions and calculation of peak flow rates and runoff volumes, examined the sizing of on-site detention facilities in accordance with City of Banning and Riverside County requirements, and identified the floodplain for the Project Site.

The 3.31-acre Project Site is impacted by existing flows from approximately 14.6 acres of tributary off-site drainage areas. These flows originate south of the A.T.S.F. railroad berm/ditch to the north of the site, and drain southeasterly through approximately 13.0 acres of undeveloped land to a break in the perimeter wall at the northeast corner of the existing 1.5-acre memory care facility located directly north of and adjacent to the Project Site. Flows then drain southerly down the existing driveway to existing rip-rap at the northeast corner of the Project Site. The off-site flows drain southerly through an existing earthen ditch along the eastern edge of the Project Site to two,12-inch pipes located at the southeast corner of the site, which subsequently drain to an existing four-foot parkway culvert that discharges to Sun Lakes Boulevard. On site flows drain southerly and southeasterly to the existing earthen ditch and the 12-inch pipes at the southeast corner of the site.

The calculated 100-year, 1-hour peak off-site (tributary) flow to the northeast corner of the Project Site is estimated to be approximately 9.49 cubic feet per second (cfs). These off-site flows will be routed along the eastern edge of the property via a 10-foot (at the narrowest point) landscape swale to the existing 12-inch pipes at the southeastern corner of the property. A flow calculation of the existing swale, indicates that it is of adequate size to convey the off-site flows. The Project provides for a six-inch curb along the western edge of this swale; and therefore, will effectively provide six inches of freeboard.

For storm water flows on-site, the Proposed Project will provide an underground infiltration system that will capture approximately 0.68 acre-feet (AF). The system will provide retention of the calculated developed conditions 100-year, 3-hour volume of 0.49 AF (per City of Banning requirements) and will provide adequate capacity to completely retain or mitigate to existing conditions all flows up to and including the 100-year, 6-hour event. The system will discharge to a proposed landscape swale that will route flows to the existing off-site discharge location. With planned project drainage improvements, impacts related to the alteration of drainage patterns and surface run-off are anticipated to be less than significant and no other mitigation measures are necessary,

g,h) **No Impact.** Per FEMA Flood Insurance Rate Map (FIRM) Panel No. 06065C0812G (effective date: August 28, 2008) and Panel No. 06065C0816G (effective date: August 28, 2008), the Project Site lies within an unshaded Zone “X” floodplain. Unshaded Zone “X” is defined as “areas determined to be outside the annual 2% chance floodplain). The Project would not place unprotected housing within a 100-year flood hazard area as mapped on

a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, because no housing is proposed as part of the Project. No impacts are anticipated.

i) **No Impact.** A Dam Inundation Zone refers to the area downstream that would be subjected to flood waters in the event of a failure to a dam or body of impounded water. The State of California designates areas of potential flooding in the event of sudden or total failure of any dam. There are no dams within the vicinity of the City. According to Figure S-16 of the County of Riverside General Plan, the nearest dam is located near Calimesa/Moreno Valley, approximately 15 miles west/northwest of the project site.

A levee generally refers to structures that hold flood water during storm events. The Banning Levee, located approximately four miles northeast of the project site, was constructed along the south side of the San Gorgonio River, about 900 feet north of the intersection of Banning Canyon Road and Summit Drive. According to County of Riverside General Plan Figure S-10, the project site does not occur within an area susceptible to inundation from failure of a dam or levee. No impacts are anticipated.

j) **No Impact.** Due to the inland distance from the Pacific Ocean and any other significant body of water, tsunamis and seiching are not potential hazards; therefore, impacts from seiche and tsunami are not anticipated.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. LAND USE AND PLANNING. *Would the project:*				
a) Physically divide an established community?	( )	( )	( )	(✓)
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	( )	( )	(✓)	( )
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	( )	( )	( )	(✓)

Impact Discussion:

a) **No Impact.** The 3.31-acre Project Site is currently vacant and is located on the north side of Sun Lakes Boulevard between Sun Lakes Village Drive and Silver Lakes Avenue. The Project Site is surrounded by *"The Lakes Independent Living and Memory Care*" to the west, multi-family residential to the north, and single family residential development to the east and south (across Sun Lakes Boulevard). Since surrounding parcels are developed, the Proposed Project would not physically divide an established community. No impacts would result.

b) **Less than Significant Impact.** The Proposed Project includes a General Plan Amendment (GPA) and a Zone Change (ZC) from High Density Residential to Professional Office. Upon City Council approval of the requested General Plan Amendment and Zone Change, the site's zoning would be changed to Professional Office (PO), and the proposed development would be consistent with uses permitted within the Professional Office Zone.

The project site is a part of the Sun Lakes Specific Plan and was designated for High Density Residential (HDR-20) land use with an Affordable Housing Opportunity (HDR - 20/AHO 20-24) by a zoning code text amendment. There will not be a conflict with the Sun Lakes Specific Plan with the General Plan Amendment and Zone Change for the proposed project.

The land use designation in the Land Use Element will be changed from High Density Residential to Professional Office, consistent with the proposed project. Because the City identified excess land capacity to meet the most recent RHNA allocation, no conflict with the Housing Element will occur with the proposed project.

In consideration of the preceding factors, a less than significant impact related to established land use plans and policies would result with the proposed project. No mitigation measures are necessary.

c) **No Impact.** Please refer to the Biological Resources section, (Threshold 4 of this Initial Study. The Project Site is not located within or adjacent to any MSHCP Criteria Cells. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan. No impacts would result.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
11. MINERAL RESOURCES. *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	( )	( )	( )	(✓)
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	( )	( )	( )	(✓)

Impact Discussion:

a) **No Impact.** The Project site is located within a mineral resource zone area classified as MRZ-3 as identified in Exhibit IV-8 in the City of Banning General Plan. Areas classified as MRZ-3 are defined as containing mineral deposits, the significance of which cannot be evaluated from available data. The City of Banning General Plan identifies one aggregate producer within its planning area; the Banning Quarry which is located in the eastern portion of the City approximately 1.25 miles northeast of the Proposed Project. Implementation of the Proposed Project would not result in the loss of known mineral

resources because the site is not locally identified as an important mineral resource recovery site.

b) **No Impact.** Implementation of the Proposed Project would not result in the loss of known mineral resources because the site is not locally identified as an important mineral resource recovery site. No impacts would result.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. NOISE. *Would the project result in:*				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	( )	(✓)	( )	( )
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	( )	( )	( )	(✓)
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	( )	( )	(✓)	( )
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	( )	( )	(✓)	( )
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	( )	( )	( )	(✓)
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	( )	( )	( )	(✓)

Impact Discussion:

In December 2017, a Noise Impact Assessment was prepared for the Proposed Project by Urban Crossroads. A copy of the report is contained in Appendix E, which is available for review at the Community Development Department, Planning Division. Findings presented in the technical study are outlined in the following discussion

a) **Less than Significant Impact with Mitigation.**

The primary source of traffic noise affecting the Project Site is anticipated to be from the I-10 Freeway and Sun Lakes Boulevard, and the primary source of railroad-related noise would be from the Union Pacific Railroad lines conveying freight and passenger trains. The on-site transportation noise level impacts indicate that the unmitigated exterior noise levels will range from 58.9 to 64.6 dBA CNEL at the Project first-floor building façade. No exterior noise mitigation is required to satisfy the City of Banning General Plan Noise Element 70 dBA CNEL normally acceptable exterior noise level criteria for medical office uses.

To present a conservative approach, the interior noise levels of the Project building based on the City of Banning 45 dBA CNEL interior noise level standard for residential land use were evaluated. On that basis, the Project building was determined to need a noise reduction of up to 13.9 dBA and a windows-closed condition requiring a means of mechanical ventilation (e.g. air conditioning). To meet the City of Banning 45 dBA CNEL interior noise standards the following mitigation measures shall be implemented:

N-1: During final building inspection, and prior to the issuance of building occupancy permits, the City Building Official shall ensure that the Project Proponent has equipped all first and second-floor windows with well-fitted, well-weather stripped assemblies with a minimum sound transmission class (STC) ratings of 27.

N-2: During final building inspection and prior to the issuance of building occupancy permits, the City Building Official shall ensure that the Project Proponent has well weather-stripped all exterior doors with a minimum STC ratings of 25.

N-3: During final building inspection and prior to the issuance of building occupancy permits, the City Building Official shall examine all penetrations of exterior walls by pipes, ducts, or conduits, and ensure that the space between the wall and pipes, ducts, or conduits are caulked or filled with mortar to form an airtight seal.

N-4: During final building inspection and prior to the issuance of building occupancy permits, the City Building Official shall ensure that any roof sheathing of wood construction is well fitted or caulked plywood of at least one half-inch thick. Ceilings shall be well fitted, well-sealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space.

N-5: During final building inspection and prior to the issuance of building occupancy permits, the City Building Official shall ensure that any exterior door or window to a habitable room can be kept closed when the room is in use and still receive circulated air. A forced air circulation system (e.g. air conditioning) or active ventilation system (e.g. fresh air supply) shall be provided in accordance with the requirements of the Uniform Building Code.

Implementation of the above mitigation measures would ensure that the Project will satisfy the 45 dBA CNEL interior noise level standard with standard building construction and windows with minimum STC ratings of 27. Impacts from project related noise increases would be less than significant with the recommended mitigation measures incorporated.

b) **No Impact.** Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB (vibration decibel notation). Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. Typically, vibration levels must exceed 100 V dB before any building damage occurs.

