

**INITIAL STUDY &
MITIGATED NEGATIVE DECLARATION
FOR**

DESIGN REVIEW 19-7007



PREPARED FOR:

City of Banning
99 East Ramsey Street
Banning, CA 92220
Contact: Adam B. Rush, M.A., AICP
(951) 922-3131

APPLICANT

Highway 243 Industrial Center, LLC
200 S. 8th Street
Banning, CA, 92220

March 2020

Table of Contents

INITIAL STUDY	1
Project Title.....	1
Lead Agency Name and Address	1
Contact Person Name and Phone Number	1
Project Sponsor and Address	1
Existing General Plan Designation/Zoning	1
Proposed Banning General Plan Designation	1
Project Location.....	1
Project Description	1
Surrounding Land Uses and Setting	2
Environmental Factors Potentially Affected	20
Determination	20
 EVALUATION OF ENVIRONMENTAL IMPACTS.....	 21
Aesthetics	21
Agriculture and Forestry Resources	22
Air Quality	23
Biological Resources	25
Cultural Resources	26
Energy	26
Geology and Soils	27
Greenhouse Gas Emissions	28
Hazards and Hazardous Materials	29
Hydrology and Water Quality	30
Land Use and Planning	31
Mineral Resources.....	31
Noise	32
Population and Housing	32
Public Services	35
Recreation	35
Transportation	36
Tribal Cultural Resources	37
Utilities and Service Systems	37
Wildfire	37
Mandatory Findings of Significance.....	40
 REFERENCES.....	 41
 LIST OF PREPARERS	 41
 LIST OF FIGURES	
Figure 1 Location, Zoning Map.....	2
Figure 2 Location, Aerial Map	3

Figure 3	Location, Vicinity Map	3
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LIST OF TABLES

Table 1	Residential Opportunity Sites Gains or Losses by Location	33
Table 2	Residential Opportunity Sites Gains or Losses by Zone	34

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.

City of Banning General Plan 2006
City of Banning Municipal Code

CITY OF BANNING INITIAL STUDY

Project Title: Highway 243 Industrial Center, LLC
(Design Review 19-7007; Environmental Assessment 18-1501)

Lead Agency Name: City of Banning Community Development Department
Planning Division

Address: 99 E. Ramsey Street
Banning, CA 92220

Contact Person: Adam B. Rush, AICP
Phone Number: (951) 922-3131

Project Sponsor: Highway 243 Industrial Center, LLC
Address: 200 South Eighth Street
Banning, CA 92220

Existing General Plan and Zoning Designation:

- | | |
|----------------|--|
| 1. 540-220-013 | Industrial General Plan & Zone
(per GPA19-2503) |
|----------------|--|

Proposed General Plan and Zoning Designation:

- | | |
|----------------|--|
| 1. 540-220-013 | Industrial General Plan & Zone
(per GPA19-2503) |
|----------------|--|

Project Location (Address/Nearest cross-streets): The Project is located at 200 South Eighth Street; more specifically, at the northeast corner of S. 8th Street and W. Lincoln Ave.

Project Description: The project site is an approximate 3.2-acre vacant lot located at the northeast corner of 8th Street and W. Lincoln Ave. The applicant proposes to redevelop of a former recycling center through the siting and construction of two industrial shell buildings. The larger of the two buildings is approximately 30,000 square feet and the second is 24,131 square feet, with both buildings located on a 3.2-acre site. The Project is located at the northeast corner of 8th Street and W. Lincoln St. (APN: 540-220-013). The proposed project is located on a vacant lot in the Industrial (I) Zoning District.

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" or "Less Than Significant Impact with Mitigation Incorporated" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology /Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use/ Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> 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, and 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: _____ Date: March 20, 2020 _____

Adam B. Rush, M.A., AICP

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. <i>Would the project:</i>				
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 public views 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-d) **No Impact.** According to the City's General Plan, none of the project locations are within a scenic vista/scenic highway view corridor. There are no designated State Scenic Highways within the vicinity of any project locations and there are no historic buildings on the Project site, or in the vicinity that would be impacted as a result of the Project. The project will not degrade the existing visual character or quality of public views of the site and its surroundings or create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, no impacts to Aesthetics would result from the project as presented.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>2. AGRICULTURAL AND FORESTRY 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:</p>				
<p>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?</p>	()	()	()	(✓)
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	()	()	()	(✓)
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?</p>	()	()	()	(✓)
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	()	()	()	(✓)
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>	()	()	()	(✓)

Impact Discussion:

- a- 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 the nearby vicinity, are identified as urban built-up land. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is

identified. The 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 is contracted under the Williamson Act. There is no farmland, agricultural use or forest located on the Project site. Therefore, no impacts to Agricultural Resources would result from the project as presented.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	()	()	()	(✓)
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?	()	()	()	(✓)
c) Expose sensitive receptors to substantial pollutant concentrations?	()	()	()	(✓)
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	()	()	()	(✓)

Impact Discussion:

a-d) **No Impact.** 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 project does not propose the development of housing units and as such will not result in an increase in population or employment that was not previously adopted in the City's General Plan. The Project does not expose sensitive receptors to substantial pollutant concentrations or result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Additionally, any of the project parcels may be developed in the future and at that time a separate environmental review in accordance with the California Environmental Quality Act will be required. Therefore, no impacts to Air Quality would result from the project as presented.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. <i>Would the project:</i>				
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?	()	()	()	(J)
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?	()	()	()	(J)
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	()	()	()	(J)
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?	()	()	()	(J)
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	()	()	()	(J)
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?	()	()	()	(J)

Impact Discussion:

a-f) According to the MSHCP consistency analysis report, prepared by ECORP consulting, Inc. on August 8, 2019, the project site did not support habitat for special-status plant or wildlife species. The little vegetation remaining on the project site was nonnative and typical of the disturbed condition of the site. Although the site was found to not provide habitat for any special-status plant or wildlife species, the ornamental shrubs and trees on and adjacent to the site could provide suitable nesting habitat for bird species protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 and the California Fish and Game Code. Active bird nests or birds exhibiting nesting behavior were not observed during the survey. Compliance with the MBTA is not considered unique mitigation.

