4.20 WILDFIRE

This section provides a discussion of the existing topography and vegetative cover setting and an analysis of the Development Site's potential wildfire impacts. In addition, this section addresses potential impacts due to wildland fire impacts resulting from construction and operation of the Specific Plan uses on the Development Site. This section also summarizes information provided in the *Fire Protection Plan Sunset Crossroads County of Riverside, California* (*Fire Protection Plan*),[1] which is provided as **Appendix G-2** to this EIR. This section also incorporates data 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 related to wildfire that may result from future development of the MSJC Site is provided in **Chapter 5.0** of this EIR.

4.20.1 Scoping Process

The City received nine comment letters during the public review period of the Notice of Preparation (NOP). For copies of the NOP comment letters, refer to **Appendix A-2** of this EIR. One comment letter broadly referenced wildfire by referencing California's projected increase in wildfire risk in the next century.

The comment letter from Ron Roy and Kim Floyd, dated March 1, 2021, expresses concern regarding the increased risk of wildfire due to global warming. No public comments related to wildfire were received during the February 18, 2021 Public Scoping meeting.

4.20.2 Methodology

To assess the impacts of the Specific Plan uses at buildout with respect to wildfire, Dudek prepared a *Fire Protection Plan* for the Development Site. The *Fire Protection Plan* was prepared in accordance with applicable portions of Riverside County Fire Department (RCFD) Fire Prevention Standards, the fire authority with jurisdiction over the Development Site, the City's Fire Protection Code (BMC Chapter 8.16), Riverside County's Fire Code (Chapter 8.32 of the County's Code of Ordinances), and Ordinances No. 460 and No. 787-9. The Development Project would also be consistent with the 2019 edition of the California Building Code (CBC); 2019 edition of the California Fire Code (CFC), including applicable portions of Chapter 49 for Wildland Interface areas; and the 2018 edition of the International Fire Code (IFC) as adopted and amended by the RCFD and the City of Banning. Additionally, the RCFD references Fire Prevention Standards for informational purposes in clarifying and interpreting provisions of the CFC, National Fire Protection Association (NFPA), and California Public Resources Code (PRC). Additionally, the FPP is developed consistent with the City's Local Hazard Mitigation Plan, the City's General Plan Wildfire Hazards Element, and applicable elements of October 2022 guidance[2] from the California Attorney General.

1 Dudek. 2023. *Fire Protection Plan, Sunset Crossroads, County of Riverside, California*. November.

2 Office of the Attorney General, State of California. 2022. *Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act*. October.

A field assessment of the Development Site was conducted on August 4, 2020, to confirm/acquire Development Site information, document existing Development Site conditions, and to determine potential actions for addressing the protection of the Development Project's proposed structures and occupants. Field tasks that were completed for analytical purposes included:

- Vegetation estimates and mapping refinements;
- Fuel load analysis;
- Topographic features documentation;
- Photograph documentation;
- Confirmation/verification of hazard assumptions;
- Ingress/egress documentation; and
- Nearby fire station reconnaissance.

Field observations were utilized to augment existing Development Site data in generating the fire behavior models and formulating the recommended mitigation measures. The modeling software package *BehavePlus* was utilized to evaluate fire behavior variables and to predict flame lengths, intensities, and spread rates objectively for three different scenarios, which consider the most likely to occur and worst-case scenarios. These fire scenarios incorporated observed fuel types representing the dominant on-site and off-site vegetation on vacant land, predominantly to the south and west, in addition to slope gradients, and wind and fuel moisture values for both the 50th percentile weather (summer, on-shore winds) and the 97th percentile weather (fall, off-shore winds). Modeling scenario locations were selected to better understand different fire behavior that may be experienced on or adjacent to the Development Site.

4.20.3 Existing Environmental Setting

Fire environments are dynamic systems and include many types of environmental factors and characteristics. Fires can occur in any environment where conditions are conducive to ignition and fire movement. Areas of naturally vegetated open space typically comprise conditions that may be favorable to wildfire spread. The three major components of fire environment are topography, climate, and vegetation (fuels). The state of each of these components and their interactions with each other determines the potential characteristics and behavior of a fire at any given moment.

It is important to note that wildland fire may transition to urban fire if structures are receptive to ignition. Structure ignition depends on a variety of factors and can be prevented through a layered system of protective features including fire resistive landscapes adjacent to structure(s), application of known ignition resistive materials and methods, and suitable infrastructure for firefighting purposes. Understanding the existing wildland vegetation and urban fuel conditions on and adjacent to the Development Site is necessary to understand the potential for fire within and around the Development Site.

The Development Site is not located in an area statutorily designated as a Moderate, High, or Very High Fire Hazard Severity Zone (FHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE) or Riverside County; rather the Development Project is accurately designated as Local Responsibility Area (LRA) Non-VHFHSZ and State Responsibility Area (SRA) Non-FHSZ. The

Development Site is located within a wildland-urban interface (WUI) influence area.[3,4] Upon annexation into the City, it is possible that the Development Site could be redesignated as an LRA in a future update of CAL FIRE Hazard Severity Zone maps.[5] **Figure 4.20-1: CAL FIRE Hazard Severity Zone** shows the location of the Development Site in an Non-VHFHSZ pursuant to CAL FIRE mapping. **Figure 4.20-2: Riverside County Fire Hazard Classification Map** shows the location of the Development Site pursuant to the County of Riverside fire hazard classification map.

The following sections discuss the characteristics, local climate, and fire history within and surrounding the Development Site. The Development Site is similar concerning topography, vegetative cover, available access, and land use to adjacent undeveloped land. The following sections discuss the characteristics of the Development Site on a regional scale. The intent of evaluating conditions at this macro-scale is to provide a better understanding of the regional fire environment, which is not constrained by property boundary delineations.

4.20.3.1 Topography

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up-slope and slower fire spread down-slope in the absence of wind. Flat terrain tends to have little effect on fire spread, resulting in fires that are driven by wind.

The Development Site is on relatively flat undeveloped parcels with several seasonal stream channels that drain to Smith Creek. Smith Creek traverses the western portion of the Development Site, and eventually flows to the San Gorgonio and Whitewater Rivers to the southeast.

4.20.3.2 Climate

Throughout southern California, and specifically at the Development Site, climate has a large influence on fire risk. The climate of Riverside County is typical of a Mediterranean area, with warm, dry summers and cold, wet winters. Annual temperatures in the Development Site vicinity average around 61 degrees Fahrenheit (°F) and reach up to 100 °F. Precipitation averages less than 16 inches and typically occurs between December and March. The prevailing wind is an onshore flow between 7 and 11 miles per hour (mph) from the Pacific Ocean.

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3 Office of the Attorney General, State of California. 2022. Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act. October.

4 Per the CAL FIRE FRAP map for Banning, the Northern Portion of the Development Site is designated as Non-VHFHSZ within an LRA. Adjacent lands in the LRA north, northeast, and west of the Development Site share this designation. The Southern Portion of the Development Site is located in an SRA; however, it is not designated as an FHSZ. Lands south and southeast of the Development Site are designated as High and Very High FHSZ in an SRA.

5 Ibid.

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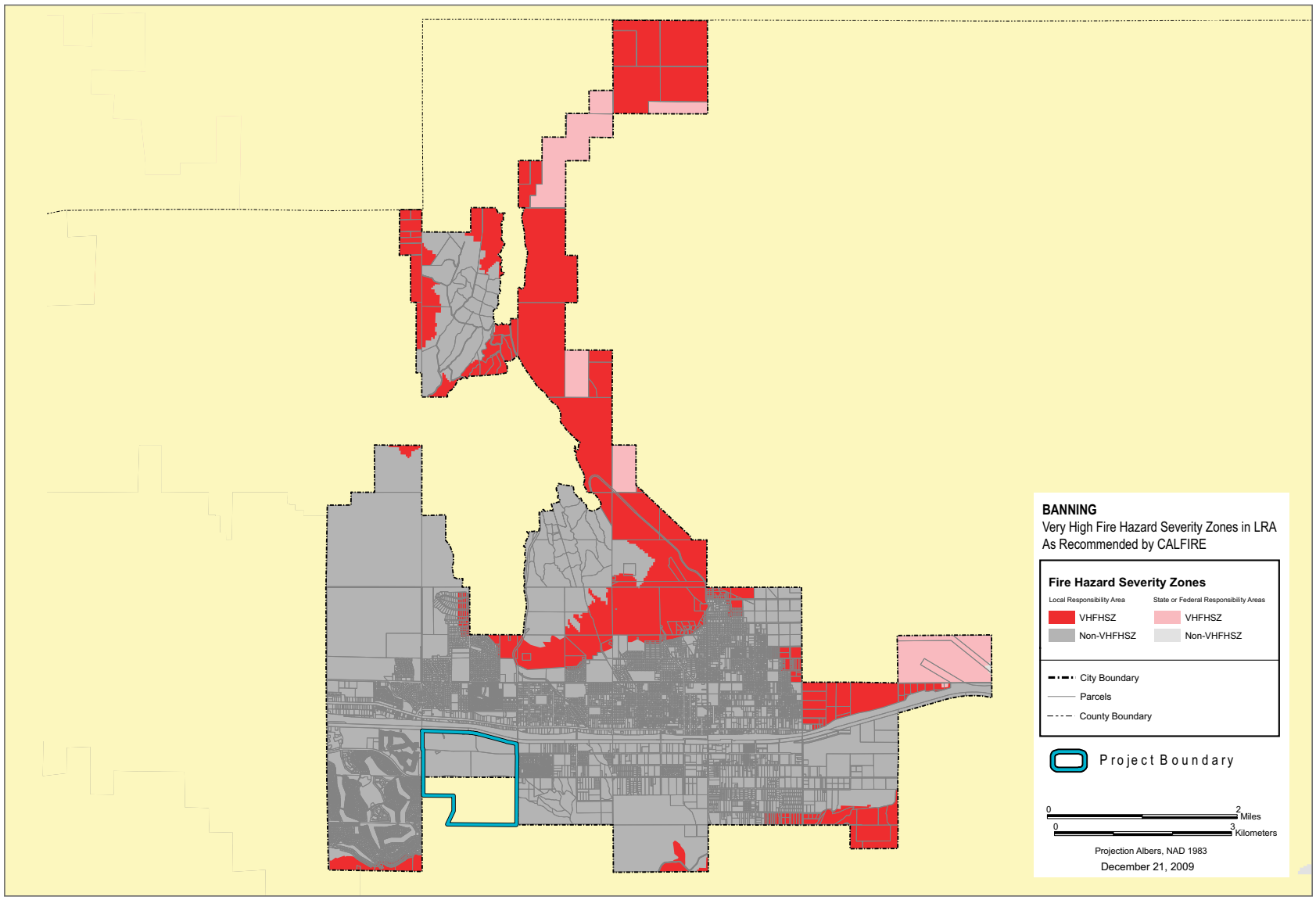