Construction Vibration - At distances ranging from 20 to 1,490 feet from Project construction activity, construction vibration velocity levels are estimated to range from 0.000 to 0.124 in/sec PPV (peak particle velocity) at the nearby sensitive receiver locations including: the Lakes Retirement Community and residences located along the project site's northern and eastern boundaries. The construction vibration would remain below the Caltrans 0.3 in/sec PPV building damage threshold for older residential structures. Vibration levels at this location are unlikely to be sustained during the entire construction period, but will occur only during the times that heavy construction equipment is operating simultaneously adjacent to the Project site perimeter. Construction at the Project site will be restricted to daytime hours consistent with City requirements thereby eliminating potential vibration impacts during sensitive nighttime hours. Consequently, vibration impacts due to Project construction are anticipated to be less than significant.

On-Site Transportation/Railroad related Vibration - The Federal Transportation Agency (FTA) *Transit Noise and Vibration Impact Assessment* identifies land use categories for railroad-related vibration thresholds. Based on the medical office use of the Project, the FTA classification closest to the Project use is Category 1, for buildings where *"vibration would interfere with interior operations*, such as *optical microscopes"*. The FTA *Transit Noise and Vibration Impact Assessment* identifies screening distances for vibration assessment based on the land use categories. For Category 1 uses, such as the Proposed Project, the screening distances range from 100 to 600 feet from transit projects such as buses, light and rapid transit, and conventional commuter rail. The Project site is located roughly 850 feet south of the existing Union Pacific Railroad lines, and therefore, over 200 feet beyond the FTA's screening distance for Category 1 uses. Consequently, no further on-site vibration analysis is necessary under FTA guidelines. Potential on-site vibration impacts due to Union Pacific Railroad-related vibration levels are thus considered less than significant and no vibration related mitigation measures are necessary.

Operation of the MOB would not require the use of equipment that would generate excessive ground borne vibration or ground-borne noise levels. In consideration of the

preceding factors, no impacts from operational ground-borne noise or vibration would result.

c) **Less than Significant Impact**. Traffic generated by the operation of the Proposed Project would influence the traffic noise levels in surrounding off-site areas. To assess the off-site transportation CNEL noise level impacts associated with development of the project, noise contours were developed based on *Careage Healthcare Traffic Impact Analysis*. (Detailed Methodology to analyze traffic noise generation is described in Appendix E.) Noise contour boundaries represent the equal levels of noise exposure and are measured in CNEL from the center of the roadway. Noise contours were developed for the following traffic scenarios:

- Existing Conditions Without/With Project: This scenario refers to the existing present-day noise conditions without and with the proposed project.

- Existing plus Ambient Growth (EA) Without/With the Project: This scenario refers to EA noise conditions without and with the proposed project plus ambient growth.

- EA plus Cumulative Development (EAC) Without/With the Project: This scenario refers to future year noise conditions without and with the proposed project plus ambient growth. This scenario includes all cumulative projects identified in the Traffic Impact Analysis prepared for the project.

To quantify the project's traffic noise impacts on the surrounding areas, the changes in traffic noise levels on roadway segments surrounding the project were calculated based on the changes in the average daily traffic volumes. Based on the noise impact significance criteria, a significant off-site traffic noise level impact occurs when the noise levels at existing and future noise-sensitive land uses (e.g. residential, etc.) are less than 60 dBA CNEL and the Project creates a *readily perceptible* 5 dBA CNEL or greater Project-related noise level increase; or range from 60 to 65 dBA CNEL and the project creates a *barely perceptible* 3 dBA CNEL or greater project-related noise level increase; or already exceed 65 dBA CNEL, and the project creates a community noise level impact of greater than 1.5 dBA CNEL (FICON, 1992).

Existing without Project conditions CNEL noise levels: The without Project exterior noise levels are expected to range from 58.7 to 71.5 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. The Existing with Project conditions will range from 58.9 to 71.6 dBA CNEL. The Project will generate a noise level increase of up to 1.3 dBA CNEL on the study area roadway segments. Based on the significance criteria, the Project-related noise level increases are considered ***less than significant*** under Existing with Project conditions at the land uses adjacent to roadways conveying project traffic.

Existing Plus Ambient Growth Project (EA) Traffic Noise Level Contributions: The EA without Project conditions CNEL noise levels are expected to range from 58.9 to 71.7 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. The EA with Project conditions will range from 59.1 to 71.8 dBA CNEL. The project will generate a noise level increase of up to 1.2 dBA CNEL on the study area roadway segments. Based on the significance criteria, the Project-related noise level

increases are considered ***less than significant*** under EA with Project conditions at the land uses adjacent to roadways conveying Project traffic.

EA Plus Cumulative (EAC) Development Project Traffic Noise Level Contributions - The EAC without Project conditions CNEL noise levels are expected to range from 58.9 to 71.9 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography, and the EAC with Project conditions will range from 59.1 to 72.0 dBA CNEL. The project will generate a noise level increase of up to 1.2 dBA CNEL on the study area roadway segments. Based on the significance criteria, the Project-related noise level increases are considered ***less than significant*** under EAC with project conditions at the land uses adjacent to roadways conveying project traffic.

d) **Less than Significant Impact.** The highest construction noise levels would occur when construction activities take place at the closest point from the edge of primary construction activity to each of the nearby receiver locations. The unmitigated exterior construction noise levels are expected to range from 44.0 to 77.3 dBA Leq at nearby sensitive receptors. To evaluate whether the Project will generate potentially significant short-term noise levels at off-site sensitive receiver locations. The City of Banning Municipal Code interior construction noise level limit for residential uses of 55 dBA Leq was used as the acceptable threshold for construction noise at the nearby sensitive receiver locations. The results of the analysis show that the highest construction noise levels with the estimated interior noise reduction of the existing residential homes of 25 dBA Leq will range from 19.0 to 52.3 dBA Leq, and will satisfy the 55 dBA Leq City of Banning interior construction noise level standard. The noise impact due to unmitigated Project construction noise levels is, therefore, considered to be ***less than significant*** at all nearby sensitive receiver locations and no mitigation measures are necessary.

Project-related operational noise sources are expected to include roof-top air conditioning units and parking lot vehicle movements. Project-related operational (stationary source) noise levels are considered significant if they exceed the exterior 55 dBA L50 daytime or 45 dBA L50 nighttime noise level standards for sensitive residential land uses. These standards shall not be exceeded for a cumulative period of 30 minutes (L50), or plus 5 dBA cannot be exceeded for a cumulative period of more than 15 minutes (L25) in any hour, or the standard plus 10 dBA for a cumulative period of more than 5 minutes (L8) in any hour, or the standard plus 15 dBA for a cumulative period of more than 1 minute (L2) in any hour, or the standard plus 20 dBA at any time (Lmax) (City of Banning Municipal Code, Sections 8.44.050 & 8.44.070); or if the existing ambient noise levels at the nearby noise-sensitive receivers near the Project site are less than 60 dBA L50 and the Project creates a *readily perceptible* 5 dBA L50 or greater Project-related noise level increase; or range from 60 to 65 dBA L50 and the Project creates a *barely perceptible* 3 dBA L50 or greater Project-related noise level increase; or already exceed 65 dBA L50, and the Project creates a community noise level impact of greater than 1.5 dBA L50 (FICON, 1992).

The Project will contribute an operational noise level increase during the daytime hours of up to 0.3 dBA L_{50} and during the nighttime hours of up to 0.3 dBA L_{50}. The Project-related operational noise level contributions of up to 0.3 dBA L_{50} on the existing ambient noise environment satisfy the significance criteria discussed above, and the increases at the sensitive receiver locations will be less than significant. On this basis, Project operational stationary-source noise would not result in a substantial temporary/periodic, or permanent

increase in ambient noise levels in the project vicinity above levels existing without the Project, and impacts therefore are considered ***less than significant.***

e) **No Impact.** The Project Site is not located within an airport land use plan and is not within two miles of a public airport. The nearest airport is the Banning Municipal Airport, located approximately 4.5 miles east of the Project Site. The Proposed Project includes the construction and operation of a MOB; its location and use would not expose people working or visiting the site to excessive aviation related noise levels. No impacts are anticipated.

f) **No Impact.** There are no private airstrips within the vicinity of the Project Site. No impacts from aircraft noise are anticipated.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. POPULATION AND HOUSING. *Would the project:*				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	( )	( )	( )	(✓)
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	( )	( )	( )	(✓)
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	( )	( )	( )	(✓)

Impact Discussion:

a) **No Impact.** Construction activity at the Project Site would be short-term and would not create any new long-term jobs. Operation of the MOB is estimated to result in a total of approximately 50 new full-time employees, a portion of which would likely be filled by the existing employment pool in the community or surrounding area, and a portion which could represent new residents to the local area. Thus, the potential for population directly related to the proposed project is anticipated to be less than significant. The project site is an infill site, thus no new infrastructure of any consequence is required. No substantial population growth in the area, either directly or indirectly would result from project implementation. No mitigation measures are necessary.

b) **No Impact.** The Project Site is currently vacant; therefore, the Proposed Project would not displace any existing housing units to accommodate the Project. No impacts would result and no mitigation measures are necessary.

c) **No Impact.** Tithe Project Site is currently vacant and would not displace any existing housing or residents. No impacts would result and no mitigation measures are necessary.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. PUBLIC SERVICES. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:* a) Fire protection?	( )	( )	(✓)	( )
b) Police protection?	( )	( )	(✓)	( )
c) Schools?	( )	( )	(✓)	( )
d) Parks?	( )	( )	( )	(✓)
e) Other public facilities? [Roads and Infrastructure]	( )	( )	(✓)	( )

Impact Discussion:

The following analysis is based on information contained in the City of Banning's General Plan, and City website (http://banning.ca.us/), the Banning Police Department staff and website (http://www.banningpolice.org/), and telephone consultation with the Banning Unified School District.

a) **Less than Significant Impact.** Fire protection services for the Project would be provided by the City of Banning through a contractual agreement with the Riverside County Fire Department, which contracts with the California Department of Forestry. Through a mutual aid agreement with surrounding communities, including Beaumont, Calimesa and Cabazon, each city has access to and benefits from the services provided by fire stations in other cities. The Riverside County Fire Department provides full service including: fire protection, paramedic response, hazardous materials response, search and rescue, swift water rescue, and disaster preparedness. Currently, a total of 12 fire personnel are stationed in the City of Banning. A Fire personnel ratio of 1:2,570 persons currently exists in the City.

