8.0 ALTERNATIVES

In accordance with the California Environmental Quality Act (CEQA) and the *CEQA Guidelines* (Section 15126.6), an Environmental Impact Report (EIR) must describe a reasonable range of alternatives to the project, or to the location of the project, that could feasibly attain most of the project's basic objectives, while avoiding or substantially lessening any of the significantly adverse environmental effects of the project, and evaluate the comparable merits of the alternatives. An EIR does not need to consider every conceivable alternative to a project, rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible.

As an EIR identifies ways to mitigate or avoid significant effects that a project may have on the environment, the discussion of alternatives should focus on alternatives to the project or its location that are capable of avoiding or substantially lessening significant effects of the project. The EIR needs to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project, the significant effects of the alternative should be discussed, but in less detail than the significant effects of the project. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. CEQA states that an EIR should not consider alternatives "whose effect cannot be ascertained and whose implementation is remote and speculative."

In selecting project alternatives for analysis, the alternatives must be feasible. *CEQA Guidelines* Section 15126.6(f)(1) indicates that among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

This chapter begins with an overview of the Project and its significant and unavoidable effects, followed by a summary of the Project alternatives considered for evaluation, including those potential alternatives that were considered but rejected from further analysis. Each alternative selected for analysis is then fully described and evaluated for potential environmental effects as compared to the Project. The chapter concludes with identification of the environmentally superior alternative. **Table 8.Q** and **Table 8.R**, which are located at the end of this chapter, respectively provide a comparison of the issues quantified for each alternative and a comparison summary of the Project impacts to each of the identified alternatives fully evaluated in this chapter.

This assessment of alternatives is supported by supplemental technical analyses included in the following memoranda provided as appendices to this EIR:

- *Alternatives Analysis Summary for Air Quality*, LSA, October 10, 2023 (see Appendix L-1);
- *Alternatives Analysis Summary of Greenhouse Gas Emissions*, Michael Hendrix Consulting, October 20, 2023 (see Appendix L-2);

- *Sunset Crossroads - Alternatives Analysis for Traffic Noise*, LSA, August 25, 2023 (see Appendix L-3);

- *Sunset Crossroads Project Alternative Trip Generation Assessment*, Urban Crossroads, October 10, 2023 (see Appendix L-4); and

- *Sunset Crossroads Project Vehicle Miles Traveled (VMT) Alternatives Analysis*, Urban Crossroads, October 9, 2023 (see Appendix L-5).

8.1 OVERVIEW OF PROJECT AND ALTERNATIVES

This section provides an overview of the Project and the Project objectives, followed by a summary of the significant and unavoidable impacts identified for the Project. Refer to **Chapter 3.0** for a complete description of the Project and **Chapters 4.0 and 5.0** for a complete discussion of the environmental impacts that would occur with Project implementation.

8.1.1 Project Summary

As described in detail in **Chapter 3.0**, the Project includes the Development Project, comprised of the development of commercial and industrial uses and associated improvements on a 533.8-acre property (Development Site) located in part in the City of Banning (City) and in part in the City's Sphere of Influence (SOI) in unincorporated Riverside County (County), California, which is proposed to be entitled through, among other things, adoption of the Sunset Crossroads Specific Plan (Specific Plan). Among other associated infrastructure improvements, the Specific Plan proposes to establish 19 Planning Areas consisting of the following:

- Up to 268,400 square feet of medical office, professional office, education, recreation, and commercial uses, including Travel Center Retail Uses, a Fueling Facility, and a hotel with 125 rooms (comprised of approximately 90,000 square feet) in a 47.9-acre area on the Northern Portion of the Development Site;[1]

- Up to 5,545,000 square feet of industrial land uses within a 392.0-acre portion of the Development Site, including 330,000 square feet of cold storage uses;

- A 65 megawatt-hours (MWh) Battery Energy Storage Systems (BESS) facility comprised of main transformers, disconnect switches, breakers and an approximately 85-foot power pole, to be constructed by the Applicant in an industrially zoned portion of the Development Site, likely associated with the planned electrical substation in PA 7.

- 65.6 acres of land designated for Open Space – Resources (53.0 acres) and Open Space – Parks (12.6 acres); and

- Approximately 28.3 acres of internal circulation features.

[1] The 90,000 square feet of hotel use is not counted as part of Planning Area 1's 268,400 Maximum Building Square Footage because traffic analysis for hotels is calculated by number of rooms, not by square footage.

With the approval of the Project, the City of Banning General Plan would be amended to change the Development Site land uses from residential, commercial, and open space to industrial, commercial, and open space. In addition, the Project Applicant will seek to have the Southern Portion of the Development Site annexed into the City of Banning through an action by the Riverside County Local Agency Formation Commission (LAFCO).

Additionally, as described in **Chapter 5.0**, to comply with State law, the Project includes the Mt. San Jacinto College (MSJC) Entitlements on the approximately 49.2-acre MSJC Site, creating capacity for up to 1,181 units of housing. The MSJC Entitlements are comprised of (1) a General Plan Land Use Amendment (GPA) and (2) a change to the Official Zoning Map (ZC) on the MSJC Site to change the land use designation and zoning from PF–S (Public Facilities-Schools[2]) to VHDR (Very High Density Residential), with a density range of 18–24 dwelling units per acre (18-24 DU/AC). The City's VHDR land use designation authorizes condominiums and townhomes, as well as apartments with the provision of common area amenities and open space. The clustering of condominiums and townhomes is appropriate with the provision of common area amenities and open space. To ensure that existing and future school facilities and any future residential development are compatible, and to provide for the clustering allowed by the City's Municipal Code, the City will establish by ordinance a specific plan overlay (overlay) coterminous with the MSJC Site boundary. The overlay would require preparation and adoption of a Specific Plan, pursuant to Chapter 17.96 of the Banning Municipal Code (BMC) prior to development of VHDR residential uses on the MSJC Site. Although no physical disturbance is proposed or authorized at this time, subsequent development of the MSJC Site with VHDR uses at some future point in time would be subject to the land use requirements established by the MSJC Entitlements and the design considerations detailed in the required future Specific Plan.

As appropriate and applicable, the Project assessed in this chapter includes the Development Project and the MSJC Entitlements detailed above and compares the Project impacts with the impacts of each Alternative.

8.1.2 Project Objectives

The following objectives of the proposed Project are based on the City's Vision Statement and Goals from various General Plan elements:

- Establish a functional and balanced pattern of land use that maximizes economic opportunity and provides needed public improvements for City residents.
- Establish land uses for properties in the City's sphere of influence that will create positive fiscal impact to the City and provide sufficient fiscal benefit to permit annexation of the property upon which the project is proposed into the City.

[2] The MSJC Site is zoned Public Facilities (PF) with the School (S) suffix, as identified through Chapter 17.16 of the BMC, public and private schools, including college facilities. The MSJC Site is owned by the Mt. San Jacinto College (MSJC) – Community College District (MSJCCD) and serves as a satellite campus occupied by the MSJCCD's Beaumont Middle College High School, which serves underrepresented students and is designed to raise graduation rates and prepare students for transfer to 4-year colleges or to obtain an associate degree. The current campus facilities comprising one administration building, two classroom buildings, and one ancillary building, and surface parking are located on three parcels collectively encompassing 8.3 acres.

- Promote job creating uses that reduce the need for City residents to commute outside of the City for employment, thereby improving the City's jobs to housing ratio.

- Locate industrial and commercial uses that rely on transportation efficiency in areas with convenient access to the local and regional transportation network, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region to the extent feasible.

- Address a need in the City for commercial and industrial land uses that accommodate a variety of modern industrial, business, hospitality and commercial activities.

- Provide commercial development that allows for a diversified economy, complements existing uses, provides a range of employment opportunities, and promotes a safe and enjoyable shopping experience for residents and visitors.

- Use comprehensive planning tools to create a master-planned development that will be marketable to users, establish an aesthetically pleasing environment and minimize impacts to adjoining uses.

- Increase City sales and property tax revenues by establishing commercial and industrial uses in the City that can increase City revenues and assist in offsetting public services costs incurred by the City in development and maintenance of housing and public facilities.

- Assist in managing supply and demand for electric services to maintain and increase the existing renewables portfolio standard while minimizing costs to rate payers.

- Assist the City in developing roadway and utility infrastructure to support the anticipated growth requirements of the City and to improve accessibility in areas of the City and the City's sphere of influence that currently have limited infrastructure to serve the needs of local residents and businesses.

- Conserve natural drainage features and open space to provide a balance between the built and natural environment.

- Minimize the demand for water resources and other public services by creating drought tolerant landscaping and encouraging use of recycled water.

A comparison of how the alternatives satisfy these objectives is provided in **Table 8.S**, which is provided later in this chapter.

8.1.3 Significant and Unavoidable Impacts

The intent of an alternatives analysis is to avoid or substantially lessen the significant and unavoidable impacts identified for the Project, which are identified in **Table 8.A: Significant Environmental Effects that Cannot be Avoided**, below. Refer to **Chapter 4.0** for additional discussion and **Table 1.B** for a more comprehensive summary of Project impacts. Note that no significant unavoidable impacts were identified for adoption of the MSJC Entitlements, as discussed in **Chapter 5.0**.

Table 8.A: Significant Environmental Effects that Cannot Be Avoided

Topic (EIR Section)	Impact	Significance Determination	Details of Impact
Air Quality (4.3.6.1)	Implementation of the Development Project would conflict with implementation of the applicable air quality plan.	Significant and Unavoidable	The Development Project results in an exceedance of criteria pollutants. Furthermore, the Development Project is not consistent with the land use assumptions cited in the 2022 Air Quality Management Plan (AQMP). Due to this inconsistency and the level of criteria pollutants, the Development Project is inconsistent with the 2022 AQMP and impacts would be significant and unavoidable as mitigation is not available to reduce emissions to below SCAQMD thresholds.
Air Quality 4.3.6.2	Implementation of the Development Project would result in exceedance of VOC emissions during project construction.	Significant and Unavoidable	Maximum daily construction emissions would be less than the SCAQMD thresholds of all pollutants except for VOCs. **Mitigation Measure AIR-1** would reduce construction VOCs by requiring low-VOC paint application. There are no additional feasible mitigation measures to further reduce VOC emissions to below SCAQMD daily thresholds.
Air Quality 4.3.6.2	Implementation of the Development Project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under an applicable federal or State ambient air quality standard.	Significant and Unavoidable	Emissions associated with operation of the Development Project would exceed established SCAQMD thresholds. Despite the incorporation of operational practices and design features cited in **Mitigation Measure AIR-2**, operation of the Development Project would result in significant and unavoidable impacts for VOCs, NO_X, CO, PM_{10}, and $PM_{2.5}$.
Air Quality 4.3.6.2	Operation of the Development Project would result in a cumulative exceedance of SCAQMD emission thresholds.	Significant and Unavoidable	The Development Project's long-term operational emissions would exceed SCAQMD's criteria pollutant thresholds for all pollutants except SO_X. SCAQMD's operational emissions thresholds are designed to accomplish regional emissions goals. While **Mitigation Measure AIR-2** would reduce emissions to the extent feasible, project emissions would remain significant and unavoidable. Therefore, the Development Project's operations would result in a significant and unavoidable cumulative increase in long-term regional emissions.
Greenhouse Gas Emissions (4.8.5.1)	Implementation of the Development Project would generate GHG emissions that may have a significant impact on the environment.	Significant and Unavoidable	Project-related GHG emissions would exceed the City's 3,000 $MTCO_2e$ per year threshold. While implementation of **Mitigation Measures GHG-1** through **GHG-6** would reduce GHG emissions to 38,726.25 MT CO_2e/year. The majority of the mitigated GHG emissions (66 percent) are associated with non-construction mobile sources that are either federally or State regulated. Neither the City of Banning nor the Development Project has control over these regulations, and no additional feasible measures are available that would further reduce GHG emissions.
Greenhouse Gas Emissions (4.8.5.2)	Implementation of the Development Project would conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emission of GHGs.	Significant and Unavoidable	The Development Project would not conflict with applicable local, regional, and statewide plans, policies, programs, and regulations that have been adopted for the purpose of reducing GHG emissions. Despite this consistency, the Development Project's long-term operational impacts would exceed the City's threshold of 3,000 MT CO_2e per year despite implementing project design features and all feasible mitigation. Thus, the Development Project may impede various plans' long-term GHG reduction goals (e.g., for 2030 and 2050), and a potentially significant impact may occur as a result of the Development Project.

Table 8.A: Significant Environmental Effects that Cannot Be Avoided

Topic (EIR Section)	Impact	Significance Determination	Details of Impact
Noise and Vibration (4.13.6.1)	Implementation of the Development Project would generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance.	Significant and Unavoidable	Existing private walls are located adjacent to residential uses along Sunset Avenue between Lincoln Street and Westward Avenue. Additional noise barriers at this location would not be feasible as walls are already in place and adding height to these walls would provide minimal noise reduction and would not achieve the noise reduction needed to reduce impacts to a less than significant level. Also, obtaining consent from residential property owners would not be possible. A minimum 6-foot-high wall adjacent to the existing MSJC buildings along Sunset Avenue would provide a noise reduction of 5 dBA and reduce traffic noise levels to below the City's noise standard of 65 dBA CNEL to 63.6 dBA CNEL; however, the off-site traffic noise impact at the MSJC campus uses remains significant because the construction of the wall would require approval of the property owner, which is outside of the control of the Project Applicant and the City. Due to the uncertainty if the wall would be constructed, a significant off-site noise impact to MSJC uses would occur. The Development Project would result in a significant permanent increase in ambient noise levels, and traffic noise levels would exceed the City's exterior noise standard of 65 dBA CNEL. In the absence of feasible or certain new mitigation measures that would reduce long-term off-site traffic noise levels along Sunset Avenue between Lincoln Street and Westward Avenue and at MSJC uses south of Westward Avenue, off-site traffic noise impacts from operation of the Development Project would be significant and unavoidable.
Noise and Vibration (4.13.6.1)	Nighttime noise levels at receptors would exceed the County's exterior nighttime 10-minute noise standard of 45 dBA L_{eq}. The Development Project would increase nighttime ambient noise levels by up to 4.1 dBA for residences at Receptors R-8, R-11 and R-12. Therefore, noise generated from operations of the Development Project would be significant.	Significant and Unavoidable	As the Development Project and residences at Receptors R-11 and R-12 have direct driveway access onto Bobcat Road, mitigation measures such as unbroken noise barriers would not be effective and mitigation is therefore infeasible. Therefore, noise impacts from operations of the Development Project would be significant and unavoidable.
Transportation (4.17.6.2)	Implementation of the Development Project would conflict with *CEQA Guidelines* Section 15064.3, subdivision (b).	Significant and Unavoidable	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 that exceeds the City's significance threshold of 25.9. The Development Project's non-retail VMT per employee would exceed the City's significance threshold of 25.9 by 4.95, which is an increase of 18.9 percent in VMT per employee. While the Transportation Demand Measures implemented pursuant to Mitigation Measure TRA-1 would realize a maximum 45 percent reduction in commute VMT, implementation of the feasible TDM measures cannot be guaranteed to reduce the industrial and service component's VMT per employee or the retail component's total VMT to a level of less than significant.

Source: Compiled by LSA (2023).

AQMP = Air Quality Management Plan
CNEL = Community Noise Equivalent Level
CO = carbon monoxide
dBA = A-weighted decibels
GHG = greenhouse gas
MSJC = Mt. San Jacinto College
MT CO_2e = metric tons of carbon dioxide equivalent
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
TDM = Transportation Demand Management
VMT = vehicle miles traveled
VOCs = volatile organic compounds

8.1.4 Summary of Project Alternatives

The purpose of this discussion of alternatives to the Project is to enable decision-makers to consider how alternatives to the Project may reduce or avoid the Project's impacts on the physical environment. As appropriate, the analysis in this chapter provides either a quantitative or qualitative evaluation of the environmental impacts that could be associated with each alternative and compares those potential impacts to those identified for the Project as described in **Chapters 4.0 and 5.0** of this EIR. **Table 8.R,** located at the end of this chapter, summarizes the impacts of the Project and compares those impacts to those that would be associated with each alternative.

Based on the goal of analyzing feasible alternatives that would feasibly attain most of the basic Project objectives and would avoid or substantially lessen any of the Project's potentially significant impacts, the following four alternatives to the Project were selected for analysis:

- **Alternative 1: No Project/No Build.** This alternative assumes that the Development Site would remain in its current, undeveloped condition. The MSJC Site would also not be rezoned for residential development. Refer to **Section 8.3** for a complete description and evaluation of this alternative.

- **Alternative 2: No Project/Existing General Plan and Zoning/Residential and Commercial Development.** This alternative assumes that the Development Site would remain undeveloped in the short term, but that future development could occur pursuant to existing City commercial and residential and County residential land use and zoning standards. Total residential development under this alternative would be comprised of 1,630 units. As with the Project, this alternative analyzes development of a125 room hotel (approximately 90,000 square feet), a 7,500-square-foot Travel Center, and 260,900 square feet of commercial/retail uses could also be developed on the Development Site. As there would be no net loss in residential capacity under this Alternative, the MSJC Site would also not be rezoned for residential development. Refer to **Section 8.4** for a complete description and evaluation of this alternative.

- **Alternative 3: Reduced Commercial Alternative.** This alternative assumes that the annexation of the Southern Portion of the Development Site proceeds and that the Development Project proceeds with the following changes: Commercial uses are removed from the Development Project with the exception of the hotel (approximately 90,000 square feet and 125 rooms) and travel center (7,500 square feet), resulting in removal of 260,900 square feet of commercial development. The area identified currently for those commercial uses in the Northern Portion of the Development Site would be replaced with 260,900 square feet of 'warehousing' uses (ITE LU 150). Other industrial uses will remain the same throughout the Development Site (same location, size, use, and ITE rates). In total, development under this alternative includes 5,805,900 square feet of industrial uses. As with the Project, to avoid net loss in residential capacity, the MSJC Site would be rezoned to allow development of up to 1,181 residential units. Refer to **Section 8.5** for a complete description and evaluation of this alternative.

- **Alternative 4: Reduced Industrial Alternative.** This alternative assumes that the annexation of the Southern Portion of the Development Site proceeds and that the Development Project proceeds with no changes to the commercial component of the Development Project and the

following changes to the industrial component: this alternative eliminates Building 9 (274,000 square feet of Warehousing uses) and foregoes the extension of Lincoln Street over the Smith Creek drainage. Additionally, this alternative replaces the warehousing and general light industrial uses in Buildings 5 and 6 with a single building containing 330,000 square feet of high-cube cold storage warehouse use. These changes result in a reduction of 422,000 square feet of industrial use and total industrial development of up to 5,123,000 square feet of industrial uses. This alternative does not require the extension of Lincoln Street beyond Planning Area 6, results in one less drainage crossing at Lincoln Street, and eliminates fire access to Highland Home Road at the Northern Portion of the Development Site as well as eliminating the buildout of Highland Home Road north of Sun Lakes Boulevard. Similar to the Development Project, the MSJC Site would be rezoned to allow development of up to 1,181 residential units. Refer to **Section 8.6** for a complete description and evaluation of this alternative.

The four alternatives identified above are discussed in greater detail in **Sections 8.3 through 8.6** below. The purpose of this discussion of alternatives is to enable decision-makers to consider how alternatives to the Project may substantially lessen or avoid the Project's impacts on the physical environment.

The MSJC Entitlements are included in the Project analysis only as a result of the proposed rezoning of the Development Site from residential to non-residential use and the State law requirement that the City rezone in another location to avoid a net loss of residential capacity. Because both Alternative 1 and Alternative 2 do not result in rezoning of the Northern Portion of the Development Site from residential to non-residential use, the MSJC Entitlements would not be adopted. Under these alternatives, it is anticipated that the MSJC Site would retain its public facilities designation and would be developed, if at all, with school facility uses that are not contemplated at this time. As any future development of the MSJC Site for school purposes would be speculative, no future development of educational or other facilities is contemplated for the MSJC Site under Alternatives 1 and 2. Under Alternatives 3 and 4, rezoning either at the MSJC Site or in another location identified by the City would be required. Because State law requires no net loss of residential units, no reduction in the residential unit count at the MSJC Site is contemplated in Alternatives 3 or 4. The infeasibility of alternative locations for this new residential zoning is discussed in **Section 8.2.4**. In addition, for Alternatives 3 and 4, development of a battery energy storage system within industrially zoned areas of the Development Site is also contemplated.

As is the case with the Development Project, all of the alternatives assume that the City has either previously approved or is in the process of considering various public improvements that may occur on or adjacent to the Development Site whether or not the Development Project proceeds. These are comprised of Sun Lakes Boulevard Extension, an electrical substation to serve the City's planned infrastructure needs, reverse osmosis facility, a potable water reservoir and the Sunset Avenue Bridge. These Public Facilities are analyzed in **Chapter 6.0** of this EIR and are not considered in this **Chapter 8.0**.

8.2 ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR FURTHER ANALYSIS

In accordance with Section 15126.6(c) of the *CEQA Guidelines*, an EIR should identify alternatives considered for analysis but rejected as infeasible, and briefly explain the reasons for their elimination.

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic project objectives, infeasibility, or inability to avoid any of the project's significant environmental impacts. Alternatives that have been initially considered and rejected as infeasible include the following**,** as detailed below, either because they would exceed or not substantially lessen the impacts of the Project being analyzed, are repetitive of other alternatives, or, based on City input, would not meet most of the City's basic objectives and requirements, or are otherwise considered infeasible.

8.2.1 Off-Site Alternative

Regarding alternative locations, per CEQA,[3] the first step is to determine whether any of the significant effects (see **Table 8.A**) would be avoided or substantially lessened by putting the project in a different location. Only locations that would avoid or substantially lessen any of the significant effects need be considered. Reasons for determining no feasible alternative locations exist must be disclosed in the EIR.

Generally, any development of the size and type proposed by the Project would have substantially the same environmental effect, regardless of where it was located in the City. The Development Site consists of 533.8 contiguous acres under a single ownership. Based on a review of the current and proposed development in the City, no single undeveloped property of sufficient size is available. The First Hathaway and Banning Commerce Center projects, located north of Interstate 10 (I-10), east of Hathaway Street, are currently under review by the City and are unavailable as an alternative site. Property east of these sites and west of Malki Road is controlled by the Morongo Band of Mission Indians and is not available as an alternative site. The Banning Distribution Project is slated for development on property south of I-10 and north of Banning Municipal Airport. Undeveloped land located between Banning Municipal Airport and the City's wastewater treatment facility is not sufficiently sized to accommodate the Development Project and is occupied by smaller industrial and residential uses which would require relocation. Land farther south is constrained by Smith Creek, rural residential uses, and the foothills of the San Jacinto Mountains. Other large currently undeveloped properties (the Butterfield Specific Plan [BSP] and RSG sites) are entitled with Specific Plans envisioning the development of residential and commercial uses; therefore, these sites are not available as alternative sites. Due to the size of the Development Site, the current ownership of other properties, current or pending entitlements, and/or site constraints, no alternative site is available to accommodate the Development Project; therefore, an off-site alternative was rejected from further consideration in this EIR.

The Project includes the transfer of residential capacity to the 49.2-acre MSJC Site, located south of Westward Avenue and east of Sunset Avenue. As part of its updated Housing Element, the City identified nine parcels that have been rezoned to VHDR to accommodate additional units required by the City's Regional Housing Needs Assessment (RHNA). Appendix B of the City's Housing Element update includes an inventory of "Vacant and Underutilized Sites"[4] which was consulted to determine if other alternate sites remain available to accept the Project's transfer of residential capacity. As the relocation of existing residents and removal of existing structures would result in potential impacts and would not be consistent with State law requirements to achieve no net loss of residential units,

3 *CEQA Guidelines* Section 15126.6(f)(2)
4 Table B-1, *City of Banning Housing Element Update 2021-2029*. October 2021.

only vacant sites included in this inventory were considered as potential alternative locations for the transfer of residential capacity[5] As there are no other singular potential sites large enough to fully accommodate the transfer of residential capacity required, consideration of an alternative site other than the MSJC Site was deemed infeasible and was not carried forward for further analysis in Alternatives 3 or 4.

8.2.2 Increased Commercial Use Alternative

Under the existing ITE rates used to develop traffic models, commercial trip generation rates are substantially higher than that of the highest intensity industrial use. Therefore, increased commercial intensity or replacement of any industrial use with commercial use would generate more traffic than would the industrial uses under the Development Project. As the Development Project already has significant project-level and cumulative air quality and greenhouse gas impacts, and because mobile source emissions are the greatest contributor to these emissions, it is reasonable to conclude that increases in project traffic resulting from more intensive commercial uses would be equally or more significant and unavoidable.

As this potential alternative would not substantially lessen or avoid significant and unavoidable impacts associated with the Development Project, this alternative was rejected from further consideration in this EIR.

8.2.3 Office Use Alternative

The traffic assessment for the Development Project anticipated a variety of industrial uses. The daily and peak hour trips for the most traffic intensive industrial use[6] estimated daily, a.m. peak hour, and p.m. peak hour rates are 4.96, 0.70, and 0.63 trips per 1,000 square feet of use, respectively. Trip generation rates for general office uses in an urban/suburban setting[7] are 10.84 daily trips, 1.52 a.m. peak hour trips, and 1.44 p.m. peak hour trips per 1,000 square feet. Assuming the replacement of industrial square footage with an equal amount of office space, per 1,000 square feet of development, it is reasonable to conclude that office uses would generate more passenger car traffic than industrial uses[8].

As mobile source emissions are the primary contributor of pollutants and greenhouse gas emissions, with the increase in traffic associated with development of office uses, it is reasonable to conclude that increases in traffic under this potential alternative would increase the level of pollutants and

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5 The City has identified in its Housing Element all other feasible locations which it views as appropriate for housing development and that are not currently zoned for housing development. These areas are primarily infill but none would so efficiently replace the scope and extent of housing and on a unit for unit basis. The transfer of units would generate the same number of trips and therefore equivalent air quality, noise and GHG impacts. Should the transfer occur over multiple sites, the possibility exists for greater impact to existing uses (due to proximity) and potentially increased VMT impacts due to the dispersed nature of multiple sites.

6 *ITE Trip Generation Manual* (11th Edition), Land Use 110 - "General Light Industrial."

7 *ITE Trip Generation Manual* (11th Edition), Land Use 710 - "General Office Building," Setting/Location - "General Urban/Suburban."

8 Based on the "Land Use 710" rate, this rejected alternative would generate approximately 59,533 passenger cars trips from offices uses and 7,702 from commercial uses (67,255 passenger car trips total), Truck uses generated total 1,718 trips with 554 and 1,164 generated from office and commercial uses, respectively. In comparison, the Development project generates 17,166 passenger vehicle 3,330 truck trips (20,496 trips total). While truck trips are 52 percent of that associated with the Development project, passenger vehicle trips are increased by nearly 400 percent.

greenhouse gases emitted, and similar to the Development Project would result in significant and unavoidable project-specific and cumulative impacts. Furthermore, due to the increased level of traffic from office uses, traffic noise impacts from operation of this potential alternative would result in significant and unavoidable increases in ambient noise levels, and traffic noise levels would exceed the City's exterior noise standard of 65 dBA CNEL.

As this potential alternative would not substantially lessen or avoid the significant and unavoidable impacts associated with the Development Project, this alternative was rejected from further consideration in this EIR.

8.2.4 Residential Alternative (with Annexation)

This alternative would analyze development of the Development Site with a mix of residential options and includes annexation of the Southern Portion of the Development Site into the City for redevelopment with residential uses. Alternative 2 (Existing General Plan and Zoning) already considers potential impacts associated with development of the Development Site with residential uses. Furthermore, without inclusion of development of commercial or industrial uses in this portion of the Development Site, which is in the City's sphere of influence, it is not likely this potential alternative would generate sufficient revenue to justify annexation into the City.

As a residential alternative is already under consideration (see **Section 8.4** below), further assessment of this potential alternative was not pursued.

8.2.5 Reduced Residential Alternative

A reduction in the amount of residential development was considered, though rejected as the City would be required to justify that zoning reduction under State law based on public health and safety reasons. Furthermore, such an alternative would fail to satisfy any of the basic project objectives identified by the City for development of the site.

8.2.6 Increased Residential Alternative

A potential alternative increasing the residential density of the site was considered, though rejected as it would generate traffic in excess of that identified for the Development Project, proportionally increase the emission of air and greenhouse gas pollutants, and likely increase vehicle miles traveled, making it unlikely to substantially lessen or avoid any of the significant impacts associated with the Development Project[9]. Furthermore, use of the site for residential development would not satisfy the most of the basic project objectives identified by the City for development of the Development Site.

[9] Alternative 2 envisions development of 1,630 units on the Development Site. The portion of the Development Site currently zoned for commercial uses would be developed as proposed by the Project with the hotel (approximately 90,000 square feet and 125 rooms), travel center (7,500 square feet), and 260,900 square feet of commercial/retail uses. As detailed in Section 8.4, Alternative 2 was determined to generate vehicle trips and air pollutants in excess of that associated with the Development Project. It is reasonable to conclude that increasing residential density beyond that identified in Alternative 2, when compared to the Development Project, these exceedances would be further increased.

8.3 ALTERNATIVE 1: NO PROJECT/NO BUILD

The following provides a description of Alternative 1 and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of this alternative to the environmental impacts associated with the Project. The discussion includes a determination of whether or not the Alternative 1 would substantially lessen, eliminate, or create new significant environmental impacts and would or would not meet most of the basic objectives of the Project.

8.3.1 Alternative 1 Characteristics

Alternative 1 assumes that the 533.8-acre Development Site would remain in its current, undeveloped condition. No development would occur, and the site would not be rezoned. Incidental grazing and agricultural uses could take place but would not be anticipated to occur on a large-scale basis. The approximately 49.2-acre MSJC Site would not be rezoned to allow for residential development under this alternative, as there would be no requirement to concurrently rezone another site to avoid net loss of residential capacity. In the absence of the MSJC Entitlements, no change in the condition of the Development Site or future development of the MSJC Site with residential uses would occur. The Sunset Avenue Bridge, which was approved as part of the entitlements for the RSG project, would proceed as required to construct the RSG project.

8.3.2 Analysis of Alternative 1

The potential impacts associated with Alternative 1are described below. As discussed, this alternative would avoid the significant impacts associated with the Project and no mitigation measures would be required; however, none of the project objectives would be achieved.

8.3.2.1 Aesthetics

Under this alternative, no development would occur on the Project Sites. Views to and through the Project Sites would not be affected by topographic alterations, the removal of vegetation, or the installation of buildings, signage, or project landscaping, and views would remain unchanged. While impacts associated with the Project under each CEQA threshold of significance for this impact area were determined to be less than significant, the Project would result in development of undeveloped land, which would not occur under this alternative. In the absence of any development, ***no impact*** to the current aesthetic condition would occur under this alternative and compared to the Project, impacts would be avoided.[10]

8.3.2.2 Agriculture and Forestry Resources

Under this alternative, the Project Sites would remain undeveloped. In the absence of any development, ***no impact*** related to the loss of important farmland or conversion of land zoned for

[10] While the City could independently construct, or cause the construction of, the SLB Extension or the Sunset Avenue Bridge and other roadways in the vicinity of the Project Sites, which might provide new public vantage points for viewing the Project Site, or would construct or cause the construction of the electric substation, potable water reservoir and/or reverse osmosis facility, these are not part of the Project and do not affect analysis of Project impacts on Aesthetics. Each of these is small in relationship to the overall size of the Project Site, and each would be subject to independent analysis by the City under CEQA prior to proceeding. CEQA analysis would include evaluation of aesthetic impacts and may require construction of walls, fencing or landscaping or other mitigation to shield these facilities from public view in the event of potential impact requiring mitigation.

agriculture or forestry resources would occur under each CEQA threshold of significance for this impact area and compared to the Project, impacts would be avoided. Agricultural uses could incidentally proceed but would not be anticipated on a large-scale basis.

8.3.2.3 Air Quality

In the absence of Project development, pollutants emitted during construction and operation of the Project would not occur. Under this alternative, there would be no new impacts under each of the relevant thresholds of significance and the significant and unavoidable impacts related to the Development Project's inconsistency with the Air Quality Management Plan, the cumulatively considerable increase of criteria pollutants for which the Basin is in non-attainment, and the exceedance of SCAQMD emission thresholds would not occur. In the absence of any development, ***no impact*** to air quality would occur under this alternative; therefore, compared to Project, impacts would be avoided.

8.3.2.4 Biological Resources

Under this alternative, the Project Sites would remain undeveloped. The topography of the Project Sites, existing vegetative cover, riparian and riverine resources, and on-site habitat would be maintained in their current condition. The enhancements to existing riparian areas that would be initiated under the Development Project would not occur under this alternative. While the Development Project includes mitigation to reduce biological resource impacts to a less than significant level, in the absence of any development, ***no impact*** to on-site biological resources would occur under this alternative; therefore, compared to the Project, impacts would be avoided.

8.3.2.5 Cultural Resources

Under this alternative, the Project Sites would remain undeveloped. As no disturbance of existing topography would occur, there is no potential for impact to previously identified or any as-of-yet undiscovered cultural materials may exist at the Project Sites. While the Development Project includes mitigation to reduce cultural resource impacts to a less than significant level, in the absence of any development, ***no impact*** to on-site cultural resources would occur under this alternative; therefore, compared to the Development Project, impacts would be avoided.

8.3.2.6 Energy Resources

In the absence of on-site development, there would be no short-term (construction) or long-term (occupancy) increase in the demand for energy resources and ***no impact*** would occur. While the energy resource impacts of the Development Project were determined to be less than significant, the energy resource impacts associated with this alternative would be avoided.

8.3.2.7 Geology and Soils

The geologic, soil/erosion, and paleontological resource impacts associated with the Project would be reduced through the compliance with standard conditions and/or mitigation measures to less than significant, or would have no impact without such measures for each threshold of significance. As the Project Sites would remain undeveloped under this alternative, ***no impact*** or increased potential for damage to structures/facilities or injury to persons resulting from geologic conditions or seismic/seismic-related events would occur. Furthermore, in the absence of any modification to

existing topography, the potential for disturbance to any potential paleontological resource that may be located on site would not occur. Compared to the Project, impacts associated with this alternative would be avoided.

8.3.2.8 Greenhouse Gas Emissions

As previously stated, no construction or operational activities would occur on site, and no mobile or stationary sources of greenhouse gas emissions would be generated. The undeveloped Project Sites also would not generate any vehicle trips that may contribute emissions into the air basin. As no greenhouse gas would be emitted under this alternative, the Development Project's significant and unavoidable impacts would be eliminated and ***no impact*** would occur. Compared to the Project, impacts would be avoided.

8.3.2.9 Hazards and Hazardous Materials

For a discussion of fire hazards related to this alternative, please refer to **Section 8.3.2.20** of this EIR. Compared to Project, wildfire risk would remain the same or may increase under this alternative. For other CEQA thresholds of significance, under this alternative, no construction or operational activities would occur. Therefore, no hazards or hazardous materials would be introduced to the project site and ***no impact*** would occur. Compared to the Development Project, impacts would be avoided, although for wildfire risk they may remain the same or increase.

8.3.2.10 Hydrology and Water Quality

Under this alternative, no Project development would occur outside of the SLB Extension project areas; the entirety of the Project Sites would remain vacant. It is expected the SLB Extension, if constructed, would include features to facilitate the continuation of existing drainage patterns through the Development Site or would be required to mitigate to less than significant. Outside of the SLB Extension, on-site drainages would be maintained in their current condition and no roadway crossings would be installed. Changes in the pattern or volume of current flows would not occur. In the absence of building footprints or paved surfaces, no change in surface permeability or increased chance of polluted runoff would occur. While the Development Project included measures to reduce impacts related to local hydrology and water quality to below a significant level, retention of the Development Site in its undeveloped condition would result in ***no impact***; therefore, compared to the Project, the hydrology and water impacts associated with this alternative would be avoided.

8.3.2.11 Land Use and Planning

As no development would occur under this alternative, the Project Sites would retain the existing General Plan and Zoning designations and annexation of the Southern Portion of the Development Site would not occur. In the absence of the required land use action or the development of structures, ***no impact*** would occur. Compared to the Project, land use impacts would be avoided.