LSA

FIGURE 4.20-1

N

0 1 2
MILES

SOURCE: Dudek, Fire Protection Plan Sunset Crossroads, April 2021

Sunset Crossroads

CalFire Hazard Severity Zone

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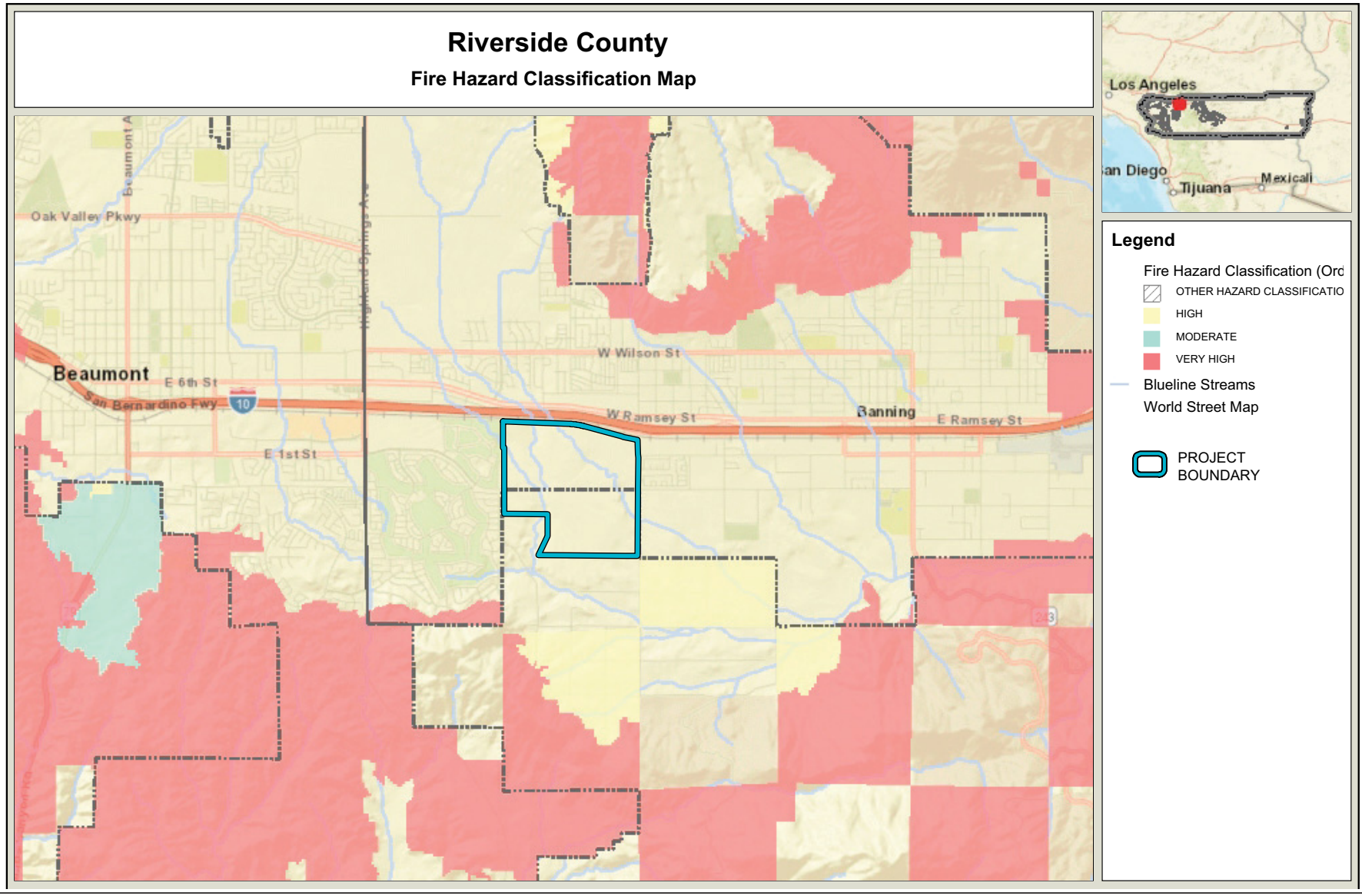

LSA

FIGURE 4.20-2

N

0 6,000 12,000

FEET

SOURCE: Dudek, Fire Protection Plan Sunset Crossroads, April 2021

I:\NPD2001\G\AI\RiversideFire_HazZone.ai (7/10/2023)

Sunset Crossroads

Riverside County Fire Hazard Classification Map

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Fires can be an issue during summer and fall, before the rainy period, especially during dry Santa Ana wind events. The seasonal Santa Ana winds can be particularly strong in the vicinity of the Development Site. Although Santa Ana events can occur anytime of the year, they generally occur during the autumn months, but the last few years have resulted in spring (April–May) and summer events as well. Santa Ana winds may gust up to 75 mph or higher. This phenomenon markedly increases the wildfire danger and intensity in the Development Site area by drying out and preheating vegetation (fuel moisture of less than 5 percent for 1-hour fuels is possible) as well as accelerating oxygen supply, and thereby, making possible the burning of fuels that otherwise might not burn under cooler, moister conditions.

4.20.3.3 Fuels (Vegetation)

The Development Site and surrounding areas primarily support non-native grasses, forbs, sage scrub plant communities, and disturbed habitat. The majority of the Northern Portion of the Development Site (north of the future Sun Lakes Boulevard [SLB] Extension) supports non-native grasses and sage scrub in the northwestern area. The Southern Portion of the Development Site (south of the future SLB Extension) supports sparse non-native grasses, forbs, and scattered sage scrub plants, as it has been intermittently grazed by livestock. An occasional isolated tree (eucalyptus, cottonwood, oak) can be seen in or alongside the stream channels. The vegetation cover types were assigned corresponding fuel models for use during Development Site fire behavior modeling.

4.20.3.4 Fire History

Fire history is an important component in analyzing wildfire susceptibility. Fire history data provide valuable information regarding fire spread, fire frequency, most vulnerable areas, and significant ignition sources, amongst others. In turn, this understanding of why fires occur in an area and how they typically spread can then be used for pre-planning and designing defensible communities.

Fire history for the Development Site and surrounding area was determined by referencing the Fire and Resources Assessment Program (FRAP) database. The FRAP summarizes fire perimeter data dating to the late 1800s, but which is incomplete due to the fact that it only includes fires over 10 acres and has incomplete perimeter data, especially for the first half of the 20th century.[6] However, the data do provide a summary of recorded fires and can be used to show whether large fires have occurred in the Development Site area and indicates whether large fires may be possible in the future. In its FRAP database, CAL FIRE has recorded 138 fires since 1900 that have burned within 5 miles of the Development Site.[7] Since 1900, there have been no recorded fires that have burned onto a portion of the Development Site, nor within 0.5 mile of the Development Site. **Figure 4.20-3: Development Site Vicinity Fire History Map** shows the fire history within 5 miles of the Development Site since 1900.

4.20.4 Regulatory Setting

This section includes applicable federal, State, regional, and City regulations.