The City is served by one fire station (Station No. 89) located at 172 North Murray approximately 3.6 miles east of the Project Site. The planning area is also served by a fire station located in the City of Beaumont, approximately one-mile northwest of the Project Site.

The proposed MOB would be required to comply with City fire suppression standards including building sprinklers and adequate fire access. No activities that would involve the use of explosive, extremely flammable or hazardous substances are anticipated with the proposed project. (See Section XVIII- Hazards and Hazardous Materials). Approval of the Project would result in a firefighter to citizen ratio of approximately 1:2,574; this represents a 0.175 percent increase if all the 50 new jobs were filled by new residents to the City. All new development must pay fire protection impact fees, which will be a Condition of Approval. Potential impacts to fire protection services are, thus, considered less than significant and no mitigation measures are necessary.

b) **Less than Significant Impact.** The Project Site is currently serviced by the City of Banning Policy Department which is located approximately 6.1 miles east of the Project Site at 125 E Ramsey Street in Banning. Services offered by the department include: field patrol, detective bureau, an emergency tactical unit, a gang task force (a regional task force that monitors gang activity, provides gang suppression and conducts search warrants) school resource officer, and a reserve police officer program. The Banning Police Department's Communications Center is staffed with 12 Public Safety Dispatchers that are responsible for answering emergency and non-emergency calls for service. The 35 sworn positions include the Chief of Police, 2 Commanders, 6 Sergeants, 6 Corporals, and 20 Officers. Banning Police Department officers respond to high priority calls within three to seven minutes, depending on the time of the day and traffic flow, (*http://www.banningpolice.org).* The current level of law enforcement staffing in the City is approximately 1.4 sworn officers for every 1,000 residents. The City has historically maintained a goal of 1.8 police officers per 1,000 residents.

The proposed MOB would generate approximately 50 new jobs. Assuming all employees are new residents to the City, this would result in a demand increase of less than a one percent in total officers to maintain the City's current level of service. Since the Department currently achieves a three to seven-minute response time, a negligible change in police protection services is anticipated. All new development must pay police protection impact fees, which will be included as a Condition of Approval. With payment of impact fees, the impact to police protection services is considered less than significant and no other mitigation measures are necessary.

c) **Less than Significant Impact**. The Banning Unified School District (BUSD), one of the oldest districts in Riverside County, currently provides school services for a 200 square-mile area. The District encompasses Banning, Cabazon, White Water, Poppet Flats, and the Morongo Indian Reservation.

The proposed MOB is estimated to generate 50 new jobs for the area. At worst case, if all new employees are assumed to be new residents to the City, approximately 50 new school students could be generated, currently the School District is under capacity, and therefore any new students would be accommodated within the District. The School District mitigates impacts on school facilities and services through development impact fees. Under Section 65995 of the California Government Code, school districts may charge development fees to help finance local school services. However, the code prohibits State or local agencies from imposing school impact fees, dedications, or other requirements in excess of the maximum allowable fee, which currently are $0.56 per square foot of new commercial and other non-residential development. As a Condition of Approval, the Project Proponent must pay current developer fees prior to issuance of building permits,

as required by the BUSD. With payment of appropriate impact fees, a less than significant impact is anticipated and no mitigation measures are necessary.

d) **No Impact.** The City of Banning Parks and Recreation Department provides recreational facilities and amenities for the citizens within the community. According to the City of Banning General Plan, the City has eight developed parks totaling approximately 200 acres.

With an estimated population of 30,834 people and a total of approximately 200 acres of parkland, the City currently has a ratio of approximately 6.49 acres of park land per 1,000 population. The proposed MOB is estimated to generate approximately 50 new jobs for the area. At worst case, assuming that all jobs would be filled by new residents, the additional demand on City parks would result in less than a one percent increase (6.48 acres per 1,000 population) on park services. All new non-residential development must pay park land impact fees on a per acre basis, which will be a Condition of Approval. Consequently, no impacts to park services or facilities are anticipated and no mitigation measures are necessary.

e) **Less Than Significant Impact.** The Project is to be developed on an infill site, is limited in scale and is located within an area that is currently served by existing City-maintained roads (i.e., Sun Lakes Boulevard), sewer, water and utility services, new service connections and payment of service impact fees are required and will be a Condition of Approval. Development of the Project Site is not anticipated to create a significant amount of additional demand on public facilities. A less than significant impact would result, and no other mitigation measures are necessary.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
15. RECREATION. *Would the project:*				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	( )	( )	( )	(✓)
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	( )	( )	( )	(✓)

Impact Discussion:

a) **No Impact.** Please refer to discussion under threshold 14 (d). The City of Banning Parks and Recreation Department provides recreational facilities and amenities for the community, and has eight developed parks totaling approximately 200 acres. In addition

to these existing facilities, the City has dedicated another 150 plus acres of land for future park development.

With an estimated population of 30,834 people and a total of approximately 200 acres of parkland, the City currently has a park ratio of approximately 6.49 acres per 1,000 population. The proposed MOB would create 50 new jobs. Assuming that all jobs would be filled by new residents, the demand on City parks would result in less than a one percent increase (6.48 acres per 1,000 population) on park services. No impacts to park services are anticipated.

b) **No Impact.** The Proposed Project is the development and operation of a 36,174 square-foot MOB and does not include the construction of recreation facilities. No impacts from the development of recreation facilities would result.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. TRANSPORTATION/TRAFFIC. *Would the project:*				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	( )	( )	(✓)	( )
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	( )	( )	( )	(✓)
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	( )	( )	( )	(✓)
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	( )	(✓)	( )	( )
e) Result in inadequate emergency access?	( )	(✓)	( )	( )
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety facilities?	( )	( )	( )	(✓)

Impact Discussion:

In April 2018, a Traffic Impact Analysis (TIA) was prepared for the Proposed Project by Kunzman Associates. The TIA provides an assessment of the traffic impacts that may result from the approval and development of the Proposed Project. Detailed methodology to analyze traffic generation and related impacts is detailed in Appendix F, which is available for review at the Community Development Department, Planning Division. Findings presented in the technical study are outlined in the following discussion

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a**/b)** **Less Than Significant Impact.** Study objectives include (1) documentation of Existing traffic conditions in the vicinity of the site; (2) calculation of Existing Plus Project traffic conditions; (3) analysis of Existing Plus Ambient Growth Plus Project traffic conditions; (4) evaluation of traffic conditions for Existing Plus Ambient Growth Plus Project Plus Cumulative; and (5) determination of on-site and off-site improvements and system management actions needed to achieve City of Banning level of service requirements. In order to achieve City of Banning level of service requirements the proposed project shall not cause traffic deficiencies or other significant impacts to the transportation infrastructure.

As stated in the City of Banning General Plan - Circulation Element roadway capacity is defined as the number of vehicles that may pass over a section of roadway in a given time period under prevailing conditions. Roadway capacity is most restricted by intersection design and operation. The capacity of a roadway and the degree to which that capacity is being utilized is typically described as the roadway's Level of Service (LOS). LOS is a qualitative measure of the efficiency of traffic flow and is defined by alphabetical connotations, ranging from "A" through "F," that characterize roadway operating conditions. LOS A represents an optimum or free-flowing condition, and LOS F indicates extremely slow speeds and system failure. For General Plan purposes, LOS C was assumed to be the "acceptable" LOS for all General Plan roadways within the City, and LOS D at freeway interchanges. Roadway LOS descriptions are provided below in Table 10.

The definition of an intersection deficiency has been obtained from the City of Banning General Plan Circulation Element. The General Plan states that the City shall maintain peak hour LOS D or better on all local roadways and intersections. The definition of an intersection deficiency has been obtained from the City of Beaumont General Plan, which states that LOS D is the maximum acceptable threshold for intersections.

In the City of Banning, an impact is considered significant if the project-related traffic causes an intersection to move from an acceptable LOS to an unacceptable LOS. If a significant impact occurs, mitigation is required to bring the intersection back to an

acceptable LOS, or to no-project conditions if the intersection is projected to operate an unacceptable LOS for no-project conditions.