8.3.2.12 Mineral Resources

In the absence of any Project development, ***no impact*** related to mineral resources or extraction would occur. The level of impact associated with this issue is similar to that associated with the Project.

8.3.2.13 Noise and Vibration

The absence of construction activity would eliminate construction noise; therefore, ***no impact*** would occur. A significant and unavoidable noise impact associated with Development Project traffic noise was identified for residents west of Sunset Avenue (between Lincoln Street and Westward Avenue) and a operational noise impact (from stationary sources) was noted for residences south of Bobcat Road The elimination of the Development Project traffic under this alternative would reduce average daily traffic volumes on local roadway segments that contribute to a permanent increase in ambient noise in excess of established standards; therefore, this significant and unavoidable noise impact would be eliminated. Additionally, the stationary noise sources associated with the commercial and industrial uses which would contribute to future noise conditions, would also be eliminated. As this alternative would not add noise to the existing noise environment, ***no impacts*** would occur. Compared to the Project, the noise impacts associated with this alternative are avoided.

8.3.2.14 Population and Housing

The City could proceed with construction of the Public Facilities to service existing and future demand consistent with the forecasts in the General Plan and/or Integrated Water Plan. Because the balance of the Project Sites would remain undeveloped, no temporary or permanent increase in population related to the occupancy of residences or new employment opportunities would occur. Generally, the City of Banning maintains more housing than available employment opportunities; absent the Development Project's 5,993 new jobs, the construction and occupation of other large residential projects in the City may exacerbate the existing job-housing imbalance since the Project serves to improve the jobs-housing imbalance in the City. However, compared to the Project, under the Appendix G thresholds of significance, there would be a greater impact under threshold (a) and ***no impact*** under threshold (b) under this alternative.

8.3.2.15 Public Services

In the absence of any development on the Project Sites, no increase in the demand for police, fire protection, school, park, or other government services and/or the need for new public service facilities would occur and ***no impact*** is anticipated. While impacts to public services were determined to be less than significant for the Project, comparatively, the level of impact associated with this alternative would be reduced.

8.3.2.16 Recreation

The Development Project would not result in increase in residential units and the MSJC Site would not result in development of residential units; therefore, the Project would have a less than significant impact on Recreation. In the absence of any development on the Project Sites, no increased demand on or for park or recreation facilities would occur and ***no impact*** is anticipated. Compared to the Project, the level of impact associated with this alternative would be reduced.

8.3.2.17 Transportation

The No Project/No Build alternative would result in the continuation of existing conditions on the Project Sites and would not result in an increase in daily traffic volumes on local or regional roadways; therefore, traffic operations at intersections and along roadway segments would not be altered. In the absence of development, the 5,993 new job opportunities resulting from implementation of the

Development Project would not occur which may cause persons to travel further for employment. While the significant VMT impact directly created through the implementation of the Development Project would not occur under this alternative, it is unknown if the absence of these jobs would indirectly contribute to a regional increase in VMT. Nonetheless, compared to the Development Project, the VMT impacts associated with this alternative likely are avoided and there would be ***no impact*** on transportation.

8.3.2.18 Tribal Cultural Resources

Under this alternative, the Project Sites would remain undeveloped. As no disturbance of existing topography would occur, there is no potential for impact to previously identified or any as-of-yet undiscovered tribal cultural materials that may exist. While the Development Project includes mitigation to reduce tribal cultural resource impacts to a less than significant level, in the absence of any on-site disturbance, ***no impact*** to on-site tribal cultural resources would occur under this alternative; therefore, compared to the Development Project, impacts would be reduced.

8.3.2.19 Utilities and Service Systems

In the absence of any development on the Project Sites, no increase in demand for water or increased generation of wastewater or solid waste would occur. No change in the capacity or functioning of the existing public utility systems would occur, and therefore ***no impact*** would occur.

8.3.2.20 Wildfire

As no structures would be developed under this alternative, the retention of the Project Sites in their current condition would eliminate the wildland fire hazard to any on-site structure or person. Additionally, the elimination of structures and human activity in the wildland-urban interface area may contribute to a reduced potential for human-induced ignition events.

The Development Project and subsequent MSJC Site development require the implementation of a development-specific Fire Protection Plan, which includes the establishment and maintenance of Fuel Management Zones. As stated in the Fire Protection Plan, "…When fire protection is implemented at the parcel level and leverages ignition resistant building materials, infrastructure improvements, and landscape design the wildfire risk can be significantly reduced in the surrounding environment. When wildfire is planned for and incorporated into the building design, such as with the Project, it can not only withstand wildfire, but prevent it. This prevention benefits the Development Project and the surrounding areas by reducing the landscape level fire risk. Further, given the Project's multi-scaled approach to fire protection, it is unlikely that the Project Site would be a significant source of ignitions and result in increased off-site impacts related to wildfire. In the absence of fire protection afforded by the Project and the extent and volume of existing ignition sources, it is possible areas prone to wildland fires would extend closer to residential areas (e.g., Sun Lakes Community). Though it is reasonable that current fire protection requirements and fire service providers would continue to provide an appropriate level of service to existing uses in the project area, compared to the Project, there is a potential that fire hazards under this alternative may be increased, though compliance with current fire protection standards/practices required by the City (e.g., clearance of flammable vegetation, etc.) would ensure no new or greater wildland fire hazard would result from retention of the existing conditions.

8.3.3 Summary of Alternative 1

While this alternative would eliminate the significant and unavoidable impacts associated with the Development Project, as well as reduce those impacts determined to be less than significant, it would not meet any of the project objectives. Since the Development Site would remain undeveloped and vacant, this alternative would not: (1) create positive fiscal impact to the City, (2) promote job creating uses that reduce the need for City residents to commute outside of the City for employment, (3) improve transportation efficiency by taking advantage of the site's proximity to local and regional access for industrial and commercial use, (4) address a need in the City for commercial and industrial land uses that accommodate a variety of modern industrial, business, hospitality, and commercial activities, (5) provide uses that allow for a diversified economy, complements existing uses, and provide a range of employment opportunities, or (6) increase City sales and property tax revenues by establishing commercial and industrial uses in the City that can increase City revenues and assist in offsetting public services costs incurred by the City in development and maintenance of housing and public facilities.

8.4 ALTERNATIVE 2: NO PROJECT/EXISTING GENERAL PLAN AND ZONING

The following provides a description of Alternative 2 and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of this alternative to the environmental impacts associated with the Project. The discussion includes a determination of whether Alternative 2 would substantially lessen, eliminate, or create new significant environmental impacts and would or would not meet most of the basic objectives of the Project.

8.4.1 Alternative 2 Characteristics

Alternative 2 assumes that the Development Site would remain undeveloped in the short term, but that future development could occur pursuant to existing land use and zoning standards applicable to the Development Site. This alternative assumes that the Southern Portion of the Development Site would not be annexed to the City of Banning. Under this alternative, the portion of the Development Site currently zoned for commercial uses would be developed as proposed by the Development Project with the hotel (approximately 90,000 square feet and 125 rooms), travel center (7,500 square feet), and 260,900 square feet of commercial/retail uses.

The remainder of the Development Site would be developed with residential and open space uses. This alternative assumes that the Northern Portion of the Development Site, which is located within the City and would be built out consistent with the City's General Plan, which designates the area with the previously mentioned General Commercial land uses and a mix of Low Density Residential (LDR), Medium Density Residential (MDR), High Density Residential (HDR), and Open Space land uses. For this alternative, the Northern Portion of the Development Site would be developed at maximum permitted densities with up to 339 single-family residential units within the LDR designated areas, up to 645 multi-family apartment units in MDR designated areas and up to 162 apartments in HDR areas, for a total of up to 1,146 residential units. The multiple-family apartment uses would be limited to four stories.

The Southern Portion of the Development Site is under the jurisdiction of the County of Riverside and currently has a General Plan land use designation of LDR and a zoning designation of Light Agriculture

(A-1-10). This alternative assumes development within this area would result in up to 484 single-family dwellings consistent with the General Plan maximum land use, which permits a maximum of 1 unit per half acre. Total residential development under this alternative would be comprised of 1,630 units. Under this alternative, MSJC Entitlements are not required as there is no loss of residential capacity. The MSJC Site would remain in its current state, substantially vacant land zoned for public facilities, with approximately 8.3 acres containing existing school facilities.

8.4.2 Analysis of Alternative 2

The potential impacts associated with Alternative 2 are described below. The MSJC Entitlements aspect of the Project would not be required under this alternative because there would be no net loss of residential capacity. In the absence of any transfer of residential capacity, future development of the MSJC Site with VHDR uses would not occur. Under this alternative, any impact (direct, indirect, or cumulative) associated with such development previously identified in this EIR would not occur. Therefore, under this alternative, impacts related to the MSJC Site would be similar to the No Project alternative, and the MSJC Site is not included in further discussion of the potential environmental effects of this alternative.

8.4.2.1 Aesthetics

The Development Site is currently undeveloped and represents an open space area in Banning. While the Development Project would retain existing drainage features and other open space areas within 65.4 acres, development pursuant to the Project's Specific Plan would result in the conversion of open, natural areas to a collection of industrial and commercial buildings and a supporting inventory of ancillary features/facilities (e.g., roadways, parking areas, lighting, signage, landscaping, utilities). The conversion of the site to urban uses represents a permanent and irreversible change in the existing aesthetic character of the site.

This alternative anticipates the Northern Portion of the Development Site would be developed. The current development standards include residential heights of up to 35 feet (two stories) for low density uses and up to 60 feet (four stories) for high density uses.[11] From vantage points along adjacent roadways, instead of the large masses of industrial buildings, viewers would see individual residential dwellings, perimeter landscaping, and ancillary features. Multi-story medium density buildings and high density residential buildings (up to 45 and 60 feet, respectively) would be developed along I-10, Sunset Avenue, and Highland Home Road.

As this alternative retains the commercial area, views of the Development Site under this alternative from westbound I-10 would be similar to that of the Development Project. Under this alternative, medium and high density buildings would replace proposed industrial buildings in Planning Area 2 (Buildings 5 and 6). The maximum heights of industrial buildings in this area for the Development Project is 60 feet (with an additional 10 feet permitted for solar arrays). Under this alternative, rather than a single, long expanse of buildings fronting the roadway, the development of residential uses along Sunset Avenue (between Lincoln Street and the SLB Extension) would likely occur through the construction of a number of buildings with smaller and more varied facades. This alternative would

[11] Development standards north of SLB maximum height (City of Banning Municipal Code, Table 17.08.030) LDR: 2 stories/35 feet, MDR: 3 stories/45 feet, HDR: 4 stories/60 feet. Per Riverside County Code, Section 17.120.20, maximum single-family residential (SFR) height of 40 feet.

likely result in the development of buildings of slightly reduced height along Sunset Avenue, allowing views past and through the buildings, which does not occur with the Development Project. Currently, views from I-10 to the Development Site (western limits) are partially blocked by the vegetated shoulder of the freeway. Under this alternative, only the upper floor of the medium density residential buildings would be visible. While individual residential structures would still be visible from this location, similar to the Development Project (which allows buildings up to 60 feet in height) (see **Figure 4.1.2-A**), views to foothills and nearby peaks of the San Jacinto Mountains Range would not be substantially altered. Under this alternative, the Development Project's Open Space areas (Planning Areas 11, 12, and the undeveloped portion of Planning Area 7) adjacent to the existing Sun Lakes Community would be developed with low and medium density residential uses. Views of distant mountains are unlikely to be altered. While these residential uses would not exceed the height of proposed industrial uses, the number of buildings and increased proximity to existing residences may alter the immediate visual character of the area, though it is anticipated that residential development under this alternative would be implemented pursuant to existing City guidelines to ensure the design and construction of uses has a ***less than significant*** aesthetic effect.

Due to intervening topography, distance, existing buildings, and vegetation (i.e., trees), the Development Site is not visible from SR-243. Similar to the Development Project, development under this alternative would not be within, adjacent, or near a State-designated scenic highway, and ***no impact*** would occur.

Development under this alternative would introduce light in the form of residential, street lighting, and vehicle lighting. While the number, location, and type of lighting may differ, as with the Development Project, this alternative would increase the amount of light in the project area. City of Banning Municipal Code Section 17.24.100 (Outdoor Lighting) identifies requirements for lighting that contains light to the boundaries on which the lighting is located. Riverside County Ordinance 655 dictates the type of lighting that can be used in new development to reduce nighttime light pollution that may affect astronomical observations at Mount Palomar Observatory. The Southern Portion of the Development Site is located 39 miles from this facility (Zone B) and is subject to the provisions of Ordinance 655. It is reasonable that development under this alternative would comply with the lighting requirements and/or restrictions established by the City and/or County to ensure increase lighting sources do not adversely affect day or nighttime views in the project area. Similar to the Development Project, potential impacts related to lighting are ***less than significant***.

8.4.2.2 Agriculture and Forestry Resources

The Development Site is occupied with natural vegetation, shrubs, and some trees. No agricultural or forestry operations occur on the Development Site. Similar to the Development Project, features and facilities ancillary to residential and commercial development (roads, utilities, landscaping, etc.) would be installed throughout the property, resulting in a conversion of Farmland of Local Importance to non-agricultural uses. This alternative would maintain the A-1 Light Agricultural Zone south of the future SLB Extension. Per Chapter 17.120 of the Riverside County Code, the A-1 Light Agricultural Zone allows nurseries, greenhouses, apiaries, field crops, tree, berry, and bush crops, vegetable, flower, and herb gardening on a commercial scale, and processing uses that are clearly in conjunction with a farming operation; grazing and husbandry of cattle, horses, sheep, goats, and other farm stock

(excluding hogs)[12] not to exceed five animals per acre; farms for rabbits, fish, frogs, chinchillas, or other small animals; limited numbers of crowing fowl; and related rural agricultural related uses (storage, farm stand, etc.). The General Plan land use designation of LDR assumes development within this area under this alternative would result in up to 484 single-family dwellings consistent with the General Plan maximum land use, which permits a maximum of 1 unit per half acre. While limited agricultural activity including the keeping of livestock (subject to provisions of Chapter 17.120) would be permitted by the County, maximum development of residential uses under Chapter 17.120 on one half acre size lots would effectively result in the conversion of Locally Important Farmland to suburban uses. As disclosed in **Section 4.2** of this EIR, the Development Site has not been used for agricultural purposes since the early 1900s; therefore, similar to the Development Project, implementation of this alternative would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and ***no impact*** would occur.

Within the Development Site, 451.9 acres are designated as Farmland of Local Importance (L), with the remaining areas designated as "Grazing Land" (G) or "Other Land" (X). Similar to the Development Project, development under this alternative would convert the Development Site to residential and commercial uses. However, also similar to the Development Project, no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be converted to non-agricultural uses under this alternative, and impacts would be ***less than significant***. As detailed in **Section 4.2.6.2**, no Williamson Act Contracts are in effect on parcels within the Development Site. Similar to the Development Project, a ***less than significant*** impact relative to Williamson Act contracted land would occur under this alternative.

The Development Site does not have any areas designated as forest land or timberland for production or resource management. Similar to the Development Project, under this alternative no impact to forest resources, timberland, or land designated for forest uses would occur.

8.4.2.3 Air Quality

The first CEQA Air Quality threshold of significance is whether the project would conflict with or obstruct implementation with the applicable air quality plan. The SCAQMD *CEQA Air Quality Handbook* provides two criteria to determine whether a project would be consistent or in conflict with the Air Quality Management Plan (AQMP):

- **Consistency Criterion No. 1:** The project would not generate population and employment growth that would be inconsistent with Southern California Association of Governments (SCAG) growth forecasts.

- **Consistency Criterion No. 2:** The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

This alternative would result in the development of the site consistent with existing General Plan and Zoning designations. The future air quality levels projected in the AQMP are based on SCAG growth

[12] Riverside County Code, Chapter 17.120.10 (Permitted Uses).

projections, which are based, in part, on the general plans of cities and counties located within the SCAG region. Because the levels of population and employment related to the development under this alternative are consistent with the applicable assumptions used in the development of the AQMP, unlike the Development Project, this alternative would not jeopardize attainment of the air quality levels identified in the AQMP under AQMP Consistency Criterion No. 1.

The volume of criteria pollutants emitted under Alternative 2 is reduced by up to 57%. As detailed in **Table 8.B: Alternative 2 – Comparison of Regional Operational Emissions**, compared to the Development Project, particulate emissions ($PM_{2.5}$) drop to below SCAQMD daily thresholds under this alternative. Emissions of VOCs, NO_X, and PM_{10} are reduced (though not to below SCAQMD thresholds). This alternative results in an increase in CO emissions exceeding the daily SCAQMD threshold. The higher CO emissions result from increases from use of landscaping equipment[13] and increases in the number of passenger vehicles. It should be noted that under the Development Project, CO emissions remained below this the daily threshold. Under AQMP Consistency Criterion No. 2, as detailed in **Table 8.B**, regional operational-source emissions under this alternative are still anticipated to exceed the regional thresholds of significance for VOCs, NO_X, CO, and PM_{10}.

Table 8.B: Alternative 2 – Comparison of Regional Operational Emissions

Source	Pollutant Emissions (lbs/day)					
	VOCs	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	62	2	134	<1	<1	<1
Energy Sources	2	15	9	<1	1	1
Light-Duty Mobile Sources	58	77	577	1	153	41
Heavy-Duty Mobile Sources	2	59	25	<1	9	3
Alternative 2 Operational Emissions – Unmitigated	**123**	**152**	**746**	2	**163**	46
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Alternative 2 Operational Emissions – Mitigated	**121**	**152**	**713**	**2**	**163**	46
Change from Development Project (Mitigated)	↓30%	↓57%	↑36%	↓33%	↓21%	↓22%
Alternative 2 Exceeds Threshold?	**Yes**	**Yes**	**Yes**	No	**Yes**	No
Development Project Operational Emissions – Mitigated	**172**	**350**	524	3	**207**	**59**
Development Project Exceeds Threshold?	**Yes**	**Yes**	No	No	**Yes**	**Yes**

Source: 2023. *Alternatives Analysis Summary for Air Quality*, LSA Associates, Inc. October 10. (Appendix L-1, Tables: C, D-E).
Note: **Bold values** indicate an exceedance of SCAQMD thresholds.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

While the land uses envisioned under this alternative are consistent with planning assumptions used in the development of the AQMP, implementation of this alternative would also result in operational emissions in excess of daily thresholds established by the SCAQMD for VOCs, CO, NO_X and PM_{10}. Specifically, like the Development Project, VOCs, NO_X, and PM_{10} would be lessened but still significant. CO would increase to significant while the Development Project impact is less than significant, and $PM_{2.5}$ would be lessened to less than significant, while the Development Project impact is significant.

13 The California Air Resources Board has approved a measure that will require most newly manufactured small off-road engines such as those found in leaf blowers, lawn mowers and other equipment be zero emission starting in 2024. Portable generators, including those in recreational vehicles, would be required to meet more stringent standards in 2024 and meet zero-emission standards starting in 2028. Use of this equipment purchased prior to these dates will still be permitted.

Similar to the Development Project, this alternative would not be consistent with Criterion 2 because it would increase violations of the State and federal ambient air quality standards (AAQS) and delay the timely attainment of air quality standards indicated in the AQMP, and impacts would be ***significant and unavoidable***.

Construction-related emissions have previously been summarized in **Table 4.3.H** of this EIR, which indicate unmitigated emissions of VOC, NO_X, and $PM_{2.5}$ would exceed SCAQMD thresholds during construction. The emissions identified in **Table 4.3.H** are the combination of the on- and off-site emissions and the greater of summer and winter emissions. Also, the daily emissions rates reflect all combinations of overlapping construction operations. While the phasing of residential development occurring under this alternative is not known, development of the residential and commercial uses envisioned would continue to require earth disturbance, result in construction emissions, and generate construction-related vehicle trips for the development of the residential and commercial uses. As development of residential uses occur, it is reasonable that an overlap of grading and construction activities would occur. It is also reasonable to anticipate that measures similar to **Mitigation Measure AIR-1** would be implemented during an alternative development on site, thereby (as detailed in **Table 4.3.I** of this EIR) reducing daily regional construction emissions of NO_X and $PM_{2.5}$ to below established thresholds; however, emissions of VOCs remain significant. It is reasonable, due to the similar extent, scale, and duration of construction, that construction emission impacts pre- and post-mitigation would be similar under this alternative. Therefore, despite the implementation of mitigation identified under the Development Project; it is reasonable to conservatively anticipate that VOC impacts would be similar to Development Project and ***significant***.

Tables 4.3.J through 4.3.M of this EIR identify conditions related to the concurrent construction and operation of the various phases of the Development Project. Due to number, extent, and variety of uses envisioned under this alternative, it is reasonable to anticipate development under this alternative would similarly be phased, resulting in concurrent grading, construction, and operational activity. Similar to the Development Project, even with the implementation of mitigation, air emissions would exceed established SCAQMD thresholds and would be cumulatively considerable. Summarized, and compared to the Development Project, the *operational* emissions associated with Alternative 2 include:

- **VOCs:** Emissions are reduced by 30% under Alternative 2 but still exceed SCAQMD thresholds.
- **NO_X:** Emissions are reduced by 57% under Alternative 2 but still exceed SCAQMD thresholds.
- **CO:** Emissions are increased by 36% under Alternative 2 and exceed SCAQMD thresholds. This exceedance is a *new impact* that does not occur under the Development Project.
- **SO_X:** Emissions under Alternative 2 are reduced by 33% under Alternative 2 and do not exceed SCAQMD thresholds.
- **PM_{10}:** Emissions are reduced by 21% under Alternative 2 but still exceed SCAQMD thresholds.
- **$PM_{2.5}$:** Emissions are reduced by 22% under Alternative 2 to below SCAQMD thresholds. The significant impact associated with this pollutant under the Development Project is eliminated.

Despite the implementation of the feasible mitigation cited in **Mitigation Measure AIR-2**, a ***significant and unavoidable*** air quality impact (VOC, NO_X, CO, and PM_{10}) would result from operation of the uses proposed under this alternative. Compared to the Project, no change in the significance of impact would occur although some emissions would be substantially lessened while CO would substantially increase.

Regarding the comparison of localized emissions during construction and operation under this alternative, as a similar area of ground disturbance and amount of equipment usage is expected under this alternative, it is reasonable that localized construction emissions would be similar to those identified in **Table 4.3.O** of this EIR. As detailed in **Table 8.E** (provided later in this chapter), Alternative 2 is anticipated to result in a net increase of 384 (1.9 percent) two-way trips per as compared to the Development Project. The volume of passenger car trips is increased by approximately 14.9 percent, while the number of trucks is reduced by approximately 65.0 percent. Further, **Table 8.F** (provided later in this chapter), identifies that Alternative 2 results in a reduction of 202,661 miles (a 68.9 percent reduction). As demonstrated in **Table 4.3.P** of this EIR, operational emissions associated with the Development Project do not exceed localized emission thresholds; therefore, with the change in uses and the vehicle mix, and the reduction in miles traveled, it is reasonable that the development of uses envisioned under this alternative would similarly not exceed localized thresholds or result in a localized significant air quality impact.

Exposure to Toxic Air Contaminants (TACs) from vehicle exhaust can result in both immediate and long-term health effects.[14] Exposure to diesel exhaust can lead to serious health conditions such as asthma and respiratory illnesses and can worsen existing heart and lung disease, especially in children and the elderly. Compared to the Development Project, this alternative would reduce the amount of truck traffic accessing the Development Site by approximately 65 percent. The Development Project's health risks to nearby residents and students were below SCAQMD's Health Risk Assessment (HRA) thresholds (**Table 4.3.Q** of this EIR). It is reasonable to conclude this alternative's reduction in diesel-fueled truck trips would further reduce TAC emissions and that health risks resulting from the operation of residential and commercial uses permitted under this alternative would remain ***less than significant***.

Similar to the Development Project, odors (e.g., heavy-duty equipment exhaust, architectural coatings, pavement, etc.) would be emitted during construction. While these odors would be noticeable to nearby sensitive receptors, these odors would be expected of any construction activity in the area, would dissipate quickly, and would be temporary in nature. Commercial and residential uses developed under this alternative may generate odors associated with occupancy (e.g., trash, restaurant exhausts, fuel dispensing, animal husbandry). As with the Development Project, adherence to City and County regulations would ensure the appropriate control of odors from trash storage areas. Vapor recovery systems on gas nozzles would minimize odors from the gas station, and cooking odors would be limited by complying with SCAQMD Rules 402, 461, 1113, and 1138.[15] While the keeping of a limited number of farm animals is permitted in the A-1 Light Agricultural Zone, it is reasonable that adherence to applicable Riverside County codes related to such husbandry would

[14] See Table 4.3.A which identifies the type, description, health effects, and source of TACs. As stated in Section 4.3, diesel exhaust is a major source of TACs.

[15] SCAQMD Rule 402: Nuisance; Rule 461: Gasoline Transfer and Dispensing; 1113: Control of Architectural Coatings; Rule 1138: Control of Emissions from Restaurant Operations.

adequately control such odors. Similar to the Development Project, odor-related impacts associated with operation of the residential and commercial uses envisioned under this alternative would be ***less than significant***.

8.4.2.4 Biological Resources

Nearly two-thirds of the Development Site is either nonnative grassland or disturbed and is not located within or adjacent to an area planned for conservation under the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Nonetheless, similar to the Development Project, implementation of this alternative would require the substantial modification of existing topography, removal of existing vegetation, and reduction in existing habitat. No federally or State-listed endangered or threatened or special-status plant or amphibian species occur within the Development Site. While burrowing owl have been identified on site and would be directly and indirectly impacted by Development Project construction, as stated in **Section 4.4, Biological Resources,** of this EIR, impacts to this species are reduced to less than significant through the implementation of mitigation. Los Angeles pocket mouse occur on site and would be directly and indirectly impacted by the Development Project. However, the predominant areas of occupation (the existing drainages) will be maintained. To accommodate development, crossings of existing drainages would be required under either this alternative or the Development Project. It is anticipated the location and extent of required crossings would be similar under this alternative. Long-term occupation of residential uses under this alternative could increase human activity in adjacent natural areas beyond that which currently occurs (e.g., trespass and/or unauthorized/illegal activity), could introduce invasive or predatory species (e.g., feral dogs and cats) into the environment, or could alter existing behavior patterns (e.g., by providing alternative food/water sources or causing disruptive activities). Given the limited daily on-site presence of employees, vendors, and/or customers, it is not likely that these indirect effects to biological resources would occur under the Development Project; therefore, although impacts would continue to be ***less than significant***, impacts would likely be slightly greater under this alternative.

The MSHCP provides the mechanism for the regional conservation of habitat in western Riverside County. The MSHCP Local Development Mitigation Fee (LDMF) establishes a per unit or per acre cost for residential, commercial, and industrial development that supports implementation of the MSHCP, including required land acquisition. As both the City of Banning and the County of Riverside are permittees under the MSHCP, it is reasonable that both would ensure any development within their jurisdiction would adhere to applicable MSCHP guidelines. In a general sense, because both the Development Project and this alternative would result in the wholesale conversion of the Development Site from natural open space to urban uses, impacts to biological resources would be similar; therefore, it is reasonable that the Mitigation Measures identified in **Section 4.4** of this EIR would apply equally to this and any development that occurs under this alternative. Upon implementation of these measures, similar to the Development Project, impacts to biological resources that may occur upon development of this alternative are ***less than significant***.

8.4.2.5 Cultural Resources

As discussed in **Section 4.5.3.4** of this EIR, two previously recorded cultural resources, P-33-013778 and RIV-7544, were identified on the Development Site. These resources have been evaluated pursuant to Section 106 of the National Historic Preservation Act (NHPA) or CEQA criteria and have

not been identified as significant resources or eligible for listing on the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR). As such, development of the Development Site pursuant to this alternative and any other similar build out alternative would not cause a significant impact to these two resources, as the resources do not retain sufficient integrity, do not retain further research potential, and are not significant under any State or local criteria, and are not eligible for the NRHP or CRHR.

Because development activities under this alternative would encompass the entirety of the Development Site and would require earth disturbance in areas where historic or archaeological resources were previously identified, in areas where dense vegetation and other constraints inhibited ground visibility during previous surveys, or near multiple natural sources of water that extend through the Development Site, it is reasonable there remains a similar potential that previously unobserved resources may exist within the Development Site that could be unearthed during activities associated with implementation of this alternative.

Similar to the Development Project, implementation of **Mitigation Measures CUL-1 through CUL-6** would ensure that: (1) if historic or archaeological resources are identified during excavation, these would be evaluated, documented, and studied in accordance with standard historic or archaeological practice, and (2) historic or archaeological deposits and human remains would be treated in accordance with appropriate State codes and regulations. As with the Development Project, compliance with these measures would reduce this alternative's potential impacts to archaeological and historical resources to a ***less than significant*** level.

There are no known human remains at the Development Site, though, similar to the Development Project, the potential exists to unearth such remains during earth moving operations associated with the development of residential and commercial uses envisioned under this alternative. Similar to the Development Project, in the event that human remains are identified during development of this alternative, these remains would be treated in accordance with Section 7050.5 of the California Health and Safety Code (HSC) and Public Resources Code (PRC) Section 5097.98, as appropriate, which require a halt in excavations and other ground disturbance of the discovery and reasonably nearby area(s) until the coroner of Riverside County has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the Riverside County coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identifications. The NAHC would identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. PRC Section 5097.98 states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., MLD). Similar to the Development Project, adherence to applicable provisions of HSC Section 7050.5 and PRC Section 5097.98 would ensure potential impacts under this alternative related to the discovery of human remains are ***less than significant***.

8.4.2.6 Energy Resources

Construction would require energy for the manufacture and transportation of building materials, preparation of the site for grading activities, utility installation, paving, and building construction and architectural coating. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. However, similar to the Development Project, energy usage on the

Development Site during construction of this alternative would be temporary. As the location and extent of development under this alternative is similar to the Development Project, it is reasonable that estimates of the amount of energy consumed during construction would be similar. Similar to the Development Project, construction activities associated with this alternative would increase the annual construction generated fuel use in Riverside County by approximately 0.03 percent for diesel fuel usage and by less than 0.01 percent for gasoline fuel usage. Such an increase in demand would have a negligible effect on local, regional, and State energy supplies. Energy consumption during construction would not be inefficient, wasteful, or unnecessary; therefore, similar to the Development Project, energy impacts from construction would be ***less than significant***.

Residential uses on site, combined with the commercial uses, would require the use of electricity and natural gas. **Table 8.C: Alternative 2 – Estimated Annual Energy Comparison,** details the energy usage required under this alternative with the Project Design Features (PDFs) and mitigation measures[16] (those identified for the Development Project) that are applicable to the residential and commercial uses that would be implemented under this alternative. Additionally, as required under Title 24, this alternative includes the requirement for installation of rooftop photovoltaic as a PDF for residential uses[17]. Photovoltaic use is not anticipated for the commercial uses under this alternative.

Electricity in the City is increasingly provided by renewable sources. Compared to the Development Project, with the implementation of the previously stated measures and design features, development under this alternative decreases electrical demand by approximately 70.9 percent. Due to the use of natural gas in residential uses, this alternative would increase the demand for natural gas by 556 percent. As detailed in **Table 8.F** (provided later in this chapter), compared to the Development Project, VMT is reduced by 68.9 percent under this alternative. As expected with the development of residential uses, the amount of gasoline is increased by 45.4 percent when compared to the Development Project due to a 14.9 percent increase in passenger car trips. Conversely, the reduction in truck trips occurring under this alternative reduces diesel fuel usage by approximately 71.7 percent. Overall, compared to the Development Project, the overall amount of vehicle fuel required during operation of this alternative is reduced by approximately 47.8 percent.

It is reasonable that as electrification occurs, future development throughout the City, including within the site, will be required to implement applicable energy efficiency standards/features.[18] Per Chapter 15.04 of the City Municipal Code, the City has adopted both the California Building Code (CBC) and California Green Building Standards Code (CALGreen Code) pertaining to energy conservation

16 Mitigation Measures AIR-2, GHG-1 through GHG-6, as applicable for commercial and residential uses. The stated mitigation is not mitigation for an identified significant energy impact, but address air quality and greenhouse gas impacts. Due to their nature, these measures reduce energy usage.

17 At this time, Title 24 does not require the installation of photovoltaic capacity on commercial uses.

18 Senate Bill (SB) 100 establishes a target for renewable and zero-carbon resources to supply 100 percent of retail sales and electricity by 2045. While SB 100 does not define "zero-carbon resources," and the State had no legal definition, it is generally accepted that natural gas is not a "zero-carbon resource." As California moves to a "zero-carbon future," it is reasonable that reductions in natural gas use will occur as utilities move from using this resource to using zero-carbon and/or renewable resources. To achieve the intended goals of SB 100, policies that may limit the installation of natural-gas appliances (i.e., residential water heaters, stoves/oven, furnaces) will increasingly reduce the overall demand for natural gas in Banning, in Riverside County, and Statewide.

Table 8.C: Alternative 2 – Estimated Annual Energy Comparison

Land Use Category	Electricity (kWh/yr)	Natural Gas (kBTU/yr)	Gasoline Consumption (gal/yr)[4]	Diesel Consumption (gal/yr)[4]
Medical Office Building	54,720	24,439	22,675	17,792
Parking Lot	150,859	0	0	0
City Park	0	0	0	0
Fast Food Restaurant with Drive Thru	263,270	636,207	75,110	58,938
Health Club	843,741	0	263,708	206,929
High Turnover (Sit Down Restaurant)	1,504,400	3,635,467	145,490	114,164
Hotel	2,164,390	0	37,378	29,330
Quality Restaurant	357,295	863,423	27,026	21,207
Apartments Low Rise	286,714	11,839,600	475,643	373,231
Single Family Housing	555,363	22,364,300	841,702	660,474
Travel Center	16,311	0	179,765	141,059
Regional Shopping Center	1,231,360	0	70,667	55,452
Total Alternative 2[1]	**7,428,443[2]**	**39,363,436[2]**	**2,139,163**	**1,678,576**
Change from Development Project	↓18,141,962	↑33,363,637	↑625,189	↓4,261,554
	↓70.9%	↑556.0%	↑45.4%	↓71.7%
Total Development Project[1]	**25,570,405[3]**	**5,999,799[3]**	**1,377,447**	**5,940,130**

Compiled by LSA Associates, Inc. (November 2023*)*.
Sources: 1. Energy demand with implementation of applicable mitigation measures and project design features.
2. 2023, Attachment E of *Alternatives Analysis Summary of Greenhouse Gases*, Michael Hendrix Consulting, October 20.
3. 2023, Appendix F of *Revised Greenhouse Gas Analysis Sunset Crossroads Projec*t, Michael Hendrix Consulting, October 20.
4. 2023, Alternative Analysis CalEEMod modeling outputs, LSA Associates, Inc., October.
Notes: The average gasoline consumption rate is 28.43 mpg (EMFAC2021).
The average diesel consumption rate is 9.06 mpg (EMFAC2021).
Assume warehouse & industrial vehicles are 75% diesel.
Assume commercial uses vehicles are 80% gasoline.
CalEEMod = California Emissions Estimator Model
EMFAC2021 = California Emissions Factor Model, Version 2021
gal/yr = gallons per year
kBTU/yr = thousand British thermal units per year
kWh/yr = kilowatt-hours per year

standards. Accordingly, the Development Project would comply with the current 2022 CALGreen Code requirements and Title 24 efficiency standards so as to not result in a wasteful or inefficient energy usage. Similar to the Development Project, potential impacts related to the conflict with or obstruction of a plan/program related to renewable energy resources or energy efficiency would be ***less than significant***.

8.4.2.7 Geology and Soils

This alternative would encompass the same location as the Development Project; therefore, the geologic setting and soil conditions affecting development would be similar. Impacts related to faulting, seismicity, landslide potential, groundwater level, liquefaction, and other potential geologic hazards would be similar to those associated with the Development Project. Furthermore, the paleontological setting of the Development Site is not affected by the type of development that may occur.

