



4.17 TRANSPORTATION

This section provides a discussion of the existing transportation conditions in the region, in the City, and in the vicinity of the Development Project. In addition, this section addresses potential impacts to transportation facilities resulting from construction and operation of the Development Project. This section also summarizes information provided in the Sunset Crossroads Traffic Analysis prepared for the Development Project in August 2023. This report is included as **Appendix J-2** to this Environmental Impact Report (EIR). This section also incorporates data and information from the City of Banning (City) and County of Riverside (County) General Plans, a review of existing resources, technical data, and applicable laws, regulations, and guidelines.

While development of the Mt. San Jacinto College (MSJC) Site is not anticipated at this time, a programmatic discussion of potential impacts to transportation that may result from future development of that site is provided in **Chapter 5.0** of this EIR.

4.17.1 Scoping

The City received nine comment letters during the public review period of the Notice of Preparation (NOP). For copies of the comment letters, refer to **Appendix A-2** of this EIR. Three comment letters included comments related to transportation.

The comment letter from Ron Roy and Kim Floyd, dated March 1, 2021, expresses concern regarding general traffic increases and truck traffic and provides recommendations for reducing traffic impacts at the Development Site and in the region.

The comment letter from the Sierra Club, San Geronio Chapter, dated March 1, 2021, identifies best management practices (BMPs) and potential mitigation measures regarding truck traffic at the Development Site.

The comment letter from the Southern California Association of Governments (SCAG), dated March 3, 2021, discusses consistency with the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal), and recommended review of the mitigation measures included in the associated Final Program Environmental Impact Report (Final PEIR).

No comments pertaining to transportation were received during the scoping meeting that occurred on Thursday, February 18, 2021.

4.17.2 Methodology

Until July 1, 2020, roadway congestion or level of service (LOS) was used as the primary study metric for planning and environmental review of projects in California. However, Senate Bill (SB) 743 required the Governor’s Office of Planning and Research (OPR) to establish a new metric for identifying and mitigating transportation impacts pursuant to the California Environmental Quality Act (CEQA) in an effort to meet the State’s goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation. California Public Resources Code (PRC) Section 21099(b) states that, upon certification of the revised guidelines for determining transportation impacts, automobile delay, as described solely by LOS or similar measures



of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA. OPR identified vehicle miles traveled (VMT) as the required CEQA transportation metric and beginning July 1, 2020, VMT (not LOS) is the only legally acceptable threshold for transportation-related environmental impacts pursuant to CEQA. However, because LOS is still used by the City of Banning in its General Plan for local planning purposes, that information is analyzed for consistency with the City of Banning General Plan under Threshold 4.17.1. VMT is a measurement of the amount and distance that a person drives, accounting for the number of passengers within a vehicle. Many interdependent factors affect the amount and distance a person might drive. In particular, the type of built environment affects how many places a person can access within a given distance, time, and cost, using different ways of travel (e.g., private vehicle, public transit, bicycling, walking). Typically, low-density development located at great distances from other land uses and in areas with few alternatives to the private vehicle provides less access than a location with high density development, a mix of land uses, and numerous ways of travel. Therefore, low-density development typically generates more VMT per capita compared to a similarly sized development located in urban areas. In general, higher VMT areas are associated with more air pollution, including GHG emissions and energy usage, than lower VMT areas. VMT is calculated by multiplying the number of trips generated by a project by the total distance of each of those trips.

Lead agencies have the discretion to set their own thresholds of significance with the goals of the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. On September 28, 2021, the Banning City Council approved Resolution 2021-95, which adopted the City of Banning VMT Analysis Implementation Guidelines. The City of Banning VMT Guidelines establish thresholds for VMT per capita, VMT per employee, VMT per service population, or total VMT. The City's VMT Guidelines define the VMT thresholds for land development projects as 16.0 VMT per capita, 25.9 VMT per employee, and 29.4 VMT per service population. If the project VMT metric is less than the significance threshold, the project is presumed to create a less than significant impact. No further VMT analysis would then be required. If the project VMT metric is greater than the significance threshold, mitigation measures will be required.

The City's VMT Guidelines list standardized screening methods for project-level VMT analyses that can be used to identify when a proposed land use development project is anticipated to result in a less than significant impact, thereby eliminating the need to conduct a full VMT analysis. The City of Banning VMT screening methods as described within the City Guidelines are listed below:

- Transit Priority Area (TPA) Screening
- Map-Based Screening based on Low VMT Area
- Local-Serving Retail Screening
- Redevelopment Projects
- Local-Serving Community Projects
- Local-Serving Essential Services Projects
- Affordable Housing
- Small Project Screening

In order for a land use development project to result in a less than significant VMT impact, the project need only meet one of the above screening methods. The Traffic Analysis determined that the TPA



Screening, Map-Based Screening based on Low VMT Area, Local-Serving Retail Screening, and Small Project Screening criteria would be applicable to the Development Project; however, after evaluating whether the Development Project satisfied the criteria, it was determined the Development Project did not meet the applicable screening criteria. The screening evaluations are discussed in more detail in **Appendix J** to this EIR.