The site is currently vacant and not generating trips. Based upon the County of Riverside Traffic Impact Analysis Preparation Guide requirements and discussion with the City of Banning engineering staff, the study area included:

Highland Springs Avenue (NS) at:
- 8th Street/Wilson Street (EW)
- 6th Street/Ramsey Street (EW)
- I‐10 Freeway WB Ramps (EW)
- I‐10 Freeway EB Ramps (EW)
- 2nd Street/Sun Lakes Village Drive (EW)
- 1st Street/Sun Lakes Boulevard (EW)
- Project Access (NS) at:
  Sun Lakes Boulevard (EW)
- Silver Lakes Avenue (NS) at:
  Sun Lakes Boulevard (EW)

For the purposes of the TIA, the Proposed Project is anticipated for opening in Year 2019 and is proposed to be built in one continuous phase. This traffic impact analysis is based upon 2 years of background traffic growth (2017-2019).

Table 10
Roadway LOS Description

LOS	Quality of Traffic Flow
A	Primarily free-flow operations at average travel speed usually about 90 percent of the free-flow speed for the arterial classification. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Stopped delay at signalized intersections is minimal.
B	Reasonably unimpeded operations at average travel speeds usually about 70 percent of the free-flow speed of the arterial classification. Ability to maneuver within the traffic stream is only slightly restricted. Stopped delays are not bothersome, and drivers generally are not subject to appreciable tension.
C	Traffic operations are stable. However, mid-block maneuverability may be more restricted than in LOS B. Longer queues, adverse signal coordination, or both may contribute to lower average travel speeds of about 50 percent of the average free-flow speed for the arterial classification. Motorists will experience some appreciable tensions while driving.
D	Borders on range where small increases in flow may cause substantial increases in approach delay and decreases in arterial speed. LOS D may be due to adverse signal progression, inappropriate signal timing, high volumes, or some combination of these factors. Average travel speeds are about 40 percent of the free-flow speed. For planning purposes, this LOS is the lowest that is considered acceptable.
E	Characterized by significant approach delays and average travel speeds of one-third or less of the free-flow speed. Typically caused by some combination of adverse progression, high signal density (more than two signalized intersection per mile), high volumes, extensive queuing, delays at critical intersections, and/or inappropriate signal timing.
F	Arterial flow at extremely slow speeds, below one-third to one-fourth of the free-flow speed. Intersection congestion is likely at critical signalized intersections, with high approach delays and extensive queuing. Adverse progression is frequently a contributor to this condition.

Source: City of Banning General Plan Circulation Element

Trip generation estimates were based on the Institute of Transportation, Trip Generation, 9th Edition, 2012. Trip generation rates were determined for daily traffic and morning peak hour inbound and outbound traffic, and evening peak hour inbound and outbound traffic for the proposed land use. The Proposed Project is anticipated to generate approximately 1,259 daily vehicle trips of which 101 will occur during the morning peak hour and 125 will occur during the evening peak hour, as demonstrated by Table 11, below. Additionally, project average daily traffic volumes are shown on Figure 4.

Table 11
Project Trip Generation

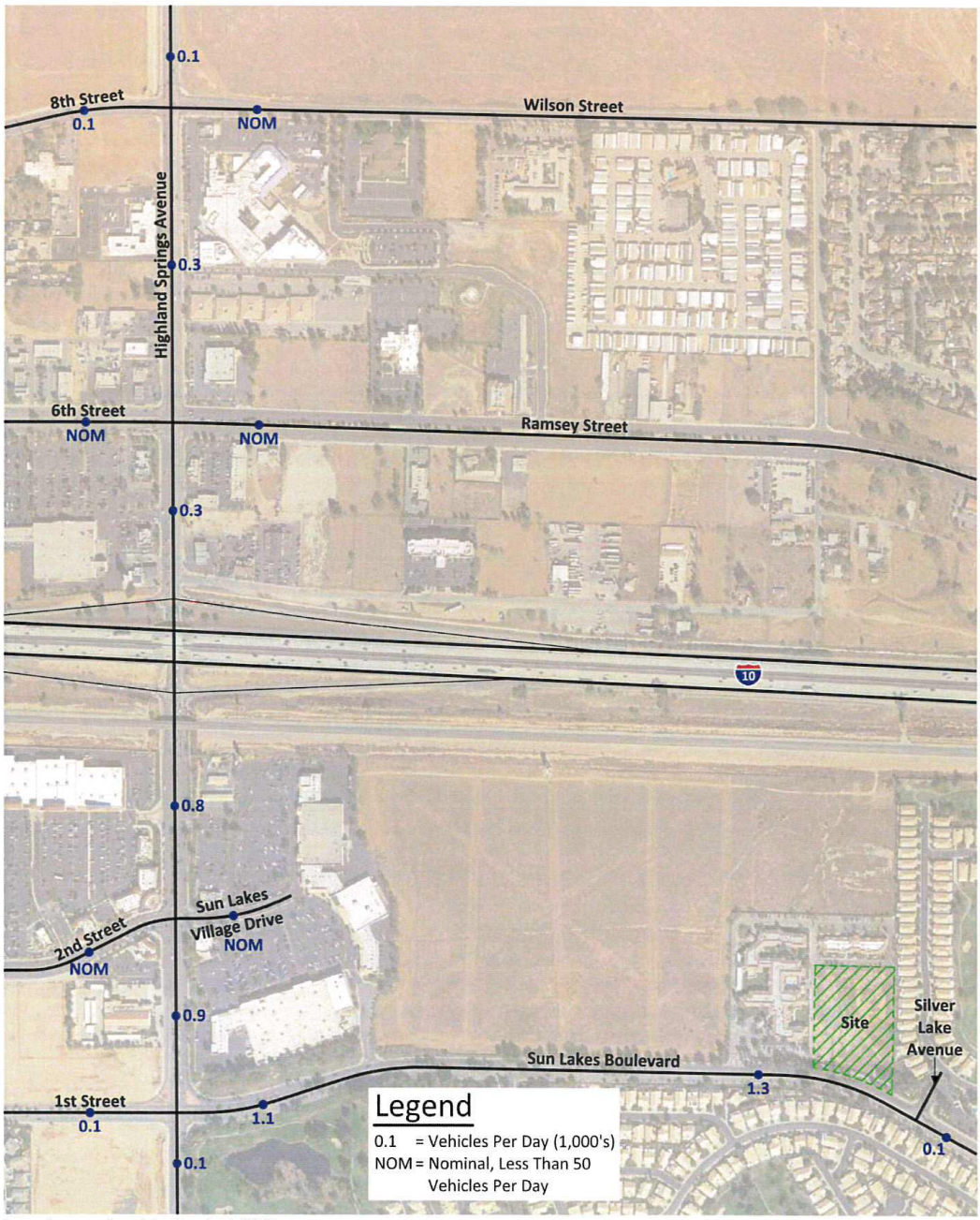
Land Use	Quantity	Units[2]	Peak Hour						Daily
			Morning			Evening			
			Inbound	Outbound	Total	Inbound	Outbound	Total	
Trip Generation Rates Medical Office Building		TSF	2.17	0.61	2.78	0.97	2.49	3.46	34.80
Trips Generated Medical Office Building	36.171	TSF	78	23	101	35	90	125	1,259

Source: Traffic Impact Analysis (2018)

The Existing average daily traffic volumes have been obtained from the 2016 Traffic Volumes on California State Highways by the California Department of Transportation and factored from peak hour intersection turning movement counts obtained by Kunzman Associates. Existing intersection traffic conditions were established through morning and evening peak hour intersection turning movement counts obtained by Kunzman Associates. The morning and evening peak hour traffic volumes were identified by counting the two-hour periods from 7:00 AM – 9:00 AM and 4:00 PM – 6:00 PM.

The methodology used to assess the capacity needs of an intersection is known as the Intersection Delay Method based on the Highway Capacity Manual – Transportation Research Board Special Report 209. To calculate delay, the volume of traffic using the intersection is compared with the capacity of the intersection. As stated in the TIA, the study intersections currently operate within acceptable LOS during peak hours for existing traffic conditions.

For Existing Plus Project traffic conditions, existing traffic volumes are combined with project trips. The Existing Plus Project average daily traffic volumes are shown on Figure 4. The Existing Plus Project delay and LOS for the study area roadway network are shown in Table 12, below. Table 12 shows delay values based on the geometrics at the study intersections without and with improvements. For Existing Plus Project Traffic conditions, the study intersections are projected to operate within acceptable LOS A, B and C during both the morning and evening peak hours.