Project applicants are required to submit a grading application to obtain a grading permit. As required under Chapter 18.06 of the City's Municipal Code, such an application is supplemented by a geotechnical report/seismicity report to determine the surface and subsurface geologic conditions of

a project. Furthermore, State regulations protecting human-occupied structures from seismic hazards are provided in the most recent CBC, which has been adopted by reference by Chapter 15.08 (Construction Codes) of the City's Municipal Code[19]. The CBC, as adopted by the City, contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. **Regulatory Compliance Measures** (RCMs) **GEO-1 and GEO-2**, require that all structures be designed in accordance with the seismic parameters presented in the Geotechnical Assessment prepared for the Development Project and applicable sections of the most current CBC. These measures would apply to any future development of the Development Site. Similar to the Development Project, it is reasonable that the siting, design, and construction of 1,630 residential units and the commercial center envisioned under this alternative would follow applicable provisions of the City's Municipal Code and the recommendations of any project-specific geotechnical assessment. As with the Development Project, impacts related to geologic impacts under this alternative are ***less than significant***.

As the paleontological sensitivity of the Development Site would remain unchanged under any alternate development of the site, it is reasonable that ground disturbance under any alternative would have an equal potential for the disturbance of previously undocumented paleontological resources. It is reasonable that **Mitigation Measure GEO-1**, requiring the monitoring of ground disturbances within older alluvial fan deposits, would be equally applicable to any alternate development of the Development Site. As with the Development Project, impacts related to paleontological resource impacts under this alternative would be reduced to a ***less than significant*** level.

8.4.2.8 Greenhouse Gas Emissions

The construction and operation of each alternative would generate GHG emissions, with most of the fuel/energy consumption and waste generation (and associated generation of GHG emissions) occurring during project operations. Typically, more than 80 percent of the total fuel/energy consumption and waste generation takes place during long-term operation of the facilities, and less than 20 percent of fuel/energy is consumed and waste generated during construction. The analysis of construction-related GHG emissions for the Development Project was used as a proxy for all alternatives. Because the construction of the Project includes buildings of equal or greater size than each of the alternatives and the grading area is of equal or greater size to each of the alternatives, using these values in the alternatives analysis is conservative. Considering these factors, construction-related GHG emissions amortized over 30 year would amount to 487.49 MT CO2e/yr.

Buildout of the Development Project will occur starting in 2027, and the impacts associated with GHG emissions for this alternative are analyzed for that year. State regulations included the Zero Emission Vehicle Program, the reduction of emissions from electric generation due to increased renewable energy in the Renewable Portfolio Standard, waste diversion requirements, and water efficiency requirements, which will all contribute to long-term reductions in GHG emissions. A forecast of 2040

[19] BMC Chapter 15.08 states, "Except as otherwise provided in this chapter, for the purposes of prescribing regulations for erecting, construction, enlargement, alteration, repair, improving, removal, conversion, demolition, occupancy, equipment use, height, and area of building and structures, the following construction codes are hereby adopted." Incorporated by reference are, "…all appendices, tables, and indices thereto."

levels of emissions associated with the Development Project and this alternative at buildout is included for informational purposes only.

The emissions identified in **Table 8.D: Alternative 2 – Long-Term Greenhouse Gas Emissions Comparison,** includes residential land uses modeled separately from the commercial land uses and include energy efficiency elements and rooftop photovoltaic (PV) solar as PDFs that are required by law. The commercial portion of Alternative 2 was modeled identically to the Development Project. As modeled, with PDFs and implementation of the requirements outlined in **Mitigation Measures AIR-2 and GHG-1 through GHG-6** applicable to commercial uses, this alternative would generate approximately 26,314.85 MT CO_2e/yr. Compared to the Development Project (38,726.25 MT CO2e/yr when mitigated), implementation of Alternative 2 would reduce mitigated GHG emissions by approximately 32.0 percent. While the volume of GHG generated under this alternative represents a reduction compared to the Development Project it still exceeds established GHG emission thresholds of significance. While the volume of GHG generated is substantially lessened compared to the Development Project, the GHG impacts associated with this alternative remain ***significant and unavoidable***.

Table 8.D: Alternative 2 – Long-Term Greenhouse Gas Emissions Comparison

Source	GHG Emissions (MT/yr)		
	Unmitigated 2027	**Mitigated 2027**	**Mitigated 2040**
Construction Emissions Amortized over 30 Years	**487.49**	**487.49**	**487.49**
Operational Emissions			
Onsite Commercial Emissions	5,128.03	2,313.61	1,125.52
Offsite Commercial Mobile Emissions	12,303.55	6,932.26	3,674.10
Onsite Industrial Emissions	0.00	0.00	0.00
Offsite Industrial Mobile Emissions	0.00	0.00	0.00
Onsite Residential Emissions	2,501.23	2,501.23	1,325.59
Offsite Residential Emissions	14,270.37	14,270.37	7,563.30
Total Onsite Emissions	7,629.26	4,624.73	2,451.11
Total Offsite Mobile Emissions	26,573.92	21,202.63	14,495.56
Total Alternative 2: GHG Emissions	**34,690.68**	**26,314.85**	**17,434.16**
Change from Development Project	-22,212.28	-12,411.40	-945.24
	↓39.0.0%	↓32%	↓5.1%
Total Development Project: GHG Emissions	**56,902.96**	**38,726.25**	**18,379.40**

Source: Tables A-C, *Alternatives Analysis Summary of Greenhouse Gas Emissions*. Michael Hendrix Consulting, October 20, 2023 (see Appendix L-2).
GHG = greenhouse gas
MT/yr = metric tons per year

8.4.2.9 Hazards and Hazardous Materials[20]

Like the Development Project, on-site construction under this alternative is expected throughout the site and would temporarily increase the regional transport, use, and disposal of construction-related hazardous materials and petroleum products (e.g., diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals). These materials are commonly used at construction sites, and the construction activities would be required to comply with applicable State and federal regulations for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. To prevent the discharge of pollutants during construction

[20] Please refer to Section 8.4.2.20 of this EIR for a discussion regarding emergency access/evacuation and wildfire hazards.

activities, **RCMs WQ-1, WQ-2, WQ-3 and HAZ-1** require compliance with the waste discharge permit requirements; control erosion; and safeguard water quality. These measures would be equally applicable to any on-site development, including that associated under this alternative; therefore, with implementation of these RCMs, as with the Development Project, construction-related hazardous material impacts would be ***less than significant***.

The government records database search, completed as part of the Environmental Site Assessment (ESA), determined that the Development Site is not included on any of the queried databases of hazardous materials sites that could create a significant hazard to the public or the environment. As it is located within the same footprint as the Development Project, it is reasonable to expect that no new recognized environmental condition[21] would be identified during development under this alternative; therefore, similar to the Development Project, a ***less than significant*** impact relative to hazardous material sites would occur. Additionally, as the site is located outside the airport influence area (AIA) established for Banning Municipal Airport, like the Development Project, ***no impact*** related to consistency with an airport land use plan or resulting in an airport safety hazard would occur under any project alternative.

Commercial and residential uses occupying the Development Site under this alternative are expected to use some amount of household hazardous waste, cleaners, lubricants, fuels, coatings, and pesticide/herbicides. It is anticipated that individual residents would exercise appropriate caution related to the transport, use, and disposal of hazardous materials within private households. Vehicles accessing the Development Site would contain oil and gasoline to power their engines, which could have the potential to result in minor releases of such substances through drips or leaks on streets or in parking areas. Compared to industrial uses, the typical residential use would generally limit the number, type, frequency, and/or duration of hazardous material use. The commercial uses envisioned under this alternative, including the proposed travel center, are similar to those proposed under the Development Project so it is reasonable to conclude that any impact related to hazardous material transport, storage, or use at the alternative's commercial center would be similar and would be required to adhere to the measures identified in **Section 4.9.6.1** of this EIR. As with the Development Project, the adherence to applicable compliance measures would reduce potential impacts related to transport, use, disposal, and/or accidental release of hazardous materials into the environment to a ***less-than-significant*** level.

8.4.2.10 Hydrology and Water Quality

As this alternative would result in development of the Development Site with a similar development footprint as the Development Project (substituting residential uses), it is reasonable that construction activities necessary to develop the Development Site would also be similar. It follows that the construction-related hydrology and water quality would be similar to that identified with the Development Project. Similarly, compliance with existing National Pollutant Discharge Elimination System (NPDES) regulations (as specified in **RCM WQ-1 and RCM WQ-3**, which are equally applicable to this alternative), including the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and Erosion and Sediment Control Plans and implementation of Construction Best Management

[21] A recognized environmental condition is the presence or likely presence of hazardous materials or petroleum products under conditions indicating an existing or past release or a material threat of a release into structures or soil or groundwater or surface water, even under conditions in compliance with laws.

Practices (BMPs) to target and reduce pollutants of concern in storm water runoff would ensure construction-related water quality impacts remain ***less than significant***.

The on-site natural drainage features would be retained under any development scenario. The extent of land developed under this alternative is substantially similar to that associated with the Development Project. While the nature and location of impermeable surfaces may change,[22] the impermeable areas would be generally similar to that of the Development Project. As with the Development Project, **RCM WQ-3** would equally apply to development under this alternative. This RCM requires preparation of a Water Quality Management Plan (WQMP) specifying the BMPs to be incorporated into site development to reduce and treat pollutants in site runoff. Implementation of water quality management facilities identified in the WQMP would ensure operational water quality impacts associated with development of this alternative would also be ***less than significant***.

This alternative would be developed at the same location as the Development Project; therefore, consideration of local groundwater will be similar. Compared to the Development Project, the development envisioned under this alternative would not substantially alter the amount of impermeable surface area, alter infiltration rates, or alter the amount or rate of post-development recharge. The 2020 UWMP included planned water demand for general commercial, open space, and residential uses on the Development Site for the previously considered (but not approved or constructed) "Five Bridges" project[23]. Development under this alternative is substantially similar to that used to develop the water demand forecast cited in the UWMP. The water demand for the existing General Plan land uses were incorporated into the City's 2020 Urban Water Management Plan (UWMP), which includes an assessment of water supplies, including groundwater. As groundwater impacts were determined to be less than significant under the Development Project and adequate supplies are known to be available,[24] it is assumed that a similar ***less than significant*** impact would occur under this alternative.

Due to similarities in the location, extent, and type of development that would occur under this alternative, it is reasonable that changes in the local drainage patterns would be similar to those identified with the Development Project. The Development Site's conceptual drainage plan consists of catch basins, storm drainpipes, reinforced concrete pipes (RCPs) ranging from 12 to 42 inches, and 13 on-site infiltration basins. The drainage system for the Development Project would route storm water runoff from the on-site impervious surfaces to proposed infiltration basins, designed to provide storm water treatment and peak flow mitigation for their respective downstream receiving waters. In compliance with City of Banning Ordinance No. 1415 and as specified in **RCM WQ-4**, a Final Hydrology Study is required to confirm that the Development Project's drainage system the hydromodification requirements of the Whitewater River Watershed MS4 Permit. Due to the generally similar extent of

22 For example, industrial building coverage, parking area, and related uses versus collective coverage of residential structures and related access.

23 The "Five Bridges" project previously proposed on the Development Site included up to 2,160 residential units, a commercial center, and open space uses, similar to the current on-site land use designations include commercial, open space, and residential uses of varying densities and was included in the water demand forecasts detailed in the 2020 UWMP.

24 The demand from development under existing land use designations has previously been assessed in the 2020 UWMP. As detailed in Tables 4.19.J and 4.19.K of this EIR, even under multiple-dry year conditions and with the slight reduction in water demand, the City's water supply is sufficient to accommodate the water demand resulting from development under this alternative.

development under this alternative, it is highly reasonable to conclude similar requirements would be imposed on any development of the site under this alternative to ensure a drainage scheme that provides an adequate and appropriate reduction of peak flow during storm conditions. As **RCMs WQ-3 and WQ-4** would equally apply to this alternative, it is reasonable that the impacts associated with changes in drainage patterns and the capacity of existing or planned drainage systems would similarly be ***less than significant***.

Flows within alluvial channels typically carry sediment, with concentrations that tend to increase with flow rate. The ability of flow to move sediment as it passes downstream is termed its sediment transport capacity. Hydraulic properties, particularly flow velocity, and bed material properties, such as median grain size, determine the sediment transport capacity of a given river reach. The capacity of a flow to transport particles of a given diameter is exponentially related to the flow velocity (above a given incipient or threshold velocity). In channels with similar bed material composition, higher velocities result in increased sediment transport capability. Development under this alternative is anticipated to require crossings across existing on-site drainage features. Similar to the Development Project, implementation of **Mitigation Measures HYD-1 and HYD-2** would equally apply to development under this alternative. Adherence to these measures would, similar to the Development Project, reduce potential sediment transport impacts to a ***less than significant*** level.

8.4.2.11 Land Use and Planning

The Union Pacific Railroad and I-10, rural residential uses, single-family residential uses and the MSJC San Gorgonio Pass Campus, and the Sun Lakes Community are located to the north, south, east, and west of the Development Site, respectively. No residential uses or residents occupy the Development Site. In the current absence of any residential uses, similar to the Development Project, development of this alternative would not physically divide an established community. As with the Development Project, this alternative assumes implementation of the SLB Extension through the site and the installation of an internal circulation system that would enhance connectivity between established neighborhoods located east and west of the site. This alternative further anticipates development of the reverse osmosis facility, electrical substation, and potable water reservoir by the City per applicable City needs and plans. In the absence of any displacement or community division, ***no impact*** would occur.

This alternative would allow development on the Northern Portion of the Development Site pursuant to the existing City General Plan and zoning designations. No change in permitted land use would occur; therefore, the General Plan Amendment and change in zoning proposed by the Development Project would not proceed. Annexation of the Southern Portion of the Development Site would not occur, and development would occur pursuant to the existing Riverside County General Plan and Zoning designations. The current land use designations have been considered in the environmental documentation for the City and County General Plans; therefore, any development on site would adhere to existing plans and would not conflict with an existing land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As the development under this alternative would be consistent with existing land use plans, ***no impact*** would occur.

Under this alternative, MSJC Entitlements are not required as there is no loss of residential capacity and the MSJC Site would remain in its current state and ***no impact*** would occur.

8.4.2.12 Mineral Resources

The Development Site is mapped as MRZ-3, indicating that the area contains known or inferred mineral occurrences of unknown significance. As established in Chapter 4.12 of this EIR, there are no records that indicate the Development Site has been previously used as a mineral resource recovery site nor a site occupied by mines; zoned by the City for mineral extraction; nor is the Development Site mapped by the California Geological Survey (CGS) as an area of known Portland-cement concrete (PCC) grade aggregate resources. The nearest mineral extraction operation is the Banning Quarry, operated by Robertson's Ready Mix, located in the MRZ-2 zone in the eastern portion of the City approximately 3.28 miles northeast of the Development Site.

This alternative envisions the development of commercial and residential uses (of varying densities), and ancillary features and facilities on the Development Site. Similar to the Development Project, in the absence of a known or designated mineral resource, past on-site mineral extraction operation, or zoning designation for extractive uses, development of the proposed commercial and residential uses would not cause a loss of availability of known mineral resources valuable to the region and the State; therefore, impacts similarly would be ***less than significant.***

8.4.2.13 Noise and Vibration

Construction Noise. The development of the commercial and residential uses would require mass grading, fine grading, and various construction activities across the site. It is reasonable the location, extent, and intensity of noise associated with grading and construction operations for this alternative would be substantially similar to that identified with the Development Project. Residences located east of the Development Site along Sunset Avenue between Lincoln Street and Westward Avenue and the MSJC Site school buildings east of the Development Site on the southeast corner of Sunset Avenue and Westward Avenue in the City of Banning would be exposed to interior construction noise levels of 55.7 dBA equivalent continuous sound level (L_{eq}) and 60.4 dBA L_{eq}, respectively, which exceeds the City's interior construction noise standard of 55 dBA for more than 15 minutes per hour. Also, residential buildings south of the Development Site along Bobcat Road in the County of Riverside would be exposed to interior construction noise levels of 56.4 dBA L_{eq}, which exceeds the City's interior construction noise standard of 55 dBA for more than 15 minutes per hour. Due to a similarity of construction activity, a similar level of construction noise is expected under this alternative. As with the Development Project, implementation of minimum 10-foot-high temporary construction barrier at the construction boundary (as required under **Mitigation Measure NOI-1**) when project construction activities are within 100 feet from the nearest residential structure would reduce construction noise levels by a minimum of 6 dBA and would reduce construction noise levels to 49.7 dBA L_{eq}. With the reduction achieved by a similar mitigation, the construction noise impact resulting from this alternative also would be ***less than significant***.

Operational Noise. The commercial uses envisioned under this alternative would require truck delivery and truck loading and unloading activities; heating, ventilation, and air conditioning (HVAC) equipment; drive-through speakerphones; parking lot activities; fueling activities; and eating activities. Noise associated with residential uses is generally limited to outdoor recreation, landscape maintenance, and related low-intensity activities.

The residential and school property lines are located 160 feet or more from noise sources that generate maximum instantaneous noise levels, such as truck delivery and truck loading/unloading activities, speakerphones, parking activities, and fueling activities. Under the Development Project, noise levels at the closest residential and school (Mount San Jacinto College) property lines within the City would not exceed the City's exterior daytime and nighttime noise standards of 55 dBA L_{eq} and 45 dBA L_{eq}, respectively, and would not exceed the City's daytime and nighttime maximum noise standards of 75 dBA and 65 dBA, respectively, for any period of time. While the precise location of individual on-site residential uses that could be developed under this alternative are not known at this time, it is reasonable to conclude (due to the location and configuration of the commercial center) that no new residential use would be located closer than 160 feet from the commercial noise sources. Furthermore, this alternative removes the operational (stationary noise) sources that would significantly and unavoidably impact residential uses south of Bobcat Road.

***Existing (2021) Traffic Noise Levels*[25].** Where noise sensitive uses are present, under Alternative 2, the existing (2021) traffic noise conditions would result in a project-related traffic noise increase of up 3.0 dBA along Highland Home Road, 4.7 dBA along Sunset Avenue, and 12.8 dBA along Sun Lakes Boulevard. Under this alternative, the noise level increase resulting from traffic at these locations is equal to or reduced from that associated with the Development Project (3.0, 22.3, and 17.8 dBA, respectively). The following is a detailed discussion of the specific roadway segments noise-sensitive land uses where potential impacts may occur:

- **Highland Home Road South of Sun Lakes Boulevard.** Residences located along the west side of Highland Home Road south of Sun Lakes Boulevard are located approximately 20 feet from the Highland Home Road centerline and would be exposed to traffic noise levels of 54.0 dBA CNEL. Compared to the Development Project (54.0 dBA CNEL) at this location, traffic noise levels would be similar. Therefore, like the Development Project, traffic noise impacts at this location would have a less than significant impact on off-site noise-sensitive land uses.

- **Sunset Avenue Between the I-10 Westbound Ramps and south of Westward Avenue.** Residences are located approximately 35 feet from the Sunset Avenue centerline and would be exposed to traffic noise levels of 63.9 dBA CNEL. The existing 5- to 7.5-foot-high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 58.9 and 55.9 dBA CNEL, respectively. Under the Development Project, traffic noise impacts at this location exceeded the 65 dBA CNEL standard (69.3 and 66.3 dBA CNEL, attenuated). Although traffic noise would increase ambient noise levels by 4.7 dBA and would be perceptible, under this alternative traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL; therefore, traffic noise generated under this condition at this location would not be significant for this alternative. Compared to the Development Project, traffic noise impacts at this location are substantially reduced and less than significant.

  Under this alternative, Mount San Jacinto College school uses located approximately 75 feet from the Sunset Avenue centerline would be exposed to a traffic noise level of 46.2 dBA CNEL. Under the Development Project, traffic noise at this location is 68.6 dBA CNEL. Although project-related

[25] The comparison table and noise modeling outputs used in the traffic noise analysis for Alternatives 2-4 are located in Table Appendix L-3 of this EIR (2021, Table A; 2027, Table B; 2045, Table C).

traffic could increase ambient noise levels by 3 dBA or more, the existing (2021) with project traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL at this location. Compared to the Development Project, traffic noise at this location under this condition is substantially reduced; and noise impacts at this location would be less than significant.

- **Sun Lakes Boulevard West of Highland Home Road.** Residences are located approximately 50 feet from the Sun Lakes Boulevard centerline and would be exposed to traffic noise levels of 57.7 dBA CNEL. The existing 5-foot-high private property wall along Sun Lakes Boulevard would provide a noise reduction of 5 dBA, which would reduce traffic noise levels to 52.7 dBA CNEL. Under the Development Project, traffic noise impacts at this location did not exceed the 65 dBA CNEL standard (59.6 dBA CNEL, attenuated). Although traffic noise could increase ambient noise levels by 12.9 dBA and would be perceptible, the existing (2021) with traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Compared to the Development Project, traffic noise levels are reduced and similar to the Development Projects, the level of impact is less than significant at this location under this alternative.

Opening Year (2027) Traffic Noise Levels. Where noise-sensitive uses are present, under Alternative 2, the opening year (2027) traffic noise conditions would result in a traffic noise increase 4.3 dBA along Sunset Avenue, and 5.7 dBA along Sun Lakes Boulevard. Under this alternative, the noise level increase resulting from traffic at these locations is equal to or reduced from that associated with the Development Project (3.0, 17.5, and 9.7 dBA, respectively). The following is a detailed discussion of the specific roadway segments where potential impacts may occur at noise-sensitive uses[26]:

- **Highland Home Road South of Sun Lakes Boulevard/Westward Avenue**. Residences located are located approximately 20 feet from the Highland Home Road centerline and would be exposed to traffic noise levels of 54.0 dBA CNEL. Compared to the Development Project (54.0 dBA CNEL) at this location, traffic noise levels would be similar. Although project-related traffic could increase noise levels by 3 dBA, the Opening Year (2027) with project traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Therefore, like the Development Project, traffic noise impacts at this location would have a less than significant impact on off-site noise-sensitive land uses.

- **Sunset Avenue Between the I-10 Westbound Ramps and Westward Avenue.** Residences are located approximately 35 feet from the Sunset Avenue centerline and would be exposed to traffic noise levels of 64.0 dBA CNEL under this alternative. The existing 5- to 7.5-foot-high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 59.0 and 56.0 dBA CNEL, respectively. Under the Development Project, traffic noise impacts at this location exceeded the 65 dBA CNEL standard (taking into consideration the existing private walls, 69.3 and 66.3 dBA CNEL, attenuated). Although traffic noise at this location under this alternative would increase ambient noise levels by 4.3 dBA and would be perceptible, under this alternative traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Traffic noise generated under this alternative at this location would not

26 Exceedance of 65 dBA CNEL and 3 dBA or more increase in ambient noise.

be significant. Compared to the Development Project, traffic noise impacts at this location are substantially reduced.

- **Sun Lakes Boulevard West of Highland Home Road.** Residences are located approximately 50 feet from the Sun Lakes Boulevard centerline and would be exposed to traffic noise levels of 61.0 dBA CNEL. The existing 5-foot-high private property wall along Sun Lakes Boulevard would provide a noise reduction of 5 dBA, which would reduce traffic noise levels to 56.0 dBA CNEL. Under the Development Project, traffic noise impacts at this location did not exceed the 65 dBA CNEL standard (59.2 dBA CNEL, attenuated). Although traffic noise could increase ambient noise levels by 3 dBA or more, at this location under this alternative, traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL; therefore, no significant traffic noise impact at this location under this alternative would occur Compared to the Development Project, traffic noise levels are reduced and similar to the Development Projects the level of impact is less than significant.

Horizon Year (2045) Traffic Noise Levels. Year 2045 conditions anticipate increases in ambient noise resulting from ambient growth in the project area. While the uses envisioned under this alternative will generate traffic noise, because the future ambient noise levels are higher, the alternative's contribution to ambient noise levels does not exceed the 3 dBA increase where it would be perceptible and therefore traffic noise associated with this alternative would not be significant under the 2045 condition.

Under the Development Project, noise generated from operation of industrial warehouse would be significant at receptors south of Bobcat Road. As this alternative does not include these uses, it is reasonable the significant operational noise impact associated with the use would similarly be eliminated.

The alternative-related traffic noise increase under Alternative 2 would be lower than the Development Project. Compared to the Development Project, this alternative eliminates the significant and unavoidable traffic noise and operational (stationary source) noise impacts along Sunset Avenue and south of Bobcat Road, respectively.

8.4.2.14 Population and Housing

Under this alternative, the portion of the Development Site currently zoned for commercial uses also would be developed with the hotel (approximately 90,000 square feet and 125 rooms), travel center (7,500 square feet), and 260,900 square feet of commercial/retail uses. Similar to the Development Project, construction of the residential and commercial uses envisioned under this alternative would provide short-term construction jobs through buildout. Generally, construction workers are only at a job site for the timeframe in which their specific skills are needed to complete that phase of construction. Although development under this alternative would generate employment at the site, it is expected that, as with the Development Project, local and regional construction workers would be available to serve the construction needs of the site and that an influx of new residents to the City would not occur. Based on residential occupancy densities cited by the City,[27] the residential uses proposed under this alternative would accommodate up to 3,752 persons, while the commercial

[27] SFR: 2.53 persons/unit = 2,082 persons, MFR: 2.07 persons/unit = 1,670 persons; Table 2.2, *City of Banning Development Impact Fee Update Study*, Wildan Financial Services, April 2019.

center retained under this alternative is expected to provide employment for up to 610 persons[28] at buildout. As this alternative retains the existing land use designated for the Development Site, it is reasonable to conclude that any population and/or employment resulting from the development of residential and commercial uses is consistent with the current City and regional forecasts, and there would be no unplanned population growth, and ***no impact*** would occur.

The City could proceed with construction of the Public Facilities to service existing and future demand consistent with the forecasts in the General Plan and/or Integrated Water Plan. While development of this alternative would extend infrastructure into previously undeveloped areas, the infrastructure improvements are located in areas of existing or planned infrastructure improvements. As the uses are currently planned, it is not likely the extension of infrastructure would spur additional unplanned development or directly/indirectly induce unplanned population growth. In the absence of any induced unplanned growth, ***no impact*** would occur.

This alternative would not require the displacement of residential units or residents. The transfer of residential capacity to the MSJC Site required for the Development Project would not occur. Under this alternative the currently undeveloped portions of the MSJC Site would remain undeveloped; therefore, any impact associated with future development of the MSJC Site would be avoided. Therefore, compared to the Development Project, this alternative would reduce the type and extent of any off-site impacts at the MSJC Site.

8.4.2.15 Public Services

The City prepared the *Development Impact Fee Update Study* (DIF Study) in August 2019 to outline and update development impact fees that are imposed on developers building in the City to fund public services. It is the City's intent that the costs representing future developments' share of public facilities and capital improvements needed to maintain acceptable service ratios, response times or other performance objectives be imposed on development in the form of a development impact fee for Police Facilities, Fire Facilities, Parks and Recreation Facilities, and General City Facilities.[29] The DIF Study estimated the number of residents, dwelling units, employees, development square footage, occupant densities (which establish a reasonable relationship between the size of development, the increase in service population, and the amount of the fee), and related factors in Banning under current (2018) and future (2040) conditions.[30] Per the DIF Study, these factors were utilized to allocate a cost per resident or employee to new development. It is reasonable to conclude that any development under this alternative would be subject to the Banning Municipal Code (Section 15.68, Development Impact Fees) and the payment of appropriate fees for residential and commercial development occurring under this alternative would be appropriately collected. The current

28 Table 1, *Sunset Crossroads Vehicle Miles Traveled (VMT) Analysis*, Urban Crossroads, March 9, 2022.

29 Impact fees for public schools are addressed through SB 50 and subsequent legislation which provides the exclusive use of fees to mitigate potential impacts on schools. While the Fee Impact Study imposed fees on Wastewater Facilities and Water Facilities, project impacts in those area are addressed under Utilities and Service Systems.

30 The base year estimates of residents and dwelling units from California Department of Finance. Future resident and dwelling unit are based on draft Growth Figures from SCAG's Integrated Growth Forecast from the 2016-2040 Regional Transportation Plan (RTP). Base year employees identified by the U.S. Census Bureau, OnTheMap Application for 2015, the latest data available. Total projected workers in 2040 identified by SCAG, allocated to land use categories using current proportions.

Development Impact Fees (DIFs) imposed by the City on residential and commercial development under this alternative[31, 32] include:

- **Police Facilities Development Impact Fee (per unit):** Single-family, $1,200; multifamily, $982; commercial, $351 per 1,000 square feet; office, $458 per 1,000 square feet.
- **Fire Protection Facilities Developer Impact Fee (per unit):** Single-family, $746; multifamily, $610; commercial, $486 per 1,000 square feet; office, $633 per 1,000 square feet.
- **Parkland and Parks (per unit):** Single-family, $3,840; multifamily, $3,142.
- **General City Facilities Developer Impact Fee (per unit.)** Single-family, $521; multifamily, $426; commercial, $493 per 1,000 square feet; office, $643 per 1,000 square feet.

The amount of fees collected is dependent on the type and number of residential units proposed or the amount of commercial square footage. It is reasonable to anticipate any development in the City that occurs pursuant to this alternative would pay the fees in effect at the time due under City ordinance. As the Southern Portion of the Development Site would not be annexed under this alternative, development would occur pursuant to existing Riverside County requirements. Riverside County's Development Impact Fee is detailed in Chapter 4.60 of the Riverside County Code. The County's DIF program has been established to provide revenue to acquire or construct required facilities. In Riverside County, various DIF payments are determined for each County Planning Area. As established in the Riverside County General Plan, the Southern Portion of the Development Site is located within Area Plan 20 "The Pass." For single-family residential development, the DIF in "The Pass" Planning Area is $3,985 per unit. The fees collect funds to offset a variety of public facility and service needs.[33]

As the DIF fee programs have anticipated the population associated with growth in residential units and changes in the service population in the City (and the Development Site), and the facilities necessary to serve this growth, and because this alternative is consistent with the growth projections, the fees established in the respective DIF programs would provide funding for any new public facilities required under this alternative. While the development of this alternative would increase the number of homes and residents requiring public services, future project residents, businesses, and patrons would also contribute to local public service funding through the payment of taxes (e.g., property, business, and sales tax). The routine payment of these taxes, in tandem with payment of required DIFs would, similar to the Development Project, ensure potential impacts to public facilities and services are ***less than significant***.

31 Table E.1, *City of Banning Development Impact Fee Update Study*, August 2019.

32 Regarding the ratio of demand per resident versus the demand per worker, it is reasonable to assume that demand for these services is less for one employee compared to one resident, because nonresidential buildings are typically occupied less intensively than dwelling units.

33 Including: criminal justice public facilities, library construction, fire protection, traffic improvement facilities, traffic signals, regional parks, regional trails, library books/media, and regional multi-service centers.

In its *Fee Justification Report,*[34] the Banning Unified School District (BUSD) identified a "seat deficit" in elementary and middle schools and a "slight excess in capacity at the high school level." Based upon SCAG's population and housing estimates, the *Fee Justification Report* projects the number of housing units within the BUSD under future conditions (2035 and 2040 conditions), identifies the student generated rates, anticipates students generated by new development, and anticipates the school facilities required to serve such development. The residential units to be developed within Banning and unincorporated Riverside County are located within the BUSD,[35] Based on a rate of 0.3657 student/dwelling unit, development under this alternative would be expected to increase student population in BUSD by up to 596 students. The BUSD has forecast the anticipated growth in residential development and established school impact fees for commercial/industrial ($0.66 per square foot) and residential ($4.08 per square foot) development.[36] While this alternative would increase the number of students attending BUSD facilities, the student increase has already been accounted for in the development and fee planning completed by the BUSD. Pursuant to Government Code Section 65996, the payment of school fees (as established and ratified by the BUSD) by the developer of the residential units would provide full mitigation of potential impacts on school facilities that may result from development under this alternative. Similar to the Development Project, impacts to school facilities would be ***less than significant***.

8.4.2.16 Recreation

The City's General Plan establishes a parkland need of 5 acres per 1,000 residents. Based on residential occupancy densities cited by the City,[37] the residential uses proposed under this alternative would accommodate up to 3,752 persons; therefore, 18.8 acres of parkland would be required under this alternative. Current land use for the site includes 41.0 acres for Open Space – Park uses and 11.7 acres for Open Space – Public uses,[38] which would provide sufficient parkland for the residents expected to occupy the Development Site under this alternative. Additionally, development impact fees that are imposed on development, which are required pursuant to Banning Municipal Code Chapter 15.68, would offset a project's contribution to impacts on park and recreation facilities. As this alternative provides adequate parkland to offset the City's parkland requirement, **no impact** would occur. While this alternative increases the number of residents (compared to the Development Project), it increases the amount of parkland in the City's inventory to accommodate them and would improve the overall parkland/resident ratio in the City.

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34 Banning Unified School District (BUSD). 2020. *District Wide Student Generation Rates, Banning Unified School District Fee Justification Report for New Residential and Commercial/Industrial Development*, SDFA, May 2020.

35 The District encompasses approximately 303 square miles in the western part of Riverside County and includes the City of Banning and portions of the Cities of Beaumont, Desert Hot Springs, and Palm Springs along with unincorporated portions of Riverside County, including the Morongo Reservation, Cabazon, and Whitewater.

36 Banning Unified School District. (BUSD). *Banning Unified School District Fee Justification Report for New Residential and Commercial/Industrial Development,* page 6, Table II. May 12. Website: https://4.files.edl.io/fe8c/03/25/21/165359-bd3c13be-80e9-402e-a2aa-861ab8a653eb.pdf (accessed December 8, 2021).

37 SFR: 2.53 persons/unit = 2,058 persons, MFR: 2.07 persons/unit = 1,670 persons; Table 2.2, *City of Banning Development Impact Fee Update Study*, Wildan Financial Services, April 2019.

38 An additional 44.8 acres is designated for Open Space – Resources, which predominantly includes the existing on-site drainages.

8.4.2.17 Transportation

The following analysis addresses the alternative's impact related to VMT and consistency with plans/programs addressing the City's circulation system.

The City's General Plan Policy 6 states, "The City shall maintain peak hour Level of Services (LOS) C or better on all local intersections, except those on Ramsey Street and at I-10 interchanges, where Level of Service D or better shall be maintained." The traffic analysis prepared for the Development Project recommended improvements the City can adopt as conditions to ensure the Development Project would be consistent with the City's LOS standard. As detailed in **Table 8.E: Alternative 2 – Trip Generation Comparison**, Alternative 2 is anticipated to result in a net increase of 384 (1.9 percent) two-way trips per as compared to the Development Project. The volume of passenger car trips is increased by approximately 14.9 percent, while the number of truck trips is reduced by approximately 65.0 percent. Changes in land use and the resulting changes in the volume and pattern of traffic would likely result in differences in the number and/or location of impacted intersections under this alternative. Similar to the Development Project, it is reasonable to conclude that development under this alternative would be similarly conditioned to install improvements to fully satisfy the City's LOS standard(s). Furthermore, it is expected that appropriate pedestrian, transit, and roadway improvements would be appropriately installed to satisfy City requirements and that these features would be designed per City standards so as to not introduce hazards due to geometric design features (e.g., sharp curves or dangerous intersections). Similar to the Development Project, development under this alternative would not be inconsistent with plans/programs addressing the City's transportation system.

Table 8.E: Alternative 2 – Trip Generation Comparison

Land Use	AM Peak			PM Peak			Daily
Development Project							
Passenger Cars	742	343	1,086	750	881	1,631	17,156
Trucks	117	61	178	59	102	161	3,330.
TOTAL	**859**	**404**	**1,264**	**809**	**963**	**1,792**	**20,496**
Alternative 2							
Passenger Cars	684	1,057	1,741	1,176	703	1,879	19,716
Trucks	33	33	66	28	25	53	1,164
TOTAL	**717**	**1,090**	**1,807**	**1,204**	**728**	**1,932**	**20,880**
Net Change – Passenger Cars	-48	713	665	425	-178	248	2,550
Net Change – Trucks	-84	-28	-112	-31	-77	-108	-2,166
Total Net Change	-142	685	543	394	-255	140	384

Source: Table 1, Sunset Crossroads Project Alternatives Trip Generation Assessment (Urban Crossroads, October 10, 2023).

Alternative 2 considers buildout of the land uses specified in the City's and Riverside County's General Plan. The Development Site is located in an already low VMT area for residential uses and, per the City's guidance, is not subject to additional VMT analysis. This alternative has been modeled using the Riverside County Model (RIVCOM) travel demand model to estimate VMT. See Table 8.F below for a VMT comparison for Alternative 2.