4.17.2.1 VMT Modeling

The City Guidelines identify the Riverside County Model (RIVCOM) as the appropriate tool for conducting VMT analysis for land development projects in the City of Banning. The Western Riverside Council of Governments (WRCOG) is the developer/owner of RIVCOM and in August 2021 launched the new modeling tool for use by its member agencies. At the time the project-specific analysis was prepared, the RIVCOM tool was in its 4th update (also referred to as version 3.0). This analysis has been prepared based on version 3.0 of RIVCOM, which is consistent with the version of the RIVCOM model used to develop the City's VMT impact thresholds listed by the City Guidelines.

4.17.3 Existing Environmental Setting

The information below describes the existing setting of the roadway network, bicycle and pedestrian facilities, and transit that services the City of Banning as well as the area of the Development Site. As LOS is no longer the legally acceptable threshold for transportation-related environmental impact pursuant to CEQA, the existing traffic conditions on nearby roadways and intersections and future traffic conditions with the Development Project and without are discussed in the Sunset Crossroads Traffic Analysis prepared for the Development Project in August 2023 (**Appendix J-2**).

4.17.3.1 Existing Transportation and Circulation System

Roadway Network. The Development Site is currently located in both the City of Banning (Northern Portion of the Development Site) and in unincorporated Riverside County (Southern Portion of the Development Site). Though no portion of the Development Site is within the City of Beaumont limits, Beaumont is in close proximity to the Development Site, and roads in its jurisdiction are also considered in the existing setting as the Development Project is anticipated to contribute 50 or more peak hour trips on Beaumont's roads. The City of Banning identifies the following types of roads within its jurisdiction:

- **Urban Arterials** are six-lane divided roadways (typically divided by a raised median or painted two-way turn-lane) with a 134-foot right-of-way and a 110-foot curb-to-curb measurement. These roadways serve both regional through-traffic and inter-city traffic and typically direct traffic onto and off of the freeways. The following study area roadways within the City of Banning are classified as an Urban Arterial: Highland Springs Avenue, south of Wilson Street.
- **Major Roadways** are four-lane divided roadways that may provide on-street parking. These roadways typically have a 100-foot right-of-way and a 76-foot curb-to-curb measurement. These roadways direct traffic through major development areas and serve to move large volumes of inter-city traffic. The following study area roadways within the City of Banning are classified as a Major Roadway: Wilson Street; Ramsey Street; Sunset Avenue, north of Lincoln Street; Lincoln Street; and Sun Lakes Boulevard.



- **Secondary Streets** are four-lane roadways and may include a painted median. These roadways typically have an 88-foot right-of-way and a 64-foot curb-to-curb measurement and typically direct traffic through major development areas and have lesser capacity than Major Roadways. The following Secondary Streets are within the study area of the Development Project: Highland Home Road, north of Sun Lakes Boulevard; Sunset Avenue, south of Lincoln Street; and Bobcat Road, west of Sunset Avenue to the western Development Site proposed boundary.
- **Collector Streets** are two-lane roadways that provide on-street parking on both sides. These roads typically have a 66-foot right-of-way and a 44-foot curb-to-curb measurement and provide connections to secondary streets, arterials, and freeways, with most traffic being through-traffic or intra-city traffic. The following Collector Streets are within the study area of the Development Project: Highland Home Road, south of Sun Lakes Boulevard; Westward Avenue; 22nd Street; and Lincoln Street, west of Sunset Avenue to the western Development Site proposed boundary.

Pedestrian Facilities. Pedestrian facilities are comprised of sidewalks, off-street pathways, marked and enhanced crosswalks (mid-block and at intersections), curb ramps, median refuges, and pedestrian scale lighting. Sunset Avenue from the railroad overcrossing to Lincoln Street provides a sidewalk on its western side. A sidewalk is also located on the east side of Sunset Avenue, from the railroad overcrossing to the driveway of Mt. San Jacinto College San Geronio Pass Campus. On the west side of the Development Site, there are no sidewalks on either side of Highland Home Road, from Sun Lakes Boulevard to the southwestern boundary of the Development Site. There are no existing pedestrian facilities located on the Development Site.