6 Dudek. 2023. *Fire Protection Plan, Sunset Crossroads*, *County of Riverside, California*, page 21. November.
7 Ibid.

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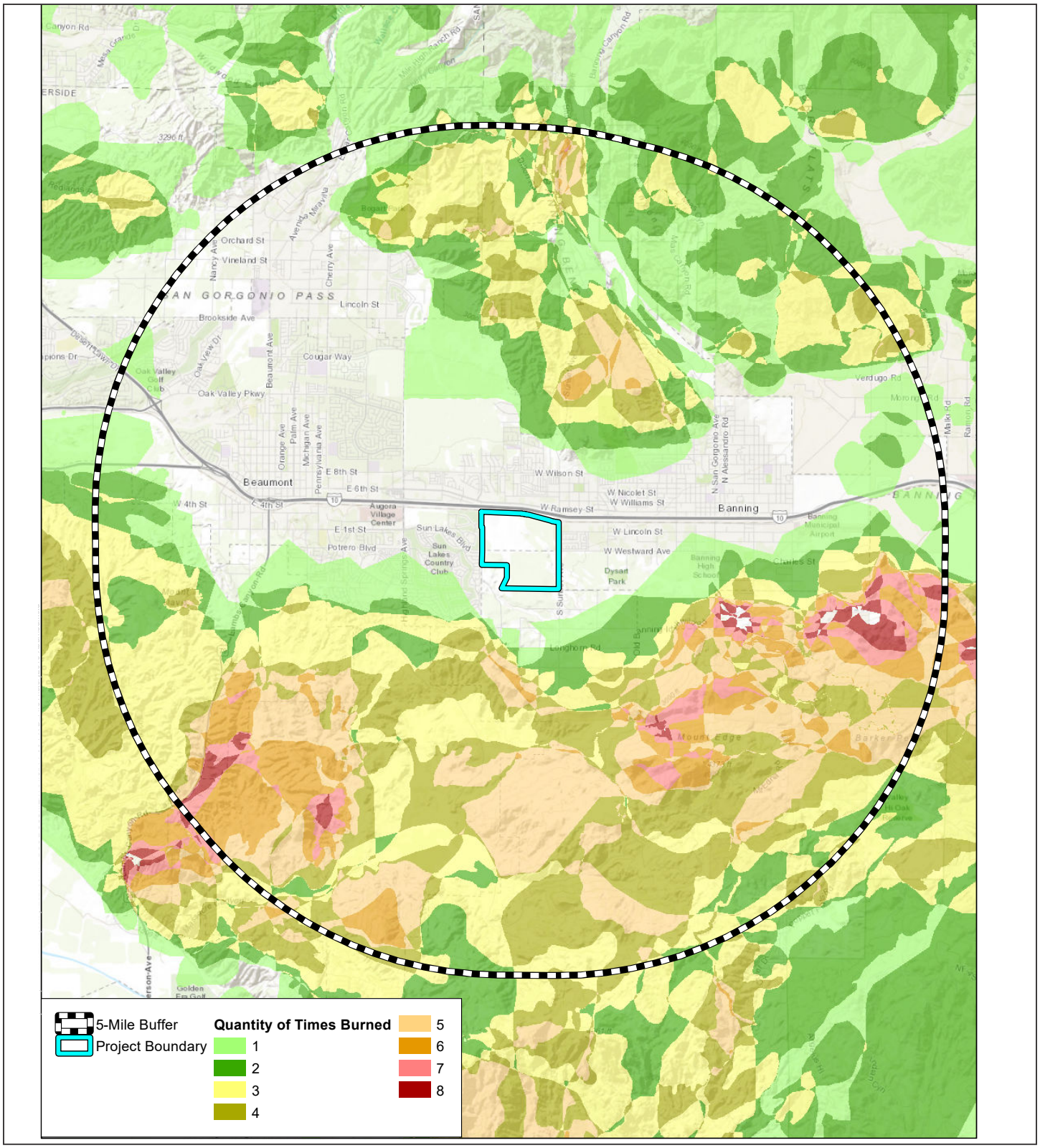

LSA

FIGURE 4.20-3

N

0 1 2

MILES

SOURCE: Dudek, Fire Protection Plan Sunset Crossroads, April 2021

I:\NPD2001\G\AI\Proj_Vicinity_Fire_Hist.ai (7/10/2023)

Sunset Crossroads

Development Site Vicinity Fire History Map

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4.20.4.1 Federal Regulations

National Incident Management System (NIMS). The NIMS provides a systematic, proactive approach to guide government agencies, nongovernmental organizations, and the private sector to work together to prevent, report, recover from, and mitigate the effects of fire incidents, regardless of cause, size, location, or complexity, to reduce the loss of life and property harm to the environment. The City participates in NIMS, which improves its ability to prepare for and respond to potential incidents and hazard scenarios.

4.20.4.2 State Regulations

CAL FIRE and Resources Assessment Program. CAL FIRE publishes maps that predict the threat of fire for each county within the State. LRAs, SRAs, and Federal Responsibility Areas (FRAs) are classified as either VHFHSZ or non-VHFHSZ based on factors including fuel availability, topography, fire history, and climate. The 2018 *Strategic Fire Plan for California* was prepared by CAL FIRE to provide guidelines and objectives to account for associated fire impacts.

California Fire Code (CFC). Chapter 8.16.010 of the City of Banning Municipal Code adopts the CFC, which is updated every three years. The CFC includes regulations for emergency planning, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations, distribution, and spacing. Several fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California State Hazard Mitigation Plan. The State Hazard Mitigation Plan (SHMP) identifies priorities, strategies, and actions to significantly reduce deaths, injuries, and other losses attributed to natural and human-caused hazards in California. The SHMP provides guidance for hazard mitigation activities emphasizing partnerships among local, State, and federal agencies as well as the private sector.

California Government Code. California Government Code §51178 defines VHFHSZ and designates lands considered by the State to be a very high fire hazard. California Government Code §51189 directs the Office of the State Fire Marshal to create building standards for wildland fire resistance. The code includes measures that increase the likelihood of a structure withstanding intrusion by fire (e.g., building design and construction requirements that use fire-resistant building materials) and provides protection of structure projections (e.g., porches, decks, balconies, and eaves) and structure openings (e.g., attics, eave vents, and windows).

California Public Resources Code (PRC). The State's Fire Safe Regulations are set forth in PRC §4290, which include the establishment of SRAs. PRC §4291 sets forth defensible space requirements, which are applicable to anyone that "… owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush covered lands, grass-covered lands, or land that is covered with flammable material" (§4291(a)).

Assembly Bill 337. Per Assembly Bill (AB) 337, local fire prevention authorities and CAL FIRE are required to identify VHFHSZ in LRAs. Standards related to brush clearance and the use of fire-resistant materials in FHSZ are also established.

California Code of Regulations Title 8: Industrial Relations. In accordance with CCR Title 8 §1270 and §6773 (Fire Prevention, and Fire Protection and Fire Equipment), the California Occupational Safety and Health Administration (Cal/OSHA) establishes fire suppression service standards. The standards range from fire hose size requirements to the design of emergency access roads.

California Code of Regulations Title 14: Natural Resources. Division 1.5 (Department of Forestry and Fire Protection), Title 14 of the CCR establishes a variety of wildfire preparedness, prevention, and response regulations.

California Code of Regulations Title 19: Public Safety. Title 19 of the CCR establishes a variety of emergency fire response, fire prevention, and construction and construction materials standards.

California Code of Regulations Title 24: California Building Standards Code. The CFC is set forth in Part 9 of the Building Standards Code. The CFC, which is pre-assembled with the IFC by the International Code Council (ICC), contains fire-safety building standards referenced in other parts of Title 24.

California Health and Safety Code §13000 et seq. and California Building Code (CBC). State fire regulations are set forth in §13000 et seq. of the California Health and Safety Code, which is divided into "Fires and Fire Protection" and "Buildings Used by the Public." The regulations provide for the enforcement of the CBC and mandate the abatement of fire hazards. The California Health and Safety Code establishes broadly applicable regulations, such as standards for buildings and fire protection devices, in addition to regulations for specific land uses, such as childcare facilities and high-rise structures.

California Health and Safety Code Division 11: Explosives. Division 11 of the California Health and Safety Code establishes regulations related to a variety of explosive substances and devices, including high explosives and fireworks. Section 12000 et seq. establishes regulations related to explosives and explosive devices, including permitting, handling, storage, and transport (in quantities greater than 1,000 pounds).

California Residential Code §R337. Section R337 establishes minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within an SRA or any WUI Fire Area to resist the intrusion of flame or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses. This section regulates materials and construction methods for exteriors susceptible to wildfire exposure.

California Building Code (CBC), Chapter 7A. Chapter 7A applies to building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a WUI Fire Area. This section of the CBC establishes minimum standards for features such as fire retardant-treated wood and wood shingles, surface treatment protection, ignition-resistant construction, roof coverings and gutters, vents, exterior walls and coverings, exterior porch ceilings, underfloor protection, exterior windows, skylights, and doors, decking, and accessory structures.

Executive Order N-04-19. On January 9, 2019, Governor Newsom announced Executive Order (EO) N-04-19, which requires State agencies to identify innovative and sustainable solutions to address the State's wildfire crisis, such as upgraded fire detection technology.

Executive Order N-05-19. On January 9, 2019, Governor Newsom also announced EO N-05-19, which requires CAL FIRE and other State agencies to compile policy and regulatory recommendations concerning wildfire mitigation, emphasizing environmental sustainability and public health. EO N-05-19 requires the incorporation of socioeconomic analysis when conducting risk management of wildfires and mandates that agencies identify geographic areas with populations that are more vulnerable to the impacts of wildfires.

4.20.4.3 Regional Regulations

Riverside County Emergency Management Department Multi-Jurisdictional Local Hazard Mitigation Plan. The plan aims to reduce the impact of a disaster by identifying hazards and developing ways to decrease their impact. Risk assessments rate hazards with the greatest potential impact to the community. In addition, long-term prevention or protection steps are developed to lessen the impact of the hazard. This plan creates awareness of hazards, threats, and vulnerabilities within the community, and paves a path forward for jurisdictions to prepare for local and regional disasters. The April 2023 update of the plan complies with the Disaster Mitigation Act of 2000.[8]

4.20.4.4 Local Regulations

City of Banning General Plan Wildland Fire Hazards Element. The Wildland Fire Hazards Element of the Banning General Plan addresses potential wildland fire hazards within the community through discussion, analysis, and setting forth goals, policies, and programs. The foremost goal of this Element is to protect the general health, safety, and welfare of Banning from potential fires and associated hazards. The following goals, policies, and programs related wildfires would be applicable to the buildout of the Development Site:

> **Goal:** Protect human life, land, and property from the effects of wildland fire hazards.
>
> > **Policy 1:** The City shall establish and maintain an information database containing maps and other information which describe fire hazard severity zones, fire threat zone, and other wildfire hazards occurring within the City boundaries, sphere-of-influence and planning area.
> >
> > > **Program 1.A:** Consult and coordinate with surrounding communities, the State Board of Forestry and Fire Protection, California Department of Forestry and Fire Protection, Riverside County Fire Department, other applicable State and federal agencies to establish, improve, and routinely update the database.

[8] County of Riverside Emergency Management Department (EMD). 2023. County of Riverside Operational Area Local Hazard Mitigation Plan, Version 8.7.23. April. Website: https://rivcoready.org/sites/g/files/aldnop181/files/2023-08/MJLHMP%208.7.23.pdf (accessed December 2023).