No burrowing owls, burrowing owl burrows (potential or occupied), or sign of burrowing owl (e.g., feathers, whitewash, pellets) were identified on the project site at the time of the survey. The small concrete debris pile and stored construction materials were searched for burrowing owl sign, as owls will often use manmade materials and structures as burrows and shelter; however, no sign of burrowing owl was observed in these locations. Soils on the project site were not suitable for burrowing owl presence, as they were hard, compacted, and paved in some areas of the project site. No impacts to biological resources are anticipated. The Project is required to pay habitat mitigation fees in compliance with City ordinances.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. <i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	()	(✓)	()	()
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5?	()	(✓)	()	()
c) Disturb any human remains, including those interred outside of formal cemeteries?	()	(✓)	()	()

Impact Discussion:

a-c) **No Impact:**

According to the Cultural Resources Report, prepared by ECORP in January of 2020, the study included a Sacred Lands File search, records search, and reviews of historical maps and aerial photographs of the Project area. The results of the search of the Sacred Lands File by the NAHC did not indicate the presence of any Native American Sacred Lands within one mile of the Project Area. The results of the records search indicate that the entirety of the Project area has been included in a large records search for the City of Banning's General Plan but has not been specifically surveyed for cultural resources. No cultural resources have previously been recorded within the Project area. However, 175 resources, mainly historic-period buildings, have been recorded within one mile of the Project area and a segment of the Union Pacific Railroad/Southern Pacific Railroad is adjacent to the Project area. Only four pre-contact sites have been recorded

within the records radius and all are over 0.5 mile from the Project area. The potential for pre-contact archaeological sites on the property is considered to be low. The potential for historic period archaeological sites on the property is considered to be moderate.

Due to the presence of archeological resources within the vicinity, the following mitigation measures are incorporated into the Project:

MM 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. The developer shall meet and confer with the tribe on the consideration of a "Sensitivity Workshop" training on possible things that could come up in case a Native American Monitor is not on-site to monitor at certain times.

MM 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.

MM 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.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY. <i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	()	()	(✓)	()
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	()	()	()	(✓)

Impact Discussion:

- a-b) The Project has been designed to comply with the 2019 California Building Code, specifically, Title 24 to ensure compliance with the baseline energy conservation requirements. Furthermore, the City's electric utility department is requiring the Project to incorporate additional energy saving measures through implementation passive conservation techniques (e.g., skylights, rainwater recapture, and/or porous pavement). These elements are in compliance with city ordinances and do not result in unique mitigation. The Project construction is not anticipated to be lengthy and as such will not cause a significant drain on city energy reserves. The proposed Project would be required to comply with City, state and federal energy conservation measures related to construction and operations. Therefore, the Project will not conflict with or obstruct a state or local for renewable energy or energy efficiency, and the Project has **no impact**.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. <i>Would the project:</i>				
a) Directly or indirectly cause 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?	()	()	()	(✓)

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Result in substantial soil erosion or the loss of topsoil?	()	()	(J)	()
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?	()	()	(J)	()
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	()	()	(J)	()
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?	()	()	(J)	()
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	()	()	(J)	()

Impact Discussion:

- a-f) **No Impact.** The San Gorgonio Pass Fault is the closest Alquist-Priolo Earthquake Fault Zone to any of the Project Locations as delineated in the latest State Earthquake Fault Zone maps and in Exhibit V-3 of the General Plan. Additionally, in accordance with the California Geological Map from the California Department of Conservation web site, <https://maps.conservation.ca.gov/cgs/EQZApp/>, there are three locations within 1/3 of a mile of the San Gorgonio Pass Fault, locations three, eight and nine. The remaining locations are all over one mile from this Fault Zone. There is no development so there will be no impacts to soil erosion, unstable soil, expansive soil, soils incapable of handling waste or impacts to paleontological resources or unique geologic features.

Liquefaction commonly occurs in loose, saturated, sandy sediments that are subject to ground vibrations greater than 0.2 g (peak ground acceleration). When liquefaction occurs, the sediments behave like a liquid or semi-viscous substance and can result in structural distress or failure due to ground settlement, a loss of load-bearing capacity in foundation soils, and the buoyant rise of buried structures (GP, p. V-17). The majority of soil types in the City of Banning are material consisted of undocumented fill (afu), Holocene-age alluvium (Qa), and Pleistocene-age Alluvial fan of the San Gorgonio Pass (Qf) deposits (GeoCon, p. 3). According to the City's GP, the Project site is located in an area with low liquefaction susceptibility (GP, Exhibit V-4; GP DEIR, Exhibit III-14). The Project is not located upon an unstably geological unit and will comply with the 2019 California Building Code, which requires compliance with the most updated seismic codes and standards. The Project site is not located within an area of either liquefaction and/or subsidence and

will be required to submit a soils report in conjunction with building plans. As such, a less than significant impact is anticipated.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. <i>Would the project:</i>				
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, b) **No Impact.** 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 Project includes both construction, and operational-related, emissions that could result in impacts to the air basin. The following tables provide the results of the air quality modeling (CalEEMod) results:

TABLE 1-1: PROJECT CONSTRUCTION TIMELINE			
Phase Name	Start Date	End Date	Days
Site Preparation	03/01/2019	3/14/2019	10
Grading	03/15/2019	05/02/2019	35
Building Construction	05/03/2019	10/01/2020	370
Paving	10/02/2020	10/29/2020	20
Architectural Coating	10/30/2020	11/26/2020	20