Bicycle Facilities. Bikeway planning and design in California typically relies on guidelines and design standards established by the California Department of Transportation (Caltrans) in the Highway Design Manual (Chapter 1000: Bikeway Planning and Design). The Caltrans guidelines cover four primary types of bikeway facilities: Class I, Class II, Class III, and Class IV. These facility types are discussed below:

- **Class I Bikeways** (Bike Paths) provide a completely separate right-of-way, are designated for the exclusive use of bicycles and pedestrians and minimize vehicle and pedestrian cross-flow. In general, bike paths serve corridors that are not served by existing streets and highways, or where sufficient right-of-way exists for such facilities to be constructed.
- **Class II Bikeways** (Bike Lanes) are lanes for bicyclists generally adjacent to the outer vehicle travel lanes. These lanes have special lane markings, pavement legends, and signage. Bicycle lanes are generally 5 feet wide. Adjacent vehicle parking and vehicle/pedestrian cross-flow are permitted. Note that when grade separation or buffers are constructed between the bicycle and vehicle lanes, these facilities are classified as Class IV Separate Bikeways.
- **Class III Bikeways** (Bicycle Routes/Bicycle Boulevards) are designated by signs or pavement markings for shared use with pedestrians or motor vehicles but have no separated bicycle right-of-way or lane striping. Bicycle routes serve either to (a) provide continuity to other bicycle facilities or (b) designate preferred routes through high-demand corridors. Bicycle routes are



implemented on low-speed (less than 25 miles per hour) and low-volume (fewer than 3,000 vehicles/day) streets.

- **Class IV Bikeways**, also known as “cycle tracks” or “protected bike lanes,” provide a right-of-way designated exclusively for bicycle travel within a roadway and which are protected from other vehicle traffic with devices, including, but not limited to, grade separation, flexible posts, inflexible physical barriers, or parked cars.

The City of Banning General Plan indicates that there are currently no bikeways within the City. Several Class II and III bikeways have been proposed along City streets; however, development of a network of bikeways is constrained by the existing condition of street right-of-way within the City. The City General Plan requires that any future bike routes be planned to provide safe routes for intra-city bicycle traffic and should be clearly marked and striped. Any new bike routes developed in the City should be designed as one-way bike routes, which would flow in the same direction as adjacent vehicle travel lanes. There are currently no bicycle facilities on or adjacent to the Development Site.

Transit. Transit service in the City of Banning is provided by Banning Connect, a bus service with routes along Highland Springs Avenue, Wilson Street, Ramsey Street, 2nd Street, 1st Street, Sunset Avenue, Lincoln Street, and Westward Avenue via Routes 1, 5, and 6. The nearest bus stop to the Development Site is located on Wilson Street, west of Sunset Avenue. Transit service is reviewed and updated by Banning Connect periodically to address ridership, budget, and community demand needs/changes. Changes in land use (i.e., occurring as part of the Development Project) can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate.

4.17.4 Regulatory Setting

The following State and local transportation plans, policies, and regulations guide transportation planning in the City of Banning.

4.17.4.1 State Regulations

This section summarizes State transportation regulations that would be applicable to the Development Project.

California Department of Transportation. Caltrans is responsible for the maintenance and operation of State routes and highways. In the City of Banning, Caltrans facilities include Interstate 10 (I-10), State Route 243 (SR 243), and SR 79. Caltrans maintains a volume monitoring program and reviews local agency planning documents (such as this EIR) to assist in its forecasting of future volumes and congestion points. The Guide for the Preparation of Traffic Impacts Studies published by Caltrans is intended to provide a consistent basis for evaluating traffic impacts to State facilities. The City recognizes that “Caltrans endeavors to maintain a target level of service at the transition between LOS C and LOS D on State highway facilities”; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target level of service. Caltrans states that, for existing State highway facilities operating at less than the target LOS, the existing LOS should be maintained.



Caltrans released a VMT-Focused Transportation Impact Study Guide (May 20, 2020) that recommends use of the OPR recommendations for land use projects and plans. For transportation projects, Caltrans has suggested that any increase in VMT would constitute a significant impact for transportation projects. This has been referred to as the “Net Zero VMT threshold.”

Senate Bill 375. As a means to achieve the Statewide emission reduction goals set by Assembly Bill 32 (“The California Global Warming Solutions Act of 2006”), SB 375 (“The Sustainable Communities and Climate Protection Act of 2008”) directs the California Air Resources Board (CARB) to set regional targets for reducing GHG emissions from cars and light trucks. Using the template provided by the State’s Regional Blueprint program to accomplish this goal, SB 375 seeks to align transportation and land use planning to reduce VMT through modified land use patterns. There are five basic directives of the bill: (1) creation of regional targets for GHG emissions reduction tied to land use, (2) a requirement that regional planning agencies create a sustainable communities strategy (SCS) to meet those targets (or an Alternative Planning Strategy if the strategies in the SCS would not reach the target set by CARB), (3) a requirement that regional transportation funding decisions be consistent with the SCS, (4) a requirement that the Regional Housing Needs Allocation numbers for municipal general plan housing element updates must conform to the SCS, and (5) CEQA exemptions and streamlining for projects that conform to the SCS.