Program 1.B: The City shall make available copies of the Fire Severity Map and discourage development within areas so designated or require detailed mitigation measures that reduce potential hazards to insignificant levels.

Program 1.C: Prepare an information handout to be distributed to developers, property owners, and other appropriate parties, which describes the need for and design of fire safe developments.

Program 1.D: Establish and maintain a program by which all potentially hazardous structures, which pose a threat due to inadequate fire hazard construction are identified, inventoried, and retrofitted with fire retardant materials. Program shall include informational handouts describing appropriate methods of retrofitting and possible sources of funding to facilitate the rehabilitation of such structures.

Policy 2: Ongoing coordination between the Banning Fire Department, Beaumont Fire Department, the Riverside County Fire Department, the California Department of Forestry, the Morongo Band of Mission Indians and the U.S. Forest Service in fire prevention programs.

Program 2.A: Cooperate with all neighboring agencies in order to identify opportunities for fuel breaks in very high hazard severity zones and to ensure that fire breaks are provided where necessary and appropriate.

Program 2.B: Development proposals shall be transmitted to the Police Department and the City Fire Marshal, and input shall be incorporated into project design or conditions of approval, as appropriate.

Program 2.C: The Police and Fire Departments shall closely coordinate and cooperate with the City and County emergency preparedness teams and shall assure the most effective disaster response practical.

Program 2.D: Contact and establish working relationships and strategies with Banning Heights Mutual Water Company, High Valley Water District, public utilities, and other appropriate agencies to strengthen or relocate utility facilities and take other appropriate measures to safeguard major utility distribution systems to the greatest extent practical.

Program 2.E: Encourage and cooperate with Caltrans and the railroad to reduce hazardous fuel loads (vegetation) near bridges, roadways, rail lines and State highways, which may be subject to closure during major wildland fire events.

Program 2.F: The public will be educated regarding disaster prevention and emergency responses including evacuation procedures.

Policy 3: Continue to identify wildfire hazard areas, and to enforce special standards for construction in wildland fire hazard areas.

Program 3.A: New and substantially remodeled structures or developments shall incorporate wildfire prevention design techniques, such as the use of “defensible

space," fire retardant sidings, optimal site planning and building orientation, landscaping orientation, and other design approaches to reduce wildfire hazards.

Program 3.B: Require that adequate emergency vehicle access and evacuation routes be available with approval of any new development.

Program 3.C: The City shall adopt standard requirements for all development proposals in High Fire Hazard Areas, including requirements for the preparation of Fire Protection Plans prior to the approval of Tentative Tract Maps, Tentative Parcel Maps, or other land use permits.

Policy 4: The City shall make every attempt to assure that adequate water supplies and pressures are available during a fire, earthquake or both.

Program 4.A: Coordinate with Banning Heights Mutual Water Company, High Valley Water District, and other agencies responsible for supplying water to the region to assure sufficient water supplies and pressures are available to provide adequate fire flows for all existing and proposed development.

Program 4.B: Special on-site fire protection measures may be required on well vegetated, hilly areas with slopes of 10 percent or greater, with possible access problems, and/or a lack of sufficient water and/or water pressure. Such measures shall be specified during project review.

City of Banning Emergency Operations Plan. The City of Banning Emergency Operations Plan (EOP) addresses the planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies in or affecting the City of Banning. The EOP is designed to establish the framework for implementation of the California Standardized Emergency Management System (SEMS) for the City of Banning, which is located within the Riverside County Operational Area (OA) and Mutual Aid Region VI as defined by the Governor's Office of Emergency Services (OES). By extension, the OES also implements the NIMS, which is being integrated into SEMS at the Governor's directive (EO S-2-05). The OES is intended to facilitate multi-agency and multi-jurisdictional coordination, particularly between the City of Banning and County of Riverside, special districts, and State agencies, in emergency operations. The OES is operational in design.[9]

4.20.5 Thresholds of Significance

The City has not established local CEQA significance thresholds as described in Section 15064.7 of the *CEQA Guidelines*. Therefore, significance determinations utilized in this section are from Appendix G of the *CEQA Guidelines*. According to Section XXI of Appendix G to the *CEQA Guidelines*, the Development Project may result in a significant impact with respect to wildfires if is located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and it would:

[9] City of Banning. 2012. *City of Banning Emergency Operations Plan Part 1-Basic Plan.* December. Website: http://banning.ca.us/DocumentCenter/View/2776/Banning-EOP---Final-Part-1---Rev-1212?bidId= (accessed July 13, 2021).

Threshold 4.20-1: Substantially impair an adopted emergency response plan or emergency evacuation plan.

Threshold 4.20-2: 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.

Threshold 4.20-3: 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.

Threshold 4.20-4: 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.

4.20.6 Impact Analysis

While the Development Site is located in a WUI setting, it is not located in an area statutorily designated as a Moderate, High, or Very High Fire Hazard Severity Zone by CAL FIRE or Riverside County; rather the Development Site is accurately designated as LRA Non-VHFHSZ and SRA Non-FHSZ.[10] While the Southern Portion of the Development Site is designated as an SRA Non-FHSZ; should this area be annexed into the City, it is possible that the entire Development Site could be redesignated as an LRA in future CAL FIRE mapping of Hazard Severity Zones .

4.20.6.1 Impair an Emergency Plan

Threshold 4.20-1: Would the Development Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Police protection services within the City are provided by the Banning Police Department and fire protection services are provided through a contractual agreement with the RCFD, which in turn contracts with CAL FIRE. According to the Banning General Plan Emergency Preparedness Element, the City does not have established evacuation routes, although depending on the location and extent of an emergency, major surface streets would be utilized to route traffic through the City onto Interstate 10 to exit the region. The City adopted the *Multi-Hazard Functional Guidance* document in 1996 and the *Emergency Operations Plan* in July 2007 (updated in 2012) both of which provide guidance for residents, City emergency responders, and businesses in the event a man-made or natural emergency occurs within the City or threatens the City. A Fire Protection Plan (FPP) has been prepared for the Development Site to evaluate and identify the potential fire risk associated with the Development Project's land uses and to identify requirements for water supply, fuel modification and defensible space, access, building ignition and fire resistance, and fire protection systems, among other pertinent fire protection criteria. The FPP is included as **Appendix G-2** of this Draft EIR.

[10] The northern portion of the site is located within an LRA and is designated non-VHFHSZ. The Southern Portion of the Development Site is located in an SRA and is not designated as an FHSZ.

Construction. The Development Site is accurately designated as LRA Non-VHFHSZ and SRA Non-FHSZ. All large construction vehicles entering and exiting the Development Site would be guided by personnel using signs and flags to direct traffic. The Development Site does not include any characteristics that would physically impair or otherwise interfere with emergency response or evacuation in its vicinity. Construction of the Development Project may require temporary lane closures on Sunset Avenue, Highland Home Road, and Bobcat Road to allow for utility connections. Temporary closures may also occur on Sunset Avenue between Interstate 10 and Lincoln Street, Sunset Avenue between Lincoln Street and Bobcat Road, Lincoln Street, Bobcat Road, and Highland Home Road due to improvements to the surrounding circulation system. These temporary lane closures/road closures would be implemented with the recommendation of the *California Temporary Traffic Control Handbook,* which, among other things, recommends early coordination with affected agencies to ensure that emergency vehicle access is maintained. In this manner, officials would be able to plan and respond appropriately to direct the public away from Sunset Avenue, Lincoln Street, Bobcat Road, and Highland Home Road, as appropriate, in the event of an emergency requiring evacuation. Therefore, because the Development Project would involve early coordination with affected agencies and emergency service personnel, the Development Project would not substantially impair an adopted emergency response plan or emergency evacuation plan during construction activities. No mitigation would be required.

Operation. The Development Project would involve the development of up to 5,545,000 square feet of industrial building on 392.0 acres, 268,400 square feet of commercial building on 47.9 acres, 65.6 acres of Open Space-Park/Resource use, and 28.3 acres of internal street dedication/circulation. According to the *Traffic Impact Report*, the Development Project is not anticipated to result in any substantial queuing along Sunset Avenue, Bobcat Road, Highland Home Road, or other nearby roads. The City of Banning General Plan, as indicated above, has not established evacuation routes within the City; however, all roads within the City could be used as evacuation routes in the event of an emergency. Roads that are used as response corridors and evacuation routes usually follow the most direct path to or from various parts of the community. For the Development Site, the main corridor utilized would be Sunset Avenue.

The Development Project would provide general and emergency access via Sunset Avenue. Sunset Avenue provides access to the Development Site via “Street A,” Lincoln Street, and the SLB Extension. Access to the commercial uses in Planning Area 1 would be provided by “Street A” and Lincoln Street. Direct access to Planning Areas 2, 3, and 4 would be provided by Sunset Avenue. Access to Planning Areas 6 and 7 would be provided from the south by Lincoln Street and access to Planning Areas 2, 5, and 8 would be provided from the north by Lincoln Street and by the SLB Extension to the south. Planning Areas 9 and 10 would be provided access from the future SLB Extension. Planning Areas 11 and 12 are accessible from the SLB Extension and Highland Home Road. Planning Area 4 would be accessible from the SLB Extension on the north and Bobcat Road on the south.

All roadways and structures within the Development Site would be developed in accordance with City and RCFD emergency access standards. The Development Project would also be required to comply with all applicable codes and ordinances for emergency vehicle access, which would ensure adequate access to, from, and on the Site for emergency vehicles.

The FPP has been prepared for the Development Site to generate and memorialize the fire safety requirements and standards of the RCFD. The entire Development Site has been designed with fire protection, emergency access, and emergency evacuation as key objectives. The proposed improvements have been designed to facilitate access and internal movement of emergency apparatus and personnel along the sides of every building. Water availability, fire water flow, and hydrant placement throughout the Development Project would be reviewed and verified by the RCFD to ensure compliance with local and State codes.