Table 8.F: Alternative 2 – Vehicle Miles Traveled Comparison

	Vehicle Miles Traveled
Alternative 2	91,284
Development Project	293,945
Difference	**-202,661**

Source: 2023. *Sunset Crossroads Vehicles Miles Traveled (VMT) Alternatives Analysis*, Urban Crossroads, October 9.

Compared to the Development Project, this alternative would result in 91,284 vehicle miles traveled, a VMT reduction of 202,661 miles (68.8 percent reduction). As expected, adding residential density and intensity would further reduce the VMT per capita. However, as the commercial component remains unchanged from the proposed Development Project, the commercial component continues to increase boundary VMT to the region and, similar to the Development Project, Alternative 2 in its entirety would be considered potentially significant.[39]

As mitigation, the Development Project would prepare a Transportation Demand Management (TDM) strategy report to reduce employee VMT. These TDM measures were derived from the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality. Due to the similarity in impact, it is reasonable that a similar measure would be required to address VMT associated with the commercial development envisioned under this alternative. As with the Development Project, since future commercial tenants are unknown at this time, implementation of the feasible TDM measures cannot be guaranteed to reduce this alternative's VMT impact to a level of less than significant. While the VMT associated with this alternative is reduced from that associated with the Development Project, because of the uncertainty related to the implementation of feasible VMT reduction measures, similar to the Development Project, the VMT impact associated with this alternative remains ***significant and unavoidable***.

8.4.2.18 Tribal Cultural Resources

While a Sacred Lands File (SLF) search conducted by the NAHC yielded negative results for tribal cultural resources, the Development Site is located within the ancestral territory and traditional use area of the Cahuilla and Serrano people of the Morongo Band of Mission Indians (MBMI). MBMI tribal representatives have emphasized the importance of including archaeological and Native American monitoring in order to thoroughly assess if there are any tribal cultural resources located at the Development Site. Development activities under this alternative would encompass ground disturbance throughout the Development Site. It is reasonable there remains a similar potential that previously unobserved tribal cultural resources may exist within the Development Site that could be discovered during activities associated with implementation of this alternative.

As with the Development Project, **Mitigation Measures CUL-1** to **CUL-6** will be implemented prior to and during ground disturbance activities associated with implementation of this alternative. These

[39] However, the commercial component may not be subject to a VMT analysis if the future development plans include retail buildings no greater than 50,000 square feet. The City considers individual buildings less than 50,000 square feet to be local serving exempt from further VMT analysis.

measures require the retention of a Secretary of the Interior qualified archaeologist and Native American monitor(s) to be present during all ground-disturbing activities within native soil; the development of an Archaeological Monitoring and Treatment Plan; and conducting pre-disturbance Archaeological Sensitivity Training. The Native American monitor(s) will be authorized to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources. These measures further identify appropriate actions to be taken in the event tribal cultural material and/or human remains are discovered during implementation of this alternative.

Similar to the Development Project, upon implementation of **Mitigation Measures CUL-1 through CUL-6,** potential impacts to tribal cultural resources that may result from the implementation of this alternative would be reduced to a ***less than significant*** level**.**

8.4.2.19 Utilities and Service Systems

As required by the City of all development that connects to the City's utility systems, implementation of this alternative would result in the payment of appropriate Water and Wastewater DIFs to offset the cost of accommodating new development.

As the transfer of residential capacity to the MSJC Site would not be required under this alternative, this alternative does not consider public utility impacts associated with development of that site.

Water. As this alternative envisions construction within the same site footprint as the Development Project, the demand for water during construction would likely be similar. Construction-related water demand for soil watering (fugitive dust control), cleanup, masonry, painting, and other activities would be of limited duration and would cease once all of the development is completed; therefore, similar to the Development Project, short-term construction activities are not expected to have any adverse impacts on the existing water system or available water supplies and would not require or result in the construction of new water treatment facilities or the expansion of existing facilities. Construction impacts would be ***less than significant.***

The City of Banning Public Works Department provides domestic water services to the City of Banning and portions of unincorporated Riverside County lands located southwesterly of the City limits. Existing potable water lines within Pressure Zone 2721 exist in Sunset Avenue (24-inch) and the future SLB Extension (18-inch). As with the Development Project, the development of residential uses permitted under the existing land use designations would require the extension and/or expansion of water delivery infrastructure throughout the site. While the precise configuration and capacity of such a water system is not known at this time, it is reasonable to conclude any such system would be designed and constructed to sufficiently accommodate the type and intensity of proposed development without adversely affecting the current delivery of water in the project areas.

The 2020 UWMP included planned water demand for general commercial, open space, and residential uses on the Development Site consistent with anticipated water demand for the previously considered (but not approved or constructed) "Five Bridges" project. Development under this alternative is substantially similar to that used to develop the water demand forecast cited in the UWMP. The water demand for the existing General Plan land uses were incorporated into the City's

2020 Urban Water Management Plan (UWMP), which includes an assessment of water supplies, including groundwater.

The demand from development under existing land use designations has previously been assessed in the 2020 UWMP. As detailed in **Tables 4.19.I through 4.19.K** of this EIR, even with implementation of the Development Project, the City maintains a sufficient water supply to accommodate demand for the existing and planned uses identified in the UWMP during normal, dry, and multiple-dry year conditions. Because this alternative anticipates a substantially similar level of development as that associated with the "Five Bridges" project, and because the water demand of the "Five Bridges" project is accommodated in the UWMP, it is reasonable sufficient water supply exists to service development envisioned under this alternative. As sufficient surplus capacity remains during all forecast conditions, similar to the Development Project, potential water demand impacts associated with this alternative are ***less than significant*****,**

Wastewater. Sanitary services during construction would be provided by portable restroom facilities, which transport waste off site for treatment and disposal. Similar to the Development Project, construction-related wastewater treatment and wastewater conveyance infrastructure under this alternative would be ***less than significant***.

Implementation of this alternative would generate approximately 329,441 gallons per day (gpd)[40,41] of wastewater, which represents approximately 93.3 percent of the anticipated flows generated from the Development Project. As the amount of wastewater generated under this alternative is reduced, and because no significant impact to wastewater treatment capacity or facilities resulted from the Development Project, it is reasonable to conclude the reduction in wastewater flows from the Development Site under this alternative also would have a ***less than significant*** impact on wastewater conveyance or treatment facilities.

Solid Waste. The Project would generate approximately 41,889 pounds (20.9 tons) of solid waste per day.[42] Based on a generation rate[43] of 5.6 pounds/day/person, the residential uses developed under this alternative would generate approximately 21,011 pounds (10.5 tons) of solid waste per day. The commercial uses combined would generate an additional 1,592 pounds[44] (0.80 ton) of solid waste per day. Combined, the 22,603 pounds (11.3 tons) of solid waste per day under this alternative represents 54 percent of the solid waste generated by the Project. As sufficient capacity at receiving landfills exists to accommodate the Development Project, it is reasonable to conclude that these same landfills could adequately accommodate the reduced flow of solid waste resulting from operation of the uses

40 Per capita generation of 73 gallons/day for residential uses (see *City of Banning. 2018. Integrated Master Plan (IMP) Final Report*, Table 3.18).

41 73 gpdc x 3,752 persons = 273,896 gallons/day/residential) + 55,545 gallons/day (commercial), Table 4.19.L.

42 Based on Table 4.19.M and Section 5.4.19.2 of this EIR, the Development Project and MSJC Site would generate 29,317 and 12,572 pounds of solid waste per day. Total solid waste: 41,889 pounds/day or 20.9 tons/day.

43 California Department of Resources Recycling and Recovery (CalRecycle). n.d. Jurisdiction Diversion/Disposal Rate Detail, Jurisdiction: Banning, County: Riverside, Reporting Year: 2021. Website: https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/slcp/capacityplanning/recycling/JurisdictionDiversionDetail?year=2021&jurisdictionID=34 (accessed May 31, 2023).

44 Table 4.19.M

proposed under this alternative. Similar to the Development Project, impacts would be ***less than significant*** related to solid waste and landfill facilities.

8.4.2.20 Wildfire

The Northern Portion of the Development Site is located within the Local Responsibility Area (LRA), in this case the City of Banning. The SOI is within the State Responsibility Area (SRA). While the Development Site is located in a wildland-urban interface (WUI) setting, it is not located in an area statutorily designated as a Moderate, High, or Very High Fire Hazard Severity Zone (FHSZ) by CAL FIRE or Riverside County; rather the Development Site is accurately designated as LRA Non-VHFHSZ. Adjacent lands in the LRA north, northeast, and west of the Development Site are also designated non-VHFHSZ. Within the SRA, the Southern Portion of the Development Site is designated non-FHSZ. Lands south and southeast of the Development Site in the SRA are designated as High and Very High FHSZ in an SRA.[45] The nearest FHSZ to the Development Site is undeveloped land approximately 0.5 mile southwest of the Development Site along the southern border to the Sun Lakes community. The topography, vegetative cover, available access, and adjacent land use to the Development Site would be similar under this alternative. On site, the industrial development would be replaced with up to 823 and 807 single-family and multi-family residences, respectively. The multi-family residences would be located in multiple buildings up to 60 feet in height. Similar to the Development Project, natural areas within existing on-site drainages would be retained under this alternative.

Since 1900 there have been no recorded fires that have burned on or within 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. The City adopted its 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.

In addition to primary access to the commercial center from Sunset Avenue and Lincoln Street, the development of residential uses under this alternative would require the extension of roadways to neighborhoods, taking access from the City's SLB Extension. Similar to the Development Project, temporary lane closures/road closures would be coordinated with emergency service agencies to ensure appropriate levels of emergency vehicle access is maintained and would not substantially impair an adopted emergency response plan or emergency evacuation plan during construction activities. Like the Development Project, no impact related to emergency access would occur during construction of this alternative.

Compared to the Development Project, the maximum number of residents (3,752 persons) and employees (610 persons) expected to be on site under this alternative is reduced by approximately 27 percent (by 1,631 persons). While this alternative increases the number of daily passenger vehicle trips by 14.9 percent, this increase is primarily offset by a 65 percent reduction of heavy truck vehicle trips. In the event of an emergency, all roads within the City, including the future SLB Extension could be used as evacuation routes. It is reasonable to expect that the design of streets and layout of residential neighborhoods will conform to the access/evacuation requirements established by the appropriate fire authorities. The design/layout of any residential development likely will be required

[45] Dudek. 2023. *Fire Protection Plan, Sunset Crossroads, County of Riverside, California,* Figure 1A. November.

to consider appropriate fire access and evacuation requirements. While it is not possible to evaluate public behavior during future fire events, it is reasonable to expect that residents would exercise sound judgement, appropriate caution, and heed the direction(s) of fire authorities during future fire events. Like the Development Project, this alternative 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 Development Site for emergency vehicles; therefore, evacuation/emergency access impacts would be ***less than significant***.

This alternative would result in the development of residential uses within a Wildland-Interface Fire Area. While the combustibility of building materials in residential and industrial uses may vary, the City's Fire Protection Code (BMC Chapter 8.16) and Riverside County Ordinances No. 460 and No. 787-8 adopt the most recent version of the California Fire Code (CFC). Chapter 49 of the CFC identifies requirements for Wildland-Urban Interface Fire Areas. Additionally, the CBC, Chapter 7A, applies to new buildings located in any FHSZ or any WUI area and identifies the ignition resistant construction methods and materials required for development in these areas. Chapter 7A requirements seek to prevent the intrusion of flames or burning embers from vegetation fire into structures to reduce the potential of "conflagration losses." Public Resources Code Section 4291 and other regulations further dictate requirements and manner of vegetation management in fire hazard areas.

While residential activity may increase the number and variety of potential for ignition sources, it is not reasonable to conclude that residential activity would definitively increase the number, frequency, or intensity of fire events. It is reasonable to conclude occupants of any residential use developed under this alternative would take appropriate precautions and exercise responsibility for the control of potential ignition sources. Similar to the Development Project, it is reasonable that development under this alternative would be sited, designed, and operated pursuant to the applicable building and fire protection requirements, including any identified in an alternative-specific Fire Protection Plan (FPP) and Fuel Modification Plan (FMP); therefore, wildland fire impacts would be similarly reduced to a ***less-than-significant*** level.

8.4.3 Summary of Alternative 2

While a slight increase in overall ADT would occur, the reduction in truck traffic under this alternative would result in lower levels of emissions of all criteria pollutants, including reducing $PM_{2.5}$ to less than significant, except for CO which is increased under this alternative. Development under this alternative, despite these reductions, would be insufficient to reduce the emission of criteria pollutants to below established thresholds of significance except for $PM_{2.5}$ emissions. Changes in land use and a reduction in VMT under this alternative would result in a decrease in GHGs generated, though the level of GHGs emitted would still exceed established thresholds of significance; therefore, overall the air quality and greenhouse gas impacts would remain significant and unavoidable. While the demand for electricity under this alternative, development of the site with residential uses results in a substantial increase in the demand for natural gas. Furthermore, though reduced, until specific tenants are identified for commercial uses, it is infeasible to impose and implement specific VMT reduction measures such as traffic demand management measures at commercial uses at this time, and the VMT impact under this alternative remains significant and unavoidable. Compared to the Development Project, this alternative eliminates the significant and unavoidable traffic noise and

operational (stationary source) noise impacts along Sunset Avenue and south of Bobcat Road, respectively.

Development under this alternative would result in earth disturbance, removal of existing natural vegetation, and landform modification throughout the site. With adherence to standard City codes, regulations, standards, and/or project-specific mitigation, it is reasonable that land-based impacts (agricultural, cultural, mineral resources, etc.) would have impacts similar to those associated with the Development Project. Residential uses would incrementally alter demand for public services and utilities, though payment of required DIFs/school fees and adherence to the connection requirements mandated by the City and utility providers would, like the Development Project, ensure impacts related to the provision of public services and facilities remain less than significant. As this alternative would result in the development of the site under existing land use and zoning designations, it is consistent with the land use and planning policies as well as local and regional population/housing forecasts.

The retention of the commercial center under this alternative would satisfy to a much lesser degree some of the basic project objectives (see **Table 8.S**, which is provided later in this chapter). This alternative would not provide, to the same extent as the Development Project, the level of employment, variety of uses, or revenue increases that would: (1) create positive fiscal impact to the City, (2) promote job creating uses that reduce the need for City residents to commute outside of the City for employment, (3) improve transportation efficiency by taking advantage of the site's proximity to local and regional access for industrial and commercial use, (4) address a need in the City for commercial and industrial land uses that accommodate a variety of modern industrial, business, hospitality, and commercial activities, (5) provide uses that allow for a diversified economy, complements existing uses, and provide a range of employment opportunities, or (6) increase City sales and property tax revenues by establishing commercial and industrial uses in the City that can increase City revenues and assist in offsetting public services costs incurred by the City in development and maintenance of housing and public facilities.

8.5 ALTERNATIVE 3: REDUCED COMMERCIAL

The following provides a description of the Reduced Commercial alternative and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of the Alternative 3 to the environmental impacts associated with the Project. The discussion includes a determination of whether or not this alternative would substantially lessen, eliminate, or create new significant environmental impacts and would or would not meet most of the basic objectives of the Project.

8.5.1 Alternative 3 Characteristics

This alternative assumes that the annexation of the Southern Portion of the Development Site proceeds and that the Development Project proceeds with the following changes: Commercial uses are removed from the Development Project with the exception of the hotel (approximately 90,000 square feet and 125 rooms) and travel center (7,500 square feet), resulting in removal of 260,900 square feet of commercial development. The area identified currently for those commercial uses in the Northern Portion of the Development site would be replaced with 260,900 square feet of 'warehousing' uses (ITE LU 150). Other industrial uses will remain the same throughout the

Development Site (same location, size, use, and ITE rates). In total, development under this alternative includes 5,805,900 square feet of industrial uses. As with the Development Project, there is the potential under this alternative to use an industrial portion of the Development Site for energy storage (such as battery storage). Because the Development Project would result in a net loss in allowable residential capacity, the MSJC Entitlements are required under this alternative.

8.5.2 Analysis of Alternative 3

While this alternative includes the MSJC Entitlements, these actions would not result in the development of residential uses at this time. As with the Development Project, the construction of VHDR uses on the MSJC Site could occur in the future if a physical development plan is proposed. **Chapter 5.0** of this EIR addresses potential effects associated with subsequent development of the VHDR on the MSJC Site on a programmatic level. It is reasonable to conclude similar conditions on the MSJC Site would exist under this alternative; therefore, the potential impacts resulting from the subsequent development of the VHDR would also be expected to be similar under this alternative. As the Programmatic Analysis of the MSJC Entitlements is provided in **Chapter 5.0** of this EIR, a discussion of the potential environmental effects associated with development of the MSJC Site is not included under this alternative, with the exception of water supply. Because development of the entire Development Site with non-residential uses is contemplated under this Alternative the scope of the MSJC Site Entitlements is not reduced. Therefore, unless otherwise discussed, the scope of the impacts related to the MSJC Site and MSJC Entitlements would remain the same as described in **Chapter 5.0** of this EIR.

8.5.2.1 Aesthetics

Under this alternative, the portion of the Development Site currently zoned for commercial uses would be replaced with an additional 260,900 square feet of 'warehousing' uses. The maximum height of any additional industrial use would be 60 feet, with an additional 10 feet allowed for the possible installation of solar facilities.[46] Although the multiple, smaller commercial structures would be replaced by a single building, as it is anticipated this alternative would be developed under a Specific Plan that establishes design guidelines applicable to the entire site, it is reasonable any additional industrial building would comply with the Specific Plan design guidelines and development standards to ensure consistency with other industrial uses. The proposed hotel and travel center would be retained. The hotel would be a maximum of 60 feet tall (five stories), slightly taller than the other industrial buildings planned; however, as the industrial buildings would be developed on elevated pads, the slight difference in height would not be readily noticeable from adjacent roadways. In the absence of the multi-tenant commercial center, the proposed 80-foot-tall and 30-foot-wide pylon sign will not likely be required under this alternative. The pylon sign was not identified as a feature causing any adverse aesthetic effect; therefore, its removal from this alternative would not alter any significance determination.

All other industrial uses will remain the same throughout the Development Site as proposed under the Development Project. Due to the substantial similarity in the type, location, and intensity of uses,

[46] Though solar panels are not anticipated under the Development Project or this alternative, this is the maximum height permitted under the proposed Specific Plan (see Specific Plan Table 3-3).

it is reasonable this alternative would have generally similar impacts on the existing visual character of the project site, scenic views, scenic resources, and lighting.

As the development envisioned under this alternative would occur in essentially the same location, pattern, and extent as that of the Development Project, it is reasonable to conclude that impacts related to the aesthetic condition and visual resources would be similarly ***less than significant***.

8.5.2.2 Agriculture and Forestry Resources

As this alternative would develop the same areas as the Development Project, impacts to agricultural and forestry resources would be identical to those resulting from the Development Project. Similar to the Development Project, ***no impact*** related to the conversion of Important Farmland or land zoned for agricultural or forestry uses would occur.

The Development Site has not supported agricultural uses, apart from occasional livestock grazing, since the early 1900s. Although the Southern Portion of the Development Site is zoned A-1, Light Agriculture, there is currently no agricultural activity on the Southern Portion of the Development Site or on any adjacent or nearby property except for occasional cattle grazing. This temporary agricultural use contributes very little to the regional agricultural economy. As detailed in **Section 4.2.6.2** of this EIR, no Williamson Act Contracts are in effect on parcels within the Development Site); therefore, similar to the Development Project, impacts to Williamson Act contracted land and the conversion of agricultural land would be ***less than significant***.

8.5.2.3 Air Quality

The first CEQA Air Quality threshold of significance is whether the project would conflict with or obstruct implementation of the applicable air quality plan. The SCAQMD *CEQA Air Quality Handbook* provides two criteria to determine whether a project would be consistent or in conflict with the AQMP.

- **Consistency Criterion No. 1:** The project would not generate population and employment growth that would be inconsistent with SCAG growth forecasts.

- **Consistency Criterion No. 2:** The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

This alternative would result in the replacement of 260,900 square feet of commercial development with an equal amount of warehousing uses. Since the AQMP is based on local land use plans, projects that are deemed consistent with local land use plans are found to be consistent with the AQMP under the first consistency criterion. The development of industrial uses on the balance of the Development Site would necessitate changes in current General Plan and zoning designations. Because development under this alternative would require a general plan land use change, similar to the Development Project, it would not be consistent with AQMP Consistency Criterion No. 1. Compared to the Development Project, Alternative 3 would have slightly lower emissions of VOCs and NO_X, but somewhat higher emissions of CO, PM_{10}, and $PM_{2.5}$, with CO remaining less than significant. The

increase in emissions results from this alternative's 3.8 percent increase in truck trips. As established in **Table 8.G: Alternative 3 – Comparison of Regional Operational Emissions**, even with mitigation, emissions of VOCs, NO_X, PM_{10}, and $PM_{2.5}$ under this alternative would exceed SCAQMD thresholds; therefore, like the Development Project, this alternative would not be consistent with AQMP Consistency Criterion No. 2. Based on the requirements for consistency with emission control strategies in the AQMP, this alternative would conflict with or obstruct the implementation of the AQMP; therefore, similar to the Development Project, impacts would be ***significant and unavoidable***.

Table 8.G: Alternative 3 – Comparison of Regional Operational Emissions

Source	Pollutant Emissions (lbs/day)					
	VOCs	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	130	<1	<1	<1	<1	<1
Energy Sources	1	10	9	<1	<1	<1
Light-Duty Mobile Sources	19	17	288	<1	119	32
Heavy-Duty Mobile Sources	16	296	244	2	119	32
Warehouse Equipment	6	90	459	<1	3	3
Alternative 3 Operational Emissions – Unmitigated	**172**	**414**	**1,000**	3	**243**	**68**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Alternative 3 Operational Emissions – Mitigated	**165**	**323**	**541**	2	**240**	**65**
Change from Development Project (Mitigated)	↓4%	↓8%	↑3%	↓33%	↑16%	↑10%
Alternative 3 Exceeds Threshold?	**Yes**	**Yes**	No	No	**Yes**	**Yes**
Development Project Operational Emissions – Mitigated	**172**	**350**	524	3	**207**	**59**
Development Project Exceeds Threshold?	**Yes**	**Yes**	No	No	**Yes**	**Yes**

Source: 2023. *Alternatives Analysis Summary for Air Quality*, LSA Associates, Inc. October 10. (Appendix L-1, Tables: C, F-G).
Note: **Bold values** indicate an exceedance of SCAQMD thresholds.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

Construction-related emissions have previously been summarized in **Table 4.3.H** of this EIR, which indicate unmitigated emissions of VOC, NO_X, and $PM_{2.5}$ would exceed SCAQMD thresholds during construction. The emissions identified in **Table 4.3.H** are the combination of the on- and off-site emissions and the greater of summer and winter emissions. Also, the daily emissions rates reflect all combinations of overlapping construction operations. This alternative would require a substantially similar amount, extent, and duration of earth disturbance and construction emission; therefore, because in of the similarity in the amount and extent of development under this alternative, it is reasonable to expect the construction emissions detailed in **Table 4.3.H and Table 4.3.I** appropriately estimate the pre- and post-mitigation construction emissions that would occur under this alternative. It is further reasonable to anticipate that measures similar to **Mitigation Measure AIR-1** would be implemented during any alternative development on site reducing daily regional construction emissions of NO_X and $PM_{2.5}$ to below established thresholds of significance. Despite this mitigation, emissions of VOCs remain significant; therefore, VOC impacts would be similar to the Development Project and remain ***significant***.

Tables 4.3.J through 4.3.M of this EIR identify conditions related to the concurrent construction and operation of the various phases of the Development Project. Due to number, extent, and variety of uses envisioned under this alternative, it is reasonable to anticipate development under this alternative would similarly be phased, resulting in concurrent grading, construction, and operational

activity. Similar to the Development Project, even with the implementation of mitigation, air emissions would exceed established SCAQMD thresholds and would be cumulatively considerable. As summarized, and compared to the Development Project, the operational emissions associated with Alternative 3 include:

- **VOCs:** Emissions are reduced by 4% under Alternative 3 but still exceed SCAQMD thresholds.
- **NO_X:** Emissions are reduced by 8% under Alternative 3 but still exceed SCAQMD thresholds.
- **CO:** Emissions are increased by 3% under this Alternative but do not exceed SCAQMD thresholds.
- **SO_X:** Emissions under Alternative 3 are reduced by 33% and, like the Development Project, do not exceed SCAQMD thresholds.
- **PM_{10}:** Emissions are increased by 16% under Alternative 3 and exceed SCAQMD thresholds.[47]
- **$PM_{2.5}$:** Emissions are increased by 10% under Alternative 3 and exceed SCAQMD thresholds.

Despite the implementation of the feasible mitigation cited in **Mitigation Measure AIR-2**, a ***significant and unavoidable*** air quality impact would result from operation of the uses proposed under this alternative. Compared to the Project, no change in the level of impact would occur.

Regarding the comparison of localized emissions during construction and operation under this alternative, as a similar area of ground disturbance and amount of equipment usage is expected under this alternative, it is reasonable that localized construction emissions would be similar to those identified in **Table 4.3.O** of the EIR. Concentrations at the Mount San Jacinto College campus located across Sunset Avenue, approximately 115 feet from the Development Site, would not exceed localized emission thresholds during construction of this alternative. As detailed in **Table 8.J** (provided later in this chapter), total traffic generated under this alternative represents approximately 82 percent of the traffic associated with the Development Project. The replacement of the commercial use with a similarly sized industrial use results in a net reduction of 3,740 two-way trips per day as compared to the proposed Development Project. The volume of passenger car trips is decreased by 22.5 percent, while the number of trucks is increased by approximately 3.8 percent. Further, **Table 8.K** (provided later in this chapter), identifies that Alternative 3 results in a reduction of 39,448 miles traveled. As demonstrated in **Table 4.3.P** of this EIR, operational emissions associated with the Development Project do not exceed localized emission thresholds; therefore, with the change in vehicle mix, and the reduction in total vehicle miles traveled, it is reasonable that the development of uses envisioned under this alternative would similarly not exceed localized thresholds or result in a localized significant air quality impact.

[47] Particulate matter is a class of air pollutants that consists of heterogeneous solid and liquid airborne particles from humanmade and natural sources. Particulate matter is categorized in two size ranges: PM_{10} for particles less than 10 microns in diameter, and $PM_{2.5}$ for particles less than 2.5 microns in diameter. Motor vehicles are the primary generators of particulates, through tailpipe emissions as well as brake pad, tire wear, and entrained road dust. Wood burning in fireplaces and stoves, industrial facilities, and ground-disturbing activities such as construction are other sources of such fine particulates.

Exposure to Toxic Air Contaminants (TACs)[48] from vehicle exhaust can result in both immediate and long-term health effects. Exposure to diesel exhaust can lead to serious health conditions such as asthma and respiratory illnesses and can worsen existing heart and lung disease, especially in children and the elderly. Compared to the Development Project, this alternative would result in an increase in the amount of truck traffic accessing the Development Site by approximately 3.8 percent. Emissions from trucks while idling result in a much higher concentration of TACs at nearby sensitive receptors compared to the emissions from moving trucks. With moving trucks, emissions are dispersed as vehicles travel and increasing the distance from sensitive receptors. While this alternative replaces commercial uses with a similarly sized industrial use, compared to the Development Project, it would not locate truck idling areas any closer to sensitive receptors. The Development Project's health risks to nearby residents and students were substantially lower than SCAQMD's HRA thresholds (see **Table 4.3.Q** of this EIR[49]). Similar to the Development Project, this alternative would operate in an outdoor environment; therefore, air dispersion between the emission sources and the receptor locations would substantially limit contaminant concentrations. It is reasonable to conclude the increase in truck trips or increase in particulate matter associated with this alternative would be insufficient to significantly increase health risks; therefore, the TAC emissions and the health risks resulting from the operation of uses proposed under this alternative would remain ***less than significant***.

Similar to the Development Project, odors (heavy-duty equipment exhaust, architectural coatings, pavement, etc.) would be emitted during construction. While these odors would be noticeable to nearby sensitive receptors, these odors would be expected of any construction activity in the area, would dissipate quickly, and would be temporary in nature. Industrial uses may generate odors during occupancy (e.g., trash, fuel dispensing). Vapor recovery systems on gas nozzles would minimize odors from the gas station, and cooking odors would be limited by complying with SCAQMD Rules 402 and 461. Similar to the Development Project, odor-related impacts associated with operation of the uses envisioned under this alternative also would be ***less than significant***.

8.5.2.4 Biological Resources

The conversion of the site from undeveloped to developed uses under this alternative would result in the removal of existing vegetation, modification of topography, and the subsequent installation of buildings and supporting infrastructure that represents a permanent change in the nature of on-site biological resources. As with the Development Project, upland habitat throughout the Development Site will be permanently and irreversibly converted by implementation of this alternative. As stated in **Section 4.4.4.3** of this EIR, the Development Site is located in the MSHCP plan area, but not within or adjacent to any Criteria Area, Core Reserve, or Linkage identified for conservation or acquisition for conservation purposes. Similar to the Development Project, the three deeply incised drainages, their associated tributaries, and other open space areas (collectively totaling 65.6 acres of open space) will be maintained under this alternative. Like the Development Project, a conservation easement will be

[48] High-volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic (distribution centers, truck stops) were identified as posing the highest risk to adjacent receptors. Other facilities associated with increased risk include warehouse distribution centers, large retail or industrial facilities, high-volume transit centers, and schools with a high volume of bus traffic.

[49] Per Table 4.3 the maximum cancer to residents and students was 3.3 in 1 million, well below the 10 in I million standard. Maximum non-cancer chronic risk and non-cancer acute risk were 0.0008 and 0.0005, respectively, each substantially lower than the 1.0 standard.

applied to upland conservation areas (32.58 acres) located adjacent to and buffering drainages prior to the issuance of construction permits for development under this alternative.

Due to the similarities the extent and amount of disturbance between this alternative and the Development Project, it is reasonable that similar impacts to on-site biological resources would result from the implementation of this alternative. Due to the similarities in impacts, this alternative would implement similar mitigation (**Mitigation Measures BIO-1 through BIO-15**) as the Development Project, thereby reducing biological resource impacts to a ***less than significant*** level.

8.5.2.5 Cultural Resources

As discussed in **Section 4.5.3.4** of this EIR, two previously recorded cultural resources, P-33-013778 and RIV-7544, were identified on the Development Site. These resources have been evaluated pursuant to Section 106 of the NHPA or CEQA criteria and have not been identified as significant resources or eligible for listing on the NRHP or CRHR. As such, development of the Development Site pursuant to this alternative and any other similar build alternative would not cause a significant impact to these two resources, as the resources do not retain sufficient integrity, do not retain further research potential, and are not significant under any State or local criteria, and are not eligible for the NRHP or CRHR.

Because development activities under this alternative would encompass the entirety of the Development Site and would require earth disturbance in areas where historic or archaeological resources were previously identified, in areas where dense vegetation and other constraints inhibited ground visibility during previous surveys, or near multiple natural sources of water that extend through the Development Site, it is reasonable there remains a similar potential that previously unobserved resources may exist within the Development Site that could be unearthed during activities associated with implementation of this alternative.

Similar to the Development Project, implementation of **Mitigation Measures CUL-1 through CUL-6** would ensure that: (1) if historic or archaeological resources are identified during excavation, these would be evaluated, documented, and studied in accordance with standard historic or archaeological practice, and (2) historic or archaeological deposits and human remains would be treated in accordance with appropriate State codes and regulations. As with the Development Project, compliance with these measures would reduce this alternative's potential impacts to archaeological and historical resources to a ***less than significant*** level.

There are no known human remains at the Development Site, though, similar to the Development Project, the potential exists to unearth such remains during earth moving operations associated with the development of industrial and commercial uses envisioned under this alternative. Similar to the Development Project, in the event that human remains are identified during development of this alternative, these remains would be treated in accordance with Section 7050.5 of the HSC and PRC Section 5097.98, as appropriate, which require a halt in excavations and other ground disturbance of the discovery and reasonably nearby area(s) until the coroner of Riverside County has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the Riverside County coroner must notify the NAHC within 24 hours of this identification. The NAHC would identify a Native American MLD to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. PRC Section

5097.98 states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., MLD). Similar to the Development Project, adherence to applicable provisions of HSC Section 7050.5 and PRC Section 5097.98 would ensure potential impacts under this alternative related to the discovery of human remains are also ***less than significant***.

8.5.2.6 Energy Resources

Similar to the Development Project, construction of the project under this alternative would increase the annual construction generated fuel use in Riverside County by approximately 0.03 percent for diesel fuel usage and by less than 0.01 percent for gasoline fuel usage. Such an increase in demand would have a negligible effect on local, regional, and State energy supplies. Energy consumption during construction would not be inefficient, wasteful, or unnecessary. The energy usage required for the operation and occupation of Alternative 3 is identified in **Table 8.H: Alternative 3 – Estimated Annual Energy Comparison.**

Table 8.H: Alternative 3 – Estimated Annual Energy Comparison

Land Use Category	Electricity (kWh/yr)	Natural Gas (kBTU/yr)	Gasoline Consumption (gal/yr)[4]	Diesel Consumption (gal/yr)[4]
Parking Lot	1,152,370	0	0	0
Hotel	1,110,290	0	37,378	29,330
Refrigerated Warehouse – No Rail	11,294,900	282,634	38,845	365,771
Unrefrigerated Warehouse – No Rail	7,289,470	0	525,422	4,947,504
General Heavy Industrial	1,438,470	0	41,263	388,542
Travel Center	54,488	0	179,765	141,059
Total Alternative 3[1]	**22,339,988[2]**	**282,634[2]**	**822,671**	**5,872,207**
Change from Development Project	↓3,230,417	↓5,727,265	↓554,776	↓67,923
	↓12.6%	↓95.3%	↓40.2%	↓1.1%
Total Development Project[1]	**25,570,405[3]**	**5,999,799[3]**	**1,377,447**	**5,940,130**

Compiled by LSA Associates, Inc. (November 2023).
Sources: 1. Energy demand with implementation of applicable mitigation measures and project design features.
2. 2023, Attachment L of *Alternatives Analysis Summary of Greenhouse Gases*, Michael Hendrix Consulting, October 20.
3. 2023, Appendix F of *Revised Greenhouse Gas Analysis Sunset Crossroads Project*, Michael Hendrix Consulting, October 20.
4. 2023, Alternative Analysis CalEEMod modeling outputs, LSA Associates, Inc., October.
Notes: The average gasoline consumption rate is 28.43 mpg (EMFAC2021).
The average diesel consumption rate is 9.06 mpg (EMFAC2021).
Assume warehouse & industrial vehicles are 75% diesel.
Assume commercial uses vehicles are 80% gasoline.
CalEEMod = California Emissions Estimator Model
EMFAC2021 = California Emissions Factor Model, Version 2021
gal/yr = gallons per year
kBTU/yr = thousand British thermal units per year
kWh/yr = kilowatt-hours per year

Compared to the Development Project, development under this alternative decreases electrical demand by approximately 12.6 percent and natural gas use by approximately 95.3 percent[50]. As detailed in **Tables 8.J and 8.K** (provided later in this chapter), compared to the Development Project, daily trips and VMT are reduced by 18.2 and 13.4 percent under this alternative, respectively. The elimination of the commercial center under this alternative reduces passenger car trips by 22.5

[50] Alternative 3 does not include the commercial and restaurant uses which creates the natural gas demand required for food preparation.

percent and results in a 40.2 percent reduction in gasoline usage and diesel fuel usage by 1.1 percent. Compared to the Development Project, this alternative results in a 8.5 percent decrease in the overall amount of vehicle fuel (gasoline and diesel fuel) used during operation of the alternative uses.

The energy usage defined in **Table 8.H** incorporates the Project Design Features (PDFs) and mitigation measures identified for the Development Project that are applicable to the commercial and industrial uses proposed under this alternative. Electricity in the City is increasingly provided by renewable sources. It is reasonable that as electrification occurs, future development throughout the City, including within the site, will be required to implement applicable energy efficiency standards/features.[51] Per Chapter 15.04 of the City Municipal Code, the City has adopted both the California Building Code (CBC) and California Green Building Standards Code (CALGreen Code) pertaining to energy conservation standards. Accordingly, the Development Project would comply with the current 2022 CALGreen Code requirements and Title 24 efficiency standards so as to not result in a wasteful or inefficient energy usage. Similar to the Development Project, potential impacts related to the conflict with or obstruction of a plan/program related to renewable energy resources or energy efficiency would be ***less than significant***.