Senate Bill 743. SB 743 was signed into law in 2013 and fundamentally changed the way transportation impacts under CEQA are analyzed. It required the OPR to “prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the [CEQA] guidelines ...establishing criteria for determining the significance of transportation impacts of projects” to “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.”

On December 28, 2018, the Natural Resources Agency adopted *CEQA Guidelines* Section 15064.3, which establishes specific criteria for evaluating a project’s transportation impacts and states that “vehicle miles traveled is the most appropriate measure of transportation impacts.” It gives agencies the “discretion to choose the most appropriate methodology to evaluate a project’s vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure” provided that “[a]ny assumptions used to estimate vehicle miles traveled... should be documented and explained in the environmental document prepared for the project.” Section 15064.3 further states that except for certain transportation projects, “a project’s effect on automobile delay shall not constitute a significant environmental impact.” See *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 43 Cal. App. 5th 609, 626 (holding that a general plan’s impact on LOS, which effectively measures automobile delay, can no longer constitute a significant environmental impact).

Additionally, OPR issued a technical advisory memorandum in December 2018 that includes general guidance and information for lead agencies to use in implementing SB 743, including choosing VMT methodology and establishing VMT thresholds. On September 28, 2021, the Banning City Council approved Resolution 2021-95, which adopted the City of Banning VMT Analysis Implementation Guidelines. The City of Banning VMT Guidelines establish thresholds for VMT per capita, VMT per employee, VMT per service population, or total VMT. The City’s VMT Guidelines define the VMT thresholds for land development projects as 16.0 VMT per capita, 25.9 VMT per employee, and 29.4



VMT per service population. If the project VMT metric is less than the significance threshold, the project is presumed to create a less than significant impact.

4.17.4.2 Local Regulations

This section summarizes local transportation regulations that would be applicable to the Development Project.

Riverside County Transportation Uniform Mitigation Fee (TUMF). The TUMF program is administered by the WRCOG based upon a regional Nexus Study that was most recently updated in 2016 to address major changes in right-of-way acquisition and improvement cost factors. The regional TUMF program was put into place to ensure that development pays its fair share, and that funding is in place for construction of Riverside County transportation facilities needed to maintain the requisite level of service and critical to mobility in the region. TUMF, as it is a regional mitigation fee program, is imposed and implemented in every jurisdiction (i.e., City of Banning) in Western Riverside County.

Riverside County Measure A. Riverside County's Measure A was adopted by voters in 1988 and extended in 2002 to fund Riverside County transportation improvements through 2039. The half-cent sales tax for transportation associated with Measure A funds a wide variety of Riverside County transportation projects and services throughout the County. The Riverside County Transportation Commission (RCTC) is responsible for administering the program, and Measure A funds are spent in accordance with a voter-approved expenditure plan that was adopted as part of the 1988 election.

City of Banning Development Impact Fee (DIF) Program. The DIF Program created and imposed by the City of Banning collects fees from new residential, commercial, and industrial development for the purpose of funding roadways and intersections necessary to accommodate City growth as identified in the City's General Plan Circulation Element. Under the City's DIF program, the City may grant to developers a credit against specific components of fees when those developers construct certain facilities and landscaped medians identified in the list of improvements funded by the DIF Program. The Development Project Applicant would be subject to the City's DIF program and would pay the requisite City DIFs at the rates in effect. The Development Project Applicant's payments of the requisite DIFs at the rates then in effect pursuant to the DIF program would mitigate its impacts to DIF-funded facilities.

City of Banning General Plan. The City of Banning General Plan Circulation Element provides the following policies pertaining to transportation that would be applicable to the Development Project:

Policy 1: The City's Recommended General Plan Street System shall be strictly implemented.

Policy 2: Local streets shall be scaled to encourage neighborhood interaction, pedestrian safety and reduced speeds.

Policy 7: New development proposals shall pay their fair share for the improvement of street within and surrounding their projects on which they have an impact, including roadways, bridges, grade separations and traffic signals.



Policy 8: Traffic calming devices shall be integrated into all City streets to the greatest extent possible and all new streets shall be designed to achieve desired speeds.

Policy 9: Street trees within the City right of way shall be preserved, unless a danger to the public health and safety or if the tree is diseased.

Policy 10: Sidewalks shall be provided on all roadways 66 feet wide or wider. In Rural Residential land use designation pathways shall be provided.

Policy 11: Sidewalks or other pedestrian walkways shall be required on all streets within all new subdivisions.

Policy 19: Bus pullouts shall be designed into all new projects on arterial roadways, to allow buses to leave the flow of traffic and reduce congestion.

Policy 24: Public alleys throughout the City shall be maintained to be useful and safe at all times.