The Fuel Modification Plan (FMP) for the Development Project would be implemented to provide greater protection to buildings and occupants of the Development Project and to reduce risk of fires. The FMP identifies a 100-foot fuel modification zone (FMZ), including a 50-foot-wide paved/irrigated Zone 1 extending out 50 feet from the proposed structures out and a 50-foot-wide paved/irrigated Zone 2 extending 50 feet beyond Zone 1 (50 to 100 feet). For those areas where the full 100 feet cannot be met, the reduced FMZ is justified by the minimal width of exposure, low fuel loads, low calculated flame lengths, and the type of construction proposed. In these areas, exterior building construction would be further enhanced to provide a 1-hour to 2-hour rated exterior wall with no openings, or with fire rated and protected door openings, based on requirements and approval of the RCFD and/or a non-combustible wall at the top of slope may be incorporated as a fire protection feature. **Figures 4.20-4a through 4.20-4f: Fuel Modification Plan** provide the Development Site-specific FMP that would be implemented as part of the Development Site. As detailed in **Regulatory Compliance Measure (RCM) Fire-1**, the Development Project would be required to implement and adhere to the FPP and its wildfire reduction measures.

The FPP and FMP prepared specifically for the Development Project would conform to City and RCFD[11] standards and facilitate effective emergency response and operation. Therefore, construction and operation of the Development Project would not physically interfere with or impair an adopted emergency response or emergency evacuation plan. Impacts 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: The following Conditions of Approval are included as part of the Development Project and are considered in the analysis of potential impacts related to wildfire. The City considers these requirements to be mandatory; therefore, they are not mitigation measures or Project Design Features.

[11] "This FPP demonstrates that the Project will comply with applicable portions of the Riverside County Fire Code (Chapter 8.32 of County's Code of Ordinances) and Ordinances No. 460 and No. 787-9, and the City of Banning's Fire Protection Code (Chapter 8.16 of the City's Municipal Code). For this FPP, where the Riverside County Fire Code and Banning Fire Protection Code differ, the Project will implement the most restrictive requirements."

LSA

FIGURE 4.20-4a

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SOURCE: DUDEK

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Sunset Crossroads
Fuel Modification Plan

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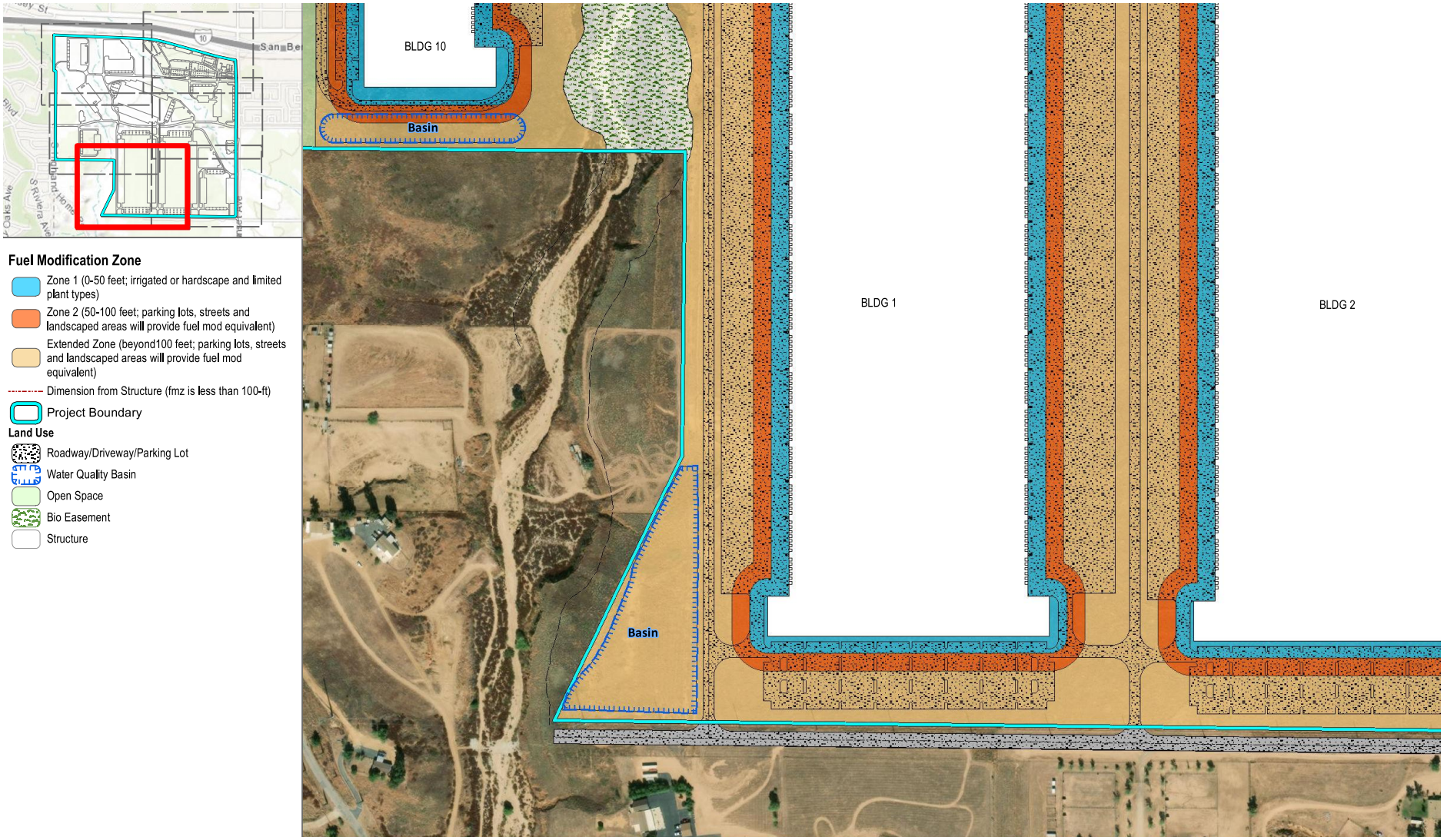

LSA

FIGURE 4.20-4b

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Fuel Modification Plan

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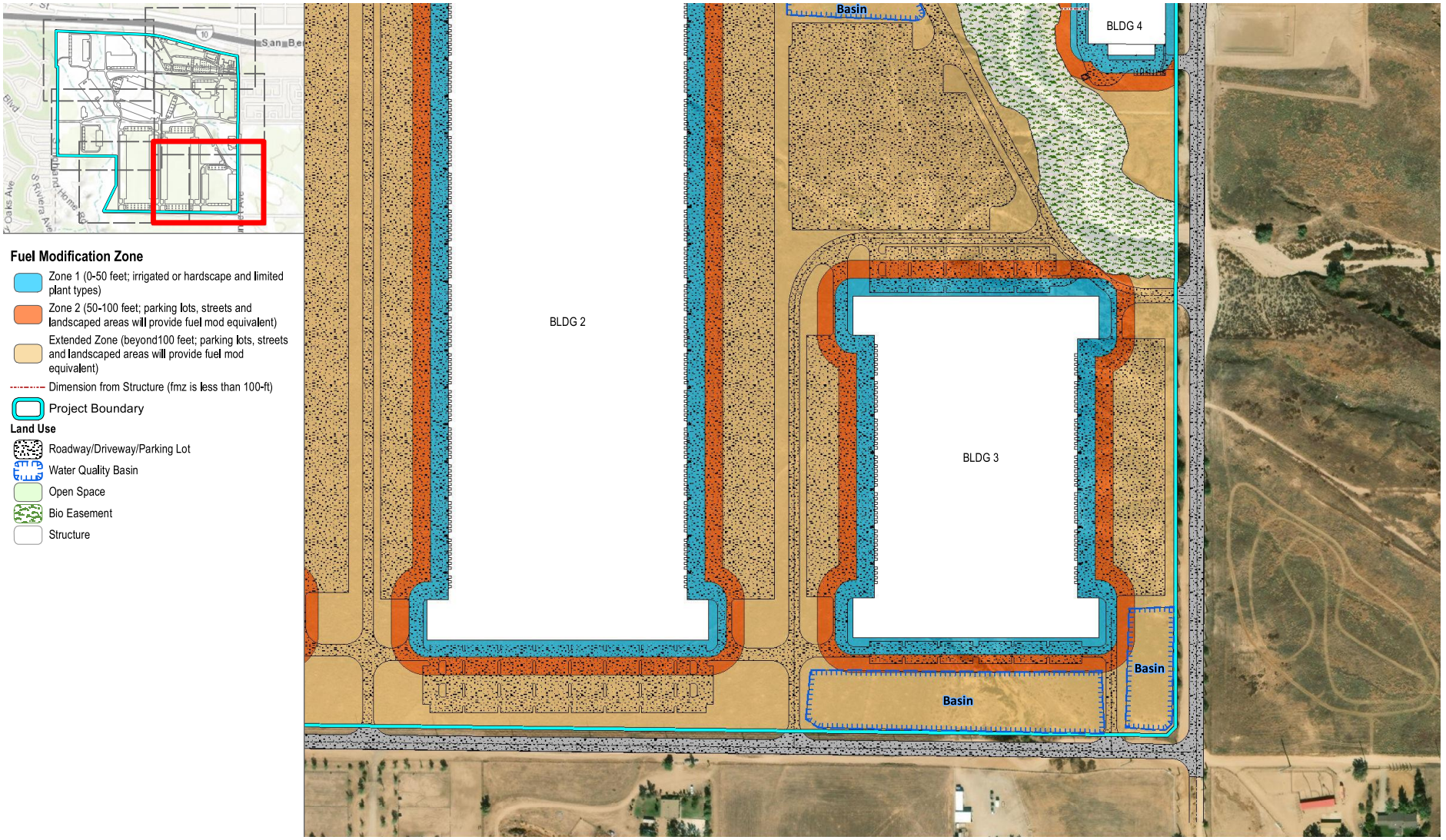