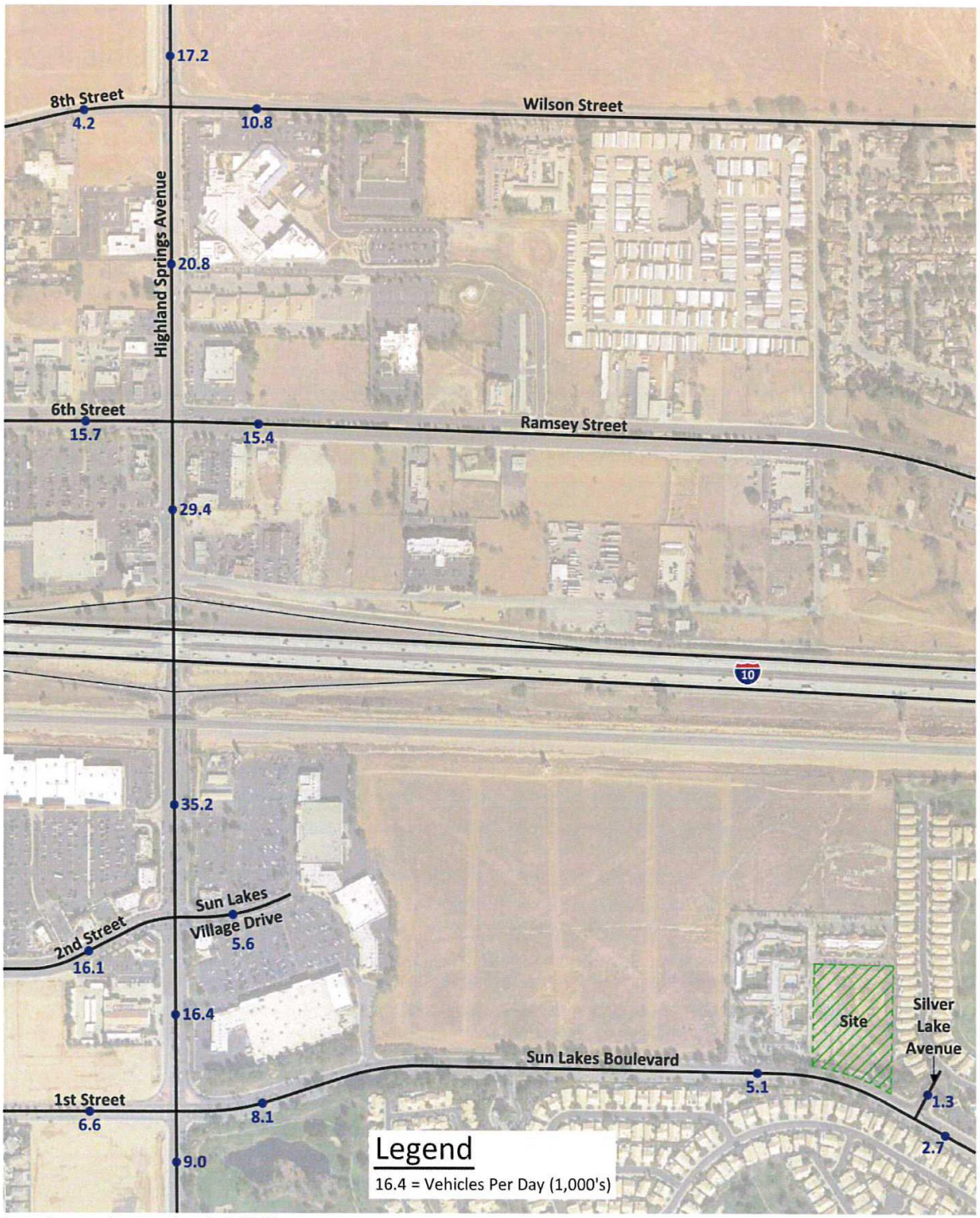
Source: kunzman Associates, Inc.; April, 2018.

Prepared By:
LILBURN
CORPORATION

PROJECT AVERAGE DAILY TRAFFIC VOLUMES

Careage Healthcare
Banning, CA

FIGURE 4



Source: kunzman Associates, Inc.; April, 2018.

Prepared By:
LILBURN
CORPORATION

EXISTING PLUS PROJECT
AVERAGE DAILY TRAFFIC VOLUMES
Careage Healthcare
Banning, CA

FIGURE 5

Table 12
Existing Plus Project Intersection Delay and Level of Service

Intersection	Traffic Control[3]	Intersection Approach Lanes[1]												Peak Hour Delay-LOS[2]	
		Northbound			Southbound			Eastbound			Westbound				
		L	T	R	L	T	R	L	T	R	L	T	R	Morning	Evening
Highland Springs Avenue (NS) at:															
8th Street / Wilson Street (EW) - #1	TS	1	1	1>	1	1.5	0.5	1	1.5	0.5	1	2	1	23.3-C	22.0-C
6th Street / Ramsey Street (EW) - #2	TS	1	2	1	1	2	1	1	2	1	1	2	d	19.7-B	23.8-C
I-10 Freeway WB Ramps (EW) - #3	TS	1	2	0	0	2	1	0	0	0	0.5	0.5	1	11.7-B	17.3-B
I-10 Freeway EB Ramps (EW) - #4	TS	0	2	1	1	2	0	0.5	0.5	1	0	0	0	15.0-B	21.9-C
2nd Street / Sun Lakes Village Drive (EW) - #5	TS	1	2.5	0.5	1	3	d	2	<1>	0	1	0.5	0.5	15.1-B	22.3-C
1st Street / Sun Lakes Boulevard (EW) - #6	TS	1	1.5	0.5	1	2	1>>	1	1.5	0.5	1	1	1>>	12.3-B	12.9-B
Project Access (NS) at:															
Sun Lakes Boulevard (EW) - #7	CSS	0	0	0	0	0	1	0	2	0	0	1.5	0.5	9.1-A	9.3-A
Silver Lakes Avenue (NS) at:															
Sun Lakes Boulevard (EW) - #8	CSS	0	0	0	1	0	1	1	2	0	0	2	1	12.5-B	11.1-B

Source: Table 4 of the Traffic Impact Analysis (2018)

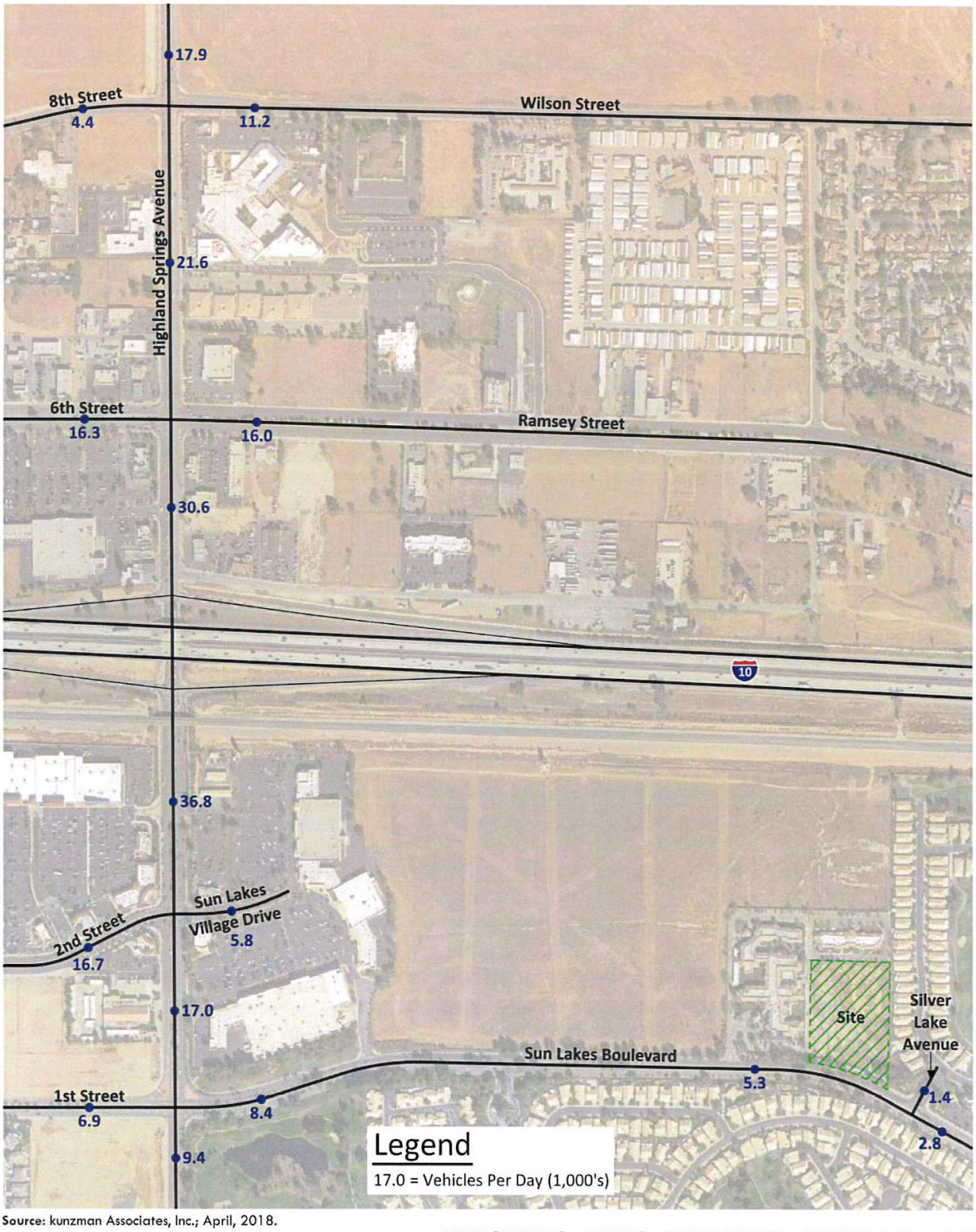
For Existing Plus Ambient Growth Plus Project traffic conditions, existing traffic volumes are combined with ambient growth and project trips. The Existing Plus Ambient Growth Plus Project average daily traffic volumes are shown on Figure 6. The Existing Plus ambient Growth Plus Project delay and LOS for the study area roadway network are shown in Table 13 below. Table 13 shows delay values based on the geometrics at the study intersections without and with improvements. For Existing Plus Ambient Growth Plus Project traffic conditions, the study intersections are projected to operate within acceptable LOS A, B and C during both the morning and evening peak hours.