The City of Banning General Plan Parks and Recreation Element provides the following policies pertaining to transportation that would be applicable to the Development Project.

Policy 6: The City shall develop and implement plans for a coordinated and connected bicycle lane network in the community that allows for safe use of bicycles on City streets.

Riverside County General Plan Circulation Element. The Circulation Element of the Riverside County General Plan was approved on July 7, 2020 and is intended to guide transportation and circulation decisions as the County builds-out. The intent of the Circulation Element is to:

- Identify the transportation needs and issues within the County, as well as regional relationships that affect the County's transportation system;
- Describe the proposed circulation system in terms of design elements, operating characteristics, and limits of operation, including current standards, guidelines, and accepted criteria for the location, design, and operation of the transportation system;
- Consider alternatives other than the single-occupant vehicle as essential in providing services and access to facilities;
- Establish policies that coordinate the circulation system with General Plan and area plan land use maps and provide direction for future decision-making in the realization of the Circulation Element goals;
- Develop implementation strategies and identify funding sources to provide for the timely application of the Circulation Element goals and policies; and
- Provide a plan to achieve a balanced, multimodal transportation network that meets the needs of all users of the streets, roads, and highways for safe and convenient travel in a manner that is suitable to the rural, suburban, or urban context of the General Plan.



The following Riverside County General Plan Circulation Element policies are applicable to the portion of the Development Project located within the County and the City's Sphere of Influence:

- Policy C 1.2** Support development of a variety of transportation options for major employment and activity centers including direct access to transit routes, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.
- Policy C 1.4** Utilize existing infrastructure and utilities to the maximum extent practicable and provide for the logical, timely, and economically efficient extension of infrastructure and services.
- Policy C 1.5** Evaluate the planned circulation system as needed to enhance the arterial highway network to respond to anticipated growth and mobility needs.
- Policy C 1.6** Cooperate with and where appropriate lead local, regional, state, and federal agencies to establish an efficient circulation system.
- Policy C 1.7** Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation, including pedestrian-oriented retail and activity centers, dedicated bicycle lanes and paths, and mixed-use community centers.
- Policy C 2.3** Traffic studies prepared for development entitlements (tracts, public use permits, conditional use permits, etc.) shall identify project related traffic impacts and determine the significance of such impacts in compliance with CEQA and the Riverside County Congestion Management Program Requirements.
- Policy C 2.5** The cumulative and indirect traffic impacts of development may be mitigated through the payment of various impact mitigation fees such as County of Riverside Development Impact Fees, Road and Bridge Benefit District Fees, and Transportation Uniform Mitigation Fees to the extent that these programs provide funding for the improvement of facilities impacted by development.
- Policy C 3.2** Maintain the existing transportation network, while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.
- Policy C 3.4** Allow roundabouts or other innovative design solutions such as triple left turn lanes, continuous flow intersections, or other capacity improvements, when a thorough traffic impact assessment has been conducted demonstrating that such an intersection design alternative would manage traffic flow, and improve safety, if it is physically and economically feasible.
- Policy C 3.6** Require private developers to be primarily responsible for the improvement of streets and highways that serve as access to developing commercial, industrial, and residential areas. These may include road construction or widening, installation of turning lanes and traffic signals, and the



improvement of any drainage facility or other auxiliary facility necessary for the safe and efficient movement of traffic or the protection of road facilities.

Policy C 3.8 Restrict heavy duty truck through-traffic in residential and community center areas and plan land uses so that trucks do not need to traverse these areas.

Because the Development Project would be annexed into the City once it is approved, the County policies listed above would not apply and are not further analyzed in this chapter.

4.17.5 Thresholds of Significance

The significance criteria for transportation impacts used in this analysis are based on Appendix G of the *CEQA Guidelines* and the City's *VMT Analysis Implementation Guidelines*. The Development Project may be deemed to have a significant impact with respect to transportation if it would:

Threshold 4.17.1: Conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities.

Threshold 4.17.2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Threshold 4.17.3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Threshold 4.17.4: Result in inadequate emergency access.

4.17.6 Development Project Impacts

Chapter 3.0 of this EIR provides a description of the development that is proposed to occur with implementation of the Development Project. The Development Project would be entitled by the City of Banning pursuant to a General Plan Amendment and a Specific Plan (Sunset Crossing Specific Plan) that proposes development of 268,400 square feet of commercial uses and a hotel with 125 rooms and comprised of approximately 90,000 square feet within a 47.9-acre portion of the Development Site designated for freeway-oriented General Commercial land uses, 5,545,000 square feet of industrial land uses within a 392.0-acre portion of the Development Site, with the remaining 93.9 acres designated as Open Space-Resources (53.0 acres), Open Space-Parks (12.6 acres), or assigned for circulation features (28.3 acres).