TABLE 1-2: PROJECT CONSTRUCTION EMISSIONS (<i>Unmitigated</i>)			
<u>Pollutant</u>	<u>Daily Maximum Emissions (lbs./day)</u>	<u>South Coast Air Quality Management District Maximum Daily Threshold¹ (lbs./day)</u>	<u>Exceeds SCAQMD Threshold?</u>
<u>Reactive Organic Gas (ROG)</u>	<u>73.26</u>	<u>75</u>	<u>NO</u>
<u>Oxides of Nitrogen (NO_x)</u>	<u>54.59</u>	<u>100</u>	<u>NO</u>
<u>Carbon Monoxide (CO)</u>	<u>38.26</u>	<u>550</u>	<u>NO</u>
<u>Sulfur Dioxide (SO₂)</u>	<u>0.11</u>	<u>150</u>	<u>NO</u>
<u>Particulate Matter (PM₁₀)</u>	<u>20.66</u>	<u>150</u>	<u>NO</u>
<u>Particulate Matter (PM_{2.5})</u>	<u>12.18</u>	<u>55</u>	<u>NO</u>
<u>Source: CalEEMod v2016.3.1. Based on highest winter or summer emissions.</u>			

¹ SCAQMD Air Quality Significance Thresholds <<http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>>

TABLE 1-3: PROJECT OPERATION EMISSIONS (<i>Unmitigated</i>)			
<u>Pollutant</u>	<u>Daily Maximum Emissions (lbs./day)</u>	<u>South Coast Air Quality Management District Maximum Daily Threshold² (lbs./day)</u>	<u>Exceeds SCAQMD Threshold?</u>
<u>Reactive Organic Gas (ROG)</u>	<u>21.34</u>	<u>75</u>	<u>NO</u>
<u>Oxides of Nitrogen (NO_x)</u>	<u>86.16</u>	<u>100</u>	<u>NO</u>
<u>Carbon Monoxide (CO)</u>	<u>197.17</u>	<u>550</u>	<u>NO</u>
<u>Sulfur Dioxide (SO₂)</u>	<u>0.68</u>	<u>150</u>	<u>NO</u>
<u>Particulate Matter (PM₁₀)</u>	<u>53.00</u>	<u>150</u>	<u>NO</u>
<u>Particulate Matter (PM_{2.5})</u>	<u>14.55</u>	<u>55</u>	<u>NO</u>
Source: CalEEMod v2016.3.1. Note: Based on highest winter or summer emissions.			

TABLE 2-1: Annual Project GHG Emissions (Unmitigated)				
Emission Source	Emissions (metric tons per year)			
	CO2	CH4	N2O	Total CO2E
Annual construction-related emissions amortized over 30 years	33.12	4.00E-03	0.00	33.20
Area	2.35E-02	6.00E-05	0.00	2.51E-02
Energy	586.65	2.39E-02	5.17E-03	588.79
Mobile Source	10,960.53	5.80E-01	0.00	10,975.04
Waste	28.34	1.67	0.00	70.22
Water Usage	65.36	3.24E-01	8.11E-03	75.86
Total CO2E (All Sources)	11,743.14			
SCAQMD Threshold	3,000			
Significant?	NO³			

² Ibid.

³ Implementation of, and compliance with, the Riverside County Climate Action (CAP) – Implementation Measures and Screening Tables will reduce Greenhouse Gas Emissions to a less than significant level.

The analysis indicates that both construction, and operation-related emissions are below the minimum level set forth by AQMD. As such, less than significant impacts are anticipated.

As described herein, above, the proposed Project will not generate any greenhouse emissions. Additionally, the City of Banning participated in the development of the Western Riverside Council of Governments (WRCOG) Sub regional Climate Action Plan (CAP). The proposed Project is consistent with the land use and zoning designation of the Project site which would have been accounted for in the City's CAP. Thus, the proposed Project does not conflict with any regulation adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, the Project has **no impacts**.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. <i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	()	()	()	(J)
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	()	()	()	(J)
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4 mile of an existing or proposed school?	()	()	()	(J)
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?	()	()	()	(J)
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 or excessive noise for people residing or working in the project area?	()	()	()	(J)
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	()	()	()	(J)
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	()	()	()	(J)

Impact Discussion:

a-g) **Less than significant impact.** The project will not involve the use or storage of hazardous materials other than those required for the routine maintenance and operations of an industrial warehouse facility. The primary use of the proposed buildings is for the storage and assembly of electrical parts and materials. However, chemicals such as Sulfur Hexafluoride (SF₆), which is used as an electrical insulator and in the production of magnesium. It is also used to manufacture semiconductors will not be stored or used at or near the facility. All materials necessary to clean up spills will be stored according to manufacturer's instructions and have the appropriate Material Data Safety Sheets (MDSS) that correspond. These aspects will mitigate the potential for incidental release of hazardous materials or explosive reactions.

The Code of Federal Regulations (CFR Title 40, Part 261) defines hazardous materials based on ignitability, reactivity, corrosivity, and/or toxicity properties. The State of California defines hazardous materials as substances that are toxic, ignitable or flammable, reactive and/or corrosive, which have the capacity of causing harm or a health hazard during normal exposure or an accidental release. As a result, the use and management of hazardous or potentially hazardous substances is regulated under existing federal, state and local laws. Hazardous wastes require special handling and disposal methods to reduce their potential to damage public health and the environment. Manufacturer's specifications also dictate the proper use, handling, and disposal methods for the specific substances. Construction of the project is expected to involve the temporary management and use of potentially hazardous substances and petroleum products. The nature and quantities of these products would be limited to what is necessary to carry out construction of the project. Some of these materials would be transported to the site periodically by vehicle and would be stored in designated controlled areas on a short-term basis. When handled properly by trained individuals and consistent with the manufacturer's instructions and industry standards, the risk involved with handling these materials is considerably reduced.