LSA

FIGURE 4.20-4c

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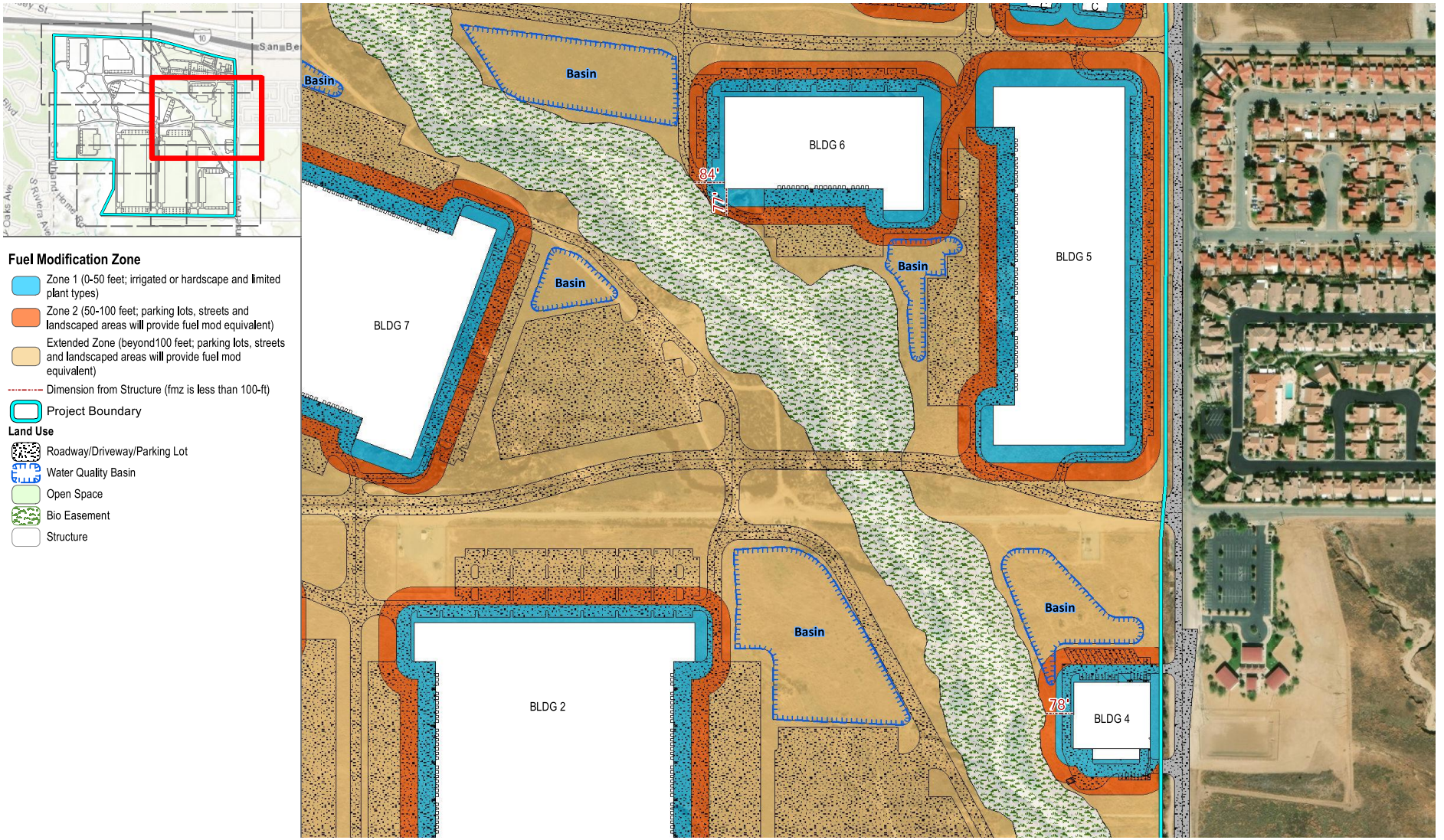

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FIGURE 4.20-4d

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Fuel Modification Plan

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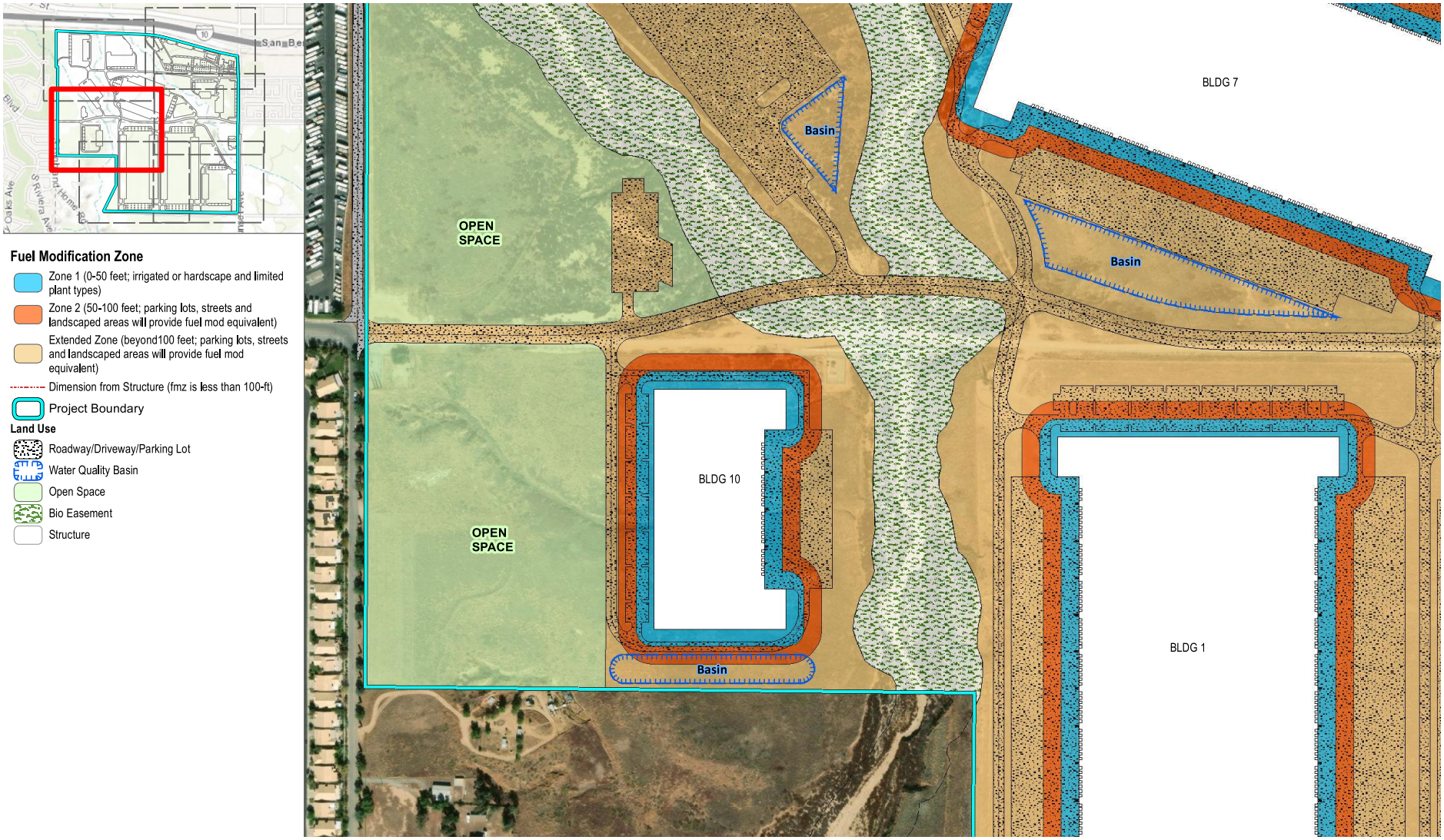