4.17.6.1 Trip Generation

Based on the Development Project land uses, employment numbers were generated using socio-economic data (SED) (population, households, employment, etc.) for the purposes of vehicle trip estimation. **Table 4.17.A: Employment Estimates** presents the estimated number of Development Project employees by land use type.



Table 4.17.A: Employment Estimates

Land Use Type	Building Area	Conversion Factor	Estimated Employees
Industrial	5,545,000 SF	1,030 SF per employee	5,383 Industrial Employees
Retail	268,400 SF	500 SF per employee	537 Retail Employees
Hotel	125 Rooms	14.34 trips per employee ¹	73 Service Employees
TOTAL			5,993 Employees

Source: Sunset Crossroads Vehicle Miles Traveled Analysis (Urban Crossroads 2023).

¹ ITE *Trip Generation Manual* (10th Edition). 1,046 hotel daily trips/14.34 trips per employee = 73 hotel employees.

SF = square feet

Trip generation was generated for the Development Project using the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition, 2017) and the TUMF High-Cube Warehouse Trip Generation Study (WSP, January 29, 2019). The Development Project, based on its mix of potential uses, is estimated to generate a total of 20,496 trip-ends per day on a typical weekday with 1,258 trips during the weekday AM peak hour and 1,792 trips during the weekday PM peak hour.

4.17.6.2 Conflict with Transportation Programs, Plans, Ordinances, or Policies

Threshold 4.17.1: Would the Development Project conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities?

Development Project Analysis. This section discusses the Development Project’s impacts related to conflicts with applicable plans, ordinances, and policies related to transportation. As discussed in more detail below, for CEQA purposes, the Development Project would be consistent with applicable plans, ordinances, and policies that address the circulation system.

Roadway Facilities. Within the Development Site, approximately 28.3 acres are identified for installation of internal roadways and improvement to circulation features in the existing surrounding roadways. The Specific Plan Development Standards and Design Guidelines identify road design standards by which the Development Project roadway network would be developed. While the Southern Portion of the Development Site is currently within unincorporated Riverside County and would fall within the County’s General Plan jurisdiction, the parcels that make up the Southern Portion of the Development Site would be annexed by the City of Banning prior to construction. This action would bring the entirety of the Development Site within the City of Banning’s jurisdiction and would ensure consistency with the City of Banning’s General Plan Circulation Element policies, as discussed above. This impact would be **less than significant**, and no mitigation measures are required.

Pedestrian Facilities. Policy 10 of the City’s General Plan Circulation Element states “Sidewalks shall be provided on all roadways 66 feet wide or wider.” Additionally, Policy 11 of the City’s General Plan Circulation Element states “Sidewalks or other pedestrian walkways shall be required on all streets within all new subdivisions.” The Development Project would add sidewalks along Lincoln Street, Sunset Avenue between I-10 and the Sun Lakes Boulevard Extension, Sunset Avenue between Sun Lakes Boulevard and Bobcat Road, Bobcat Road, and Highland Home Road in the Development Site. The Development Project would be consistent with the applicable General Plan policies related to



pedestrian facilities. This impact would be *less than significant*, and no mitigation measures are required.

Bicycle Facilities. Policy 6 of the City’s General Plan Parks and Recreation Element states “The City shall develop and implement plans for a coordinated and connected bicycle lane network in the community that allows for safe use of bicycles on City streets.” While the Development Project would not include internal bike paths, it would not preclude future development of bike facilities along the future Sun Lakes Boulevard Extension (to be constructed by the City and third parties) or on the roadway network that borders the Development Site (Highland Home Road, Bobcat Road, and South Sunset Avenue). The Development Project would be consistent with Policy 6 of the City’s General Plan Parks and Recreation Element. This impact would be *less than significant*, and no mitigation measures are required.

Transit Facilities. The Development Project, once the Specific Plan is built out, would generate vehicle trips in the vicinity of existing transit services and facilities and would generate the need to add new transit trips on existing routes. The City of Banning provides transit service through Banning Connect, which is a bus service with routes along Highland Springs Avenue, Wilson Street, Ramsey Street, 2nd Street, 1st Street, Sunset Avenue, Lincoln Street, and Westward Avenue. Wilson Street, west of Sunset Avenue, is the nearest bus stop serving the Development Site. The Development Project is anticipated to generate 5,993 employees that would work on the Development Site on an annual basis. The majority of these employees and patrons are expected to access uses on the Development Site via their own personal vehicles; however, with such an increase in population working on and visiting the Development Site, it could be reasonably assumed that a certain percentage of people would access the uses on the Development Site via the transit system. The Development Project would include an internal circulation system, as shown on **Figure 3-9 in Chapter 3.0** of this EIR, presenting an opportunity for new bus stops to be added to the Banning Connect transit system. As part of its annual review, Banning Connect would review transit service and bus stop locations in the area of the Development Site as uses are constructed and occupied on the Development Site. Banning Connect would consistently evaluate if Route 5/6 and Route 6 and the bus stop located at the Westward Avenue/Sunset Avenue (MSJC Campus Parking Lot) area is adequate to provide transit services as buildout of the Development Project occurs. It is expected that transit service would be provided as needed and determined by Banning Connect once the Development Project reaches a transit-supportable level of operations or surpasses the existing transit facilities to the east of the Development Site. For these reasons, implementation of the Development Project would not be inconsistent with a program, plan, ordinance, or policy addressing the existing transit system. This impact would be *less than significant*, and no mitigation measures are required.