To prevent a threat to the environment during construction, the management of potentially hazardous materials and other potential pollutant sources will be regulated through the implementation of control measures required in the Stormwater Pollution Prevention Plan (SWPPP) for the project. The SWPPP requires a list of potential pollutant sources and the identification of construction areas where additional control measures are necessary to prevent pollutants from being discharged. Best Management Practices (BMPs) are necessary for *Material Delivery and Storage; Material Use; and Spill Prevention and Control*. These measures outline the required physical improvements and procedures to prevent impacts of pollutants and hazardous materials to workers and the environment during construction. For example, all construction materials, including paints, solvents, and petroleum products, must be stored in controlled areas and according to the manufacturer's specifications. In addition, perimeter controls (fencing with wind screen), linear sediment barriers (gravel bags, fiber rolls, or silt fencing), and access restrictions (gates) would help prevent temporary impacts to the public and environment. With such standard measures in place, less than significant impacts are anticipated during construction.

Implementation Measure S-7, within the City of Banning's General Plan states that the City shall require commercial and industrial businesses to meet the procedures for the proper transport, use, storage and disposal of hazardous waste as required by the County Waste

Management Department, the City of Banning Fire Department, and Riverside County Department of Environmental Health Services. Additionally, the City of Banning Fire Department shall require a detailed chemical inventory in accordance with the fire code to determine the hazards and classifications of the materials used in the proposed dispensary. Less than significant impacts related to the routine transport, use or disposal of hazardous materials are expected.

The project site is located within an Industrial land use sector of the City that is separated from residential or other densely populated land uses. As previously discussed, the project is not expected to handle any significant quantities of hazardous materials. Any other use of potentially hazardous substances, is expected to occur in small quantities and managed on-site with the proper containment and facilities, as required by the fire department and other applicable industry standards.

The Safety Element, within the City General Plan, addresses safety within the City through goals, policies, and implementation measures that seek to reduce the potential for the loss of life, injuries and property damage associated with natural and human-induced hazards.

The City has one Fire Department and one Police Department within their City boundaries. The Fire Station #88 (operated by Cal Fire) is located at 122 N. San Geronio, approximately five driving miles southeast of the project site. The California City Fire Station is staffed by three full-time fire fighters on a 24-hour basis, including a captain, engineer and fire fighter; however, the Fire Department is designed to be staffed by nine fire fighters. The fire department is equipped with one fire engine unit, , one water tender, and two full-sized fire engines. In addition to fire suppression, additional services the department provides includes Paramedic Advanced Life Support, fire prevention, public education, fire hydrant maintenance, hazardous materials response, nuisance abatement, flood response and aircraft crash and arson investigation. According to the National Fire Protection Association (NFPA), the recommended dispatch-to-arrival time is five minutes, on 90 percent of calls. The City Fire Department has mutual aid agreements with the Morongo Fire Department, the Riverside County Fire Department, and the Bureau of Land Management.

Police protection services within the City are provided by the City's Police Department, located at 125 E. Ramsey Street, approximately four miles southeast of the project site. Coroner's services are provided through the County by the Sheriff's Department and the court system and jails are operated and maintained by Riverside County.

The project site proposes improvements to 8th and Lincoln streets, accessing from 8th street and the Interstate 10 freeway, including a newly proposed curb-and-gutter, as well as paved access to the facility. Primary access intends to be located on the westerly portion of the Project site. The site plan configuration of the proposed development includes fire truck accessible drive aisles and a two-way driveway to ensure adequate emergency response access on-site. The proposed design would be subject to a standard review process by the Fire Department to ensure that the site-specific emergency access, water pressure, and other pertinent criteria are met by the project. Less than significant impacts are expected.

Toxic cleaning compounds, sanitizing agents, solvents, and potentially flammable materials

may also be involved within the proposed facilities. The use of these products would also be subject to the manufacturer's specifications, as well as local, state, and federal regulations that would help protect against accidental release, explosive reactions, injury and contamination.

The project operator would be required to provide the proper storage facilities and containers designed to protect and isolate these substances, therefore minimizing the threat to the public or the environment. Facility employees shall be trained on safety rules to prevent personal or public risk. Solid waste produced by the project will be stored in a designated staging area with enclosures and less than significant impacts are expected.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. <i>Would the project:</i>	()	()	()	(✓)
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	()	()	()	(✓)
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	()	()	()	(✓)
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	()	()	()	(✓)
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	()	()	()	(✓)
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	()	()	()	(✓)
iv. Impede or redirect flood flows?	()	()	()	(✓)
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	()	()	()	(✓)

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	()	()	()	(✓)

Impact Discussion:

a-e) **Less than significant impact.** The Project engineer of record, prepared a Hydrology Study for the property on February of 2020, which sets forth compliance with the City' grading ordinance and the County's Municipal Storm Water Permit (MS-4). The proposed project will result in temporary and permanent disturbance in an area that nearly encompasses one acre in gross area. As a precautionary measure, the developer will comply with the State's most current Construction General Permit (CGP). Compliance with the CGP involves the development and implementation of a project-specific Storm Water Pollution Prevention Plan (SWPPP) designed to reduce potential adverse impacts to surface water quality during the period of construction. The required plan will identify the locations and types of construction activities requiring Best Management Practices (BMPs) and other necessary compliance measures to prevent soil erosion and stormwater runoff pollution. The plan will also identify the limits of allowable construction-related disturbance to prevent any off-site exceedances or violations. The project will be designed with on-site stormwater detention facilities that, during the life of the project, will comply with the City's drainage requirements by preventing site discharge and transport of untreated runoff. The project will be required to comply with the most current State standards, as well as the standards outlined in the City of Banning's Urban Water Management Plan and the Water Quality Control Plan for Lahontan Region (Region 6V). Per the project-specific Final Hydrology Report (dated February 2020), current drainage requirements for this project fall under the jurisdiction of the City, which requires the entirety of the storm water from the 100-year, 3-hour storm to be detained onsite. The site plan, grading design, storm drain design, and retention facilities of the project must be factored in the project- specific WQMP development and documentation. Runoff from throughout the impervious surfaces (buildings, hardscape and pavement) of each drainage management area will be conveyed via surface and piped flows to either corresponding underground retention chambers or retention basins. Each of the retention basins and underground facilities will be sized to retain the incremental increase between the pre-development and post-development volume per City requirements. As proposed, the stormwater retention and management strategy are expected to comply with local and regional requirements for protecting surface water quality and preventing waste discharge violations. Less than significant impacts are expected. According to the City's Water Master Plan, Banning obtains its water primarily from groundwater wells and relies on imported surface water supply from the state water project only as an emergency function. Historic water levels of groundwater wells remain steady and Banning draws from an open, and adjudicated groundwater basin (with subsurface outflow). The most important storage system is the groundwater aquifer, which holds water below

ground surface and is anticipated to remain steady even in light of substantial residential development growth within the City.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
11. LAND USE AND PLANNING. <i>Would the project:</i>				
a) Physically divide an established community?	()	()	()	(✓)
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	()	()	()	(✓)