Table 13
Existing Plus Ambient Growth Plus Project Intersection Delay and Level of Service

Intersection	Traffic Control[3]	Intersection Approach Lanes[1]												Peak Hour Delay-LOS[2]	
		Northbound			Southbound			Eastbound			Westbound				
		L	T	R	L	T	R	L	T	R	L	T	R	Morning	Evening
Highland Springs Avenue (NS) at:															
8th Street / Wilson Street (EW) - #1	TS	1	1	1>	1	1.5	0.5	1	1.5	0.5	1	2	1	24.6-C	23.3-C
6th Street / Ramsey Street (EW) - #2	TS	1	2	1	1	2	1	1	2	1	1	2	d	20.5-C	25.2-C
I-10 Freeway WB Ramps (EW) - #3	TS	1	2	0	0	2	1	0	0	0	0.5	0.5	1	12.2-B	18.6-B
I-10 Freeway EB Ramps (EW) - #4	TS	0	2	1	1	2	0	0.5	0.5	1	0	0	0	16.0-B	24.6-C
2nd Street / Sun Lakes Village Drive (EW) - #5	TS	1	2.5	0.5	1	3	d	2	<1>	0	1	0.5	0.5	15.3-B	23.4-C
1st Street / Sun Lakes Boulevard (EW) - #6	TS	1	1.5	0.5	1	2	1>>	1	1.5	0.5	1	1	1>>	12.5-B	13.2-B
Project Access (NS) at:															
Sun Lakes Boulevard (EW) - #7	CSS	0	0	0	0	0	1	0	2	0	0	1.5	0.5	9.1-A	9.3-A
Silver Lakes Avenue (NS) at:															
Sun Lakes Boulevard (EW) - #8	CSS	0	0	0	1	0	1	1	2	0	0	2	1	12.6-B	11.2-B

Source: Table 5 of the Traffic Impact Analysis (2018)

For Existing Plus Ambient Growth Plus Project Plus Cumulative traffic conditions, existing traffic volumes are combined with ambient growth, project trips, and other development trips. The Existing Plus Ambient Growth Plus Project Plus Cumulative average daily traffic volumes are shown on Figure 7. The Existing Plus Ambient Growth Plus Project Plus Cumulative delay and LOS for the study area roadway network are shown in Table 14, below. Table 14 shows delay values based on the geometrics at the study intersections without and with improvements. For Existing Plus Ambient Growth Plus Project Plus Cumulative traffic conditions, the study intersections are projected to operate within acceptable LOS A, B and C during both the morning and evening peak hours.



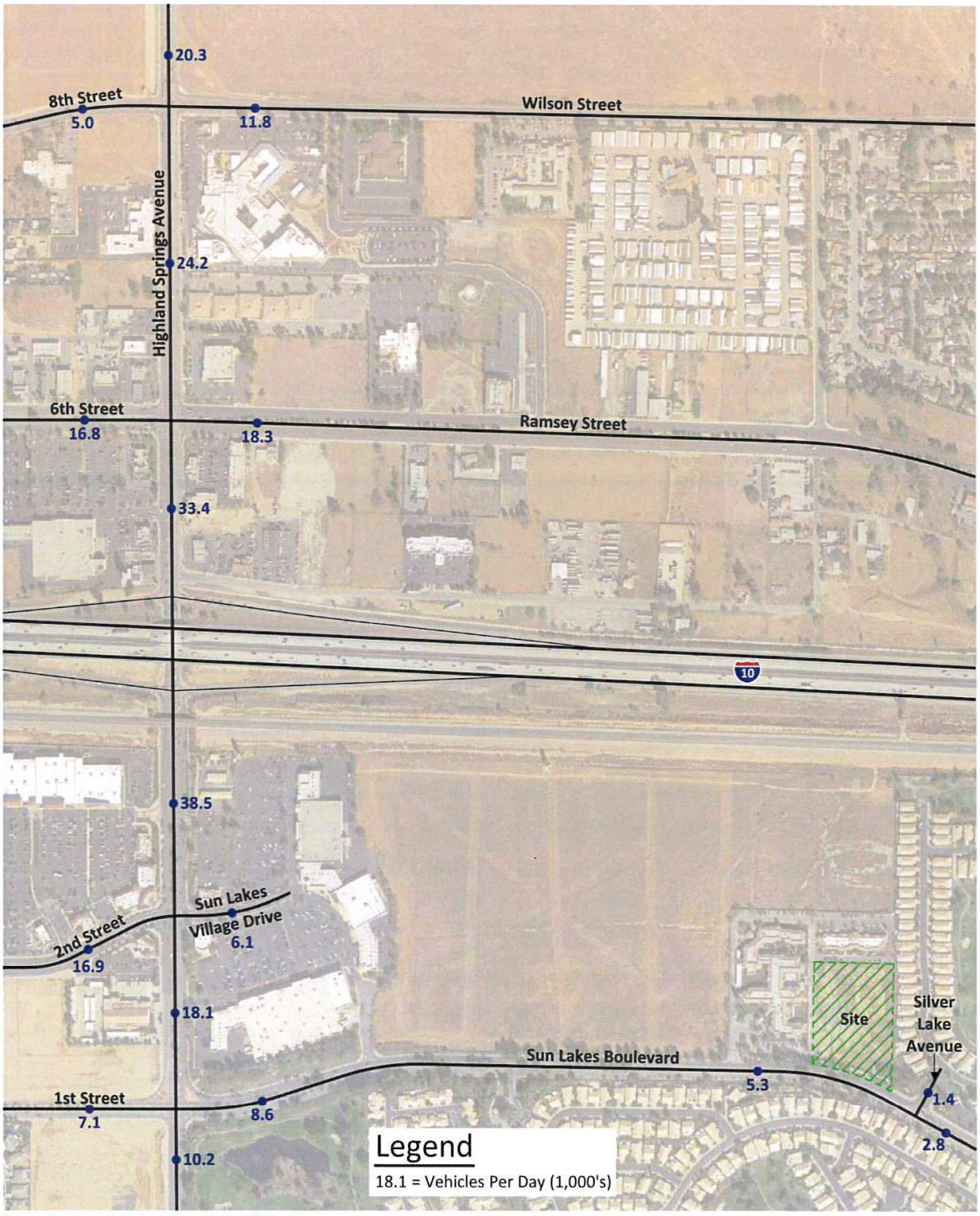
Source: kunzman Associates, Inc.; April, 2018.

Prepared By:
LILBURN CORPORATION

EXISTING PLUS AMBIENT GROWTH PLUS PROJECT AVERAGE DAILY TRAFFIC VOLUMES

Careage Healthcare
Banning, CA

FIGURE 6



Source: kunzman Associates, Inc.; April, 2018.

EXISTING PLUS AMBIENT GROWTH PLUS PROJECT PLUS CUMULATIVE PROJECT AVERAGE DAILY TRAFFIC VOLUMES

Careage Healthcare
Banning, CA

Prepared By:
LILBURN CORPORATION

FIGURE 7

Table 14
Existing Plus Ambient Growth Plus Project Plus Cumulative Intersection Delay and Level of Service

Intersection	Traffic Control[3]	Intersection Approach Lanes[1]												Peak Hour Delay-LOS[2]	
		Northbound			Southbound			Eastbound			Westbound				
		L	T	R	L	T	R	L	T	R	L	T	R	Morning	Evening
Highland Springs Avenue (NS) at:															
8th Street / Wilson Street (EW) - #1	TS	1	1	1>	1	1.5	0.5	1	1.5	0.5	1	2	1	27.4-C	30.5-C
6th Street / Ramsey Street (EW) - #2	TS	1	2	1	1	2	1	1	2	1	1	2	d	22.1-C	29.2-C
I-10 Freeway WB Ramps (EW) - #3	TS	1	2	0	0	2	1	0	0	0	0.5	0.5	1	13.3-B	21.5-C
I-10 Freeway EB Ramps (EW) - #4	TS	0	2	1	1	2	0	0.5	0.5	1	0	0	0	17.9-B	29.8-C
2nd Street / Sun Lakes Village Drive (EW) - #5	TS	1	2.5	0.5	1	3	d	2	<1>	0	1	0.5	0.5	15.7-B	24.6-C
1st Street / Sun Lakes Boulevard (EW) - #6	TS	1	1.5	0.5	1	2	1>>	1	1.5	0.5	1	1	1>>	12.7-B	13.5-B
Project Access (NS) at:															
Sun Lakes Boulevard (EW) - #7	CSS	0	0	0	0	0	1	0	2	0	0	1.5	0.5	9.1-A	9.3-A
Silver Lakes Avenue (NS) at:															
Sun Lakes Boulevard (EW) - #8	CSS	0	0	0	1	0	1	1	2	0	0	2	1	12.6-B	11.2-B

Source: Table 6 of the Traffic Impact Analysis (2018)

As demonstrated in the preceding discussion, the Existing Plus Ambient Growth Plus Project, and the Existing Plus Ambient Growth Plus Project Plus Cumulative traffic conditions would occur within LOS A, B, and C in both the morning and evening peak hours. As stated in the Circulation Element of the City of Banning General Plan. LOS C is assumed to be the "acceptable" LOS for all General Plan roadways within the City. Consequently, it is demonstrated that the project's traffic impacts would not exceed these thresholds. As such, the proposed Project would occur in compliance with the Circulation Element of the City of Banning General Plan, and less than significant traffic impacts would result from implementation of the Proposed Project.