Level of Significance Prior to Mitigation: Less Than Significant Impact.

Regulatory Compliance Measures and Mitigation Measures: No Regulatory Compliance or Mitigation Measures are required.

Level of Significance After Mitigation: Less Than Significant Impact.



4.17.6.3 VMT Impacts

Threshold 4.17.2: Would the Development Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Development Project Analysis. Section 4.2.3 of the City VMT Guidelines states that “for mixed-use projects (i.e., projects containing more than one land use type), the VMT analysis should be performed separately for each component of the project using the most appropriate VMT metric.” The City has adopted the VMT metric for retail projects greater than 50,000 square feet of gross leasable area to utilize the metric of net change in total VMT. Therefore, for purposes of this analysis with respect to the Development Project’s retail uses a significant impact to VMT would occur if the addition of the Development Project’s retail component would result in a net increase in total VMT for the region. The City Guidelines define the region as the WRCOG region for VMT analysis.

SB 743 and the resulting *CEQA Guidelines* Section 15064.3 requires CEQA analysis of vehicle miles traveled for light duty trucks and passenger vehicles with the goal of lessening miles traveled, encouraging infill development and diversity of land uses instead of sprawl, and promoting multimodal transportation (transit) networks. The OPR Technical Advisory was prepared to assist lead agencies in compliance with SB 743’s framework. As an initial point, *CEQA Guidelines* Section 15064.3(a) defines VMT as “the amount and distance of automobile travel attributable to a project.” *CEQA Guidelines* Section 15064.3(a) focuses on “automobile travel.” The OPR Technical Advisory states that “automobile” refers to on-road passenger vehicles, specifically cars and light trucks. It does not include heavy duty trucks, semi-trailers, construction equipment, or other commercial-type vehicles. While the Project Heavy Truck VMT is included in **Table 1** of the Supplemental VMT analysis (**Appendix J-4** of the Draft EIR) to identify and disclose any heavy truck activity related Development Project VMT, this was prepared for information purposes, is not required under *CEQA Guidelines* Section 15064.3(a), and cannot be used in determining the significance of traffic impacts in CEQA.

For projects that are not residential, office, or retail land use types, the City Guidelines identify VMT per employee as the appropriate VMT metric for analysis. Therefore, the Development Project’s industrial warehouse and hotel land uses have been evaluated based on the metric VMT per employee. A significant impact to VMT would occur if the addition of the Development Project’s industrial or hotel component would result in Development Project-generated VMT per employee to exceed the City’s significance threshold of 25.9.

Consistent with the City’s VMT Guidelines, retail land uses were evaluated using the VMT metric of total VMT. Using RIVCOM to calculate total link-level VMT for the WRCOG region for both “No Project” and “with Project” model runs, and as shown in **Table 4.17.B: Net Change in Total VMT for the Region**, the addition of the Development Project results in a small net decrease to total VMT, which does not exceed the City’s significance threshold.



Table 4.17.B: Net Change in Total VMT for the Region

	WRCOG Region
Total VMT for No Project	46,664,450
Total VMT for With Project	46,241,002
+/- to VMT	-423,448
Percent Change	-0.9%

Source: Sunset Crossroads Vehicle Miles Traveled Analysis (Urban Crossroads 2023).

VMT = vehicle miles traveled

WRCOG = Western Riverside Council of Governments

Consistent with the City’s VMT Guidelines, RIVCOM was used to calculate the Development Project-generated VMT for the non-retail land uses and that value was then divided by the Development Project’s employment estimate to derive project-generated VMT per employee. **Table 4.17.C: Non-Retail VMT per Employee** presents home-based work (HBW) VMT as calculated from RIVCOM for the Development Project’s non-retail land uses, the number of Development Project non-retail employees, and Development Project non-retail VMT per employee. The Development Project’s non-retail VMT per employee would exceed the City’s significance threshold of 25.9 by 4.9, an increase in per employee VMT of 18.9 percent.

Table 4.17.C: Non-Retail VMT per Employee

	Project Non-Retail
VMT	165,615
Employment	5,383
VMT per Employee ¹	30.8
City Threshold	25.9
Difference	+4.9
Percent Change	+18.9%

Source: Sunset Crossroads Vehicle Miles Traveled Analysis (Urban Crossroads 2023).