Impact Discussion:

- a-b) **No Impact.** The Project is consistent with the recent General Plan Amendment (19-2503) which was adopted in 2019 and modified the land use from General Commercial to Industrial. An accompanying zone change was also adopted concurrent with this GPA to modify the zoning classification. The Project will not divide an established community as the Project is located and surrounded by industrial and commercial development. A natural geographic division already occurs through the existence of the Interstate 10 freeway to the north. The project will not cause an impact, or conflict, with any land use policy or overlay as none exist that are germane to the proposed project.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. <i>Would the project:</i>				
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-b) **No Impact.** The Project sites are all 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. 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.

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.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. <i>Would the project result in:</i>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	()	()	()	(✓)
b) Generation of excessive ground borne vibration or ground borne noise levels?	()	()	()	(✓)
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	()	()	()	(✓)

Impact Discussion:

- a-c) **No Impact.** The Project is located within Compatibility Zone D, of the Banning Municipal Airport land use compatibility plan (CLUP). Zone D provides non-residential intensities that are limited to an average of 200 persons per acre, with a maximum of 800 person in any single acre. The Project is consistent with these provisions as a maximum of 205 personal can accommodate the buildings at any one time per the building and fire code. The Project is well outside of the noise contour levels that would pose a threat to future employees (noise in excess of 65 DbA. The Project will comply with the requirements of the CLUP.

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

Impact Discussion:

a-b) To evaluate whether the project would induce substantial unplanned population growth either directly or indirectly, an analysis of, potential opportunity sites for residential housing, gains or losses was performed that demonstrates that the project will cause an overall decrease or loss of potential opportunity sites for residential housing in the amount of 33 units. According to the California Department of Finance, Demographic Report EA-5 (2019); it is estimated that the current population in 2019 in Banning is 31,044. The report also estimates that there are 2.76 persons per household. Using this information, we can conclude that there is a potential decrease of 91 potential residents. This amount is relatively small in comparison to the projected Build-Out Population estimates of the General Plan of 80,226. This project will decrease the potential population of Banning at Build-Out to 80,135 (see the discussion and tables below).

The proposed facility consists of a 54,131 square foot (sf) industrial center. The Project is compatible with operations and uses permitted in the City's Industrial zone and general plan, subject to the approval of a Design Review application. The facility is estimated to staff approximately 205 employees with multiple shifts. The proposed Project may encourage relocation for employment. However, the number of employees is expected to come from existing and surrounding residential communities. In addition, the City of Banning recently issued 479 building permits for new single-family homes, indicating a well-established housing stock for future employees. Less than significant 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
15. PUBLIC SERVICES. <i>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:</i>				
a) Fire protection?	()	()	()	(✓)
b) Police protection?	()	()	()	(✓)
c) Schools?	()	()	()	(✓)
d) Parks?	()	()	()	(✓)
e) Other public facilities? [Roads and Infrastructure]	()	()	()	(✓)

Impact Discussion:

a-e) **No Impact.** Fire protection services are provided to the City of Banning through a contractual agreement with the Riverside County Fire Department, which in turn contracts with CalFire. The contract provides various fire related services, including emergency medical services, fire prevention, disaster preparedness, fire safety inspections, hazardous materials business plan programs and plan reviews. When an emergency call is received, the station that is physically closest to the emergency will respond, even if the emergency is located outside the station's official "jurisdiction" (GP, p. VI-35).

Per the Riverside County Fire Department, there is one fire station located in the City: Fire Station 88, located at 122 N. San Geronio. Fire Station 20, located in the City of Beaumont at 1550 E. 6th Street, also responds to fire emergencies that occur in the City. The closest fire station in the City is Fire Station 88, approximately 0.9 miles to the northeast of the Project. The Riverside County Fire Department is rated as Class 4 by the Insurance Service Office (ISO), a private company, which rates fire departments throughout the country based on a scale of 1 to 10, with Class 1 being the highest possible score. The City aims for a ratio of above 0.70 fire personnel per 1,000 residents, which would be 58 firefighters at GP buildout (GP DEIR, p. III-202).

Police protection services within City limits are provided by the Banning Police Department (GP, p. VI-32). The Banning Police Department has 35 sworn officers and maintains a ratio of 1.4 sworn officers for every 1,000 residents (GP DEIR, p. III-200). The City's police station is located at 125 East Ramsey Street, approximately 0.9 miles east of the Project site. The proposed Project has been evaluated through the City's General Plan Amendment, and contrasted with existing levels of service and will not cause a significant increase in population triggering the need for additional police services and will not impact to police facilities or maintenance of acceptable service ratios, response times, or other performance objectives, and therefore the Project has **no impact**.

Most of the City is served by the Banning Unified School District, with a small area in the western portion of the City served by the Beaumont Unified School District (GP, pp. VI-24 – VI-25). The proposed Project will not develop additional residential units or will substantially increase the number of school-age children through the recruitment of new employees as the majority of staff will be relocating from the City of Beaumont where education of school age children is already established. Thus, the Project will not cause an increase in population that would require additional school facilities, and therefore the Project has **no impact**.