The Riverside County Congestion Management Program (CMP) is recognized by the City of Banning as the framework for the assessment of regional impacts. The intent of the CMP is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related impacts, and improve air quality. As stated in the 2011 Riverside County CMP, the minimum LOS standard for intersections and segments along the CMP System of Highways and Roadways is LOS E, unless the intersection or segment had a lower LOS (LOS F) in 1991. Traffic analyses conducted for the proposed project demonstrated that all the study area intersections are forecast to operate at Level of Service C or better for Buildout (Existing Plus Ambient Growth Plus Project) traffic conditions during both morning and evening peak hours. Therefore, there is no conflict with the CMP. No impacts would result.

c) **No Impact.** The Banning Municipal Airport is located approximately 4.5 miles east of the Project Site, at 600 South Hathaway Street, adjacent to the Southern Pacific Railroad and

the I-10 Freeway. The approximately 295-acre airport site includes 65 hangars and 32 tie downs. It includes a 5,100-foot runway and is capable of handling most private single engine and corporate jet aircraft. According to the City of Banning General Plan the airport averages approximately 10 to 15 takeoffs and landings daily, and about 12,000 operations per year. Air traffic at the Municipal Airport is comprised primarily of private, single engine fixed-wing aircraft.

The project site is not located within the boundaries of the Airport Land Use Plan (ALUC) for the Municipal Airport and, therefore, is not subject to the jurisdiction of the Riverside County Airport Land Use Commission. The Proposed Project involves the construction and operation of a MOB which would not be expected to alter operations, change air traffic patterns or conflict with the airport land uses for people residing or working in the area. No aviation impacts are anticipated.

d) **Less Than Significant Impact with Mitigation.** A Sight Distance Analysis was performed as part of the TIA. The posted speed limit along Sun Lakes Boulevard adjacent to the Project is currently 35 miles per hour. The minimum stopping sight distance requires 250 feet of unobstructed line of sight for a 35 mile per hour posted speed limit on Sun Lakes Boulevard (Table 201.1 in the Highway Design Manual). For a vehicle located at the Project access intending to head westbound on Sun Lakes Boulevard, the driver's eye would be situated 42 inches above the pavement and 15 feet back from the edge of the travel way. Similarly, a driver must have a minimum unobstructed sight line of 250 feet looking eastbound at an object 42 inches above the pavement situated in the center of the westbound travel lane. Sun Lakes Boulevard and the surrounding terrain at and adjacent to the Project Site is relatively flat with minimal changes in gradient. Consequently, vertical sight distance concerns are not anticipated, and existing conditions are anticipated to satisfy vertical sight distance requirements. In addition, there are no sharp curves or dangerous intersections, or incompatible uses) on-site or within the vicinity of the Project Site which would present hazards to vehicular traffic.

Although impacts related to design hazards are anticipated to be less than significant, recommendations presented in the TIA are presented as mitigation measures to satisfy City requirements. Impacts would be further minimized with the design measures listed below.

TR-1: Construct Sun Lakes Boulevard from the west project boundary to the east project boundary at its ultimate half-section width including landscaping and parkway improvements in conjunction with development, as necessary to the satisfaction of the Department of Public Works.

TR-2: The Project Proponent shall ensure that final site plans address safe access to the Project Site from Sun Lakes Boulevard via a right turns in/out only driveway.

TR-3: The Project Proponent shall ensure that the access to the Project Site from Sun Lakes Boulevard has a stopping sight distance of 250 feet of unobstructed line of sight.

e) **Less Than Significant with Mitigation.** The Emergency Preparedness Element of the General Plan outlines the potential for natural and man-made disasters that could affect the City and its Sphere of Influence. According to the General Plan, in 1996 the City adopted the Multi-Hazard Functional Planning Guidance document that includes: 1) the Banning Emergency Plan; 2) twelve functional annexes that describe an emergency response organization; and 3) a listing of operational data such as resources, key personnel, and essential facilities and contacts. The City does not have an established evacuation route; however, depending on the location and extent of an emergency, major surface streets could be utilized to route traffic through the City. For example, Highland Springs Avenue, Hargrave Street, Sunset Avenue, 22nd Street, Eighth Street, and San Gorgonio Avenue are major intra-city north-south roadways, and Wilson Street, Ramsey Street, Lincoln Street and Westward Avenue are major inter-city east-west roadways. The I-10 Freeway and State Highway 243 to State Route 79 are major regional access routes serving the City and the planning area.

Construction of the Proposed Project would not alter or interfere with emergency response operations or an adopted emergency evaluation plan. Banning Police Department, and Riverside County Sheriff's Department access standards shall be followed to allow adequate emergency access. To ensure appropriate secondary access is provided the following mitigation measure shall be implemented. With recommended Mitigation, potential impacts related to emergency access on the Project Site are reduced to a less than significant level.

TR-4: The Project Proponent shall provide a secondary emergency access point for the Project Site. The Project Proponent shall identify a second emergency access on final site plans, which shall be reviewed and approved by City staff. Prior to issuance of grading permits, the Project Proponent shall record an access agreement reflecting this condition within the grant deeds of all properties.

f) **No Impact.** The Riverside Transit Agency System Map depicts Transit Route 31 as operating on Highland Springs Avenue south of the I-10 Freeway, 2nd Street, and Sun Lakes Boulevard. Transit Route 210 operates on Highland Springs Avenue south of the I-10 Freeway, on 2nd Street, and on 1st Street. There are no bus stops adjacent to the Project Site. According to the County of Riverside General Plan Trail and Bikeway Plan, there are no existing or planned pedestrian trails in the vicinity or adjacent to the Project Site. In addition, the Circulation Element of the City of Banning General Plan does not specify any planned pedestrian trails in the vicinity or adjacent to the Project Site., and none are existing. In consideration of these factors, implementation of the Proposed Project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. No impacts would result; thus no mitigation measures are necessary.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRIBAL CULTURAL RESOURCES. *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	( )	(✓)	( )	( )

Impact Discussion:

a) California Assembly Bill 52 (AB 52) was approved in 2014. AB52 specifies that projects subject to the California Environmental Quality Act (CEQA) which may cause a substantial adverse change in the significance of a tribal cultural resource may have a significant effect on the environment. As such, the bill requires lead agency consultation with the Native American Historical Commission (NAHC) and California Native American tribes traditionally and culturally affiliated with the geographic area of a proposed project. The legislation further requires that potentially affected tribes may request formal consultation with the public agency, prior to the determination of the form of CEQA documentation appropriate for a project.

In accordance with AB 52, tribes must first request to be on the Lead Agency's notification list to receive information about a known project and to request consultation. In accordance with AB 52, a records search at California State University Fullerton was conducted to determine potential tribal cultural resources that may occur at the Project Site and in the vicinity, as well as an assessment of potential impacts to archaeological and paleontological resources and human remains. Please refer to Section V - Cultural Resources and Appendix B (available at the Planning Department) for additional information.

The City of Banning has provided the full Cultural Resources investigation to all tribes who have requested it, and held consultations with all tribal representatives who requested to receive additional information. Results of the cultural resources investigation and tribal consultations are reflected in the impact discussion and Mitigation Measures contained in Section 5 – Cultural Resources. With mitigation contained in Section 5 of this Initial Study, impacts to tribal cultural resources are considered reduced to a less than significant level.

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18.	**UTILITIES AND SERVICE SYSTEMS.** *Would the project:*				
	a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	( )	( )	(x)	( )
	b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	( )	( )	( )	(✓)
	c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	( )	( )	( )	(✓)
	d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	( )	( )	(x)	( )
	e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	( )	( )	( )	(✓)
	f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	( )	( )	( )	(✓)
	g) Comply with Federal, State, and local statutes and regulations related to solid waste?	( )	( )	( )	(✓)

Impact Discussion:

a,e) **Less Than Significant Impact**. The City of Banning Public Works Wastewater Division provides sanitary wastewater services to the City of Banning. The City Public Works Department is located at 99 East Ramsey Street. The City of Banning Wastewater Reclamation Plant is located at 2242 East Charles Street. The City contracts with United Water Services for the operation and maintenance of the water reclamation plant. Recent upgrades of the plant resulted in an increase of secondary treatment capacity to 3.6 million gallons-per-day, including improvements that could accommodate future capacity to approximately 5.8 million gallons-per-day. On a daily basis the, plant currently receives an average flow of approximately 2.3–2.4 million gallons-per day.

Water demand of the MOB, as estimated from actual water use records from another similar facility owned by the Project Proponent, is expected to be approximately 109,200 gallons per month or 1.3 million gallons per year, which is equivalent to 4.02 acre-feet per year. A conservative estimate of 95 percent of the total water use returning to wastewater

flow results in 0.003 MGD in additional flow to the City of Banning Public Works Wastewater facility. The Project would be required to meet the requisites of the City of Banning and the Regional Water Quality Control Board (RWQCB) regarding wastewater quality. The Proposed Project would not require the construction of new wastewater facilities, exceed wastewater treatment requirements, or exceed wastewater treatment capacities. Therefore, impacts related to wastewater treatment requirements of the RWQCB are considered to be less than significant and no mitigation measures are necessary.

b) **No impact.** Please refer to discussion in item 18–a. above. There is sufficient capacity available in existing water and wastewater treatment facilities to accommodate the additional flow estimated to be generated by the Proposed Project. The project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. No mitigation measures are necessary.

c) **No Impact.** Currently, offsite flows drain southerly through an existing earthen ditch along the eastern edge of the project site to two 12-inch pipes located at the southeast corner of the site, which subsequently drain to an existing 4-foot parkway culvert that discharges to the curb and gutter at Sun Lakes Boulevard. On site flows drain southerly and southeasterly to the existing earthen ditch and the 12-inch pipes at the southeast corner of the site.