8.5.2.7 Geology and Soils

This alternative would encompass the same location as the Development Project; therefore, it is reasonable the geologic setting and soil conditions affecting development would be similar. Impacts related to faulting, seismicity, landslide potential, groundwater level, liquefaction, and other potential geologic hazards would be similar to those associated with the Development Project. Furthermore, the paleontological setting of the Development Site is not affected by the type of development that may occur on site.

Project applicants are required to submit a grading application to obtain a grading permit. As required under Chapter 18.06 of the City's Municipal Code, such an application is supplemented by a geotechnical report/seismicity report to determine the surface and subsurface geologic conditions of a project. Furthermore, State regulations protecting human-occupied structures from seismic hazards are provided in the most recent CBC, which has been adopted by reference by Chapter 15.08 (Construction Codes) of the City's Municipal Code. The CBC, as adopted by the City, contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. **RCMs GEO-1 and GEO-2** require that all structures be designed in accordance with the seismic parameters presented in the Geotechnical Assessment prepared for the Development Project and applicable sections of the most current CBC. As this alternative substantially retains the location, extent, type of use and buildings, and intensity of uses planned under the Development Project, it is reasonable this alternative would follow applicable provisions of the City's Municipal Code and the recommendations of any project-specific geotechnical assessment. As with the

[51] Senate Bill (SB) 100 establishes a target for renewable and zero-carbon resources to supply 100 percent of retail sales and electricity by 2045. While SB 100 does not define "zero-carbon resources," and the State had no legal definition, it is generally accepted that natural gas is not a "zero-carbon resource." As California moves to a "zero-carbon future," it is reasonable that reductions in natural gas use will occur as utilities move from using this resource to using zero-carbon and/or renewable resources. To achieve the intended goals of SB 100, policies that may limit the installation of natural-gas appliances (i.e., residential water heaters, stoves/oven, furnaces) will increasingly reduce the overall demand for natural gas in Banning, in Riverside County, and Statewide.

Development Project, impacts related to geologic impacts under this alternative are ***less than significant.***

As the paleontological sensitivity of the Development Site would remain unchanged under any alternate development of the site, it is reasonable that ground disturbance under any alternative would have an equal potential for the disturbance of previously undocumented paleontological resources. It is reasonable that **Mitigation Measure GEO-1**, requiring the monitoring of ground disturbances within older alluvial fan deposits, would be equally applicable to any alternate development of the Development Site. As with the Development Project, impacts related to paleontological resource impacts under this alternative would be reduced to a ***less than significant*** level.

8.5.2.8 Greenhouse Gas Emissions

The construction and operation of each alternative would generate GHG emissions, with most of the fuel/energy consumption and waste generation (and associated generation of GHG emissions) occurring during project operations. Typically, more than 80 percent of the total fuel/energy consumption and waste generation on site takes place during long term operation of the facilities, and less than 20 percent of fuel/energy is consumed, and waste generated during construction. The analysis of construction-related GHG emissions for the Development Project was used as a proxy for all alternatives. Because the construction of the Project includes buildings of equal or greater size than each of the alternatives and the grading area is of equal or greater size to each of the alternatives, using these values in the alternatives analysis is conservative. Considering these factors, construction-related GHG emissions amortized over 30 years would amount to 487.49 MT CO_2e/yr.

Buildout of the Development Project will occur starting in 2023 and the impacts associated with GHG emissions for this alternative are totaled for construction occurring between 2023 and 2027, averaged, amortized over a 30 year period per SCAQMD and added to operations at full buildout in 2027. State regulations included the Zero Emission Vehicle Program, the reduction of emissions from electric generation due to increased renewable energy in the Renewable Portfolio Standard, waste diversion requirements, and water efficiency requirements, which will all contribute to long term reductions in GHG emissions. The forecast of 2040 levels of emissions associated with the Project and this alternative is included for informational purposes only.

The emissions identified in **Table 8.I: Alternative 3 – Long-Term Greenhouse Gas Emissions** included energy efficiency elements as PDFs. As modeled, with PDFs and implementation of the requirements outlined in **Mitigation Measures AIR-2 and GHG-1 through GHG-6** would result in GHG emissions totaling approximately 32,801.19 MT CO_2e/yr, a 15.3 percent reduction compared to the Development Project. While this alternative substantially lessens the volume of GHG emitted by percent reduction compared to the Development Project, it still exceeds established GHG emission thresholds of significance, and the GHG impacts associated with this alternative remain ***significant and unavoidable***.

Table 8.I Alternative 3 – Long-Term Greenhouse Gas Emissions

Source	GHG Emissions (MT/yr)		
	Unmitigated 2027	**Mitigated 2027**	**Mitigated 2040**
Construction Emissions Amortized over 30 Years	**487.49**	**487.49**	**487.49**
Operational Emissions			
Onsite Commercial Emissions	2,101.34	1,197.69	634.78
Offsite Commercial Mobile Emissions	4,735.44	3,409.68	1,807.13
Onsite Industrial Emissions	18,266.68	9,131.08	4,839.47
Offsite Industrial Mobile Emissions	26,864.60	18,575.25	9,844.88
Onsite Residential Emissions	0.00	0.00	0.00
Offsite Residential Emissions	0.00	0.00	0.00
Total Onsite Emissions	20,368.02	10,328.77	5,474.25
Total Offsite Mobile Emissions	31,600.04	21,984.93	11,652.01
Total Alternative 3: GHG Emissions	**52,455.55**	**32,801.19**	**17,613.75**
Change from Development Project	-4,447.41	-5,925.06	-765.65
	↓7.8%	↓15.3%	↓4.2%
Total Development Project: GHG Emissions	**56,902.96**	**38,726.25**	**18,379.40**

Source: Tables A-B & D, *Alternatives Analysis Summary of Greenhouse Gas Emissions*. Michael Hendrix Consulting, October 20, 2023 (see Appendix L-2).
GHG = greenhouse gas
MT/yr = metric tons per year

8.5.2.9 Hazards and Hazardous Materials

The government records database search, completed as part of the Phase I ESA, determined that the Development Site is not included on any of the queried databases of hazardous materials sites that could create a significant hazard to the public or the environment. As it is located within the same footprint as the Development Project, it is reasonable that no new recognized environmental condition would be identified during development under this alternative; therefore, similar to the Development Project, a ***less than significant*** impact relative to hazardous material sites would occur under this alternative. Additionally, as the site is located outside the AIA established for Banning Municipal Airport, like the Development Project, ***no impact*** related to consistency with an airport land use plan or resulting in an airport safety hazard would occur under any project alternative.

As the uses envisioned under this alternative occupy the same project area and are substantially similar to the uses planned under the Development Project, it is reasonable to conclude impacts resulting from the local hazard or the transport, storage, use, and/or disposal of hazardous materials would be similar. As the adjacent land uses under this alternative would remain unchanged, local impacts resulting from the on-site presence and use of hazardous materials would be similar to that identified with the Development Project. It is reasonable to anticipate the RCMs identified for the Development Project would be equally applicable to any on-site development, including that associated under this alternative; therefore, with implementation of these RCMs, as with the Development Project, hazardous material impacts during construction and occupation of the site would be ***less than significant***.

8.5.2.10 Hydrology and Water Quality

As this alternative envisions development of industrial uses with a substantially similar type, footprint, extent, and intensity of use, it is reasonable that construction activities necessary to develop the Development Site would also be similar. It follows that the construction-related hydrology and water quality impact would be similar to that identified with the Development Project. Similarly, compliance with existing NPDES regulations (as specified in **RCM WQ-1 and RCM WQ-3**, which are equally applicable to this alternative), including the preparation of an SWPPP and Erosion and Sediment Control Plans and implementation of Construction BMPs to target and reduce pollutants of concern in storm water runoff, would ensure construction-related water quality impact remain ***less than significant***.

With the exception of replacement of the commercial uses with a single industrial building, the extent of development envisioned under this alternative is substantially similar to that associated with the Development Project. The additional industrial building would be similarly sized as the commercial center and would be expected to include trailer parking lots, loading areas, and similar features such that the amount of impermeable surfaced would be generally similar to that of the commercial center it is replacing. As with the Development Project, **RCM WQ-3** would equally apply to development under this alternative. This RCM requires preparation of a WQMP specifying the BMPs to be incorporated into site development to reduce and treat pollutants in site runoff. Implementation of water quality management facilities identified in the WQMP would ensure operational water quality impacts associated with development of this alternative are ***less than significant***.

This alternative would be developed at the same location as the Development Project; therefore, consideration of local groundwater will be similar. Compared to the Development Project, the development envisioned under this alternative would not substantially alter the amount of impermeable surface area, alter infiltration rates, or alter the amount or rate of post-development recharge. It is anticipated the additional industrial building would be constructed using the same methods as other industrial proposed on site; therefore, no change in this alternative's effect on local groundwater would occur. Additionally, as detailed in **Section 8.5.2.19** below, this alternative would reduce total Project water demand by approximately 163.18 afy; therefore, this alternative slightly reduces the volume of local groundwater withdraws. As groundwater impacts were determined to be ***less than significant*** under the Development Project, in the absence of any changed effect to local groundwater resources, a similar level of impact would occur under this alternative.

Due to similarities in the location, extent, and type of development that would occur under this alternative, it is reasonable that changes in the local drainage patterns would be similar to those identified with the Development Project. The Development Site's conceptual drainage plan consists of catch basins, storm drainpipes, RCPs ranging from 12 to 42 inches, and 13 on-site infiltration basins. The drainage system for the Development Project would route storm water runoff from the on-site impervious surfaces to proposed infiltration basins, designed to provide storm water treatment and peak flow mitigation for their respective downstream receiving waters. In compliance with City of Banning Ordinance No. 1415 and as specified in RCM WQ-4, a Final Hydrology Study is required to confirm that the Development Project's drainage system meets this standard as the hydromodification requirements of the Whitewater River Watershed MS4 Permit. Due to the similarity of development under this alternative, it is highly reasonable to conclude similar

requirements would be imposed on any development of the site to ensure a drainage scheme that provides an adequate and appropriate reduction of peak flow during storm conditions. As RCMs WQ-3 and WQ-4 would equally apply to this alternative, it is reasonable that the impacts associated with changes in drainage patterns and the capacity of existing or planned drainage systems would similarly be ***less than significant***.

Flows within alluvial channels typically carry sediment, with concentrations that tend to increase with flow rate. The ability of flow to move sediment as it passes downstream is termed its sediment transport capacity. Hydraulic properties, particularly flow velocity, and bed material properties, such as median grain size, determine the sediment transport capacity of a given river reach. The capacity of a flow to transport particles of a given diameter is exponentially related to the flow velocity (above a given incipient or threshold velocity). In channels with similar bed material composition, higher velocities result in increased sediment transport capability[52]. Development under this alternative would require similar crossings across existing on-site drainage features. Similar to the Development Project, implementation of **Mitigation Measures HYD-1 and HYD-2** would equally apply to development under this alternative. Adherence to these measures would, similar to the Development Project, reduce potential sediment transport impacts to a ***less than significant*** level.

8.5.2.11 Land Use and Planning

Similar to the Development Project, the development of industrial uses would require changes in existing General Plan and Zoning and the annexation of the Southern Portion of the Development Site into the City of Banning. The type, location, and extent of development envisioned under this alternative and the related project components (e.g., required entitlements) are generally similar to that associated with the Development Project; therefore, it is reasonable that the land use and planning implications of this alternative would be similar to those resulting from the Development Project and also would be ***less than significant***.

No residential uses or residents occupy the Development Site. In the current absence of any residential uses, similar to the Development Project, development of this alternative would not physically divide an established community. As with the Development Project, this alternative assumes implementation of the SLB Extension through the site, and the installation of an internal circulation system that would enhance connectivity between established neighborhoods located east and west of the site. In the absence of any displacement or community division, ***no impact*** would occur.

8.5.2.12 Mineral Resources

The Development Site is mapped as MRZ-3, indicating that the area contains known or inferred mineral occurrences of unknown significance. As established in **Section 4.12** of this EIR, there are no records that indicate the Development Site has been previously used as a mineral resource recovery

[52] As stated in Section 4.10 of this Draft EIR, much of the sand for the sand dune and sand sheet habitats downstream/downwind is supplied by ephemeral streams flowing out of the San Bernardino Mountains through the city and then onward to the San Gorgonio River. Features within upstream drainage areas, such as detention basins, and changes in stream flow related to flood control features have the potential to diminish the amount of sediment transported downstream which is then available for aeolian transport to Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) conservation areas.

site nor a site occupied by mines; zoned by the City or Riverside County for mineral extraction; nor is the Development Site mapped by the CGS as an area of known PCC grade aggregate resources. The nearest mineral extraction operation is the Banning Quarry, operated by Robertson's Ready Mix, located in the MRZ-2 zone in the eastern portion of the City approximately 3.28 miles northeast of the Development Site.

This alternative envisions the development of commercial and industrial and ancillary features and facilities within the same footprint on the Development Site. Similar to the Development Project, in the absence of a known or designated mineral resource, past on-site mineral extraction operation, or zoning designation for extractive uses, development of the proposed commercial and residential uses would not cause a loss of availability of known mineral resources valuable to the region and the State; therefore, impacts would be ***less than significant.***

8.5.2.13 Noise and Vibration

Construction Noise. The development proposed under this alternative would require mass grading, fine grading, and various construction activities across the site at a location, extent, intensity and duration similar to that required of the Development Project; therefore, noise associated with grading and construction operations would also be substantially similar. As with the Development Project, implementation of minimum 10-foot-high temporary construction barrier at the construction boundary (as required under **Mitigation Measure NOI-1**) when project construction activities are within 100 feet from the nearest residential structure would reduce construction noise levels by a minimum of 6 dBA and would reduce construction noise levels to 49.7 dBA L_{eq}. With the reduction achieved by a similar mitigation, the construction noise impact resulting from this alternative also would be less than significant.

Operational Noise. The commercial and industrial uses envisioned under this alternative would require truck delivery and truck loading and unloading activities, HVAC equipment, drive-through speakerphones, parking lot activities, fueling activities, and outdoor eating activities, which are generally located in the same location as those planned for the Development Project.

The residential and school property lines are located 160 feet or more from noise sources that generate maximum instantaneous noise levels, such as truck delivery and truck loading/unloading activities, speakerphones, parking activities, and fueling activities. Under the Development Project, noise levels at the closest residential and school (Mount San Jacinto College) property lines within the City would not exceed the City's exterior daytime and nighttime noise standards of 55 dBA L_{eq} and 45 dBA L_{eq}, respectively, and would not exceed the City's daytime and nighttime maximum noise standards of 75 dBA and 65 dBA, respectively, for any period of time for campus uses.

The Development Project would increase ambient noise levels by up to 4.1 dBA for residences represented by Receptors R-8, R-11, and R-12 south of Bobcat Road, and this operational noise impact was identified as significant. The residences at Receptors R-8, R-11, and R-12 have driveway access onto Bobcat Road; therefore, for the Development Project, mitigation measures such as noise barriers would not be feasible because they could not be built in a continuous manner that would be effective. Therefore, noise impacts from operations of the Development Project would be significant and unavoidable. Under this alternative, the intensity and location of industrial uses fronting Bobcat Road in Planning Area 4 are unchanged. A similar condition of direct residential access to Bobcat Road

makes the installation of an effective noise barrier infeasible; therefore, similar to the Development Project, stationary operational noise impacts to the affected residences south of Bobcat Road would be ***significant and unavoidable.***

Existing (2021) Traffic Noise Levels. Traffic noise conditions under Alternative 3, where noise sensitive uses are present, would result in a traffic noise increase of up 3.0 dBA along Highland Home Road, 19.6 dBA along Sunset Avenue, and 16.9 dBA along Sun Lakes Boulevard. Under this alternative, the noise level increase resulting from traffic at these locations is equal to or reduced from that associated with the Development Project (3.0, 22.3, and 17.8 dBA, respectively). The following is a detailed discussion of the specific roadway segments noise-sensitive land uses where potential impacts may occur:

- **Highland Home Road South of Sun Lakes Boulevard/Westward Avenue.** Residences are located approximately 20 feet from the Highland Home Road centerline and would be exposed to traffic noise levels of 54.0 dBA CNEL. Compared to the Development Project (54.0 dBA CNEL) at this location, traffic noise levels at this location under this alternative would be similar. Although project-related traffic could increase ambient noise levels by 3 dBA and would be perceptible, the existing (2021) with project traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Therefore, like the Development Project, traffic noise impacts at this location would have a less than significant impact on off-site noise-sensitive land uses.

- **Sunset Avenue Between the I-10 Westbound Ramps and Bobcat Road.** Residences are located approximately 35 feet from the Sunset Avenue centerline and would be exposed to traffic noise levels of 74.3 dBA CNEL. The existing 5- to 7.5-foot-high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 69.3 and 66.3 dBA CNEL, respectively. A similar traffic noise level is present under the Development Project at this location (69.3 and 66.3 dBA CNEL, attenuated). As the level of noise at this location under this alternative is equal to that resulting from the Development Project, traffic noise impacts at this location under this condition would be similarly ***significant***.

  Mount San Jacinto College campus uses are located approximately 75 feet from the Sunset Avenue centerline and would be exposed to a traffic noise level of 65.9 dBA CNEL. Implementation of the Development Project results in a noise level of 68.6 dBA CNEL at this location. Similar to the Development Project, traffic noise generated at this location under this condition and alternative would be significant because alternative-related traffic would increase ambient noise levels by 3 dBA or more (and would be perceptible) and the existing (2021) with alternative traffic noise levels would exceed the City's noise standard of 65 dBA CNEL. Though noise levels are reduced, like the Development Project, as traffic noise still exceed the standard, impacts at this location remain ***significant.***

  Similar to the Development Project, for the residences located along Sunset Avenue between Lincoln Street and Westward Avenue, an additional off-site noise barrier would not be feasible because there are already walls in place and adding additional heights to those walls would provide minimal noise reduction and would not achieve the noise reduction needed to reduce impacts to less than significant. Also, obtaining consent from all property owners to construct off-site noise barriers cannot be assured and is outside of the control of the Project Applicant and the

City. Construction of a minimum 6-foot-high wall adjacent to the existing MSJC campus uses along the Sunset Avenue frontage would provide a noise reduction of 5 dBA and reduce traffic noise levels to below the City's noise standard of 65 dBA CNEL. However, the off-site traffic noise impact remains significant because the construction of the wall would require approval of the property owner, which is outside of the control of the Project Applicant and the City, and therefore it is uncertain whether the wall would be constructed. Therefore, noise impacts to existing residences and MSJC campus uses along Sunset Avenue under this alternative, like the Development Project, remain ***significant and unavoidable***.

- **Sun Lakes Boulevard East of Highland Springs Road.** Residences are located approximately 50 feet from the Sun Lakes Boulevard centerline and would be exposed to traffic noise levels of 67.2 dBA CNEL. The existing 5-foot-high private property wall along Sun Lakes Boulevard would provide a noise reduction of 5 dBA, which would reduce traffic noise levels to 62.2 dBA CNEL. Under the Development Project, attenuated noise levels at this location were 59.6 dBA CNEL. Although alternative-related traffic could increase ambient noise levels by 3 dBA or more (which would be perceptible), the existing (2021) with alternative traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Therefore, similar to the Development Project, traffic noise impacts at this location under this condition would be ***less than significant***.

- **Sun Lakes Boulevard West of Highland Home Road.** Residences are located approximately 50 feet from the Sun Lakes Boulevard centerline and would be exposed to alternative traffic noise levels of 63.9 dBA CNEL without the existing 5-foot-high private property walls. The existing 5-foot-high private property wall along Sun Lakes Boulevard would provide a noise reduction of 5 dBA, which would reduce traffic noise levels to 58.9 dBA CNEL. Although alternative-related traffic could increase ambient noise levels by 3 dBA or more, the existing (2021) with project traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Therefore, traffic noise generated under Alternative 3 would have a less than significant impact on off-site noise-sensitive land uses.

Opening Year (2027) Traffic Noise Levels. The Opening Year (2027) traffic noise conditions under Alternative 3 would result in a traffic noise increase of up to 3.0 dBA along Highland Home Road, 16.9 dBA along Sunset Avenue where noise-sensitive land uses are present and 9.4 dBA along Sun Lakes Boulevard where noise-sensitive land uses are present. Under this alternative, the noise level increase resulting from traffic at these locations is equal to or reduced from that associated with the Development Project (3.0, 17.5, and 9.7 dBA, respectively). The following is a detailed discussion of the specific roadway segments noise-sensitive land uses where potential impacts may occur:

- **Highland Home Road South of Sun Lakes Boulevard/Westward Avenue.** Residences are located approximately 20 feet from the Highland Home Road centerline and would be exposed to alternative traffic noise levels of 54.0 dBA CNEL, a noise level equal to that occurring under the Development Project. Although alternative-related traffic could increase ambient noise levels by 3 dBA, the opening year (2027) with alternative traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Therefore, like the Development Project, traffic noise impacts at this location under this alternative would have a ***less than significant*** impact on off-site noise-sensitive land uses.

- **Sunset Avenue Between the I-10 Westbound Ramps and Bobcat Road:** Residences are located approximately 35 feet from the Sunset Avenue centerline and would be exposed to alternative traffic noise levels of 74.3 dBA CNEL. The existing 5- to 7.5-foot-high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce alternative traffic noise levels to 69.3 and 66.3 dBA CNEL, respectively. This condition is similar to what occurs at this location under the Development Project. As the level of noise at this location under this alternative is equal to that resulting from the Development Project, traffic noise impacts at this location under this condition would be similarly ***significant and unavoidable***.

  For Mount San Jacinto College, school uses are located approximately 75 feet from the Sunset Avenue centerline and would be exposed to a traffic noise level of 65.9 dBA CNEL a noise level equal to that occurring at this location under the Development Project. Therefore, alternative traffic noise generated at this location and under this condition would result in a significant impact on off-site noise-sensitive land uses because alternative-related traffic would increase ambient noise levels by 3 dBA at this location and under this condition or more and the Opening Year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL and impacts would, similar to the Development Project, be ***significant***.

  Similar to the Development Project, for the residences located along Sunset Avenue between Lincoln Street and Westward Avenue, an additional off-site noise barrier would not be feasible because there are already walls in place and additional heights to those walls would provide minimal noise reduction and would not achieve the noise reduction needed to reduce impacts to less than significant. Also, obtaining consent from all property owners to construct off-site noise barriers cannot be assured and is outside of the control of the Project Applicant and the City. Construction of a minimum 6-foot-high wall adjacent to the existing MSJC campus uses along the Sunset Avenue frontage (see **Mitigation Measure NOI-2**) would provide a noise reduction of 5 dBA and reduce traffic noise levels to below the City's noise standard of 65 dBA CNEL. However, the off-site traffic noise impact remains significant because the construction of the wall would require approval of the property owner, which is outside of the control of the Project Applicant and the City, and therefore it is uncertain whether the wall would be constructed. Therefore, noise impacts to existing residences and MSJC campus uses along Sunset Avenue under this alternative, like the Development Project, remain ***significant and unavoidable.***

- **Sun Lakes Boulevard West of Highland Home Road.** Residences are located approximately 50 feet from the Sun Lakes Boulevard centerline and would be exposed to alternative traffic noise levels of 64.2 dBA CNEL. The existing 5-foot-high private property wall along Sun Lakes Boulevard would provide a noise reduction of 5 dBA, which would reduce these traffic noise levels to 59.2 dBA CNEL. This is a similar noise level condition at this location that would occur under the Development Project. While the increase in ambient noise at this location under this alternative is 3 dBA (which is perceptible), noise levels do not exceed the City's noise standard of 65 dBA CNEL. Similar to the Development Project, therefore, a traffic noise at this location under this alternative would be ***less than significant***.

Horizon Year (2045) Traffic Noise Levels. The horizon year (2045) traffic noise conditions under Alternative 3 would result in a project-related traffic noise increase of up to 16.9 dBA along Sunset Avenue where noise-sensitive land uses are present and 5.2 dBA along Sun Lakes Boulevard where

noise-sensitive land uses are present. At these locations and under this condition, traffic increases are reduced from that associated with the Development Project (11.8 and 5.3 dBA, respectively). The following is a detailed discussion of the specific roadway segments noise-sensitive land uses where potential impacts may occur:

- **Sunset Avenue Between the I-10 Westbound Ramps and Bobcat Road.** Residences are located approximately 35 feet from the Sunset Avenue centerline and would be exposed to traffic noise levels of 74.5 dBA CNEL. The existing 5- to 7.5-foot-high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 69.6 and 66.6 dBA CNEL, respectively. This attenuated noise level is equal to that occurring at this location with implementation of the Development Project. Like the Development Project, alternative traffic noise impacts at this location under this condition would be a ***significant impact*** since traffic would increase ambient noise levels by 3 dBA or more over 2045 conditions and would exceed the City's noise standard of 65 dBA CNEL.

  For Mount San Jacinto College, the school is located approximately 75 feet from the Sunset Avenue centerline and would be exposed to a traffic noise level of 66.1 dBA CNEL which is a slight reduction from that occurring under the Development Project (66.7 dBA CNEL). Though noise levels are slightly reduced, similar to the Development Project, a ***significant impact*** would result from this alternative as the ambient noise levels is increased by more than 3 dBA (which is perceptible) and because the noise level would exceed the City's noise standard of 65 dBA CNEL.

  Similar to the Development Project, for the residences located along Sunset Avenue between Lincoln Street and Westward Avenue, an additional off-site noise barrier would not be feasible because there are already walls in place and additional heights to those walls would provide minimal noise reduction and would not achieve the noise reduction needed to reduce impacts to less than significant. Also, obtaining consent from all property owners to construct off-site noise barriers cannot be assured and is outside of the control of the Project Applicant and the City. Construction of a minimum 6-foot-high wall adjacent to the existing MSJC campus uses along the Sunset Avenue frontage (see **Mitigation Measure NOI-2**) would provide a noise reduction of 5 dBA and reduce traffic noise levels to below the City's noise standard of 65 dBA CNEL. However, the off-site traffic noise impact remains significant because the construction of the wall would require approval of the property owner, which is outside of the control of the Project Applicant and the City, and therefore it is uncertain whether the wall would be constructed. Therefore, noise impacts to existing residences and MSJC campus uses along Sunset Avenue under this alternative, like the Development Project, remain ***significant and unavoidable.***

- **Sun Lakes Boulevard West of Highland Home Road.** Residences are located approximately 50 feet from the Sun Lakes Boulevard centerline and would be exposed to traffic noise levels of 65.9 dBA CNEL without the existing 5-foot-high private property walls. The existing 5-foot-high private property wall along Sun Lakes Boulevard would provide a noise reduction of 5 dBA, which would reduce traffic noise levels to 60.9 dBA CNEL, which represents a slight reduction from the noise level occurring at this location with implementation of the Development Project (61.0 dBA CNEL). Although project-related traffic could increase ambient noise levels by 3 dBA or more (which is perceptible), the increase is slightly reduced and project traffic at this location under this alternative would not exceed the City's standard of 65 dBA CNEL. Therefore, traffic noise at this

location generated under Alternative 3 would have a ***less than significant*** impact on off-site noise-sensitive land uses.

The traffic noise increase generated by Alternative 3 would be slightly lower than the Development Project. Also, traffic noise impacts on Sunset Avenue between Lincoln Avenue and south of Westward Avenue under Alternative 3 are similar to the Development project.

Similar to the Development Project, there are no feasible mitigation measures that would reduce off-site traffic noise levels along Sunset Avenue between Lincoln Street and south of Westward Avenue under Alternative 3. Construction of off-site noise barriers could reduce impacts to less than significant but obtaining consent from property owners to construct off-site noise barriers cannot be assured and is outside of the control of the Project Applicant and the City. Use of rubberized asphalt could also reduce impacts to less than significant but this could not be sustained as the asphalt improvements are not permanent, i.e., they degrade over time. Therefore, similar to the Development Project, off-site traffic noise impacts under Alternative 3 would be ***significant and unavoidable*** because the noise increase would result in a substantial (3 dBA) permanent increase in ambient noise levels and traffic noise levels would exceed the City's exterior noise standard of 65 dBA CNEL.

8.5.2.14 Population and Housing

Under this alternative, the portion of the Development Site currently zoned for commercial uses would be replaced with an additional 260,900 square feet of 'warehousing' uses. All other industrial uses will remain the same throughout the Development Site as proposed under the Development Project. Due to the substantial similarity in the type, location, and intensity of uses, it is reasonable this alternative would create a similar demand for construction-related employment. While development under this alternative would generate temporary construction employment, as with the Development Project, it is expected that local and regional construction workers would be available to serve the construction needs of the site and that an influx of new residents to the City would not occur. Similar to the Development Project, potential population impacts associated with temporary construction employment would be ***less than significant***.

Development of the site under this alternative is substantially similar to that proposed under the Development Project. The replacement of the commercial uses with an additional warehouse building will slightly reduce (4.5 percent) potential future jobs available (from 5,993 jobs to 5,725 jobs[53]). As of March 2023[54], the City had a labor force of 11,300, and the County had a labor force of 1,158,900, with approximately 600 and 53,000 people unemployed, respectively. August 2023[55] unemployment rates of 5.9 and 5.0 percent have been recorded for the City and Riverside County, respectively. This suggests an ample available local and regional labor pool to serve the long-term employment opportunities offered by this alternative. As this alternative provides a substantially equivalent

53 Based on employment factors cited in Table 4.17.A. Industrial: 1 employee/1,030 square feet (5,637 employees); retail: 1 employee/500 square feet (15 employees); hotel: 1,046 daily trips/14.34 trips per employee – 73 employees. Total employees = 5,725.

54 Labor Market Information by California Geographic Areas, Labor Force and Unemployment Rate for Cities and Census Designated Places (ca.gov). site accessed April 21, 2023.

55 Labor Market Information by California Geographic Areas, Labor Force and Unemployment Rate for Cities and Census Designated Places (ca.gov) (accessed August 19, 2023).

number of potential new jobs in the City and region consistent with the regional forecasts, it is reasonable to conclude impacts on population and housing would be similar to that resulting from the Development Project and would be ***less than significant***.

Like the Development Project, the City could proceed with construction of the Public Facilities to service existing and future demand consistent with the forecasts in the General Plan and/or Integrated Water Plan. As the Development Site has been previously planned for development and due to the adjacency of existing infrastructure to the site, it is not likely the extension of infrastructure would spur additional unplanned development or directly/indirectly induce unplanned population growth. Similar to the Development Project, in the absence of any induced unplanned growth, ***no impact*** would occur.

This alternative requires the transfer of residential capacity from the Development Site to the MSJC Site. Similar to the Development Project, no impacts would result from changing the General Plan and zoning designations on the MSJC Site, and similar impacts would result from any subsequent development of any residential uses on the MSJC Site.

8.5.2.15 Public Services

It is reasonable to conclude that any alternate development would be subject to the Banning Municipal Code (Section 15.68, Development Impact Fees) and the payment of appropriate fees for commercial and industrial development occurring under this alternative would be appropriately collected. The current DIFs imposed by the City on industrial development include:

- **Police Facilities Development Impact Fee:** Commercial, $351 per 1,000 square feet; industrial, $170 per 1,000 per square feet.
- **Fire Protection Facilities Developer Impact Fee:** Commercial, $486 per 1,000 square feet; industrial, $236 per 1,000 square feet.
- **General City Facilities Developer Impact Fee:** Commercial, $493 per 1,000 square feet; industrial, $239 per 1,000 square feet.

With the exception of replacing the commercial center with a similarly size industrial building, the development under this alternative is similar to that proposed under the Development Project; therefore, it is reasonable to conclude potential public service impacts would be substantially similar.

As the City's DIF program has anticipated the changes in service population resulting from commercial and industrial development in the City, and the facilities necessary to service this growth, the fees established in the DIF program would provide funding for any new public facilities required under this alternative. Like the Development Project, development of this alternative may increase demand on public services, but future project businesses and patrons would contribute to local public service funding through the payment of taxes (e.g., property, business, and sales tax). With payment of required DIFs, taxes, and other obligations, similar to the Development Project, potential impacts to public facilities and services would be ***less than significant***.

As previously stated, the BUSD has identified a "seat deficit" in elementary and middle schools and a "slight excess in capacity at the high school level." The BUSD Fee Justification Report identifies the

student generated rates, anticipates students generated by new development, and anticipates the school facilities required to serve such development. While the development under this alternative would not directly increase student population, the BUSD has identified a school impact fee for commercial/industrial ($0.66 per square foot). Pursuant to Government Code Section 65996, the payment of school fees (as established and ratified by the BUSD) would provide full mitigation of potential impacts on school facilities that may result from development under this alternative. Similar to the Development Project, impacts to school facilities would be ***less than significant***.

8.5.2.16 Recreation

Because this alternative does not include a residential component, it would not directly add to the City's population; therefore, similar to the Development Project, additional park or recreation facilities to serve new residents of the City would not be required. Buildout of this alternative would provide up to 5,725 jobs in the City and region. This alternative retains the Development Project's 12.6 acres of Open Space – Parks (comprising a 5.0-acre passive park and 7.6 acres of passive open space), which would be accessible to residents of the City and persons employed on site. The collection of development impact fees imposed on new development is required pursuant to Banning Municipal Code Chapter 15.68. The DIF program collects funds to offset a development's impact on recreation facilities.

As the City determines park demand on a per resident basis, industrial and commercial uses are not considered by the City to generate park and recreation demand that would require the construction of new or expansion of existing recreation facilities; similar to the Development Project, the impacts to park and recreation facilities are ***less than significant***.

8.5.2.17 Transportation

As detailed in **Table 8.J: Alternative 3 – Trip Generation Comparison**, total traffic generated under this alternative represents approximately 81.8 percent of the traffic associated with the Development Project. The replacement of the commercial use with a similarly sized industrial use results in a net reduction of 3,740 two-way trips per day as compared to the proposed Development Project. The volume of passenger car trips is decreased by 22.5 percent, while the volume of truck trips is increased by approximately 3.8 percent. The reduction of daily trips resulting from removal of the commercial uses would likely result in changes in the number and/or location of impacted intersections under this alternative. Similar to the Development Project, it is reasonable to conclude that development under this alternative would be similarly conditioned to install improvements to fully satisfy the City's LOS standard(s). It is reasonable that necessary and appropriate pedestrian, transit, and roadway improvements would be installed to satisfy City requirements and that these features would be designed to satisfy City standards so as to not introduce hazards due to geometric design features (e.g., sharp curves or dangerous intersections). Similar to the Development Project, development under this alternative would not be inconsistent with plans/programs addressing the City's transportation system.[56]

[56] The City's General Plan Policy 6 states, "The City shall maintain peak hour Level of Services (LOS) C or better on all local intersections, except those on Ramsey Street and at I-10 interchanges, where Level of Service D or better shall be maintained." The traffic analysis prepared for the Development Project recommended improvements the City can adopt as conditions to ensure it would be consistent with the City's LOS standard. It is reasonable that development under this alternative would similarly be conditioned to satisfy this City standard.

Table 8.J: Alternative 3 – Trip Generation Comparison

Land Use	AM Peak			PM Peak			Daily
Development Project							
Passenger Cars	742	343	1,086	750	881	1,631	17,156
Trucks	117	61	178	59	102	161	3,330
TOTAL	**859**	**404**	**1,264**	**809**	**963**	**1,792**	**20,496**
Alternative 3							
Passenger Cars	673	248	921	412	752	1,165	13,330
Trucks	121	62	184	61	107	168	3,456
TOTAL	**795**	**310**	**1,105**	**473**	**860**	**1,333**	**16,756**
Net Change – Passenger Cars	-69	-95	-164	-338	-129	-467	-3,866
Net Change – Trucks	4	1	6	2	5	7	126
Total Net Change	-65	-94	-159	-336	-123	-459	-3,740

Source: 2023. Table 2, Sunset Crossroads Project Alternatives Generation Assessment, Urban Crossroads, October 10.