Parks and recreation services within the City are provided by the City Parks and Recreation Department. The Riverside County Regional Park and Open Space District also provides recreational facilities and services at County owned parks facilities within the City (GP, p. III-83). The proposed Project will not develop additional residential units or will substantially increase the number of school-age children through the recruitment of new employees as the majority of staff will be relocating from the City of Beaumont where recreational amenities are already established. Thus, the Project will not cause an increase in population that would require additional school facilities, and therefore the Project has **no impact**.

Other public facilities in the City include one U.S. Post Office, the Banning Municipal Airport, San Geronio Memorial Hospital, and several public utility facilities operated by the City Public Works Department. The Project description has been evaluated by said entities and no impact to the level of service is found, nor the requirement to augment and/or construction or rehabilitate any existing public service facilities is derived from the project development. Therefore, the Project has **no impact**.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION. <i>Would the project:</i> 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-b) Parks and recreation services within the City are provided by the City Parks and Recreation Department. The Riverside County Regional Park and Open Space District also provides recreational facilities and services at County owned parks facilities within the City (GP, p. III-83). The proposed Project will not develop additional residential units or will substantially increase the number of school-age children through the recruitment of new employees as the majority of staff will be relocating from the City of Beaumont where recreational amenities are already established. Thus, the Project will not cause an increase in population that would require additional school facilities, and therefore the Project has **no impact**.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION. <i>Would the project:</i>				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	()	()	()	(✓)
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	()	()	()	(✓)
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	()	()	()	(✓)
d) Result in inadequate emergency access?	()	()	()	(✓)

Impact Discussion:

Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Each county in California is required to develop a Congestion Management Program (CMP) that analyzes at the links between land use, transportation and air quality. The Riverside County Transportation Commission (RCTC) is the County of Riverside's Congestion Management Agency. The RCTC prepares and periodically updates the County's CMP to meet federal Congestion Management System guidelines and state CMP legislation. The most recent CMP is included within RCTC's Long Range Transportation Plan (LRTP), which was completed in December 2019. According to Appendix A of the LRTP, in the 2011 Riverside County Congestion Management Program, Interstate 10 and Highway 243 are the only roads in proximity to the Project site listed as part of the CMP System of Highways and Roadways. These roads are not directly adjacent to the Project site. Thus, the Project will not conflict with a CMP due to the distance between the Project site and these covered roadways and the trips have been accounted for in the GP.

The GP identifies that sidewalks, bike lanes, off-street trails and golf cart routes are especially important along major roadways in the community. The City identifies bus schedules as part of their local transit network (PASS). Regional bus service is provided by the Riverside Transit Agency (RTA), which provides services to Hemet/San Jacinto (Route 31), Moreno Valley (Route 35), and Calimesa/Redlands (Route 36). The Project will not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, the Project has **no impact**.

Sources: GP; LRTP; PASS; Resolution 2017-07; RTA

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Senate Bill 743 (SB 743) was passed by the California State Legislature and signed into law by Governor Brown in 2013. SB 743 required the Office of Planning and Research and the California

Natural Resources Agency to develop alternative methods of measuring transportation impacts under the California Environmental Quality Act (CEQA). In December 2018, the California Natural Resources Agency finalized updates to the CEQA Guidelines, which included SB 743. Section 15064.3 of the 2019 State *CEQA Guidelines* provide that transportation impacts of projects are, in general, best measured by evaluating the project's vehicle miles environmental impact under CEQA. Automobile delay can, however, still be used by agencies to determine local operational impacts.

The provisions of this section are not mandatory until July 1, 2020; however, local agencies may choose to opt in before that date. At the time of preparation of this report, the City has not updated their procedures to analyze VMT; thus, this Project is not currently subject to section 15064.3 of the 2019 CEQA Guidelines. The Project has **no impact**.

Sources: SB 743

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

LSA prepared a Traffic Impact Analysis (TIA), dated August 2019, for the proposed Project. Within the City of Banning, all major roadways are classified based on the General Plan Street System provided in the Circulation Element of the City General Plan, adopted January 2006. Following is a brief description of major roadways within the TIA study area:

- **8th Street:** Based on the City's General Plan, 8th Street is classified as a major highway south of Ramsey Street. Within the study area, 8th Street is currently an undivided, two-lane road. There are sidewalks along both sides of 8th Street within the study area. State Route 243 (SR-243) also runs concurrently on 8th Street between the I-10 westbound ramps and Lincoln Street, with its northern terminus ending at the I-10 westbound ramps. Based on the City's General Plan, 8th Street is proposed to be widened to a 100 or 110 foot major or arterial highway with 4 lanes with left turn pockets between Ramsey Street and Lincoln Street under build-out conditions. The City's public transit (Pass Transit) Route 6 and Route 5/6 combo runs along 8th Street within the study area.
- **Lincoln Street:** Based on the City's General Plan, Lincoln Street is classified as a major highway throughout Banning. Within the study area, Lincoln Street is currently an undivided, two-lane road. There are no sidewalks along either side of Lincoln Street within the study area. SR-243 also runs concurrently on Lincoln Street between 8th Street and San Gorgonio Avenue. Based on the City's General plan, Lincoln Street is proposed to be widened to a 100 or 110 foot major or arterial highway with 4 lanes with left turn pockets under build-out conditions.

The trip generation for the proposed project of 54,131 sf industrial buildings was developed using rates from the ITE *Trip Generation Manual* (10th Edition) for Land Use 110 – "Light Industrial." The resulting trips were converted to trucks and passenger vehicles based on the vehicle mix from the City of Fontana's *Truck Trip Generation Study*, dated August 2003. As such, 21.4% of the peak hour project traffic will be trucks. The peak hour truck mix was considered as 49.4% 4-axle, 17.9% 3-axle and 32.7% 2-axle trucks. The mix of daily traffic will be 78.6% cars, 9.5% 4-axle, 3.9% 3-axle and 8.0% 2-axle trucks. All truck trips were converted to PCEs using a 1.5 PCE factor for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4- and more axle trucks.