¹ HBW VMT per Employee is a measure of all auto trips between home and work and does not include heavy duty truck trips or freight, which is consistent with OPR direction and City Guidelines.

HBW = home-based work

OPR = Office of Planning and Research

VMT = vehicle miles traveled

The Development Project would exceed the City’s adopted thresholds of 25.9 VMT per employee for the industrial and hotel uses. This would result in a potentially significant impact. With implementation of the measures identified in **MM TRA-1**, a project can realize a maximum reduction of 45 percent in commute VMT. The Development Project would require a minimum reduction of 18.9 percent to achieve a less than significant impact.

Level of Significance Prior to Mitigation: Potentially Significant Impact.

Regulatory Compliance Measures and Mitigation Measures: The following mitigation measure would require the preparation of a Transportation Demand Management (TDM) strategy report to reduce employee VMT. The TDM measures included in **MM TRA-1** below were derived from



the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality.¹ Since future tenants on the Development Site are unknown at this time, implementation of the feasible TDM measures identified in **MM TRA-1** cannot be guaranteed to reduce the industrial and service component's VMT per employee to a level of less than significant. With the implementation of **MM TRA-1**, Impact 4.17.2 would remain **significant and unavoidable**.

MM TRA-1: Prior to issuance of occupancy permits, the project applicant shall prepare a Transportation Demand Management (TDM) strategy report (as discussed in the *Sunset Crossroads Vehicle Miles Traveled (VMT) Analysis*) for review and approval by the City Traffic/Transportation Manager. Transportation Demand Management (TDM) strategies have been incorporated into the project design including commute trip reduction marketing, rideshare program, and end-of-trip bicycle facilities.

Level of Significance After Mitigation: Significant and Unavoidable Impact.

4.17.6.4 Transportation Hazards

Threshold 4.17.3: Would the Development Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Development Project Analysis. The Development Project is located adjacent to Highland Home Road, Bobcat Road, and South Sunset Avenue, which are fully improved roadways that meet City standards. Highland Home Road, Bobcat Road, and Sunset Avenue are classified as Secondary Streets in the General Plan Circulation Element. A Secondary Street is a four-lane roadway and may include a painted median. Access to the Development Site would be from Lincoln Street and other internal roadways, the Sun Lakes Boulevard Extension, and Bobcat Road. Improvements to the existing roadway network and new internal roadways would be constructed to meet City standards. The proposed driveways and intersections would be designed so as to not introduce hazards due to geometric design feature (e.g., sharp curves or dangerous intersections). This impact would be less than significant. Additionally, the Development Site occurs in an area surrounded by residential uses to the west, Union Pacific Railroad and I-10 to the north, and business park, light industrial, and residential uses to the east. While large-lot residential uses and agricultural operations (ranching/grazing) are located south of Bobcat Road, the Development Project would be separated from such uses by the existing roadway (Bobcat Road). Therefore, the Development Project would not introduce safety hazards due to incompatible uses. This impact would be **less than significant**, and no mitigation measures are required.

¹ California Air Pollution Control Officers Association (CAPCOA). 2021. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality. Website: <https://www.caleemod.com/handbook/index.html> (accessed June 7, 2022).



Level of Significance Prior to Mitigation: Less Than Significant Impact.

Regulatory Compliance Measures and Mitigation Measures: No Regulatory Compliance or Mitigation Measures are required.

Level of Significance After Mitigation: Less Than Significant Impact.

4.17.6.5 Emergency Access

Threshold 4.17.4: Would the Development Project result in inadequate emergency access?

Development Project Analysis. The Development Project is not anticipated to result in any significant emergency access impacts during construction. In the event of an accident or emergency during Development Project construction, emergency service providers would still be able to access the Development Site from Bobcat Road, Sunset Avenue, Lincoln Avenue, and Highland Home Road. Unimpeded access throughout the Development Site would be maintained by ensuring that vehicles would not be parked or placed in a manner that would impede access for emergency response vehicles. Internal access roads would be constructed throughout the Development Site for construction staff/inspectors, construction equipment and materials delivery/removal, and emergency response vehicles. The access roads would be maintained in such condition to allow for the safe passage of emergency response vehicles. As discussed in **Section 3.5.3.2** of this EIR, the Development Project would include improvements to the existing roadway network and development of an internal roadway network consistent with City design standards. Overall, the Development Project would provide adequate access and signage for patrons, workers, and emergency access personnel. This impact would be **less than significant**, and no mitigation measures are required.

Level of Significance Prior to Mitigation: Less Than Significant Impact.

Regulatory Compliance Measures and Mitigation Measures: No Regulatory Compliance or Mitigation Measures are required.

Level of Significance After Mitigation: Less Than Significant Impact.