As detailed in **Table 8.K: Alternative 3 – Vehicle Miles Traveled Comparison,** compared to the Development Project, implementation of this alternative would reduce VMT approximately 13.4 percent. Under this alternative, the removal of the retail component and increase in industrial uses results in a VMT per employee to be nominally reduced, although still above the City's VMT impact threshold. Without the retail component, boundary VMT is higher than the Development Project, as the loss of the retail uses would cause an increased trip length as the service population (i.e., population and employees) would be required to seek the retail/commercial services that are further away. Overall, the VMT impacts associated with this alternative, similar to the Development Project, would be considered potentially significant.

Table 8.K: Alternative 3 – Vehicle Miles Traveled Comparison

	Vehicle Miles Traveled
Alternative 3	254,497
Development Project	293,945
Difference	**-39,448**

Source: 2023. Sunset Crossroads Vehicles Miles Traveled (VMT) Alternatives Analysis, Urban Crossroads, October 9.

As mitigation, the Development Project would prepare a TDM strategy report to reduce employee VMT. These TDM measures were derived from the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality. Due to the similarity in impact, it is reasonable that a similar measure would be required to address the VMT associated with this alternative. As with the Development Project, since future industrial tenants are unknown at this time, implementation of the feasible TDM measures are unknown and cannot be guaranteed to reduce this alternative's VMT impact to a level of less than significant. While the VMT associated with this alternative is reduced from that associated with the Development Project, because of the uncertainty related to the implementation of feasible VMT reduction measures, similar to the Development Project, the VMT impact associated with this alternative remains ***significant and unavoidable***.

8.5.2.18 Tribal Cultural Resources

While an SLF search conducted by the NAHC yielded negative results for tribal cultural resources, the Development Site is located within the ancestral territory and traditional use area of the Cahuilla and Serrano people of the MBMI. MBMI tribal representatives have emphasized the importance of including archaeological and Native American monitoring during ground disturbance to ensure tribal cultural resources that may be located on the Development Site are thoroughly assessed. Development activities under this alternative would encompass ground disturbance throughout the Development Site. It is reasonable there remains a similar potential that previously unobserved tribal cultural resources may exist within the Development Site that could be discovered during activities associated with implementation of this alternative.

As with the Development Project, **Mitigation Measures CUL-1 through CUL-6** will be implemented prior to and during ground disturbance activities associated with implementation of this alternative. These measures require the retention of a Secretary of the Interior qualified archaeologist and Native American monitor(s) to be present during all ground-disturbing activities within native soil; the development of an Archaeological Monitoring and Treatment Plan; and conducting pre-disturbance Archaeological Sensitivity Training. The Native American monitor(s) will be authorized to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources. These measures further identify appropriate actions to be taken in the event tribal cultural material and/or human remains are discovered during implementation of this alternative.

Similar to the Development Project, upon implementation of **Mitigation Measures CUL-1 through CUL-6**, potential impacts to tribal cultural resources that may result from the implementation of this alternative would be reduced to a ***less than significant*** level.

8.5.2.19 Utilities and Service Systems

As required by the City of all development that connects to the City's utility systems, implementation of this alternative would result in the payment of appropriate Water and Wastewater DIFs to offset the impact of accommodating new development.

Water. As this alternative envisions construction within the same site footprint as the Development Project, and the demand for water during construction would likely be similar. Construction-related water demand for soil watering (fugitive dust control), cleanup, masonry, painting, and other activities would be of limited duration and would cease once all of the development is completed; therefore, similar to the Development Project, short-term construction activities are not expected to have any adverse impacts on the existing water system or available water supplies and would not require or result in the construction of new water treatment facilities or the expansion of existing facilities. Construction impacts would be ***less than significant.***

This alternative replaces most of the Development Project's commercial center with an industrial building of the same square footage. The location, type, and intensity of all other proposed uses would remain the same. As established in the project-specific Water Supply Assessment, the water demand for industrial uses (1,700 gpd/acre) is substantially less than the water demand for commercial uses (5,300 gpd/acre). Based on these demand factors, replacing the commercial center with industrial

uses would reduce water demand under this alternative by approximately 145,680 gpd[57] (or approximately 163.18 afy). Compared to the Development Project, which has an estimated water demand of 1,060 afy,[58] the water demand associated with use of the MSJC Site totals 734 afy and would remain unchanged under this alternative. Combined, the water demand associated with this alternative is approximately 90.6 percent of that required for the Project.[59] As detailed in **Tables 4.19.I through 4.19.K** of this EIR, even under multiple-dry year conditions, the City's water supply is sufficient to accommodate the water demand resulting from development under this alternative. Because the water demand under this alternative is reduced, it is reasonable that impacts to water supplies and systems would remain ***less than significant***.

Wastewater. Sanitary services during construction would be provided by portable restroom facilities, which transport waste off site for treatment and disposal. Similar to the Development Project, construction-related wastewater treatment and wastewater conveyance infrastructure under this alternative would be ***less than significant***.

This alternative envisions replacement of the commercial uses in the northeast portion of the project site with a single additional industrial use. The Project would generate 414,892 gpd of wastewater (352,900 gpd from the Development Project and 61,992 gpd from the MSJC Site). Wastewater flows from the MSJC Site remain unchanged under this alternative. The hotel and travel center would be retained under this alternative. Based on wastewater demand factors cited in **Table 4.19.L**, the change in land use in this area would reduce wastewater generated daily by approximately 399,892 gpd.[60] The amount of wastewater generated from MSJC site uses (upon development) would be unchanged (61,992 gpd). Compared to the Development Project, this alternative would reduce wastewater generated on the Development Site by 3.6 percent.[61] As the amount of wastewater generated under this alternative is reduced, and because no significant impact to wastewater treatment capacity or facilities resulted from the Development Project, it is reasonable to conclude the reduction in wastewater flows from the Development Site under this alternative, like the Project, would have a ***less than significant*** impact on wastewater conveyance or treatment facilities.

Solid Waste. As detailed in **Table 4.19.M**, commercial and industrial uses each have a solid waste generation factor of 5 pounds/1,000 square feet of use. This alternative replaces the 260,900 square feet of commercial uses with the same amount of industrial use; therefore, there is no change in the

57 Based on water demand factors cited in the WSA (which themselves are based on Table 3-5 of the IMP). This alternative assumes approximately 7 acres retained for the hotel and travel center, 7 ac x 5,300 gpd/ac = 37,100 gpd (approximately 41.56 afy); industrial, 439.80 acres x 1,700 gpd/ac = 747,660 gpd (approximately 837.49 afy). This alternative will assume an equal amount of water (14 afy) is required for open space (park) use. Total water demand for this area under Alternative 3 would be approximately 797,360 gpd or 893.05 afy. Per Table 4.19.H, water demand under the Development Project is 943,040 gpd or 1,060 afy. Therefore, water demand required under Alternative 3 is reduced by 145,680 gpd or approximately 163.18 afy.

58 See Table 4.19.H.

59 Total Project water demand: 1,060 + 734 = 1,794 afy, Alternative 3 total water demand: 893 + 734 = 1,627 afy. 1,625/1,794 = 90.6 percent.

60 Commercial and industrial wastewater generation factors of 1,150 and 750 gpd/acre, respectively. Assumes approximately 7 acres retained for the hotel and travel center = 8,050 gpd and 439.8 acres of industrial uses = 329,850 gpd of 337,900 gpd total for the uses envisioned under this alternative. Wastewater flows from the MSJC Site would be unchanged (61,992 gpd). Compared to the Development Project, total wastewater flows under this alternative are 399,892 gpd versus the 414,912 required for the Development Project.

61 399,892/414,892 = 15,020 gpd or a 3.6 percent reduction.

amount of solid waste generated under this alternative.[62] As sufficient capacity at receiving landfills exists to accommodate the Development Project, in the absence of any change in the amount of solid waste, it is reasonable to conclude these same landfills could adequately accommodate the flow of solid waste resulting from operation of the uses proposed under this alternative. Similar to the Development Project, impacts would be ***less than significant*** related to solid waste and landfill facilities.

8.5.2.20 Wildfire

The Northern Portion of the Development Site is located within the LRA, in this case the City of Banning. The SOI is within the SRA. 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 (FHSZ) by CAL FIRE or Riverside County; rather the Development Site is accurately designated as LRA Non-VHFHSZ. Adjacent lands in the LRA north, northeast, and west of the Development Site are also designated non-VHFHSZ. Within the SRA, the Southern Portion of the Development Site is designated non-FHSZ. Lands south and southeast of the Development Site in the SRA are designated as High and Very High FHSZ in an SRA.[63] The nearest FHSZ to the Development Site is undeveloped land approximately 0.5 mile southwest of the Development Site along the southern border to the Sun Lakes community. The development envisioned under this alternative extends within the same footprint as the Development Project; therefore, it is reasonable that a similar roadway network would be developed to serve the proposed uses. Similar to the Development Project, temporary lane closures/road closures during would be coordinated with emergency service agencies to ensure appropriate levels of emergency vehicle access is maintained and would not substantially impair an adopted emergency response plan or emergency evacuation plan during construction activities. Like the Development Project, ***no impact*** related to emergency access would occur during construction of this alternative.

The City adopted its 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. The Development Project is not anticipated to result in any substantial queuing along Sunset Avenue, Bobcat Road, South Highland Home Road, or other nearby roads. Compared to the Development Project, the maximum number of persons (employees) expected to be on site under this alternative is reduced by approximately 4.5 percent (to 5,725 persons). As this alternative also results in a net decrease of 3,740 daily vehicle trips, no increase in roadway queuing is anticipated. In the event of an emergency, all roads within the City, including the future SLB Extension, could be used as evacuation routes. Like the Development Project, this alternative 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 Development Site for emergency vehicles; therefore, evacuation/emergency access impacts would be ***less than significant***.

With the exception of replacing the commercial center with an industrial building of the same size, the type, location, and extent of development envisioned in this alternative and the related project

[62] Similar to the Development Project, it is anticipated measures to reduce waste (e.g., Mitigation Measure GHG-1, providing recycling opportunities to divert industrial waste by 80 percent) will be implemented under this alternative.

[63] Dudek. 2023. *Fire Protection Plan, Sunset Crossroads, County of Riverside, California,* Figure 1A. November.

components are generally similar to that associated with the Development Project; therefore, it is reasonable that the alternative's relationship to adjacent wildlands and potential exposure to wildland fire-related impacts would be equivalent to that identified for the Development Project. The City's Fire Protection Code (BMC Chapter 8.16), and Riverside County Ordinances No. 460 and No. 787-8 adopt the most recent version of the CFC. Chapter 49 of the CFC identifies requirements for WUI Areas. Additionally, the CBC, Chapter 7A, applies to new buildings located in any FHSZ or any WUI Area and identifies the ignition resistant construction methods and materials required for development in these areas. Chapter 7A requirements seek to prevent the intrusion of flames or burning embers from vegetation fire into structures to reduce the potential of "conflagration losses." Public Resources Code Section 4291 and other regulations further dictate requirements and manner of vegetation management in fire hazard areas.

Similar to the Development Project, it is reasonable that development under this alternative would be sited, designed, and operated pursuant to the applicable building and fire protection requirements, including any identified in an alternative-specific FPP and FMP. As the location, extent, and type of uses envisioned under this alternative are substantially similar to those planned under the Development Project, it is reasonable that wildland fire impacts would be similarly reduced to a ***less than significant*** level through the adherence to applicable regulations and adherence to the appropriate measures detailed in an alternative-specific FPP or FMP.

8.5.3 Summary of Alternative 3

This alternative would reduce to some degree overall ADTs and VMT and the volume of greenhouse gases emitted; the reduction of greenhouse gas emissions would be insufficient to reduce the emissions to below established thresholds of significance. As such, greenhouse gas impacts would remain significant and unavoidable. Changes in composition of the traffic associated with this alternative would slightly reduce emissions of some pollutants (e.g., VOCs, NO_X) while somewhat increasing emissions of others (e.g., CO, PM_{10}, and $PM_{2.5}$). While SO_X is reduced by a greater percentage, impacts are less than significant under both the Development Project and this alternative. Despite these changes, mitigated emissions of VOC, NO_X, PM_{10} and $PM_{2.5}$ remain above SCAQMD thresholds and impacts would remain significant and unavoidable. CO emissions are increased under this Alternative as compared to the Development Project, but as with the Development project, do not exceed SCAQMD thresholds. This alternative reduces overall demand for electricity, natural gas, and vehicle fuels. Furthermore, the reduced retail component and increase in industrial uses results in a VMT per employee to be nominally reduced, although still above the City's VMT impact threshold. The reduction of locally-serving retail in Alternative 3 results in an increased trip length for the service population (i.e., population and employees) in the nearby area seeking retail services that may now be further away. VMT impacts of Alternative 3 in its entirety would be considered potentially significant. Under this alternative, like the Development Project, TDM measures would be imposed. As future tenants are unknown at this time, implementation of specific, feasible TDM measures[64] and the extent of VMT reductions are uncertain, and CEQA requires that the VMT impact under this alternative be treated as significant and unavoidable. Though the amount of traffic is reduced, due to the location of adjacent sensitive receptors to the site and the lack of feasible mitigation, the significant and unavoidable traffic noise (east of Sunset Avenue) and stationary noise impact (south

64 Transportation Demand Management (TDM) strategies may include commute trip reduction marketing, rideshare programs, end-of-trip bicycle facilities, and/or other programs/features to reduce vehicle trips.

of Bobcat Road) impacts occurring under the Development Project would remain under this alternative.

Development under this alternative would result in earth disturbance, removal of existing natural vegetation, and landform modification throughout the site and would result in substantially similar building footprints as what is planned under the Development Project. With adherence to standard City codes, regulations, standards, and/or project-specific mitigation, it is reasonable that land-based impacts (agricultural, biological, cultural, mineral resources, etc.) would have impacts similar to those associated with the Development Project. Because this alternative requires similar entitlement actions, compared to the Development Project, land use and planning impacts would be similar. Incremental changes in the demand for public services and utilities would occur, though payment of required DIFs/school fees and adherence to the connection requirements mandated by the City and utility providers would, like the Development Project, ensure impacts related to the provision of public services and facilities remain less than significant. A similar suite of land use entitlements would be required to develop either this alternative or the Development Project. The MSJC Entitlements required to allow development of this alternative would ensure no net loss in residential capacity in the City. Impacts associated with the MSJC Entitlements would remain as discussed in **Chapter 5.0** of this EIR.

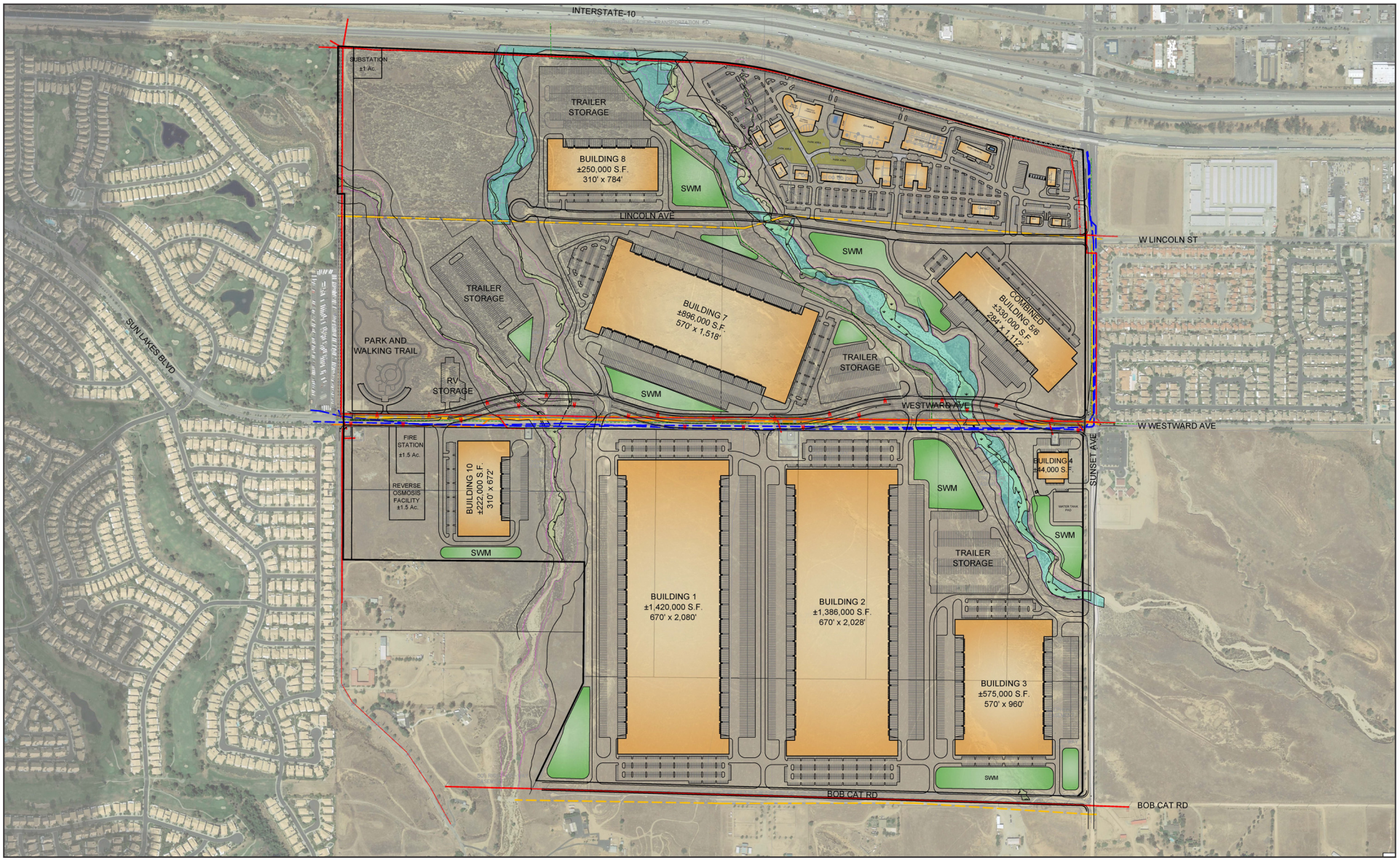
This alternative eliminates most of the commercial uses on the Development Site and therefore provides a less diversified economy and a more limited range of employment opportunities, and would be substantially less effective in meeting several of the City's key objectives. It still provides a variety of industrial opportunities to provide employment in the City, and would create a substantial number of new jobs (5,725 jobs). However, the uses envisioned under this alternative would meet to a much lesser extent the City's objectives of accommodating development that generates sales and property tax revenues that can increase City revenues and assist in offsetting other public services costs incurred by the City than the Development Project.

8.6 ALTERNATIVE 4: REDUCED INDUSTRIAL

The following provides a description of the Alternative 4 and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of this alternative to the environmental impacts associated with the Project. The discussion includes a determination of whether or not Alternative 4 would substantially lessen, eliminate, or create new significant environmental impacts compared to the Development Project, and would or would not meet most of the basic objectives of the Project.

8.6.1 Alternative 4 Characteristics

This alternative assumes that the annexation of the Southern Portion of the Development Site proceeds and that the Development Project proceeds with the following changes to the industrial component: this alternative eliminates Building 9 (274,000 square feet of Warehousing uses) and foregoes the extension of Lincoln Street over the Smith Creek drainage. Additionally, this alternative removes 105,500 square feet of Warehousing use and 42,500 square feet of General Light Industrial use from Buildings 5 and 6 respectively. The 330,000 square feet of High-Cube Cold Storage Warehouse use remains in a single building (combined Building 5/6) designed to sit parallel to the Pershing Creek drainage (see **Figure 8.1: Alternative 4 – Conceptual Layout**).



LSA

FIGURE 8.1

N

0 150 300

FEET

SOURCE: Northpoint Development, October 2023

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Sunset Crossroads

Alternative 4 - Conceptual Layout

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Other industrial uses will remain the same throughout the Development Project (same location, size, use, and ITE rates). Overall, this alternative includes a reduction of 422,000 square feet of industrial use (approximately 7.6 percent), with a maximum of 5,123,000 square feet of industrial uses. Under this alternative, the Development Project's commercial area development is not changed and, as with the Project, includes 260,900 square feet of commercial/retail uses, the 7,500 square foot travel center, and a 125-room (approximately 90,000 square foot) hotel. This alternative does not require the extension of Lincoln Street beyond Planning Area 6, results in one less drainage crossing at Lincoln Street, and eliminates fire access to Highland Home Road at the Northern Portion of the Development Site as well as eliminating the buildout of Highland Home Road north of Sun Lakes Boulevard. As with the Development Project, there is the potential under this alternative to use an Industrial portion of the Development Project for energy storage (such as battery storage). Because implementation of the Development Project would result in a net loss in allowable residential capacity, this alternative requires the avoidance of that net loss and includes the MSJC Entitlements.[65]

8.6.2 Analysis of Alternative 4

The potential impacts associated with the Reduced Industrial alternative are described below. While this alternative includes the MSJC Entitlements, approval of the MSJC Entitlements would not result in the development of residential uses at this time. As with the Development Project, the construction of VHDR uses on the MSJC Site could occur in the future if a specific development plan for residential use is proposed. **Chapter 5.0** of this EIR addresses potential effects associated with subsequent development of the VHDR on the MSJC on a programmatic level. It is reasonable to conclude similar conditions on the MSJC Site would exist under this alternative; therefore, the potential impacts resulting from the subsequent development of the VHDR would also be expected to be similar under this alternative. As the Programmatic Analysis of the MSJC Entitlements is provided in **Chapter 5.0** of this EIR, a discussion of the potential environmental effects associated with development of the MSJC Site, except for water supply, is not included under this alternative.

8.6.2.1 Aesthetics

Under this alternative, Building 9, currently located south of I-10, would not be developed. As detailed in **Figure 4.1.2-A**, this building does not substantially obstruct view of the foothills or peaks of the San Jacinto Mountains. The removal of Building 9 would retain the view of the current undeveloped condition of this portion of the Development Site from this location. On the eastern edge of the Development Site (Planning Area 2), Buildings 5 and 6 will be combined into a single building and sited to maximize the distance from Sunset Avenue (e.g., approximately paralleling the adjacent drainage). The maximum heights of proposed industrial uses of this single building would remain 60 feet (with an additional 10 feet permitted for solar arrays). The siting of the building in Planning Area 2 would eliminate the currently proposed single, long expanse of building fronting Sunset Avenue, though the overall change in the visual character in the project area would still be from open space to industrial and commercial uses.

[65] The 10% of project traffic distributed west on Sun Lakes Boulevard only comes from Building 9; therefore, under Alternative 4, this 10% would be removed. It is unlikely trucks from the other Phase 4 buildings would travel west on Sun Lakes Boulevard when they are adjacent to the I-10 Freeway interchange. The 10% west on Sun Lakes Boulevard will remain for the other buildings in other phases where it makes sense (for example, Building 10).

All other commercial and industrial uses throughout the Development Site would remain the same as proposed under the Development Project; therefore, due to the substantial similarity in the type, location, and intensity of uses, it is reasonable this alternative would have generally similar impacts on the existing visual character of the project site, scenic views, scenic resources, and lighting. As the development envisioned under this alternative would offer slightly more open space, as the location, pattern, and extent as of development proposed is substantially similar to that of the Development Project, it is reasonable to conclude that impacts related to the aesthetic condition and visual resources would be similarly ***less than significant***.

8.6.2.2 Agriculture and Forestry Resources

With the exception of Building 9 in the northwest corner of the Development Site, this alternative would develop the same areas as the Development Project; therefore, impacts to agricultural and forestry resources would be identical to those resulting from the Development Project. Similar to the Development Project, ***no impact*** related to the conversion of Important Farmland or land zoned for agricultural or forestry uses would occur.

The Development Site has not supported agricultural uses, apart from occasional livestock grazing, since the early 1900s. Although the Southern Portion of the Development Site is zoned A-1, Light Agriculture, there is currently no agricultural activity on the Southern Portion of the Development Site or on any adjacent or nearby property except for occasional cattle grazing. As detailed in **Section 4.2.6.2** of this EIR, no Williamson Act Contracts are in effect on parcels within the Development Site or MSJC Site); therefore, similar to the Development Project, impacts to Williamson Act contracted land and the conversion of agricultural land would be ***less than significant***.

8.6.2.3 Air Quality

The first CEQA Air Quality threshold of significance is whether the project would conflict with or obstruct implementation with the applicable air quality plan. The SCAQMD *CEQA Air Quality Handbook* provides two criteria to determine whether a project would be consistent or in conflict with the AQMP.

- **Consistency Criterion No. 1:** The project would not generate population and employment growth that would be inconsistent with SCAG growth forecasts.

- **Consistency Criterion No. 2:** The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Because development under this alternative would require a general plan land use change, similar to the Development Project, it would not be consistent with AQMP Consistency Criterion No. 1. Compared to the Development Project, emissions are equal to (SOx) or slightly reduced. Despite this reduction, emissions of VOCs, NO_X and particulate emissions (PM_{10} and $PM_{2.5}$) continue to exceed SCAQMD daily thresholds. As established in **Table 8.L: Alternative 4 – Comparison of Regional Operational Emissions,** even with mitigation, emissions of VOCs, NO_X, and PM_{10} and $PM_{2.5}$ would

Table 8.L: Alternative 4 – Comparison of Regional Operational Emissions

Source	Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	121	<1	<1	<1	<1	<1
Energy Sources	2	15	12	<1	1	1
Light-Duty Mobile Sources	33	37	405	1	141	38
Heavy-Duty Mobile Sources	7	279	95	1	56	17
Warehouse Equipment	4	63	321	<1	2	3
Alternative 4 Operational Emissions -Unmitigated	**167**	**394**	**834**	3	**201**	**59**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Alternative 4 Operational Emissions – Mitigated	**163**	**330**	**513**	3	**198**	**56**
Change from Development Project (Mitigated)	↓5%	↓6%	↓2%	=	↓4	↓5
Alternative 4 Exceeds Threshold?	**Yes**	**Yes**	No	No	**Yes**	**Yes**
Development Project Operational Emissions – Mitigated	**172**	**350**	524	3	**207**	**59**
Development Project Exceeds Threshold?	**Yes**	**Yes**	No	No	**Yes**	**Yes**

Source: 2023. *Alternatives Analysis Summary for Air Quality*, LSA Associates, Inc. October 10. (Appendix L-1, Tables: C, H-I).
Note: **Bold values** indicate an exceedance of SCAQMD thresholds.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

exceed SCAQMD thresholds; therefore, like the Development Project, this alternative would not be consistent with AQMP Consistency Criterion No. 2. Based on the requirements for consistency with emission control strategies in the AQMP, this alternative would conflict with or obstruct the implementation of the AQMP; therefore, similar to the Development Project, impacts would be ***significant and unavoidable***.

Construction-related emissions have previously been summarized in **Table 4.3.H** of this EIR, which indicate unmitigated emissions of VOC, NO_X, and $PM_{2.5}$ would exceed SCAQMD thresholds during construction. The emissions identified in **Table 4.3.H** are the combination of the on- and off-site emissions and the greater of summer and winter emissions. Also, the daily emissions rates reflect all combinations of overlapping construction operations. This alternative would require a substantially similar amount, extent, and duration of earth disturbance and construction emissions; therefore, because in of the similarity in the amount and extent of development under this alternative, it is reasonable to expect the construction emissions detailed in **Table 4.3.H and Table 4.3.I** appropriately estimate the pre- and post-mitigation construction emissions that would occur under this alternative. It is further reasonable to anticipate that measures similar to **Mitigation Measure AIR-1** would be implemented during any alternative development on site reducing daily regional construction emissions of NO_X and $PM_{2.5}$ to below established thresholds of significance. Emissions of VOC are not reduced to below SCAQMD thresholds. While the total development under this alternative is reduced by approximately 7.6 percent of the Development Project, it is still reasonable to anticipate a generally similar extent, scale, and duration of construction would occur, and that construction emission impacts pre- and post-mitigation would be similar. Therefore, despite the implementation of mitigation identified under the Development Project; it is reasonable that VOC impacts would be similar to the Development Project and ***significant***.

Tables 4.3.J through 4.3.M of this EIR identify conditions related to the concurrent construction and operation of the various phases of the Development Project. Due to number, extent, and variety of uses envisioned under this alternative, it is reasonable to anticipate development under this alternative would similarly be phased, resulting in concurrent grading, construction, and operational activity. Similar to the Development Project, even with the implementation of mitigation, air emissions would exceed established SCAQMD thresholds and would be cumulatively considerable. As summarized, and compared to the Development Project, the operational emissions associated with Alternative 4 include:

- **VOCs:** Emissions are reduced by 5% under Alternative 4 but still exceed SCAQMD thresholds.
- **NO_X:** Emissions are reduced by 6% under Alternative 4 but still exceed SCAQMD thresholds.
- **CO:** Emissions are reduced by 2% under Alternative 4 and do not exceed SCAQMD thresholds.
- **SO_X:** Emissions under Alternative 4 are equal to that resulting from the Development Project and do not exceed SCAQMD thresholds.
- **PM_{10}:** Emissions are reduced by 4% under Alternative 4 but still exceed SCAQMD thresholds.
- **$PM_{2.5}$:** Emissions are reduced by 5% under Alternative 4 but still exceed SCAQMD thresholds.

Despite the implementation of the feasible mitigation cited in **Mitigation Measure AIR-2,** the volume of all pollutants emitted is slightly lowered, and a ***significant and unavoidable*** air quality impact would result from operation of the uses proposed under this alternative. Compared to the Project, no change in the level of impact would occur.

Regarding the comparison of localized emissions during construction and operation under this alternative, as a similar area of ground disturbance and amount of equipment usage is expected under this alternative, it is reasonable that localized construction emissions would be similar to those identified in **Table 4.3.O**: of this EIR. Concentrations at the Mount San Jacinto College campus located across Sunset Avenue, approximately 115 feet from the Development Site, would not exceed localized emission thresholds of significance during construction of this alternative. As detailed in **Table 8.O** (provided later in this chapter), total traffic generated under this alternative represents approximately 97.6 percent of the traffic associated with the Development Project. Alternative 4 is anticipated to result in a net reduction of 498 two-way trips (-2.4 percent) per day as compared to the Development Project. The volume of passenger car trips and trucks is decreased by 1.7 and 6.1 percent, respectively. Further, **Table 8.P** (provided later in this chapter), identifies a reduction of 20,085 vehicle miles traveled (a reduction of 6.8 percent from the Development Project). The Development Project's health risks to nearby residents and students were substantially lower than SCAQMD's HRA thresholds (**Table 4.3.Q** of this EIR). It is reasonable to conclude the reduction in truck trips (202 daily trips) associated with this alternative would proportionally reduce TACs emissions; the TAC emissions and health risks resulting from the operation of industrial uses permitted under this alternative would remain ***less than significant***.

Similar to the Development Project, odors (heavy-duty equipment exhaust, architectural coatings, pavement, etc.) would be emitted during construction. While these odors would be noticeable to nearby sensitive receptors, these odors would be expected of any construction, would dissipate quickly, and would be temporary in nature. Industrial uses may generate odors during occupancy (e.g.,

trash, food odors, fuel dispensing). Vapor recovery systems on gas nozzles would minimize odors from the gas station, and cooking odors would be limited by complying with SCAQMD Rules 402 and 461. Similar to the Development Project, odor-related impacts associated with operation of the uses envisioned under this alternative would be ***less than significant***.

8.6.2.4 Biological Resources

The conversion of the site from undeveloped to developed uses under this alternative would result in the removal of existing vegetation, modification of topography, and the subsequent installation of buildings and supporting infrastructure that represents a permanent change in the nature of on-site biological resources. As with the Development Project, upland habitat throughout the Development Site will be permanently and irreversibly converted by implementation of this alternative. As stated in **Section 4.4.4.3** of this EIR, the Development Site is located in the MSHCP plan area, but not within or adjacent to any Criteria Area, Core Reserve, or Linkage identified for conservation or acquisition for conservation purposes. Similar to the Development Project, the three deeply incised drainages, their associated tributaries, and other open space areas (collectively totaling 65.6 acres of open space) will be maintained under this alternative. Additionally, Building 9 (Planning Area 7) would not be developed and the 25.8 acres within Planning Area 7 would be retained as additional natural open space. Like the Development Project, it is expected that a conservation easement will be applied to upland conservation areas (32.58 acres) located adjacent to and buffering drainages prior to the issuance of construction permits for development under this alternative.

Under this alternative, the retention of Planning Area 7 as natural open space would increase the amount of undeveloped areas to 91.4 acres. Additionally, as access to Building 9 is not required under this alternative, the Lincoln Street crossing of Smith Creek is not required. The elimination of this crossing will proportionally reduce the alternative's extent of impacts to riverine resources. While this alternative does slightly decrease the development footprint proposed by the Development Project, due to the similarity in the extent, scale, and nature of development that would occur on the balance of the Development Site, it is reasonable that similar impacts to on-site biological resources in these areas would result from the implementation of this alternative. Due to the similarities in impacts, this alternative would implement similar mitigation (**Mitigation Measures BIO-1 through BIO-15)** as the Development Project, thereby reducing biological resource impacts to a ***less than significant*** level.

8.6.2.5 Cultural Resources

With the exception of Building 9 in the northwest corner of the Development Site, this alternative would develop virtually the same areas as the Development Project. As discussed in **Section 4.5.3.4** of this EIR, two previously recorded cultural resources, P-33-013778 and RIV-7544, were identified on the Development Site. These resources have been evaluated pursuant to Section 106 of the NHPA or CEQA criteria and have not been identified as significant resources or eligible for listing on the NRHP or CRHR. As such, development of the Development Site pursuant to this alternative or any other similar alternative would not cause a significant impact to these two resources, as the resources do not retain sufficient integrity, do not retain further research potential, and are not significant under any State or local criteria, and are not eligible for the NRHP or CRHR.

Because development activities under this alternative would require earth disturbance in areas where historic or archaeological resources were previously identified, in areas where dense vegetation and

other constraints inhibited ground visibility during previous surveys, or near multiple natural sources of water that extend through the Development Site, it is reasonable there remains a similar potential that previously unobserved resources may exist within the Development Site that could be unearthed during activities associated with implementation of this alternative.

Similar to the Development Project, implementation of **Mitigation Measures CUL-1 through CUL-6** would ensure that: (1) if historic or archaeological resources are identified during excavation, these would be evaluated, documented, and studied in accordance with standard historic or archaeological practice, and (2) historic or archaeological deposits and human remains would be treated in accordance with appropriate State codes and regulations. As with the Development Project, compliance with these measures would reduce this alternative's potential impacts to archaeological and historical resources to a **less than significant** level.

There are no known human remains at the Development Site, though, similar to the Development Project, the potential exists to unearth such remains during earth moving operations associated with the development of industrial and commercial uses envisioned under this alternative. Similar to the Development Project, in the event that human remains are identified during development of this alternative, these remains would be treated in accordance with Section 7050.5 of the HSC and PRC Section 5097.98, as appropriate, which requires a halt in excavations and other ground disturbance of the discovery and reasonably nearby area(s) until the coroner of Riverside County has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the Riverside County coroner must notify the NAHC within 24 hours of this identification. The NAHC would identify a Native American MLD to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. PRC Section 5097.98 states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., MLD). Similar to the Development Project, adherence to applicable provisions of HSC Section 7050.5 and PRC Section 5097.98 would ensure potential impacts under this alternative related to the discovery of human remains are ***less than significant***.

8.6.2.6 Energy Resources

Similar to the Development Project, construction of the project under this alternative would increase the annual construction generated fuel use in Riverside County by approximately 0.03 percent for diesel fuel usage and by less than 0.01 percent for gasoline fuel usage. Such an increase in demand would have a negligible effect on local, regional, and State energy supplies. Energy consumption during construction would not be inefficient, wasteful, or unnecessary; therefore, because the construction assumed under this alternative is substantially similar to that required for the Development Project, energy impacts from construction would be similar.

The energy usage defined in **Table 8.M: Alternative 4 – Estimated Annual Energy Usage Comparison** incorporates the Project Design Features (PDFs) and mitigation measures identified for the Development Project that are applicable to the commercial and industrial uses proposed under this alternative. Compared to the Development Project, development under this alternative decreases the demand for electricity and natural gas by approximately 0.6 and 9.3 percent, respectively.