The proposed project is estimated to generate 338 daily total PCE trips, with 49 PCE trips occurring during the a.m. peak hour and 44 PCE trips occurring during the p.m. peak hour.

Since the project site includes an existing recycling center, traffic counts were conducted at Project Driveway 2. The traffic counts show nominal trips coming in and out from the existing use during a.m. and p.m. peak hours. Therefore, no trip credits were applied from the existing use to present a more conservative analysis.

At intersections where the level of service is forecast to be unsatisfactory or where the project would have a significant impact, the City requires that improvements be identified to improve the intersection LOS to D or better. Since all study intersections are located on Caltrans facilities, recommended mitigations should improve the intersection delay to 30 seconds (if unsignalized) or 45 seconds (if signalized) or better. Following are the recommended improvements under each analysis scenario:

8.1.1 Existing Plus Project Conditions:

- **8th Street/I-10 Westbound Ramps:** Install a traffic signal. Add a northbound left-turn lane with protected left-turn phasing. It should be noted that the project has a direct, significant impact at this intersection. The project is fully responsible for the recommended improvements under existing plus project conditions. Since the recommended mitigations are part of the future roadway improvements covered by the City's *Traffic Fee Component of the Development Impact Fee (DIF) Program*, the project would be partially reimbursed for the improvements.
- **8th Street/I-10 Eastbound Ramps:** Install a traffic signal. Add a southbound left-turn lane with protected left-turn phasing. The traffic signal with protected phasing improvement is not covered under the City's DIF program. Since the project has a cumulative impact at this intersection, the project will be required to pay its fair share for implementation of the proposed improvement. Addition of the southbound left-turn lane is covered through the City's DIF program and the project would contribute its assessed fee to the fee program.

8.1.2 Project Completion (2021) Plus Project Conditions:

- **8th Street/I-10 Westbound Ramps:** Install a traffic signal. Add a northbound left-turn lane with protected left-turn phasing. It should be noted that the project has a direct, significant impact at this intersection. The recommended mitigations for project completion plus project conditions are the same as the recommended mitigations for existing plus project conditions. The project is fully responsible for the recommended improvements under existing plus project conditions. Since the recommended mitigations are part of the future roadway improvements covered by the City's DIF program, the project would be partially reimbursed for the improvements.
- **8th Street/I-10 Eastbound Ramps:** Install a traffic signal. Add a southbound left-turn lane with protected left-turn phasing. The traffic signal improvement is not covered under the City's DIF program. Since the project has a cumulative impact at this intersection, the project will be required to pay its fair share for implementation of the proposed improvement. Addition of the southbound left-turn lane with protected phasing is covered through the City's DIF program and the project would contribute its assessed fee to the fee program.

Therefore, a Less than significant impact will occur.
Source: Project Description; Resolution No. 2017-07

d) Result in inadequate emergency access?

It is a Major Highway in the City's GP circulation element, therefore will provide access to the land uses with the surrounding area. The Project does not include an implementing project or change to the road designation in the GP, and thus involves no construction or operation or physical impact to the Project site. As the Project has no physical impact on the Project site, it will not result in inadequate emergency access. Therefore, the Project has **no impact**.

Source: Project Description; Resolution No. 2017-07

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES. <i>Would the project:</i>					
a)	Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	()	()	(J)	()
ii)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	()	()	(J)	(J)

Impact Discussion:

- a) Assembly Bill 52 (AB 52), signed into law in 2014, amended CEQA and established new requirements for tribal notification and consultation. AB 52 applies to all projects for which a notice of preparation or notice of intent to adopt a negative declaration/mitigated negative declaration is issued after July 1, 2015. AB 52 also broadly defines a new

resource category of tribal cultural resources and established a more robust process for meaningful consultation that includes:

- prescribed notification and response timelines;
- consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and
- documentation of all consultation efforts to support CEQA findings.

AB 52 notification was initiated for this Project as required for a notice of intent to adopt a negative declaration/mitigated negative declaration.

As of the date of publishing this document, three Tribal responses have been received; one from the Morongo Band of Mission Indians; San Manuel Band of Mission Indians; and the second from Rincon Band of Luiseno Indians. The San Manuel and Rincon tribes have deferred to the Morongo Band; which has requested the following mitigation measures be applied to the Project.

MM 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. The developer shall meet and confer with the tribe on the consideration of a "Sensitivity Workshop" training on possible things that could come up in case a Native American Monitor is not on-site to monitor at certain times.

MM 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.

MM 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.

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. <i>Would the project:</i>					
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	()	()	()	(✓)
d)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	()	()	()	(✓)
c)	Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	()	()	()	(✓)
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	()	()	()	(✓)
e)	Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?	()	()	()	(✓)

Impact Discussion:

a-e) The City of Banning Public Works Department – Wastewater Division provides sanitary wastewater services to the City of Banning, including the Project site. Buildout according to the City's GP is anticipated to occur gradually over the life of the GP and it is expected that the City will be able to monitor growth trends to assure that wastewater services are adequate (GP DEIR, p. III-210). The City Public Works Department provides domestic water services to the City of Banning and unincorporated County of Riverside lands located southwesterly of the City limits. The City owns and operates wells, reservoirs, and a distribution line system to deliver domestic water within their service area. The City has water lines ranging from 2 inches to 30 inches in

diameter (GP DEIR, p. II-15). The Riverside County Flood Control and Water Conservation District (RCFC) is responsible for the management of regional drainage within and in the vicinity of the City. The City, however, remains directly responsible for the management of local drainage (GP DEIR, p. III-90). Electricity is provided to the City by the Banning Department of Public Works, which buys its electricity from Southern California Edison (SCE). SCE facilities include a substation located on east Ramsey Street, and high-voltage transmission lines, which range from 12 kilovolts (KV) to 115KV. Three of the 33KV transmission lines deliver power to areas other than the City. Another 33KV transmission line delivers power supplies to five distribution stations operated by the City. These stations distribute power via 4KV and 12KV distribution systems, which provide electricity to individual residences (GP DEIR, p. III-204). The Gas Company (formerly Southern California Gas) provides natural gas services and facilities to the City. Natural gas supplies to the City originate from Texas, transported by three major east-west trending gas lines. These high-pressure gas lines, of varying sizes, traverse through the eastern desert areas to the western end of Riverside County. In addition, there are other natural gas pipelines located in Wilson and Lincoln Streets (GP DEIR, pp. III-205 – III-206).