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FIGURE 4.20-4e

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Fuel Modification Plan

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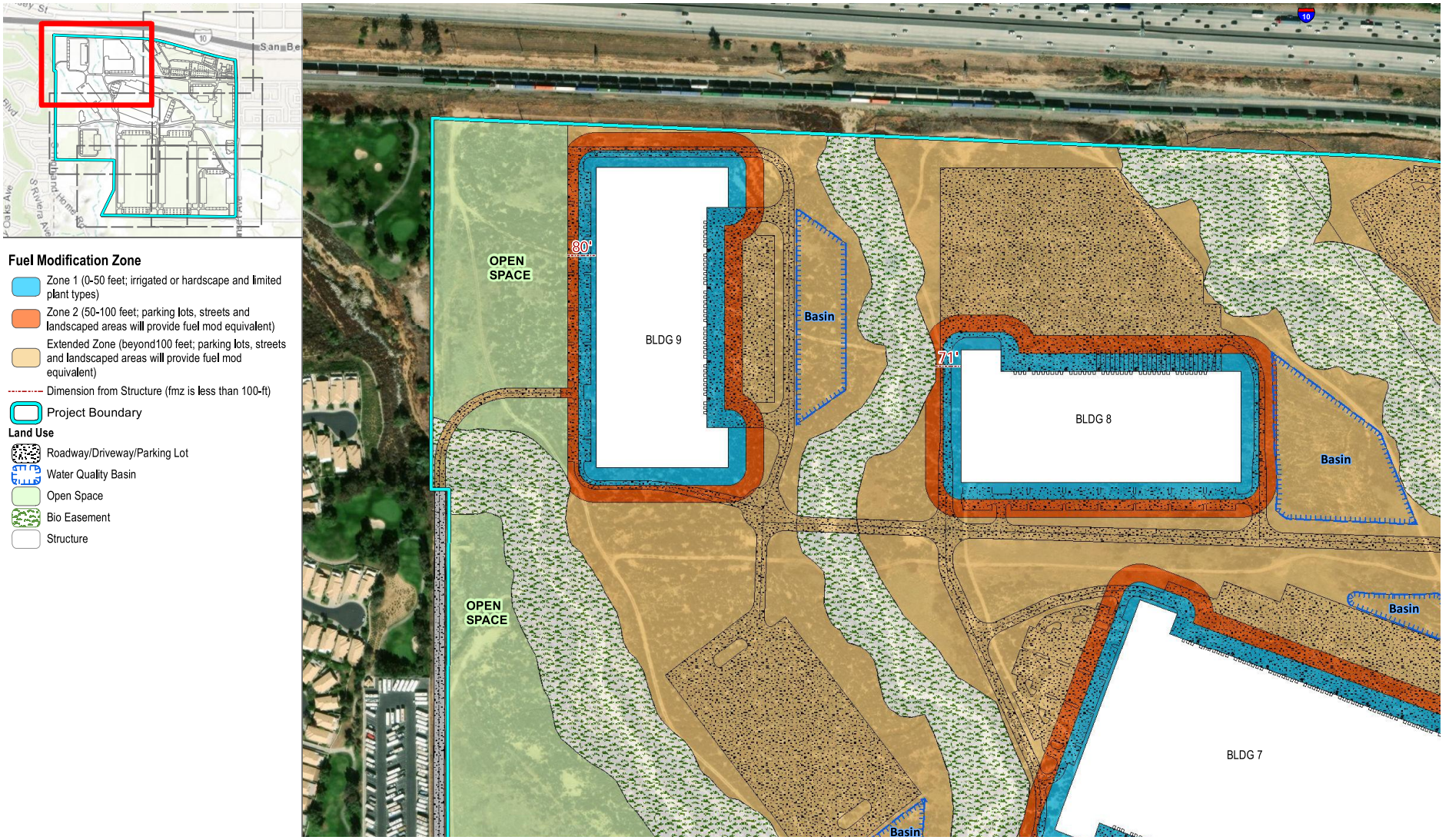

LSA

FIGURE 4.20-4f

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SOURCE: DUDEK

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Sunset Crossroads
Fuel Modification Plan

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RCM FIRE-1 The Development Project shall adhere to the site-specific Fire Protection Plan and Fuel Modification Plan and implement the specific measures in both documents. The following measures (minimally but not limited to) shall be implemented to reduce impacts associated with wildfires:

- Buildings will be constructed of ignition-resistant construction materials and include automatic fire sprinkler systems based on the latest adopted Building and Fire Codes for occupancy types.[12]
- Fuel modification will be provided around the perimeter of the structures on the Development Site, and will typically be 100 feet wide, though there are a few areas that are less as detailed herein. In areas where 100 feet of fuel modification cannot be achieved, exterior building construction will be further enhanced to provide a 1-hour to 2-hour rated exterior wall with no openings, or with fire rated and protected door openings, based on requirements and approval of RCFD and/or a non-combustible wall at the top of slope may be incorporated as a fire protection feature. In addition, an extended fuel modification width will be provided around many structures due to the hardscape landscape design.

Ongoing maintenance shall be managed by owners, property management company, or another approved entity, at least annually or as needed. Annual maintenance should occur before May 1st of each year and inspected by RCFD or an approved third party.

- In the event the square footage or footprint of a proposed building has been modified from that described in the Fire Protection Plan, the applicant will submit and the RCFD will provide approval of the revised Fire Protection Plan. The revised Fire Protection Plan will identify alternative materials (as necessary) and methods to provide the functional equivalency of a full 100 feet of defensible space. Alternative materials and methods will be to the satisfaction of the RCFD and may include structural hardening enhancements or landscape features, like non-combustible walls.
- Landscape plantings will not utilize prohibited plants that have been found to be highly flammable.
- Fire apparatus access roads (i.e., public and private streets) will be provided throughout the development and will vary in width and configuration but will provide at least the minimum required unobstructed travel lanes, lengths,

[12] A type of building material that resists ignition or sustained flaming combustion sufficiently to reduce losses from wildland-urban interface conflagrations under worst-case weather and fuel conditions with wildfire exposure of burning embers and small flames, as prescribed in CBC, Chapter 7A and State Fire Marshal Standard 12-7A-5, Ignition-Resistant Materials.

turnouts, turnarounds, and clearances required by applicable codes. Primary access and internal circulation will comply with the requirements of the RCFD.

- Buildings will be equipped with automatic commercial fire sprinkler systems meeting RCFD requirements.
- Water capacity and delivery for a reliable water source will be provided for operations and during emergencies requiring extended fire flow.
- The property owners or property management company will provide business owners informational brochures at time of occupancy, which will include an outreach and educational role to ensure fire safety measures detailed in the FPP have been implemented and prepare development-wide "Ready, Set, Go!" plans.

Level of Significance After Mitigation: Less Than Significant Impact.

4.20.6.2 Exacerbate Wildfire Risks Due to Slope, Prevailing Winds, and Other Factors

Threshold 4.20-2: Would the Development Project, 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?

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up-slope and slower fire spread down-slope in the absence of wind. The Development Site is on relatively flat undeveloped parcels with several seasonal natural drainages that drain to Smith Creek, which traverses the western portion of the Development Site, and eventually drain to the San Gorgonio and Whitewater Rivers. Fires can be an issue in the City and County during summer and fall, before the rainy period, especially during dry Santa Ana wind events. The seasonal Santa Ana winds can be particularly strong in the Development Site area. Santa Ana winds may gust up to 75 mph or higher thereby drying out and preheating vegetation as well as accelerating oxygen supply, and thereby making possible the burning of fuels that otherwise might not burn under cooler, moister conditions.

There have been 138 fires recorded since 1900 by CALFIRE in their FRAP database, four that have burned within a five-mile vicinity of the Project, with one as recently as July 2023 (known as the "Rabbit Fire"). Since 1900 there have been no recorded fires that have burned on or withing 0.5 mile of the Development Site. Wildfires may potentially occur in open space areas adjacent to the Development Site, or in on-site undeveloped open space. Under existing conditions, the Development Site includes numerous potential fire hazards, including unmaintained, fire-prone vegetation. The types of potential ignition sources that currently exist in the surrounding area include vehicles, residential neighborhoods, as well as arson. The existing physical condition poses as a challenge for fire protection to the surrounding communities because of grassland fuels, Santa Ana winds, high temperatures, and/or firefighter exposure. The Development Project would include conversion of approximately 80 percent of the Development Site to maintained urban development with designated landscaping and FMZs. As discussed in **Section 4.20.6.1** of this Draft EIR, an FMZ is a strip of land

where combustible vegetation has been removed and/or modified and partially or totally replaced with more adequately spaced, drought-tolerant, fire-resistant plants to provide a reasonable level of protection to structures from wildland and vegetation fires. The FMZs for the Development Site are shown above in **Figures 4.20-4a through 4.20-4f.**

The Development Project would introduce new potential ignition sources in the form of building materials (e.g., wood and stucco), vegetation for landscaping, vehicles, and small machinery (e.g., for typical commercial and landscape maintenance), but would also result in a large area separating ignition sources from native fuels as well as the conversion of existing ignitable fuels to maintained landscapes that are ignition resistant. Therefore, the Development Site would function as a fuel reduction area by helping create context-sensitive development and a new first-fuel break line of defensible space.

In addition to current codes and standards requiring defensible space to be provided around all structures, the FPP prepared for the Development Site identifies various policies and management actions for vegetation management. The vegetation management areas include private property, where vegetation management would occur in cooperation with the future landowners, as well as common areas. The FPP also outlines a suite of vegetation management methods to reduce wildland fuel hazards. This would ultimately reduce the potential flammability of the landscape. In addition, the Development Project provides improved access throughout the Development Site, which improves firefighters' access for wildland firefighting efforts.

The Development Project proposes FMZs ranging from a minimum of 100 feet to 200 feet, twice the required distance, or provides alternative measures to meet the intent of the FMZ requirement. In addition, **RCM FIRE-1** would require compliance with the regulations of the most recently adopted CFC and CBC to avoid potential impacts from the Development Site's potential to exacerbate wildfire risks. Therefore, with adherence to the regulatory standards and FPP measures included in **RCM FIRE-1**, impacts related to exacerbating wildfire risks due to slope, prevailing winds, or other factors, impacts from exposure of project occupants to pollutant concentrations from a wildfire, or impacts from the uncontrolled spread of a wildfire would be ***less than significant***. No mitigation measures are required.

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

Regulatory Compliance Measures and Mitigation Measures: Regulatory Compliance Measure FIRE-1 would be applicable.

Level of Significance After Mitigation: Less Than Significant Impact.

4.20.6.3 Exacerbate Wildfire Risks Due to the Installation or Maintenance of Infrastructure

Threshold 4.20-3: Would the Development Project 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?

Utility and infrastructure improvements included as part of the Development Project are discussed in **Chapter 3.0** and analyzed in **Section 4.19** of this EIR. Potable, recycled water, and wastewater infrastructure would be installed on the Development Site and improvements to existing infrastructure in surrounding roads would occur. Existing overhead power lines surrounding the Development Site would be undergrounded and connected to buildings developed as a part of the Development Project.

The Development Project would include a new internal circulation system and would also include improvements to surrounding roads. None of these features would exacerbate fire risk or result in temporary or ongoing impacts to the environment. Although utilities, including water facilities, sewer facilities, storm drain lines, and power lines, would be modified and/or extended throughout the Development Site, these improvements would be underground and would not exacerbate fire risk. All utility lines, pipes, utility junction boxes, and transformers would be located underground. Design and implementation of utility improvements in the Development Site would be reviewed and approved by the City's Public Works Department as part of the Development Project approval process to ensure the proposed uses are compliant with all applicable fire codes, design standards, and regulations.