Table 8.M: Alternative 4 – Estimated Annual Energy Comparison

Land Use Category	Electricity (kWh/yr)	Natural Gas (kBTU/yr)	Gasoline Consumption (gal/yr)[4]	Diesel Consumption (gal/yr)[4]
Medical Office Building	56,568	24,439	23,106	18,131
Parking Lot	1,176,310	0	0	0
City Park	0	0	0	0
Fast Food Restaurant with Drive Thru	263,270	636,207	105,014	82,403
Health Club	847,826	0	274,019	215,020
High Turnover (Sit Down Restaurant)	1,504,400	3,635,467	107,944	84,702
Hotel	1,176,310	0	37,378	29,320
Quality Restaurant	357,295	863,423	16,589	13,017
General Industrial – Heavy	1,438,470		32,399	305,076
Refrigerated Warehouse – No Rail	11,294,900	282,634	31,498	296,596
Regional Shopping Center	565,073	0	70,667	55,452
Travel Center	54,488	0	179,765	141,059
Unrefrigerated Warehouse – No Rail	6,550,770		455,228	4,286,542
Total Alternative 4[1]	**25,285,680[2]**	**5,442,170[2]**	**1,333,607**	**5,527,329**
Change from Development Project	↓15,275	↓557,629	↓43,840	↓412,801
	↓0.6 %	↓9.3%	↓3.2%	↓6.9%
Total Development Project[1]	**25,570,405[3]**	**5,999,799[3]**	**1,377,447**	**5,940,130**

Compiled by LSA Associates, Inc. (November 2023*)*.

Sources: 1. Energy demand with implementation of applicable mitigation measures and project design features.
2. 2023, Attachment R of *Alternatives Analysis Summary of Greenhouse Gases*, Michael Hendrix Consulting, October 20.
3. 2023, Appendix F of *Revised Greenhouse Gas Analysis Sunset Crossroads Projec*t, Michael Hendrix Consulting, October 20.
4. 2023, Alternative Analysis CalEEMod modeling outputs, LSA Associates, Inc., October.

Notes: The average gasoline consumption rate is 28.43 mpg (EMFAC2021).
The average diesel consumption rate is 9.06 mpg (EMFAC2021).
Assume warehouse & industrial vehicles are 75% diesel.
Assume commercial uses vehicles are 80% gasoline.

CalEEMod = California Emissions Estimator Model
EMFAC2021 = California Emissions Factor Model, Version 2021
gal/yr = gallons per year
kBTU/yr = thousand British thermal units per year
kWh/yr = kilowatt-hours per year

As detailed in **Tables 8.O and 8.P** (both provided later in this chapter)**,** compared to the Development Project, daily trips and VMT are reduced by 2.4 and 6.8 percent under this alternative, respectively. Compared to the Development Project, overall fuel usage under this alternative is reduced by approximately 6.2 percent, which includes 3.2 and 6.9 percent reductions in gasoline and diesel fuel usage, respectively.

Electricity in the City is increasingly provided by renewable sources. It is reasonable that as electrification occurs, future development throughout the City, including within the site, will be required to implement applicable energy efficiency standards/features. Per Chapter 15.04 of the City Municipal Code, the City has adopted both the California Building Code (CBC) and California Green Building Standards Code (CALGreen Code) pertaining to energy conservation standards. Accordingly, similar to the Development Project, this alternative would comply with the current 2022 CALGreen Code requirements and Title 24 efficiency standards so as to not result in a wasteful or inefficient energy usage.

Similar to the Development Project, potential impacts related to the conflict with or obstruction of a plan/program related to renewable energy resources or energy efficiency would be ***less than significant***.

8.6.2.7 Geology and Soils

RCMs GEO-1 and GEO-2 require that all structures be designed in accordance with the seismic parameters presented in the Geotechnical Assessment prepared for the Development Project and applicable sections of the most current CBC. While this alternative eliminates Building 9 and modifies the extent of Buildings 5 and 6, it otherwise substantially retains the location, extent, type, and intensity of uses planned under the Development Project. Therefore, it is reasonable this alternative would follow applicable provisions of the City's Municipal Code and the recommendations of any project-specific geotechnical assessment that would render any potential impacts from seismic related shaking or ground failure, soil erosion, subsidence, or other soils issues less than significant. As with the Development Project, impacts related to geologic impacts under this alternative are ***less than significant***.

As the paleontological sensitivity of the Development Site would remain unchanged under any alternate development of the site, it is reasonable that ground disturbance under any alternative would have an equal potential for the disturbance of previously undocumented paleontological resources. It is reasonable that **Mitigation Measure GEO-1**, requiring the monitoring of ground disturbances within older alluvial fan deposits would be equally applicable to any alternate development of the Development Site. As with the Development Project, impacts related to paleontological resource impacts under this alternative would be reduced to a ***less than significant level***.

8.6.2.8 Greenhouse Gas Emissions

Because the construction of the Project includes buildings of equal or greater size than each of the alternatives and the grading area is of equal or greater size to each of the alternatives, using these values in the alternatives analysis is conservative. Considering these factors, construction-related GHG emissions amortized over 30 years would amount to 487.49 MT CO_2e/yr.

Buildout of the Development Project will occur starting in 2023 and the impacts associated with GHG emissions for this alternative are totaled for construction occurring between 2023 and 2027, averaged, amortized over a 30 year period per SCAQMD and added to operations at full buildout in 2027. State regulations included the Zero Emission Vehicle Program, the reduction of emissions from electric generation due to increased renewable energy in the Renewable Portfolio Standard, waste diversion requirements, and water efficiency requirements, which will all contribute to long-term reductions in GHG emissions. The forecast of 2040 levels of emissions associated with the Project and this alternative is included for informational purposes only.

This alternative includes the same energy efficiency project design features (PDFs) as the Development Project. The mitigated emissions identified in **Table 8.N: Alternative 4 – Long-Term Greenhouse Gas Emissions** assume implementation of the PDFs **Mitigation Measures AIR-2 and GHG-1 through GHG-6** applicable to commercial and industrial uses. As such, this alternative would

Table 8.N: Alternative 4 - Long-Term Greenhouse Gas Emissions

Source	GHG Emissions (MT/yr)		
	Unmitigated 2027	**Mitigated 2027**	**Mitigated 2040**
Construction Emissions Amortized over 30 Years	487.49	487.49	487.49
Operational Emissions			
Onsite Commercial Emissions	4966.45	3,213.01	1,702.89
Offsite Commercial Mobile Emissions	8,272.18	7,108.61	3,767.56
Onsite Industrial Emissions	15,204.24	5,553.33	2,943.56
Offsite Industrial Mobile Emissions	23,435.35	17,467.10	9,257.56
Onsite Residential Emissions	0.00	0.00	0.00
Offsite Residential Emissions	0.00	0.00	0.00
Total Onsite Emissions	20,170.69	8,766.33	4,646.16
Total Offsite Mobile Emissions	31,707.52	24,575.71	13,025.13
Total Alternative 4: GHG Emissions	**52,365.70**	**33,829.54**	**18,158.77**
Change from Development Project	-4,537.26	-4,896.71	-220.63
	↓8.0%	↓12.6%	↓1.2%
Total Development Project: GHG Emissions	**56,902.96**	**38,726.25**	**18,379.40**

Source: Tables A-B &ED, *Alternatives Analysis Summary of Greenhouse Gas Emissions*. Michael Hendrix Consulting, October 20, 2023 (see Appendix L-2).
GHG = greenhouse gas
MT/yr = metric tons per year

generate approximately 33,829.54 MT CO_2e/yr. Compared to the Development Project, this mitigated alternative reduces the volume of GHG emitted by approximately 12.6 percent; however, it still exceeds established GHG emission thresholds of significance. While the volume of GHG generated is reduced to some degree, the GHG impacts associated with this alternative remain ***significant and unavoidable***.

8.6.2.9 Hazards and Hazardous Materials

The government records database search, completed as part of the Phase I ESA, determined that the Development Site is not included on any of the queried databases of hazardous materials sites that could create a significant hazard to the public or the environment., It is reasonable that no new recognized environmental condition would be identified during development under this alternative; therefore, similar to the Development Project, a ***less than significant*** impact relative to hazardous material sites would occur under this alternative. Additionally, as the site is located outside the AIA established for Banning Municipal Airport, like the Development Project, ***no impact*** related to consistency with an airport land use plan or resulting in an airport safety hazard would occur under any project alternative.

As the uses envisioned under this alternative occupy the same project area and are substantially similar to the uses planned under the Development Project, it is reasonable to conclude impacts resulting from the local hazard or the transport, storage, use, and/or disposal of hazardous materials would be similar. As the adjacent land uses under this alternative would remain unchanged, local impacts resulting from the on-site presence and use of hazardous materials would be similar to that identified with the Development Project. It is reasonable to anticipate the RCMs identified for the Development Project would be equally applicable to any on-site development, including that associated under this alternative; therefore, with implementation of these RCMs, as with the Development Project, hazardous material impacts during construction and occupation of the site would be ***less than significant.***

8.6.2.10 Hydrology and Water Quality

With the exception of retention of Planning Area 7 (25.8 acres) and the consolidation of industrial uses in Planning Area 2 to a single, large use, this alternative envisions development of industrial uses with a substantially similar type, extent and intensity of use, it is reasonable that construction activities necessary to develop the Development Site would also be similar. It follows that the construction-related water quality would be generally similar to that identified with the Development Project. Similarly, compliance with existing NPDES regulations (as specified in **RCM WQ-1 and RCM WQ-3**, which are equally applicable to this alternative), including the preparation of an SWPPP and Erosion and Sediment Control Plans and implementation of Construction BMPs to target and reduce pollutants of concern in storm water runoff, would ensure construction-related water quality impacts remain ***less than significant***.

The larger industrial building in Planning Area 2 would be expected to include trailer parking lots, loading areas, and similar features as currently envisioned under the Development Project. As with the Development Project, **RCM WQ-3** would equally apply to development under this alternative. This RCM requires preparation of a WQMP specifying the BMPs to be installed to reduce and treat pollutants in site runoff. Implementation of water quality management facilities identified in the WQMP would ensure operational water quality impacts associated with development of this alternative would be ***less than significant***.

This alternative would be developed at the same location as the Development Project; therefore, consideration of local groundwater will be similar. Compared to the Development Project, the development envisioned under this alternative would slightly increase permeable areas on site, which would incrementally improve the amount and rate of post-development recharge. It is anticipated the commercial and industrial buildings would be constructed using the same methods as the Development Project; therefore, no change in this alternative's effect on local groundwater would occur. Additionally, as detailed in **Section 8.6.2.19** below, this alternative would reduce water demand by approximately 50.6 afy; therefore, this alternative reduces the volume of local groundwater withdrawals. As groundwater impacts were determined to be ***less than significant*** under the Development Project, in the absence of any changed effect to local groundwater resources, a similar level of impact would occur under this alternative.

The Development Site's conceptual drainage plan consists of catch basins, storm drainpipes, RCPs, and on-site infiltration basins and would apply to this alternative. The drainage system for the Development Project would route storm water runoff from the on-site impervious surfaces to proposed infiltration basins, designed to provide storm water treatment and peak flow mitigation for their respective downstream receiving waters and would likely be utilized by this alternative. As the industrial use in Planning Area 7 (Building 9) would not be developed, it is expected the infiltration basin (Basin K) envisioned under the Development Project for this area would not be required. It is anticipated the infiltration basin in Planning Area 2 would be modified to accommodate any change in site runoff resulting from changes in the development footprint in this area. In compliance with City of Banning Ordinance No. 1415 and as specified in **RCM WQ-4**, a Final Hydrology Study is required to confirm that the Development Project's drainage system meets this standard as the hydromodification requirements of the Whitewater River Watershed MS4 Permit. Due to the similarity of development under this alternative, it is highly reasonable to conclude similar

requirements would be imposed on any development of the site to ensure a drainage scheme that provides an adequate and appropriate reduction of peak flow during storm conditions. As **RCMs WQ-3 and WQ-4** would equally apply to this alternative, it is reasonable that the impacts associated with changes in drainage patterns and the capacity of existing or planned drainage systems would similarly be ***less than significant***.

Flows within alluvial channels typically carry sediment, with concentrations that tend to increase with flow rate. The ability of flow to move sediment as it passes downstream is termed its sediment transport capacity. Hydraulic properties, particularly flow velocity, and bed material properties, such as median grain size, determine the sediment transport capacity of a given river reach. The capacity of a flow to transport particles of a given diameter is exponentially related to the flow velocity (above a given incipient or threshold velocity). In channels with similar bed material composition, higher velocities result in increased sediment transport capability.[66] The development of Lincoln Street includes construction of 10-foot-by-10-foot reinforced concrete box culverts across Pershing and Smith Creek. Under this alternative, the Lincoln Street crossing of Smith Creek would not be required and no change in the volume or capacity of sediment transport in this drainage would occur. Similar to the Development Project, this alternative retains the Lincoln Street Crossing at Pershing Creek; therefore, implementation of **Mitigation Measures HYD-1** and **HYD-**2 would equally apply to development under this alternative. Adherence to these measures would, similar to the Development Project, reduce potential sediment transport impacts to a less than significant level.

8.6.2.11 Land Use and Planning

Similar to the Development Project, the development of industrial uses would require changes in existing General Plan and Zoning and the annexation of the Southern Portion of the Development Site into the City of Banning. The type, location, and extent of development envisioned under this alternative and the related project components are generally similar to that associated with the Development Project; therefore, it is reasonable that the land use and planning implications of this alternative would be similar to those resulting from the Development Project and would be ***less than significant.***

No residential uses or residents occupy the Development Site. In the current absence of any residential uses, similar to the Development Project, development of this alternative would not physically divide an established community. As with the Development Project, this alternative assumes implementation of the Sun Lakes Boulevard Extension through the site, and the installation of an internal circulation system that would enhance connectivity between established neighborhoods located east and west of the site. In the absence of any displacement or community division, ***no impact*** would occur.

[66] As stated in Section 4.10 of this Draft EIR, much of the sand for the sand dune and sand sheet habitats downstream/downwind is supplied by ephemeral streams flowing out of the San Bernardino Mountains through the city and then onward to the San Gorgonio River. Features within upstream drainage areas, such as detention basins, and changes in stream flow related to flood control features have the potential to diminish the amount of sediment transported downstream which is then available for aeolian transport to CVMSHCP conservation areas.

8.6.2.12 Mineral Resources

The Development Site is mapped as MRZ-3, indicating that the area contains known or inferred mineral occurrences of unknown significance. As established in **Section 4.12** of this EIR, there are no records that indicate the Development Site has been previously used as a mineral resource recovery site nor a site occupied by mines; zoned by the City or Riverside County for mineral extraction operations; nor is the Development Site mapped by the CGS as an area of known PCC grade aggregate resources. The nearest mineral extraction operation is the Banning Quarry, operated by Robertson's Ready Mix, located in the MRZ-2 zone in the eastern portion of the City approximately 3.28 miles northeast of the Development Site.

With the exception of Building 9 in the northwest corner of the Development Site, this alternative would develop the same areas as the Development Project. Similar to the Development Project, in the absence of a known or designated mineral resource, past on-site mineral extraction operation, or zoning designation for extractive uses, development of the proposed commercial and residential uses would not cause a loss of availability of known mineral resources valuable to the region and the State; therefore, impacts would be ***less than significant.***

8.6.2.13 Noise and Vibration

Construction Noise. The development proposed under this alternative would generally require mass grading, fine grading, and various construction activities across the site at a location, extent, intensity, and duration similar to that required of the Development Project; therefore, noise associated with grading and construction operations would also be substantially similar. As with the Development Project, implementation of minimum 10-foot-high temporary construction barrier at the construction boundary (as required under **Mitigation Measure NOI-1**) when project construction activities are within 100 feet from the nearest residential structure would reduce construction noise levels by a minimum of 6 dBA and would reduce construction noise levels to 49.7 dBA L_{eq}. With the reduction achieved by a similar mitigation, the construction noise impact resulting from this alternative also would be less than significant.

Operational Noise. The commercial and industrial uses envisioned under this alternative would require truck delivery and truck loading and unloading activities, HVAC equipment, drive-through speakerphones, parking lot activities, fueling activities, and outdoor eating activities, which are generally located in the same location as those planned for the Development Project.

The residential and school property lines to the east are located 160 feet or more from noise sources that generate maximum instantaneous noise levels, such as truck delivery and truck loading/unloading activities, speakerphones, parking activities, and fueling activities. Under the Development Project, noise levels at the closest residential and school (Mount San Jacinto College) property lines within the City would not exceed the City's exterior daytime and nighttime noise standards of 55 dBA L_{eq} and 45 dBA L_{eq}, respectively, and would not exceed the City's daytime and nighttime maximum noise standards of 75 dBA and 65 dBA, respectively, for any period of time at campus uses.

The Development Project would increase ambient noise levels by up to 4.1 dBA for residences represented by Receptors R-8, R-11, and R-12 south of Bobcat Road, and this operational noise impact

was identified as significant. The residences at Receptors R-8, R-11, and R-12 have driveway access onto Bobcat Road; therefore, for the Development Project, mitigation measures such as noise barriers would not be feasible because they could not be built in a continuous manner that would be effective. Therefore, noise impacts from operations of the Development Project would be significant and unavoidable. Under this alternative, the intensity and location of industrial uses fronting Bobcat Road in Planning Area 4 are unchanged. A similar condition of direct residential access to Bobcat Road makes the installation of an effective noise barrier infeasible; therefore, similar to the Development Project, stationary operational noise impacts to the affected residences south of Bobcat Road would be ***significant and unavoidable.***

Existing (2021) Traffic Noise Levels. The existing (2021) traffic noise conditions under Alternative 4 where noise sensitive uses present, would result in a traffic noise increase of up 3.0 dBA along Highland Home Road, 19.0 dBA along Sunset Avenue, and 16.2 dBA along Sun Lakes Boulevard where noise-sensitive land uses are present. These noise level increases are equal to or reduced from that associated with the Development Project (3.0, 22.3, and 17.8 dBA, respectively). The following is a detailed discussion of the specific roadway segments where potential impacts may occur at noise-sensitive land uses.

- **Highland Home Road South of Sun Lakes Boulevard/Westward Avenue**. Residences are located approximately 20 feet from the Highland Home Road centerline and would be exposed to traffic noise levels of 54.0 dBA CNEL. Compared to the Development Project (54.0 dBA CNEL) at this location, traffic noise levels would be similar. Although project-related traffic could increase ambient noise levels by 3 dBA (which is perceptible), these traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Therefore, like the Development Project, traffic noise impacts at this location if this is a perceptible reduction, why isn't have a ***less than significant*** impact on off-site noise-sensitive land uses.

- **Sunset Avenue Between I-10 Westbound Ramps and Bobcat Road.** Residences located east of Sunset Avenue between Lincoln Street and Westward Avenue are approximately 35 feet from the Sunset Avenue centerline and would be exposed to alternative traffic noise levels of 73.7 dBA CNEL. The existing 5- to 7.5-foot-high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 68.7 and 65.7 dBA CNEL, respectively. This alternative very slightly reduces noise levels at this location compared to the Development Project (69.3 and 66.3 dBA CNEL, attenuated). While a slight reduction in attenuated noise levels occur at this location under this alternative, like the Development Project, traffic noise generated at this location would have a significant impact on off-site residential uses because alternative-related traffic would have a perceptible ambient noise level increase of more than 3 dBA or more and would exceed the City's noise standard of 65 dBA CNEL. Similar to the Development Project, impacts at this location under this alternative remain ***significant***.

  Mount San Jacinto College campus uses are located approximately 75 feet from the Sunset Avenue centerline and would be exposed to a traffic noise level of 65.3 dBA CNEL, which is a slight but perceptible reduction compared to the 68.6 dBA CNEL associated with the Development Project. Similar to the Development Project, traffic noise at this location under Alternative 4 would have a ***significant impact*** on off-site noise-sensitive land uses because traffic would increase

ambient noise levels by 3 dBA or more and the noise levels at this location under this condition would exceed the City's noise standard of 65 dBA CNEL.

Similar to the Development Project, for the residences located along Sunset Avenue between Lincoln Street and Westward Avenue, an additional off-site noise barrier would not be feasible because there are already walls in place and additional heights to those walls would provide minimal noise reduction and would not achieve the noise reduction needed to reduce impacts to less than significant. Also, obtaining consent from all property owners to construct off-site noise barriers cannot be assured and is outside of the control of the Project Applicant and the City Construction of a minimum 6-foot-high wall adjacent to the existing MSJC campus uses along the Sunset Avenue frontage would provide a noise reduction of 5 dBA and reduce traffic noise levels to below the City's noise standard of 65 dBA CNEL. However, the off-site traffic noise impact remains significant because the construction of the wall would require approval of the property owner, which is outside of the control of the Project Applicant and the City, and therefore it is uncertain whether the wall would be constructed. Therefore, noise impacts to residences and MSJC campus uses along Sunset Avenue under this alternative, like the Development Project, remain ***significant and unavoidable.***

- **Sun Lakes Boulevard West of Highland Home Road.** Residences are located approximately 50 feet from the Sun Lakes Boulevard centerline and would be exposed to traffic noise levels of 63.7 dBA CNEL. The existing 5-foot-high private property wall along Sun Lakes Boulevard would provide a noise reduction of 5 dBA, which would reduce traffic noise levels to 58.7 dBA CNEL. This is slight reduction in noise at this location when compared to the Development Project (59.6 dBA CNEL, attenuated). Although traffic could increase ambient noise levels by 3 dBA or more, as the traffic noise levels at this location under this condition would not exceed the City's noise standard of 65 dBA CNEL, similar to the Development Project, traffic noise impacts generated under Alternative 4 at this location be ***less than significant***.

Opening Year (2027) Traffic Noise Levels. Where noise-sensitive land uses are present, alternative -related noise increases of up to 3.0 dBA on Highland Home Road, 16.2 dBA along Sunset Avenue, and 8.8 dBA along Sun Lakes Boulevard would occur under this alternative in the 2027 condition. Compared to the conditions at these locations under the Development Project (3.0, 17.5, and 9.7 dBA, respectively), the noise levels under this alternative are equal to or slightly reduced.

- **Highland Home Road South of Sun Lakes Boulevard/Westward Avenue.** Noise-sensitive land uses in this area include residences located along the west side of Highland Home Road south of Sun Lakes Boulevard/Westward Avenue. Residences are located approximately 20 feet from the Highland Home Road centerline and would be exposed to alternative traffic noise levels of 54.0 dBA CNEL. Compared to the Development Project (54.0 dBA CNEL) at this location, traffic noise levels would be similar. Although alternative-related traffic could increase ambient noise levels by 3 dBA (which is perceptible), these traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Therefore, like the Development Project, traffic noise impacts at this location would have a ***less than significant*** impact on off-site noise-sensitive land uses.

- **Sunset Avenue Between I-10 Westbound Ramps and Bobcat Road.** Residences located east of Sunset Avenue between Lincoln Street and Westward Avenue are approximately 35 feet from the

Sunset Avenue centerline and would be exposed to alternative traffic noise levels of 73.7 dBA CNEL. The existing 5- to 7.5-foot-high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 68.7 and 65.7 dBA CNEL, respectively. This alternative slightly reduces noise levels at this location compared to the Development Project (69.3 and 66.3 dBA CNEL, attenuated). While a slight reduction in attenuated noise levels occur at this location under this alternative, like the Development Project, traffic noise generated at this location under Alternative 4 would have a significant impact on off-site residential uses because alternative-related traffic would have a perceptible ambient noise level increase of more than 3 dBA or more and would exceed the City's noise standard of 65 dBA CNEL. Similar to the Development Project, impacts at this location under this scenario remain ***significant***.

MSJC campus uses are located approximately 75 feet from the Sunset Avenue centerline and would be exposed to a traffic noise level of 65.3 dBA CNEL, which is a slight reduction compared to the 65.9 dBA CNEL associated with the Development Project. Similar to the Development Project, traffic noise at this location under Alternative 4 would have a ***significant impact*** on off-site noise-sensitive land uses because traffic would increase ambient noise levels by 3 dBA or more and the noise levels at this location under this condition would exceed the City's noise standard of 65 dBA CNEL.

Similar to the Development Project, for the residences located along Sunset Avenue between Lincoln Street and Westward Avenue, an additional off-site noise barrier would not be feasible because there are already walls in place and additional heights to those walls would provide minimal noise reduction and would not achieve the noise reduction needed to reduce impacts to less than significant. Also, obtaining consent from all property owners to construct off-site noise barriers cannot be assured and is outside of the control of the Project Applicant and the City. Construction of a minimum 6-foot-high wall adjacent to the existing MSJC campus uses along the Sunset Avenue frontage (see **Mitigation Measure NOI-2**) would provide a noise reduction of 5 dBA and reduce traffic noise levels to below the City's noise standard of 65 dBA CNEL. However, the off-site traffic noise impact remains significant because the construction of the wall would require approval of the property owner, which is outside of the control of the Project Applicant and the City, and therefore it is uncertain whether the wall would be constructed. Therefore, noise impacts to residences and MSJC campus uses along Sunset Avenue under this alternative, like the Development Project, remain ***significant and unavoidable.***

- **Sun Lakes Boulevard West of Highland Home Road.** Residences are located approximately 50 feet from the Sun Lakes Boulevard centerline and would be exposed to alternative traffic noise levels of 63.7 dBA CNEL. The existing 5-foot-high private property wall along Sun Lakes Boulevard would provide a noise reduction of 5 dBA, which would reduce these traffic noise levels to 58.7 dBA CNEL. This noise level is slightly less than the noise level at this location upon implementation of the Development Project (59.2 dBA CNEL, attenuated). Although alternative-related traffic could increase ambient noise by more than 3 dBA (which is perceptible), the slightly reduced traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Therefore, similar to the Development Project, off-site traffic noise impacts would be ***less than significant***.

Horizon Year (2045) Traffic Noise Levels. The horizon year (2045) traffic noise conditions under Alternative 4 would result in an alternative-related increase of up to 10.5 dBA along Sunset Avenue noise-sensitive land uses where potential impacts may occur and 4.6 dBA along Sun Lakes Boulevard noise-sensitive land uses are present. Compared the noise levels associated with the Development project at these locations (11.8 and 5.3 dBA, respectively), these noise levels are reduced. The following is a detailed discussion of the specific roadway segments where potential impacts may occur at noise-sensitive land uses.

- **Sunset Avenue Between I-10 Westbound Ramps and Bobcat Road.** Residences located east of Sunset Avenue between Lincoln Street and Westward Avenue are approximately 35 feet from the Sunset Avenue centerline and would be exposed to alternative traffic noise levels of 74.0 dBA CNEL. The existing 5- to 7.5-foot-high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 69.0 and 66.0 dBA CNEL, respectively. Compared to the Development Project (69.6 and 66.6 dBA, attenuated), Alternative 4 slightly reduces noise levels at these locations. Despite this slight reduction in noise levels, Alternative 4 at this location and under this condition would still result in a perceptible noise increase (10.5 dBA) and would exceed the City's noise standard of 65 dBA CNEL. While slightly reduced, similar to the Development Project, noise impacts at this location remain ***significant***.

  Mount San Jacinto College is located approximately 75 feet from the Sunset Avenue centerline and would be exposed to a traffic noise level of 65.6 dBA CNEL (a slight reduction compared to the 66.7 dBA CNEL for this location resulting from implementation of the Development Project). Therefore, traffic noise generated under Alternative 4 would have a significant impact on school uses as it would increase ambient noise levels by 3 dBA or more at this location and would exceed the City's noise standard of 65 dBA CNEL. Despite the reduction in noise level at this location associated with this alternative, similar to the Development Project, this increase in noise levels and exceedance of the 65 dBA CNEL standard, would result in a ***significant*** noise impact at this location under Alternative 4.

  Similar to the Development Project, for the residences located along Sunset Avenue between Lincoln Street and Westward Avenue, an additional off-site noise barrier would not be feasible because there are already walls in place and additional heights to those walls would provide minimal noise reduction and would not achieve the noise reduction needed to reduce impacts to less than significant. Also, obtaining consent from all property owners to construct off-site noise barriers cannot be assured and is outside of the control of the Project Applicant and the City. Construction of a minimum 6-foot-high wall adjacent to the existing MSJC campus uses along the Sunset Avenue frontage (see **Mitigation Measure NOI-2**) would provide a noise reduction of 5 dBA and reduce traffic noise levels to below the City's noise standard of 65 dBA CNEL. However, the off-site traffic noise impact remains significant because the construction of the wall would require approval of the property owner, which is outside of the control of the Project Applicant and the City, and therefore it is uncertain whether the wall would be constructed. Therefore, noise impacts to residences and MSJC campus uses along Sunset Avenue under this alternative, like the Development Project, remain ***significant and unavoidable.***

- **Sun Lakes Boulevard West of Highland Home Road.** Residences are located approximately 50 feet from the Sun Lakes Boulevard centerline and would be exposed to alternative traffic noise

levels of 64.8 dBA CNEL. The existing 5-foot-high private property wall along Sun Lakes Boulevard would provide a noise reduction of 5 dBA, which would reduce traffic noise levels to 59.8 dBA CNEL (slightly less than the attenuated 61 dBA CNEL resulting from the Development Project). Although alternative-related traffic could increase ambient noise levels by 3 dBA or more, the traffic noise levels at this location and under this condition would not exceed the City's noise standard of 65 dBA CNEL. Therefore, similar to the Development Project, traffic noise generated under Alternative 4 would have a less than significant impact on off-site noise-sensitive land uses.

The alternative-related traffic noise increase under Alternative 4 would be slightly lower than the Development Project along Sunset Avenue between the I-10 westbound ramps and Bobcat Road and Sun Lakes Boulevard west of Highland Home Road. Also, traffic noise impacts on Sunset Avenue between Lincoln Street and south of Westward Avenue under Alternative 4 are similar to the Development Project.

Similar to the Development Project, there are no feasible mitigation measures that would reduce off-site traffic noise levels along Sunset Avenue between Lincoln Street and south of Westward Avenue under Alternative 4. Construction of off-site noise barriers could reduce impacts to less than significant but obtaining consent from property owners to construct off-site noise barriers cannot be assured and is outside of the control of the Project Applicant and the City. Use of rubberized asphalt could also reduce impacts to less than significant but this could not be sustained as the asphalt improvements are not permanent, i.e., they degrade over time. Therefore, off-site traffic noise impacts under Alternative 4 would be significant and unavoidable because the noise levels generated would result in a substantial permanent increase in ambient noise levels and traffic noise levels would exceed the City's exterior noise standard of 65 dBA CNEL along the roadways described above.

8.6.2.14 Population and Housing

This alternative would reduce the amount of industrial uses on site by 415,500 square feet, eliminating Building 9 and replacing Buildings 5 and 6 with a single building. All other proposed on-site commercial and industrial uses will remain the same throughout the Development Site. Due to the substantial similarity in the type, location, and intensity of uses, it is reasonable this alternative would create a similar demand for construction-related employment. While development under this alternative would generate temporary construction employment at the site, it is expected that local and regional construction workers would be available to serve the construction needs of the site and that an influx of new residents to the City would not occur. Similar to the Development Project, potential population impacts associated with temporary construction employment would be ***less than significant***.

Development of the site under this alternative is substantially similar to that proposed under the Development Project. The reduction in industrial uses building will reduce (6.8 percent) potential future jobs available (from 5,993 jobs to 5,584 jobs[67]). As of March 2023, the City had a labor force of 11,300, and the County had a labor force of 1,158,900, with approximately 600 and 53,000 people unemployed, respectively. As of August 2023,[68] unemployment rates of 5.9 and 5.0 percent were

[67] Based on employment factors cited in Table 4.17.A. Industrial: 1 employee/1,030 square feet (4,974 employees); retail: 1 employee/500 square feet (537 employees); hotel: 1,046 daily trips/14.34 trips per employee – 73 employees. Total employees = 5,584.

[68] Labor Market Information by California Geographic Areas, Labor Force and Unemployment Rate for Cities and Census Designated Places (ca.gov) (accessed August 19, 2023).

recorded for the City and County, respectively. This suggests an ample available local and regional labor pool to serve the long-term employment opportunities offered by this alternative. As this alternative provides a substantially equivalent number of potential new jobs in the City and region, it is reasonable to conclude impacts on population and housing would be similar to that resulting from the Development Project and would be ***less than significant***.

Like the Development Project, the City could proceed with construction of the Public Facilities to service existing and future demand consistent with the forecasts in the General Plan and/or Integrated Water Plan. As the Development Site has been previously planned for development and due to the adjacency of existing infrastructure to the site, it is not likely the extension of infrastructure would spur additional unplanned development or directly/indirectly induce unplanned population growth. Similar to the Development Project, in the absence of any induced unplanned growth, ***no impact*** would occur.

This alternative requires the transfer of residential capacity from the Development Site to the MSJC Site. Similar to the Development Project, no impacts would result from adoption of the MSJC Entitlements, and similar impacts would result from any subsequent development of any residential uses on the MSJC Site.

8.6.2.15 Public Services

The current DIFs imposed by the City on commercial and industrial development include:

- **Police Facilities Development Impact Fee:** Commercial, $351 per 1,000 square feet; Office, $458 per 1,000 square feet; Industrial, $170 per 1,000 per square feet.
- **Fire Protection Facilities Developer Impact Fee:** Commercial, $486 per 1,000 square feet; Office, $633 per 1,000 square feet; Industrial, $236 per 1,000 square feet.
- **General City Facilities Developer Impact Fee:** Commercial, $493 per 1,000 square feet; Office, $643 per 1,000 square feet; Industrial, $239 per 1,000 square feet.

Under this alternative, the amount of industrial development is reduced by approximately 7.6 percent, incrementally decreasing the demand for public services. The commercial component of the project is retained as proposed under the Development Project. As the City's DIF program has anticipated the changes in service population resulting from commercial and industrial development in the City, it is reasonable to anticipate that the fees established in the DIF program would provide funding for any new public facilities required under this alternative. As with the Development Project, development under this alternative may increase demand on public services. Future businesses and patrons would contribute to local public service funding through the payment of taxes (e.g., property, business, and sales tax). With payment of required DIFs, taxes, and other obligations, similar to the Development Project, potential impacts to public services and facilities would be ***less than significant***.

In the absence of a residential component, the development of this alternative would not directly increase student population in the BUSD. BUSD has forecast the anticipated growth in its service area. In addition to a residential impact fee, the BUSD has identified a school impact fee for commercial/industrial ($0.66 per square foot). Pursuant to Government Code Section 65996, the

payment of school fees (as established and ratified by the BUSD) would provide full mitigation of potential impacts on school facilities that may result from development under this alternative. Similar to the Development Project, impacts to school facilities would be ***less than significant***.

8.6.2.16 Recreation

As with the Development Project, this alternative does not propose any residential uses or other land use that may generate a population that would directly increase the use of existing neighborhood and regional parks or other recreational facilities. Although there may be a nominal increase in the use of local recreation facilities, any employees under this alternative are not expected to utilize local recreational facilities to the extent that physical deterioration would occur or be accelerated, even when considered in the context of cumulative developments in the area. Therefore, similar to the Development Project, additional park or recreation facilities to serve new residents of the City would not be required. Buildout of this alternative would provide up to 5,584 jobs in the City and region. This alternative retains the Development Project's 12.6 acres of Open Space – Parks (comprising a 5.0-acre passive park and 7.6 acres of passive open space), which would be accessible to residents of the City and persons employed on site. The collection of development impact fees imposed on new development is required pursuant to Banning Municipal Code Chapter 15.68. The DIF program collects funds to offset potential impacts of all development on recreation facilities.

Development under this alternative is not anticipated to directly or indirectly result in an increase in population. As the City determines park demand on a per resident basis, industrial and commercial uses are not considered by the City to generate park and recreation demand that would require the construction of new or expansion of existing recreation facilities. Similar to the Development Project, the impacts to park and recreation facilities are ***less than significant***.