Telephone services are provided by Verizon, while cable is provided by Time Warner (GP DEIR, p. III-192). Verizon provides a variety of services to their customers including local and long-distance calling, internet services, wireless communication, conference services, calling cards, toll free business numbers, and voicemail. Time Warner offers a variety of services including a wide range of cable products and services, high speed internet, digital cable, movies, and High Definition TV (GP DEIR, p. III-207). The Project will not require the use or relocation of any utilities or services. The Project will not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project has **no impact**.

The City Public Works Department provides domestic water services to the City of Banning and unincorporated County of Riverside lands located southwesterly of the City limits. The City owns and operates wells, reservoirs, and a distribution line system to deliver domestic water within their service area. The City has water lines ranging from 2 inches to 30 inches in diameter (GP DEIR, p. II-15). According to the City's 2015 Urban Water Management Plan, the City will be able to meet future demands through 2035 with existing supplies, without using any of the City's 46,774 acre-feet of groundwater in reserve storage in the Beaumont Storage Unit. If the stored groundwater is used to supplement demands, the City will be able to satisfy projected demands at 220 gallons per capita per day (GPCD) without acquiring additional quantities of replenishment water for many years beyond 2040. (UWMP, p. 6-5). The proposed Project is consistent with the City's current land use and zoning designations for the site, and thus would have been accounted for in the City's UWMP. Therefore, the Project has **no impact**.

The City of Banning Public Works Department provides sanitary wastewater services to the City of Banning, including the Project site. Buildout according to the City's GP is anticipated to occur gradually over the life of the GP and it is expected that the City will be able to monitor growth trends to assure that wastewater services are adequate (GP DEIR, p. III-210). The proposed Project is consistent with the City's current land use and zoning designations for the site, and thus would have been accounted for in the City's GP. Therefore, the Project has **no impact**.

Solid waste collection and disposal services are provided by Waste Management Inland Empire and trash collected from the City is disposed at the Lamb Canyon Sanitary Landfill, El Sobrante Landfill, and the Badlands Landfill (GP DEIR, p. III-211). According to Cal Recycle databases, the Badlands Landfill will remain operational until 2022, Lamb Canyon Landfill until 2029, and El

Sobrante Landfill until 2051 (CAL-R). Additionally, proposed land uses envisioned in the City's GP are not anticipated to produce unusually high quantities of waste. However, in order to ensure the safe and cost-effective disposal of the City's solid waste, monitoring of waste management by City departments is necessary (GP DEIR, p. III-212). Therefore, the Project has **no impact**. Therefore, the Project has **no impact**.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, <i>Would the project:</i>	()	()	()	(✓)
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	()	()	()	(✓)
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	()	()	()	(✓)
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	()	()	()	(✓)
d) Expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	()	()	()	(✓)

Impact Discussion:

a-d) According to GP, the proposed Project is within an area classified as high fire threat zone, with a small portion of the right-of-way within a very high fire threat zone and is adjacent to an area of very high fire threat zone to the south within the City's sphere of influence (GP, Exhibit V-10). According to CalFire, the proposed Project borders a local responsibility area (LRA) to the north and a state responsibility area (SRA) to the south. The proposed Project involves amending the GP Circulation Element to realign Sun Lakes Boulevard within its existing right-of-way and this use is consistent with the City's existing land use designations. The Project will not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, the Project has **no impact**.

As discussed herein, the Project is near a high fire hazard severity zone (GP, Exhibit V-10). Since the Project will not exacerbate wildfire risks, the Project will not expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and **no impact** is anticipated.

As noted above, the Project is near a high fire hazard severity zone (GP Exhibit V-10). Project will not install or maintain infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. **No impact** is anticipated.

As noted above, the Project is near a high fire hazard severity zone (GP Exhibit V-10). The Project will not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. **No impact** is anticipated.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
21. 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?	()	()	(✓)	()

Impact Discussion:

As discussed throughout the Initial Study, the proposed Project area does not contain some sensitive biological resources. The presence of any previously recorded or potential cultural or historic resources were not found on the proposed Project site or within the Project vicinity. Further, the site has been previously highly disturbed, and it is highly unlikely that any cultural resources could exist. The Project will not produce any substantial or unanticipated impacts to the property or surrounding environment; including any impacts to fish or wildlife species, plant or animal communities, rare or endangered plants or animals, or important examples of major periods of California history or prehistory.

The proposed Project will not 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 an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts are **less than significant**.

As demonstrated by the analysis in this Initial Study, the proposed Project involves the construction of approximately 54,000 sf of industrial warehousing, manufacturing and office space. The proposed Project will not result in any impacts that are individually limited, but cumulatively considerable. The Project is consistent with local and regional plans, and the Project has no air quality emissions (since there is no construction or operation associated with the Project). The Project adheres to all other land use plans and policies with jurisdiction in the Project area and will not increase traffic volumes within the Project area. The Project is not considered growth-inducing as defined by State *CEQA Guidelines* Section 15126.2(d) and will not induce, either directly or indirectly, population and/or housing growth. Therefore, impacts are **less than significant**.

Effects on human beings were evaluated as part of this Initial Study and found to be less than significant or have no impact. Based on the analysis and conclusions in this Initial Study, the proposed Project will not have any physical impacts, and thus will not cause substantial adverse effects directly or indirectly to human beings. Therefore, potential direct and indirect impacts on human beings that result from the proposed Project are considered **less than significant**.

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