The Development Site is not located in an area statutorily designated as a Moderate, High, or Very High Fire Hazard Severity Zone by CAL FIRE or Riverside County. The Northern Portion of the Development Site is accurately designated as LRA Non-VHFHSZ, while the Southern Portion of the Development Site is designated SRA Non-FHSZ. Should the Southern Portion of the Development Site be annexed by the City, it is possible that the entire Development Site could be redesignated as an LRA in future CAL FIRE mapping of Hazard Severity Zones.

The installation of on-site utilities, on-site circulation system, and off-site road improvements would not exacerbate fire risk due to the Development Site's location in an urban area outside of a designated fire hazard zone. The Development Site is required to demonstrate provision of water capacity and delivery for a reliable water source for operations and during emergencies requiring extended fire flow. The improved connectivity of water lines would aid in fire suppression compared to existing conditions on the Development Site in the unlikely event of a wildfire. Therefore, the Development Site would not require the installation or maintenance of infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or result in temporary or ongoing impacts to the environment. Temporary or ongoing impacts to the environment would be ***less than significant*** and no mitigation would be required.

The proposed electrical substation would be developed and operated by the City in compliance with regulations set forth by Cal/OSHA and the National Electrical Safety Code (NESC). The reverse osmosis facility and potable water reservoir would be operated by the City in compliance with standards as set forth by the City of Banning Water and Wastewater Department. These facilities would be remotely operated and monitored and include fire suppression features (i.e., sprinklers, defensive space, and fire alarms) that would reduce the exacerbation for fire risk.

The location of the electrical substation, in an industrial use area of the Development Site, would also reduce the risk of wildfire exacerbation as this facility would not be located in Open Space areas occupied by natural vegetation. The California Public Utilities Commission (CPUC) identifies three

Tiers/Levels of fire threat risk associated with electric-line ignited fires[13]. A short stretch of transmission line (0.9 mile long), currently located in an open area south of the I-10 Freeway between Sunset Avenue and South Highland Home Road, is identified as an area of Tier 2 threat (areas of elevated risk for destructive utility-associated fires). Banning Electric Utility (BEU) meets or exceeds the minimum industry standard vegetation management practices. For transmission-level facilities, BEU complies with NERC FAC-003-4[14], where applicable. The BEU's *Wildfire Mitigation Plan*[15] describes the range of activities that BEU is taking to mitigate the threat of power-line ignited wildfires, including its various programs, policies, and procedures. BEU has completed vegetation management on all of its poles in the Tier 2 and Tier 3 areas and also in other areas identified by CAL Fire as possible hazardous to wildfire between May and July of 2022. The vegetation management activities include clearing away any tree branches, dry brush, or other types of vegetation within 4 feet of energized lines and up to 10 feet from the base of each pole operating at 12,470 volts and below. Per the BEU *Utility Wildfire Mitigation Plan*, in Tier 2 areas, the BEU conducts patrols of facilities every 2 years and conducts intensive pole testing[16] every 10 years. It should be noted that while drought conditions persist, patrols of Tier 2 threat areas are conducted annually. For both transmission and distribution level facilities, BEU meets: (1) Public Resources Code Section 4292; (2) Public Resources Code Section 4293; (3) GO 95 Rule 35; and (4) the GO 95 Appendix E Guidelines to Rule 35 requirements.[17,18]

Overall, implementation of the City-sponsored public infrastructure and facilities on the Development Site would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. As the City-sponsored infrastructure and facilities will be constructed, operated, and maintained pursuant to required fire protection requirements for utility facilities, the potential for increased fire risk from these facilities would be ***less than significant***.

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13 Tier 1 consists of areas that have the lowest hazards and risks. Tier 2 consists of areas on the CPUC Fire Threat Map where there is an elevated risk for destructive utility-associated wildfires. Finally, Tier 3 consists of areas on the CPUC Fire-Threat Map where there is an extreme risk for destructive utility-associated wildfires. For the BEU service area, the CPUC identifies four primary areas of wildfire potential within Banning: a Tier 2 threat level within the site of the Rancho San Gorgonio Development, a Tier 2 level in East Banning north and south of the Banning Airport, a Tier 2 threat level within the Communication Hill, Gilman Ranch, and Sunnyslope Cemetery areas, and a Tier 3 threat level in the Banning Canyon and Mias Canyon areas. There is also a short stretch of transmission line (0.9 mile long) in an open area south of the I-10 Freeway between Sunset Avenue and South Highland Home Road that is in a Tier 2 threat level area.

14 Relating to vegetation management on transmission rights-of-way.

15 *Banning Electric Utility Wildfire Mitigation Plan, Version 3.0*, September 2002. Banning Electric Utility.

16 Detailed pole tests to assess the condition of transmission and distribution poles to identify which poles need to be repaired or replaced. The specific tests include pole sounding, butt testing, and visual inspections. The test information is used to determine the pole strength and shell thickness.

17 Generally, these requirements pertain to clearance of vegetation and tree trimming in the vicinity of electrical-utility features.

18 Chapter 1206 of the CFC Fire Code was added to address a wide range of systems to generate and store energy. This chapter addresses standby and emergency power, portable generation, photovoltaic systems, fuel cell energy systems, and energy storage systems. The provisions of this chapter apply to the installation, operation, maintenance, repair, retrofitting, testing, commissioning, and decommissioning of these energy systems. It is anticipated the installation and operation of a BESS as envisioned, as permitted under the Specific Plan, would be conditioned by the City to demonstrate compliance with California Fire Code Chapter 1206.

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.

4.20.6.4 Expose People or Structures Significant Post-Fire Risks

Threshold 4.20-4: Would the Development Project 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?

After a wildfire passes through an area, post-fire hazards can occur based on conditions of the topography and susceptibility to flooding. Post-fire landslide hazards include fast-moving, highly destructive debris flows that can occur in the years immediately after wildfires in response to high intensity rainfall events, and those flows that are generated over longer time periods accompanied by root decay and loss of soil strength.[19] Post-fire debris flows are specifically hazardous because they can occur with little warning, can exert great impulsive loads on objects in their paths, can strip vegetation, block drainage ways, damage structures, and endanger human life.[20] Wildfires also have the potential to destabilize preexisting deep-seated landslides over long time periods.[21]

Landslides. According to the FPP, the Development Site is situated on a relatively flat undeveloped area with several seasonal natural drainages that drain to Smith Creek, which traverses the western portion of the Development Site, and eventually to the San Gorgonio and Whitewater Rivers. The topography surrounding the Development Site is also relatively flat. According to the California Department of Conservation, no landslides have been inventoried on or adjacent to the Development Site; however, the Development Site is susceptible to deep-seated landslides.[22] The *Geologic and Geotechnical Review* prepared for the Development Site provides measures for the Development Project that would provide slope stability and reduce vulnerability of post-fire landslide conditions if a wildfire were to infiltrate into the Development Site. As described above, the Development Project would be required to comply with the measures of the approved FPP and FMP (**RCM FIRE-1**).

In the extremely unlikely event that a wildfire should spread to the Development Site, it would not expose any on-site slopes to erosion and potential failure because, as discussed above, the Development Site does not contain any steep slopes that are prone to landslide. The Development Project would not expose people or structures to significant risks, including downslope landslides, as a result of runoff, post-fire slope instability, or drainage changes. There would be a ***less than significant impact*** to Development Site occupants or nearby residents or workers related to post-wildfire landslide risks and no mitigation would be required.

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19 United States Geological Survey. *Natural Hazards.* "What Should I Know about Wildfires and Debris Flows?" Website: https://www.usgs.gov/faqs/what-should-i-know-about-wildfires-and-debris-flows?qt-news_science_products=0#qt-news_science_products (accessed July 14, 2021).

20 Ibid.

21 Ibid.

22 California Department of Conservation. Landslide Inventory. Website: https://maps.conservation.ca.gov/cgs/lsi/app/ (accessed July 14, 2021).

Flooding and Drainage. According to the Federal Emergency Management Administration, the Development Site is located on FIRM Panel 06065C0816G (effective August 28,2008) and portions of the Development Site are designated as Flood Zone A.[23] The Development Site has Flood Zone A designations based on the existing natural drainages that cross the Development Site. A fire north of the Development Site could trigger increased downstream sediment movement, which could raise the elevation of potential flooding along the natural drainages in the Development Site. The design of the Development Project considers such events and would be developed in accordance with standards and Best Management Practices (BMPs) that would reduce flooding and post-fire flows.

The Development Project would be required to adhere to the FPP and FMP approved by the City and RCFD. Compliance with these plans would reduce the likelihood of urban conflagration on the Development Site in the unlikely event of a wildfire. In addition, according to the *Preliminary Hydrology and Hydraulics Study*, the Development Project would not exceed the existing peak discharge for 2-year, 25-year, or 100-year frequency storm events and would reduce the potential for flooding conditions in downstream storm drain facilities and on private property as compared to existing conditions.

In the unlikely event that a wildfire should spread to the Development Site, it is not expected that the Development Project would contribute any additional runoff or sedimentation to the on-site natural drainages or other downstream drainages. This is due to the lack of steep slopes prone to landslide or erosion on the Development Site, and the fact that the drainage improvements would remain intact after a major wildfire, allowing them to continue to reduce the potential for flooding conditions in downstream storm drain facilities. Therefore, downslope, or downstream flooding as a result of runoff, post-fire slope instability, or drainage changes are unlikely to expose occupants or structures on the Development Site to significant risks. Impacts to on-site occupants related to post-wildfire flooding or landslide risks would be ***less than significant*** and no mitigation is 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.

[23] Federal Emergency Management Administration (FEMA). Flood Insurance Rate Map (FIRM), Panel 06065C0816G. Website: https://msc.fema.gov/portal/search?AddressQuery=Banning#searchresultsanchor (accessed July 14, 2021).

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