8.6.2.17 Transportation

As detailed in **Table 8.O: Alternative 4 – Trip Generation Comparison**, total traffic generated under this alternative represents approximately 97.6 percent of the traffic associated with the Development Project. As shown, Alternative 4 is anticipated to result in a net reduction of 498 two-way trips (2.4 percent) per day as compared to the proposed Development Project. The volume of passenger car trips and trucks is decreased by approximately 1.7 and 6.1 percent, respectively. While the location and extent of the industrial uses envisioned under this alternative is substantially similar to the Development Project, the reduction of daily trips resulting from the reduction in industrial uses would likely result in changes in the number and/or location of impacted intersections under this alternative. Similar to the Development Project, it is reasonable to conclude that development under this alternative would be similarly conditioned to install improvements to fully satisfy the City's LOS standard(s). It is further reasonable that necessary and appropriate pedestrian, transit, and roadway improvements would be installed to satisfy City requirements and that these features would be designed to satisfy City standards so as to not introduce hazards due to geometric design features (e.g., sharp curves or dangerous intersections). Similar to the Development Project, development under this alternative would not be inconsistent with plans/programs addressing the City's transportation system.

Table 8.O: Alternative 4 – Trip Generation Comparison

Land Use	AM Peak			PM Peak			Daily
Development Project							
Passenger Cars	742	343	1,086	750	881	1,631	17,156
Trucks	117	61	178	59	102	161	3,330.
TOTAL	**859**	**404**	**1,264**	**809**	**963**	**1,792**	**20,496**
Alternative 4							
Passenger Cars	700	345	1,045	746	837	1,582	16,870
Trucks	111	60	71	57	95	152	3,128
TOTAL	**811**	**405**	**1,216**	**803**	**932**	**1,734**	**19,998**
Net Change – Passenger Cars	-42	2	-41	-4	-45	-49	-296
Net Change – Trucks	-6	-1	-7	-2	-7	-9	-202
Total Net Change	-48	1	-48	-6	-52	-58	-498

Source: 2023. Table 3, Sunset Crossroads Project Alternatives Generation Assessment, Urban Crossroads, October 10.

The VMT associated with this alternative is detailed in **Table 8.P: Alternative 4 – Vehicle Miles Traveled Comparison**. Compared to the Development Project, implementation of this alternative would reduce VMT by approximately 6.8 percent. Under this alternative, Alternative 4 assumes a reduction in industrial intensity resulting in no change of VMT per employee. As the City of Banning's VMT threshold is framed in an efficiency metric, the reduction of intensity and the subsequent reduction of employees remains proportional to the home-based work VMT generated. The Alternative 4 scenario in its entirety remains significant.

Table 8.P: Alternative 4 – Vehicle Miles Traveled Comparison

	Vehicle Miles Traveled
Alternative 4	273,860
Development Project	293,945
Difference	**-20,085**

Source: 2023. Sunset Crossroads Vehicles Miles Traveled (VMT) Alternatives Analysis, Urban Crossroads, October 9.

As mitigation, the Development Project would prepare a TDM strategy report to reduce employee VMT. These TDM measures were derived from the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality. Due to the similarity in impact, it is reasonable that a similar measure would be required to address VMT associated with the industrial and commercial development envisioned under this alternative. As with the Development Project, since future industrial tenants are unknown at this time, implementation of the feasible TDM measures cannot be guaranteed to reduce this alternative's VMT impact to a level of less than significant. While the VMT associated with this alternative is reduced from that associated with the Development Project, because of the uncertainty related to the implementation of feasible VMT reduction measures, similar to the Development Project, the VMT impact associated with this alternative remains ***significant and unavoidable***.

8.6.2.18 Tribal Cultural Resources

While an SLF search conducted by the NAHC yielded negative results for tribal cultural resources, the Development Site is located within the ancestral territory and traditional use area of the Cahuilla and

Serrano people of the MBMI. MBMI tribal representatives have emphasized the importance of including archaeological and Native American monitoring during ground disturbance to ensure tribal cultural resources that may be located on the Development Site are thoroughly assessed. With the exception of Building 9, development activities under this alternative would encompass ground disturbance throughout the Development Site. It is reasonable there remains a similar potential that previously unobserved tribal cultural resources may exist within the Development Site that could be discovered during activities associated with implementation of this alternative.

As with the Development Project, **Mitigation Measures CUL-1 through CUL-6** will be implemented prior to and during ground disturbance activities associated with implementation of this alternative. These measures require the retention of a Secretary of the Interior qualified archaeologist and Native American monitor(s) to be present during all ground-disturbing activities within native soil; the development of an Archaeological Monitoring and Treatment Plan; and conducting pre-disturbance Archaeological Sensitivity Training. The Native American monitor(s) will be authorized to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources. These measures further identify appropriate actions to be taken in the event tribal cultural material and/or human remains are discovered during implementation of this alternative.

Similar to the Development Project, upon implementation of **Mitigation Measures CUL-1 through CUL-6**, potential impacts to tribal cultural resources that may result from the implementation of this alternative would be reduced to a ***less than significant*** level.

8.6.2.19 Utilities and Service Systems

As required by the City of all development that connects to the City's utility systems, implementation of this alternative would result in the payment of appropriate Water and Wastewater DIFs to offset the cost of accommodating new development.

Water. Compared to the Development Project, this alternative envisions construction within a slightly reduced development footprint; therefore, it is reasonable that the demand for water during construction would be incrementally reduced. Construction-related water demand for soil watering (fugitive dust control), cleanup, masonry, painting, and other activities would be of limited duration and would cease once all of the development is completed; therefore, similar to the Development Project, short-term construction activities are not expected to have any adverse impacts on the existing water system or available water supplies and would not require or result in the construction of new water treatment facilities or the expansion of existing facilities. Construction impacts would be ***less than significant***.

This alternative removes Building 9 from development and reduces the size of industrial uses in Planning Area 2.[69] The location, type, and intensity of all other proposed uses would remain the same. As established in the project-specific Water Supply Assessment, the water demand for industrial uses is 1,700 gpd/acre. The removal of the industrial use in 25.8-acre Planning Area 7 (Building 9) would reduce water demand by 43,860 gpd (or approximately 49.1 afy). The Development Project estimated

[69] As water demand for industrial uses is factored per acre, because only industrial uses are planned for Planning Area 2, no change in water use is anticipated for this area.

water demand is 1,060 afy. The water demand associated with use of the MSJC Site totals 734 afy and would remain unchanged under this alternative. Combined, the water demand associated with this alternative is approximately 97.3 percent of that required for the Project.[70] As detailed in **Tables 4.19.I through 4.19.K** of this EIR, even under multiple-dry year conditions, the City's water supply is sufficient to accommodate the water demand resulting from the Development Project. Because the water demand under this alternative is reduced, it is reasonable that impacts to water supplies and systems would remain ***less than significant***.

Wastewater. Sanitary services during construction would be provided by portable restroom facilities, which transport waste off site for treatment and disposal. Similar to the Development Project, construction-related wastewater treatment and wastewater conveyance infrastructure under this alternative would be less than significant.

This alternative foregoes industrial development on 25.8 acres in the northwest corner of the Development Site, which would reduce wastewater generated daily by approximately 19,350[71] gpd. The Project would generate 414,892 gpd of wastewater (352,900 gpd from the Development Project and 61,992 gpd from the MSJC Site). Wastewater flows from the MSJC Site remain unchanged under this alternative. Compared to the Project, this alternative would reduce daily wastewater generated on the Development Site by 4.6[72] percent. As the amount of wastewater generated under this alternative is reduced, and because no significant impact to wastewater treatment capacity or facilities resulted from the Development Project, it is reasonable to conclude the reduction in wastewater flows from the Development Site under this alternative also would have a ***less-than-significant*** impact on wastewater conveyance or treatment facilities.

Solid Waste. As detailed in **Table 4.19.M**, commercial and industrial uses each have a solid waste generation factor of 5 pounds/1,000 square feet of use. While the commercial development under this alternative is unchanged, this alternative envisions a reduction of 415,500 square feet of industrial uses. This reduction in industrial development will reduce the amount of solid waste generated daily to 25,648 pounds (12.8 tons), which is approximately 87 percent of the solid waste generated by the Development Project. As sufficient capacity at receiving landfills exists to accommodate the Development Project, it is reasonable to conclude these same landfills could adequately accommodate the reduced flow of solid waste resulting from operation of the uses proposed under this alternative.[73] Similar to the Development Project, impacts would be ***less than significant*** related to solid waste and landfill facilities.

8.6.2.20 Wildfire

The Northern Portion of the Development Site is located within the LRA, in this case the City of Banning. The SOI is within the SRA. 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 (FHSZ) by CAL FIRE or Riverside County; rather the Development Site is accurately designated as LRA

[70] Development Project water demand: 1,060 + 734 = 1,794 afy, Alternative 4 water demand: 1,010.9 + 734 = 1.744.9 afy. 1,744.9/1,794 = 97.3 percent.

[71] 25.8 ac x 750 gpd/ac = 19,350 gpd

[72] 19,350/414,892 = 4.6 percent.

[73] Similar to the Development Project, it is anticipated measures to reduce waste (e.g., Mitigation Measure GHG-1,providing recycling opportunities to divert industrial waste by 80 percent) will be implemented under this alternative.

Non-VHFHSZ. Adjacent lands in the LRA north, northeast, and west of the Development Site are also designated non-VHFHSZ. Within the SRA, the Southern Portion of the Development Site is designated non-FHSZ. Lands south and southeast of the Development Site in the SRA are designated as High and Very High FHSZ in an SRA.[74] The nearest FHSZ to the Development Site is undeveloped land approximately 0.5 mile southwest of the Development Site along the southern border to the Sun Lakes community.

With the exception of the elimination of Building 9 in the northwest corner of the Development Site, development envisioned under this alternative extends within the same footprint as the Development Project. The improvement of Highland Home Road as planned to serve Building 9 would not be required, though some modified access along this alignment would still be required to access the electrical substation and BESS use. It is reasonable that the remaining roadway network planned under the Development Project would be developed to serve the uses proposed under this alternative. Similar to the Development Project, temporary lane closures/road closures would be coordinated with emergency service agencies to ensure appropriate levels of emergency vehicle access is maintained and would not substantially impair an adopted emergency response plan or emergency evacuation plan during construction activities. Like the Development Project, ***no impact*** related to emergency access would occur during construction of this alternative.

As stated in **Section 4.20**, the City 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. Like the Development Project, this alternative would provide general and emergency access via Sunset Avenue via "Street A," Bobcat Road, and the SLB Extension. While Lincoln Street would not be extended over Smith Creek, Lincoln Street east of Smith Creek would still provide access to Sunset Avenue from Buildings 8 and 7 and the commercial area. All roadways and structures within the Development Site would be developed in accordance with City and Riverside County Fire Department emergency access standards. The alternative 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 Development Site for emergency vehicles. Compared to the Development Project, the maximum number of persons (employees) expected to be on site under this alternative is reduced by approximately 6.9 percent (to 5,584 persons). This alternative also results in a slight net reduction of 498 daily vehicle trips anticipated. In the event of an emergency, all roads within the City, including the future SLB Extension, could be used as evacuation routes. Like the Development Project, this alternative 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; therefore, evacuation/emergency access impacts would be ***less than significant***.

With the exception of the removal of Building 9, and alterations in the size and location of Buildings 5 and 6, the type, location, and extent of development envisioned in this alternative and the related project components are generally similar to that associated with the Development Project. Therefore, it is reasonable that the alternative's relationship to adjacent wildlands and potential exposure to wildland fire-related impacts would be equivalent to that identified for the Development Project.

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

Similar to the Development Project, the electrical substation would be developed and operated by the City in compliance with regulations set forth by the California Occupational Safety and Health Administration and the National Electrical Safety Code (NESC).[75] Additionally, the CBC, Chapter 7A, applies to new buildings located in any FHSZ or any WUI Area and identifies the ignition resistant construction methods and materials required for development in these areas. Chapter 7A requirements seek to prevent the intrusion of flames or burning embers from vegetation fire into structures to reduce the potential of "conflagration loses." Public Resources Code Section 4291 and other[76] regulations further dictate requirements and manner of vegetation management in fire hazard areas.

Similar to the Development Project, it is reasonable that development under this alternative would be sited, designed, and operated pursuant to the applicable building and fire protection requirements, including any identified in an alternative-specific FPP and FMP. As the location, extent, and type of uses envisioned under this alternative are substantially similar to those planned under the Development Project, it is reasonable that wildland fire impacts would be similarly reduced to a less than significant level through the adherence to applicable regulations and adherence to the appropriate measures detailed in an alternative-specific FPP or FMP.

8.6.3 Summary of Reduced Industrial Alternative (Alternative 4)

While this alternative does not reduce or eliminate the significant impacts associated with the Development Project, development of the site under Alternative 4 does reduce the overall contribution to such impacts. This alternative would slightly reduce ADTs and VMT, which will also slightly reduce the overall emission of air pollutants and greenhouse gases, but these reductions would be insufficient to reduce the emissions to below established thresholds of significance, and the air quality and greenhouse gas impacts would remain significant and unavoidable. The uses envisioned under Alternative 4 reduces the overall demand for electricity, natural gas, and vehicle fuel. Though reduced, development of the site under this alternative would slightly reduce VMT, which would still be above the City's VMT impact threshold. Similar to the Project, TDM measures[77] would be imposed, but since future tenants are unknown at this time, implementation of specific, feasible TDM measures and the extent of VMT reductions are uncertain, and CEQA requires that the VMT impact under this alternative be treated as significant and unavoidable. Though the amount of traffic is reduced, due to the location of adjacent sensitive receptors to the site, the significant and unavoidable traffic noise impact occurring under the Development Project would remain under this alternative.

Because the area planned for Building 9 would remain undeveloped, development under this alternative would reduce the overall extent of earth disturbance and reduce the amount existing natural vegetation removed. Landform modification throughout the balance of the site would result in substantially similar building footprints as what is planned under the Development Project. With adherence to standard City codes, regulations, standards, and/or project-specific mitigation, it is

[75] ICC Digital Codes. n.d. Website: https://codes.iccsafe.org/content/CFC2019P4/chapter-49-requirements-for-wildland-urban-interface-fire-areas#CFC2019P4_Pt04_Ch49_Sec4906 (accessed April 25, 2023).

[76] California Code of Regulations (CCR) Title 14, Division 1.5, Chapter 7, Subchapter 3, Section 1299; CGC Section 51182; CCR Title 19, Division 1, Chapter , Subchapter 1 Section 3.07

[77] Transportation Demand Management (TDM) strategies may include trip reduction marketing, rideshare programs, end-of-trip bicycle facilities, and/or other programs features that could reduce vehicle trips.

reasonable that land-based impacts (agricultural, cultural, mineral resources, etc.) would have impacts similar to those associated with the Development Project. Due to the removal of Building 9 under this alternative, the Lincoln Street crossing of Smith Creek is not required; therefore, impacts to jurisdictional features are reduced and no change in the rate or capacity of sediment transport would occur in this drainage. Incremental changes in the demand for public services and utilities would occur, though payment of required DIFs/school fees and adherence to the connection requirements mandated by the City and utility providers would, like the Development Project, ensure impacts related to the provision of public services and facilities remain less than significant. A similar suite of land use entitlements would be required to develop either this alternative or the Development Project. The MSJC Entitlements required to allow development of this alternative would ensure no net loss in residential capacity in the City. Impacts associated with the MSJC Entitlements would remain as discussed in **Chapter 5.0** of this EIR. The expected decrease in employment would ensure the alternative remains consistent with housing and employment forecasts for the City.

This alternative retains all of the commercial uses and slightly reduces industrial uses. Therefore, it provides a similar diversified economy and only a slightly lower range of employment opportunities than the Development Project (5,584 jobs versus 5,993 jobs for the Development Project), would create a substantial number of new jobs, and would be comparably effective in meeting several of the City's key objectives. Because it retains the commercial uses, this alternative would meet the City's objectives of accommodating development that generates sales and property tax revenues that can increase City revenues and assist in offsetting other public services costs incurred by the City to an extent similar to the Development Project due to the similarity in the variety, location, and intensity of uses.

8.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because Alternative 1 would retain the Development Site in its current undeveloped condition, the significant and unavoidable air quality, greenhouse, noise, and VMT-related impacts associated with the Development Project, and to a lesser extent each of the other alternatives, would not occur. In the absence of any such significant impact, Alternative 1 (No Project/No Build) would be the Environmentally Superior alternative. As required by CEQA,[78] if the environmentally superior alternative is the "No Project" alternative, the EIR must also identify an environmentally superior alternative from the other alternatives.

78 *CEQA Guidelines*, §15126.6(e)(2).

The following discussion compares the impacts of each alternative with the impacts of the proposed Project. For the issues for the issues quantified in this analysis, **Table 8.Q: Comparison of Alternatives** compares the degree of change between the Development Project and the various build alternatives.[79] **Table 8.R: Comparison of Impacts** compares the impacts of the alternatives with those of the Development Project and identifies whether the alternative (1) substantially lessens reduction of the impact; (2) results in a greater impact than the Project; or (3) results in the same or similar impact as the Project. Alternative 1: No Project/No Build is the environmentally superior alternative as it would avoid the environmental impacts associated with the Project and would negate the need for mitigation, it was determined that maintenance of the site in its current condition was not likely and would not achieve any of the City's objectives for the site. The comparison of whether the alternatives achieve the City's objectives for the Project is provided in the discussion and summarized in **Table 8.S: Do the Alternatives Generally Meet Project Objectives?**

CEQA Guidelines Section 15126.6(e)(2) states that "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives".

As detailed in **Section 8.4** and **Table 8.D**, Alternative 2 would reduce the overall emission of air pollutants and greenhouse gases, though the reduction would be insufficient to reduce the emissions to below established thresholds of significance and the air quality and greenhouse gas impacts would remain significant and unavoidable. Furthermore, though reduced, until specific tenants are identified for commercial uses, it is infeasible to impose and implement specific VMT reduction measures such as traffic demand management measures at commercial uses at this time, and the VMT impact under this alternative remains significant and unavoidable. Changes in vehicle traffic and the removal of large industrial buildings that would occur under this alternative would eliminate the significant and unavoidable noise impact traffic noise occurring under the Development Project. Compared to the Development Project, this alternative eliminates the significant and unavoidable traffic noise and operational (stationary source) noise impacts along Sunset Avenue and south of Bobcat Road, respectively.

[79] In the absence of development, quantification of impacts related to air pollutant and greenhouse gas emissions, noise, VMT, and energy usage for Alternative 1 is not warranted; therefore, the comparison summary included in Table 8.R does not include this alternative.

Table 8.Q: Comparison of Alternatives (changes from Development Project)

Source	Alternative 2 Existing General Plan/Zoning	Alternative 3 Reduced Commercial	Alternative 4 Reduced Industrial
Criteria Pollutants (lbs/day)			
VOCs	↓30%	↓4%	↓5%
NO_X	↓57%	↓8%	↓6%
CO	↑36%	↑3%	↓2%
SO_X	↓33%	↓33%	=
PM_{10}	↓21%	↑16%	↓4%
$PM_{2.5}$	↓22%	↑10%	↓5%
GHG Emissions (MT CO_2e/yr)	↓32.0%	↓15.3%	↓12.6%
Vehicle Miles Traveled	↓68.9%	↓13.4%	↓6.4%
Average Daily Trips			
Total	**↑1.9%**	**↓18.2%**	**↓2.4%**
Cars	↑14.9%	↓22.5%	↓1.7%
Trucks	↓65.0%	↑3.8%	↓6.1%
Energy Usage			
Electricity (kW/hr)	↓70.9%	↓12.6%	↓0.6%
Natural Gas (kBTU/yr)	↑556%	↓95.3%	↓9.3%
Gasoline (gal/yr)	↑45.4%	↓40.2%	↓3.2%
Diesel Fuel (gal/yr)	↓71.7%	↓1.1%	↓6.9%

Source: Compiled by LSA Associates, Inc. (November 2023).
CO = carbon monoxide
gal/yr = gallons per year
kBTU/yr = thousand British thermal units per year
kW/hr = kilowatts per hours
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SO_X = sulfur oxides
VOCs = volatile organic compounds

Table 8.R: Comparison of Impacts

Environmental Impacts	Proposed Project (Without/With Mitigation)	Alternative 1 (Without/With Mitigation)	Alternative 2 (Without/With Mitigation)	Alternative 3 (Without/With Mitigation)	Alternative 4 (Without/With Mitigation)
4.1 Aesthetics					
Threshold 4.1.1: Would the Project have a substantial adverse effect on a scenic vista?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.1.2: Would the Project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway?	NI/NI	NI/NI	NI/NI	NI/NI	NI/NI
Threshold 4.1.3: In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.1.4: Would the Project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
4.2 Agriculture and Forestry Resources					
Threshold 4.2.1: Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	NI/NI	NI/NI	NI/NI	NI/NI	NI/NI
Threshold 4.2.2: Conflict with existing zoning for agricultural use or a Williamson Act contract?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.2.3: Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	NI/NI	NI/NI	NI/NI	NI/NI	NI/NI
Threshold 4.2.4: Result in the loss of forest land or conversion of forest land to non-forest use?	NI/NI	NI/NI	NI/NI	NI/NI	NI/NI
Threshold 4.2.5: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS

Table 8.R: Comparison of Impacts

Environmental Impacts	Proposed Project (Without/With Mitigation)	Alternative 1 (Without/With Mitigation)	Alternative 2 (Without/With Mitigation)	Alternative 3 (Without/With Mitigation)	Alternative 4 (Without/With Mitigation)
4.3 Air Quality					
Threshold 4.3.1: Would the proposed project conflict with or obstruct implementation of the applicable air quality plan?	S/SU	NI/NI	S/SU	S/SU	S/SU
Threshold 4.3.2: Would the proposed project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard?	S/SU	NI/NI	S/SU	S/SU	S/SU
Threshold 4.3.3: Would the proposed project expose sensitive receptors to substantial pollutant concentrations?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.3.4: Would the proposed project create objectionable odors affecting a substantial number of people?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
4.4 Biological Resources					
Threshold 4.4.1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.	S/LTS	NI/NI	S/LTS	S/LTS	<S/LTS
Threshold 4.4.2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.	S/LTS	NI/NI	S/LTS	S/LTS	<S/LTS
Threshold 4.4.3: Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.4.4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	S/LTS	NI/NI	S/LTS	S/LTS	<S/LTS
Threshold 4.4.5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	S/LTS	NI/NI	S/LTS	S/LTS	<S/LTS
Threshold 4.4.6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	S/LTS	NI/NI	S/LTS	S/LTS	<S/LTS

Table 8.R: Comparison of Impacts

Environmental Impacts	Proposed Project (Without/With Mitigation)	Alternative 1 (Without/With Mitigation)	Alternative 2 (Without/With Mitigation)	Alternative 3 (Without/With Mitigation)	Alternative 4 (Without/With Mitigation)
4.5 Cultural Resources					
Threshold 4.5.1: Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.	S/LTS	NI/NI	S/LTS	S/LTS	S/LTS
Threshold 4.5.2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.	S/LTS	NI/NI	S/LTS	S/LTS	S/LTS
Threshold 4.5.3: Disturb any human remains, including those interred outside of dedicated cemeteries.	NI/NI	NI/NI	NI/NI	NI/NI	NI/NI
4.6 Energy					
Threshold 4.6.1: Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.6.2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
4.7 Geology and Soils					
Threshold 4.7.1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of known fault? (Refer to Division of Mines and Geology Special Publication 42) (ii) Strong seismic ground shaking? (iii) Seismic-related ground failure, including liquefaction? (iv) Landslides?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.7.2: Result in substantial soil erosion or the loss of topsoil?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.7.3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.7.4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.7.5: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	NI/NI	NI/NI	NI/NI	NI/NI	NI/NI
Threshold 4.7.6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	S/LTS	NI/NI	S/LTS	S/LTS	S/LTS

Table 8.R: Comparison of Impacts

Environmental Impacts	Proposed Project (Without/With Mitigation)	Alternative 1 (Without/With Mitigation)	Alternative 2 (Without/With Mitigation)	Alternative 3 (Without/With Mitigation)	Alternative 4 (Without/With Mitigation)
4.8 Greenhouse Gas Emissions					
Threshold 4.8.1: Would the project generate GHG emissions either directly or indirectly that may have a significant impact on the environment?	S/SU	NI/NI	<S/SU	<S/SU	<S/SU
Threshold 4.8.2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	S/SU	NI/NI	<S/SU	<S/SU	<S/SU
4.9 Hazards and Hazardous Materials					
Threshold 4.9.1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.9.2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.9.3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.9.4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.9.5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	NI/NI	NI/NI	NI/NI	NI/NI	NI/NI
Threshold 4.9.6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.9.7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
4.10 Hydrology and Water Quality					
Threshold 4.10.1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS

Table 8.R: Comparison of Impacts

Environmental Impacts	Proposed Project (Without/With Mitigation)	Alternative 1 (Without/With Mitigation)	Alternative 2 (Without/With Mitigation)	Alternative 3 (Without/With Mitigation)	Alternative 4 (Without/With Mitigation)
Threshold 4.10.2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.10.3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) Result in substantial erosion or siltation on or off site; (ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; (iii) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows.	S/LTS	NI/NI	S/LTS	S/LTS	S/LTS
Threshold 4.10.4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.10.5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
4.11 Land Use and Planning					
Threshold 4.11.1: Physically divide an established community.	LTS/LTS	NI/NI	NI/NI	LTS/LTS	LTS/LTS
Threshold 4.11.2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	LTS/LTS	NI/NI	NI/NI	LTS/LTS	LTS/LTS
4.12 Mineral Resources					
Threshold 4.12.1: Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the State.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.12.2: Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.	NI/NI	NI/NI	NI/NI	NI/NI	NI/NI
4.13 Noise and Vibration					
Threshold 4.13.1: The generation of a substantial temporary or permanent increase (defined as an increase of 3 dBA or more) in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	S/SU	NI/NI	LTS/LTS	<S/SU	<S/SU

Table 8.R: Comparison of Impacts

Environmental Impacts	Proposed Project (Without/With Mitigation)	Alternative 1 (Without/With Mitigation)	Alternative 2 (Without/With Mitigation)	Alternative 3 (Without/With Mitigation)	Alternative 4 (Without/With Mitigation)
Threshold 4.13.2: The generation of excessive groundborne vibration or groundborne noise levels.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.13.3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure of people residing or working in the project area to excessive noise levels.	NI/NI	NI/NI	LTS/LTS	NI/NI	NI/NI
4.14 Population and Housing					
Threshold 4.14.1: Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	LTS/LTS	NI/NI	NI/NI	LTS/LTS	LTS/LTS
Threshold 4.14.2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	NI/NI	NI/NI	NI/NI	NI/NI	NI/NI
4.15 Public Services					
Threshold 4.15.1: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.15.2: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.15.3: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS

Table 8.R: Comparison of Impacts

Environmental Impacts	Proposed Project (Without/With Mitigation)	Alternative 1 (Without/With Mitigation)	Alternative 2 (Without/With Mitigation)	Alternative 3 (Without/With Mitigation)	Alternative 4 (Without/With Mitigation)
Threshold 4.15.4: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.15.5: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?	NI/NI	NI/NI	NI/NI	NI/NI	NI/NI
4.16 Recreation					
Threshold 4.16.1: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	LTS/LTS	NI/NI	NI/NI	LTS/LTS	LTS/LTS
Threshold 4.16.2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	LTS/LTS	NI/NI	NI/NI	LTS/LTS	LTS/LTS
4.17 Transportation					
Threshold 4.17.1: Conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.17.2: Conflict or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b).	S/SU	NI/NI	S/SU	<S/SU	<S/SU
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).	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.17.4: Result in inadequate emergency access.	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
4.18 Tribal Cultural Resources					
Threshold 4.18.1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with	S/LTS	NI/NI	S/LTS	S/LTS	S/LTS

Table 8.R: Comparison of Impacts

Environmental Impacts	Proposed Project (Without/With Mitigation)	Alternative 1 (Without/With Mitigation)	Alternative 2 (Without/With Mitigation)	Alternative 3 (Without/With Mitigation)	Alternative 4 (Without/With Mitigation)
cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).					
Threshold 4.18.2: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	S/LTS	NI/NI	S/LTS	S/LTS	S/LTS
4.19 Utilities and Service Systems					
Threshold 4.19.1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.19.2: Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.19.3: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.19.4: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS
Threshold 4.19.5: Conflict with federal, state, and local management and reduction statutes and regulations related to solid waste?	LTS/LTS	NI/NI	LTS/LTS	LTS/LTS	LTS/LTS

Table 8.R: Comparison of Impacts

Environmental Impacts	Proposed Project (Without/With Mitigation)	Alternative 1 (Without/With Mitigation)	Alternative 2 (Without/With Mitigation)	Alternative 3 (Without/With Mitigation)	Alternative 4 (Without/With Mitigation)
4.20 Wildfire					
Threshold 4.20.1: Substantially impair an adopted emergency response plan or emergency evacuation plan.	LTS/LTS	>S/>S	LTS/LTS	LTS/LTS	LTS/LTS
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.	LTS/LTS	>S/>S	LTS/LTS	LTS/LTS	LTS/LTS
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.	LTS/LTS	>S/>S	LTS/LTS	LTS/LTS	LTS/LTS
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.	LTS/LTS	LTS/LTS	LTS/LTS	LTS/LTS	LTS/LTS

Source: Compiled by LSA Associates, Inc. (November 2023).
~S = Similar to proposed project
<S = The impact remains Significant but the alternative's contribution to the impact is incrementally *less than* the Development Project.
>S = The impact remains Significant but the alternative's contribution to the impact Incrementally *greater than* the Development Project.
LTS = Less than significant
NI = No Impact
S = Significant
SU = Significant and unavoidable

Table 8.S: Do the Alternatives Generally Meet Project Objectives?

Project Objectives	Project	Alternative 1: No Project/No Build	Alternative 2: Existing General Plan/Zoning	Alternative 3: Reduced Commercial	Alternative 4: Reduced Industrial
Establish a functional and balanced pattern of land use that maximizes economic opportunity and provides needed public improvements for City residents.	Yes	**No**	**No**	Yes	Yes
Establish land uses for properties in the City's Sphere of Influence that will create positive fiscal impact to the City and provide sufficient fiscal benefit to permit annexation of the Project site into the City.	Yes	**No**	**No**	Yes	Yes
Promote job creating uses that reduce the need for City residents to commute outside of the City for employment, thereby improving the City's jobs to housing ratio.	Yes	**No**	**No**	Yes	Yes
Locate industrial and commercial uses that rely on transportation efficiency in areas with convenient access to the local and regional transportation network, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region to the extent feasible.	Yes	**No**	**No**	Yes*	Yes
Address a need in the City for commercial and industrial land uses that accommodate a variety of modern industrial, business, hospitality and commercial activities.	Yes	**No**	Yes*	Yes	Yes
Provide commercial development that allows for a diversified economy, complements existing uses, provides a range of employment opportunities, and promotes a safe and enjoyable shopping experience for residents and visitors.	Yes	**No**	**No**	Yes*	Yes
Use comprehensive planning tools to create a master-planned development that will be marketable to users, establish an aesthetically pleasing environment and minimize impacts to adjoining uses.	Yes	**No**	Yes	Yes	Yes
Increase City sales and property tax revenues by establishing commercial and industrial uses in the City that can increase City revenues and assist in offsetting public services costs incurred by the City in development and maintenance of housing and public facilities.	Yes	**No**	**No**	Yes*	Yes
Assist in managing supply and demand for electric services to maintain and increase the existing renewables portfolio standard while minimizing costs to rate payers.	Yes	**No**	No	Yes	Yes
Assist in City developing roadway and utility infrastructure to support the anticipated growth requirements of the City and to improve accessibility in areas of the City and the City's Sphere of Influence that currently have limited infrastructure to serve the needs of local residents and businesses.	Yes	**No**	**Yes**	Yes	Yes
Conserve natural drainage features and open space to provide a balance between the built and natural environment.	Yes	**Yes**	Yes	Yes	Yes**
Minimize the demand for water resources and other public services by creating drought tolerant landscaping and encouraging use of recycled water.	Yes	**No**	Yes	Yes	Yes

Source: Compiled by LSA Associates, Inc., September 2023.

* Satisfies objective to a lesser extent than the Development Project because: (1) provision of fewer jobs, (2) provision of reduced levels of sales and property tax revenue, and/or (3) reduced and/or variety of commercial opportunities.

** Avoids disturbance of natural drainage due to the elimination of the second Lincoln Street crossing.

Generally, residential uses project have higher fiscal impacts related to the provision of public services and would generally generate less revenue to support the resultant population. The retention of the commercial center under this alternative would satisfy to a much lesser degree some of the basic project objectives (see **Table 8.S**,). This alternative would not provide, to the same extent as the Development Project or either Alternatives 3 or 4, the level of employment, variety of uses, or revenue increases that would: (1) create positive fiscal impact to the City, (2) promote job creating uses that reduce the need for City residents to commute outside of the City for employment, (3) improve transportation efficiency by taking advantage of the site's proximity to local and regional access for industrial and commercial use, (4) address a need in the City for commercial and industrial land uses that accommodate a variety of modern industrial, business, hospitality, and commercial activities, (5) provide uses that allow for a diversified economy, complements existing uses, and provide a range of employment opportunities, or (6) increase City sales and property tax revenues by establishing commercial and industrial uses in the City that can increase City revenues and assist in offsetting public services costs incurred by the City in development and maintenance of housing and public facilities.

As detailed in **Section 8.4** and **Table 8.D**, Alternative 2 would reduce the overall emission of air pollutants and greenhouse gases, though the reduction would be insufficient to reduce the emissions to below established thresholds of significance and the air quality and greenhouse gas impacts would remain significant and unavoidable. Furthermore, though reduced, until specific tenants are identified for commercial uses, it is infeasible to impose and implement specific VMT reduction measures such as traffic demand management measures at commercial uses at this time, and the VMT impact under this alternative remains significant and unavoidable. Changes in vehicle traffic and the removal of large industrial buildings that would occur under this alternative would eliminate the significant and unavoidable noise impact traffic noise occurring under the Development Project. Compared to the Development Project, this alternative eliminates the significant and unavoidable traffic noise and operational (stationary source) noise impacts along Sunset Avenue and south of Bobcat Road, respectively.

Generally, residential uses project have higher fiscal impacts related to the provision of public services and would generally generate less revenue to support the resultant population. The retention of the commercial center under this alternative would satisfy to a much lesser degree some of the basic project objectives (see **Table 8.S**,). This alternative would not provide, to the same extent as the Development Project or either Alternatives 3 or 4, the level of employment, variety of uses, or revenue increases that would: (1) create positive fiscal impact to the City, (2) promote job creating uses that reduce the need for City residents to commute outside of the City for employment, (3) improve transportation efficiency by taking advantage of the site's proximity to local and regional access for industrial and commercial use, (4) address a need in the City for commercial and industrial land uses that accommodate a variety of modern industrial, business, hospitality, and commercial activities, (5) provide uses that allow for a diversified economy, complements existing uses, and provide a range of employment opportunities, or (6) increase City sales and property tax revenues by establishing commercial and industrial uses in the City that can increase City revenues and assist in offsetting public services costs incurred by the City in development and maintenance of housing and public facilities.

The hotel and travel center uses retained under Alternative 3 (Reduced Commercial) would provide a less diversified economy and more limited range of commercial employment opportunities than included in Alternative 4 (Reduced Industrial). In addition, Alternative 3 would provide much less sales tax revenue and reduced property tax revenue than Alternative 4 (Reduced Industrial) and would be materially less effective in satisfying the City's economically based objectives for development of the Development Site. While the significant and unavoidable air quality, greenhouse gas, noise, and VMT impacts would still occur under either of these alternatives, as established in **Sections 8.5 and 8.6** and as compared to the Development Project, the alternatives' relative contribution to these impacts is slightly reduced. As detailed in **Table 8.Q**, of the two alternatives, Alternative 3 overall contributes only slightly less to the significant and unavoidable impacts than Alternative 4, though under both alternatives, the significant and unavoidable impacts associated with the Development Project are retained. The removal of Building 9 under Alternative 4 eliminates the need for a crossing over Smith Creek (at Lincoln Street) eliminating the need for mitigation to reduce potential impacts to less than significant; mitigated impacts to Biological Resources and Hydrology are less than significant under Alternative 4. Compared to the Development Project, Alternative 4 slightly reduces air pollutants, greenhouse gas emissions, noise, and overall traffic, reduces the number of crossings of sensitive drainage features, maintains existing sediment transport in Smith Creek, and would be substantially effective in meeting the City's project objectives; therefore, it has been identified as the Environmentally Superior Alternative.

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