Pursuant to City of Banning Ordinance No. 1415, Section 6, retention of the entire calculated developed conditions 100-year, 3-hour volume of 0.49 acre feet (AF) is required. County of Riverside policy is reduction of peak flows for all storm events up to and including the 10-year, 24-hour event. An underground infiltration system is proposed for the project. In order to reduce the developed conditions peak 10-year, 24-hour flow of 1.38 cubic feet per second (CFS) to match the existing conditions peak 10-year, 24-hour flow of 0.82 CFS, the underground infiltration system has been sized to capture 0.68 AF, as this eliminates all discharge until the 15+35-hour point, past the peak of the hydrograph and at a discharge of 0.77 CFS. Based on this capture volume, the proposed underground infiltration system will retain and infiltrate the entire developed conditions volumes for all events, except for the 10-year, 24-hour and 100-year, 24-hour events, and peak flow for the developed conditions 10-year, 24-hour event will be reduced to the existing conditions peak flow.

The peak developed conditions flow for the 10-year, 24-hour event will be mitigated to lower than the existing conditions 10-year, 24-hour peak flow. Mitigation for the peak developed conditions flow for the 100-year, 24-hour event is not required per County of Riverside standards. Overflow discharge from the underground infiltration system for the 10- year, 24-hour and 100-year, 24-hour events will overflow the proposed catch basin at the southeast corner of the property and join the routed offsite flows draining to the two existing 12” pipes and 4-foot parkway culvert to the Sun Lakes Boulevard curb and gutter (where all on-site and off-site flows currently drain). The proposed underground infiltration system shall be designed to capture and infiltrate 0.68 AF.

The calculated 100-year, one-hour peak offsite (tributary) flow to the northeast corner of the project site is 19.49 CFS. Per the project site plan, these offsite flows shall be routed along the eastern edge of the property via a 10-foot (at the narrowest point) landscape swale to the existing 12-inch pipes at the southeastern corner of the property. The 6-inch

curb shall be provided along the western edge of this swale; and will effectively provide 6-inches of freeboard.

The proposed project will provide a retention system sized to retain 0.68 AF. This will provide retention of the calculated developed conditions 100-year, 3-hour volume of 0.49 AF. (per City of Banning requirements) and will provide adequate volume to completely retain or mitigate to existing conditions all flows up to and including the 100-year, 6-hour event. The proposed landscape swale will route offsite flows to the existing conditions discharge location. No impacts are anticipated.

d) **Less Than Significant Impact:** The City of Banning Public Works and Utilities Department provides domestic water services to the City of Banning, and to unincorporated Riverside County lands located southwesterly of the City limits. The various storage units of the San Gorgonio Pass groundwater basin serve as the main water source for the City. There are 22 operating groundwater wells from which the City obtains its water. These are located in Banning Water Canyon and in residential and commercial districts throughout the City. The City also owns six unequipped groundwater wells, three of which could be used as a future water source.

The distribution line system serving the City consists of water lines ranging from 2" to 30" in diameter. The City operates its water services with guidance from its Urban Water Management Plan. Water demand of the MOB, as estimated from actual water use records retrieved from another similar facility owned by the Project Proponent, is expected to be 109,208 gallons per month or 1.3 million gallons per year which is equivalent to 4.02 acre-feet per year. The year 2015 population within the water service area is estimated at 30,491 and is projected to increase to 37,700 based on a factor of 3.12 persons per water service connection. The year 2040 projected population increases to 56,685 if two major proposed Specific Plan developments within the City's service area are approved and constructed. Based on the City of Banning Final 2015 Urban Water Management Plan, adopted in 2016, for the Planning Period of 2020 – 2040, adequate water supply is projected for meeting demands. The Multiple Dry Years Supply and Demand Comparison (UWMP Table 6-6) shows that in the first and third years of multiple year dry conditions, there is a shortfall of 311 acre-feet per year to meet demands. However, the UWMP indicates that the 46,774 acre-feet of water stored in the Beaumont Basin storage account is not included in the supply totals and concludes that the City has ample water supplies to meet projected demands through 2040. Therefore, the City has sufficient water supplies available to serve the Project based on existing entitlements and resources; a less than significant impact would result.

f) **No Impact.** The City of Banning contracts with Waste Management Inland Empire for solid waste and disposal services. Solid waste that is not diverted to recycling or composting facilities is transported to the Lamb Canyon Sanitary Landfill. The Lamb Canyon Sanitary Landfill is located in the City of Beaumont, approximately three miles southwest of the City of Banning. It is owned and operated by the Riverside County Waste Management Department and accepts solid waste collected from the communities of Banning, Beaumont, Hemet and San Jacinto. It may also accept solid waste generated from anywhere within Riverside County.

The Lambs Canyon Sanitary Landfill has a design capacity of 33,041,000 cubic yards and can receive a maximum permitted tonnage of 5,000 tons per day. The facility has an estimated closure year of 2021. The proposed MOB would generate approximately one

(1) ton of solid waste per day[2], which is approximately 0.020 percent of the permitted capacity of the landfill. The Proposed Project would not place a significant demand on solid waste services and would not be served by a landfill with insufficient permitted capacity. No impacts are anticipated.

g) **No Impact.** As required by Assembly Bill 939 (AB939), the California Integrated Waste Management Act, all cities and counties within the state must divert 50 percent of their wastes from landfills by the year 2000. Construction and Demolition (C&D) debris represents a large portion of materials being disposed of at landfills. To achieve the State-mandated diversion goal, the City has implemented a variety of programs that seek to reduce the volume of solid waste generated, encourage reuse, and support recycling efforts. Collected green waste from the Banning area is taken to a green waste recycling station in Romoland. Other recyclable materials, such as glass, plastic, and paper are transported to a third-party recycler in the City of Pico Rivera. Construction and operation of the MOB must comply with all federal, State, and local statutes and regulations related to solid waste. No impacts are anticipated and no mitigation measures are necessary.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
19. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	( )	(✓)	( )	( )
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	( )	(✓)	(	( )
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	( )	(✓)	( )	( )

[2] Based on the California Integrated Waste Management Board Estimated Solid Waste Generation Rates for Institutions (Medical offices/hospitals).

Impact Discussion:

a) **Less Than Significant with Mitigation.** The Project site has been previously disturbed by rough grading activities and contains minimal vegetation or other natural features. A general biological assessment of the project site was conducted under the requirements of the Western Riverside County Multiple Species Habitat Conservation Plan (MSCHP). A field survey of the Project Site was also conducted which included an evaluation of habitats. In addition, records of the general and sensitive biological resources present on-site and in the surrounding area were consulted.

No amphibian or reptile species were observed during surveys. Four bird species were observed, none of which are listed as rare or endangered. No sign of mammal species was observed. Compliance with the MSHCP required an assessment for Narrow Endemic Plant Species, presence of burrowing owl habitat, riverine and riparian habitats, as well as vernal pools and fairy shrimp habitat, and jurisdictional waters. The Narrow Endemic Plant Species identified two candidate plant species as potentially present in the area. Neither of these plant species were identified on the project site, and no suitable habitat or soils are present. The Project Site does not provide suitable habitat for burrowing owls, and it is not located within the Stephen's Kangaroo Rat fee area. No significant impacts to biological resources were identified.

No prehistoric or historic cultural resources were identified within the Project Site. The Project Site is, however, located within an area considered moderately sensitive for prehistoric archaeological resources. Implementation of **Mitigation Measure CUL – 1** will ensure potential impacts to archeological resources are reduced to a less than significant level. In consideration of the foregoing information, the project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

(b) **Less than Significant with Mitigation.** The Project is not anticipated to generate significant impacts from generation of air pollutants, traffic or noise with mitigation. **Mitigation Measures N-1 through N-5, and TR-1 through TR-4** have been incorporated for any impacts that have been assessed as potentially significant. No significant air quality of GHG impacts were identified. Thus, all project specific impacts have been reduced to a less than significant level. Consequently, no significant cumulative adverse impacts are expected with implementation of the proposed development.

c) **Less than Significant with Mitigation.** Noise impacts from traffic and other existing sources would be the primary impacts to human beings. No potentially significant impacts have been identified inn any other subject area that would affect Traffic noise affecting the Project site is anticipated to be from I-10 and Sun Lakes Boulevard, and the primary source of railroad-related noise would be from the Union Pacific Railroad lines conveying freight and passenger trains. The on-site transportation noise level impacts indicate that the unmitigated exterior noise levels will range from 58.9 to 64.6 dBA CNEL at the Project first-floor building façade. No exterior noise mitigation is required to satisfy the City of

Banning General Plan Noise Element 70 dBA CNEL acceptable exterior noise level criteria for medical office uses.

Interior noise levels of the medical building were evaluated based on the City of Banning 45 dBA CNEL interior noise level standard for residential land use. The Project building is shown to require a Noise Reduction (NR) of up to 13.9 dBA and a windows-closed condition requiring a means of mechanical ventilation (e.g. air conditioning). To meet the City of Banning 45 dBA CNEL interior noise standards, **Mitigation Measures N-1 through N-5.** No significant adverse effects on human beings are foreseen as a result of the Proposed Project with required Mitigation Measures.

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