

Water Supply Assessment

First Hathaway Logistics, Banning CA

Final Report

January 30, 2023

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January 30, 2023

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Executive Summary

FR Hathaway, LLC has retained Stantec Consulting Services Inc. (Stantec) to prepare this Water Supply Assessment (WSA) for the First Hathaway Logistics Project (Project) in Banning, California. The Project is designed to span approximately 95 acres of commercially zoned land and include a 1.4 million square-foot (msf) warehouse and office. Project construction and long-term operation includes the use of potable water from the City of Banning (City) as described in the City's 2018 Integrated Master Plan (Master Plan). This WSA was conducted in conformance with the requirements of the California Water Code (CWC).

The Project is in eastern Banning approximately 1.5 miles west of the Morongo Reservation and 1 mile south of the San Gorgonio Mountain base. Project area and boundaries are presented on Figure 1.

Stantec analyzed water supplies available to serve the project, as well as the water demand anticipated during construction and through operation of the facility. For water supply analysis, this WSA references and relies upon the City of Banning's 2020 Urban Water Management Plan update (prepared by West & Associates Engineering/John Robinson Consulting, Inc). The 2015 Urban Water Management Plan update (prepared by Krieger and Stewart Engineering Consultants) was reviewed as a comparison to the changes in the 2020 update. The purpose of this WSA is to answer whether the City's total projected water supplies available during normal, single dry, and multiple consecutive dry water years projection could meet the projected water demand associated with the Project in addition to the public water system's existing and planned future uses.

As the 2020 UWMP projections incorporate the public water system's existing and planned future uses, it is sufficient to use the "Available Leftover Supply Capacity" listed in Table 13 through Table 19 of this document.

The Project site has a General Plan and Zoning overlay designation of Business Park, which is part of the City's commercial land use designation. Using a commercial unit water demand duty factor, the water demand is estimated to be 734 AFY.

The minimum available leftover supply capacity the City predicts is 1,841 AF in 2045 after a five-year period of multiple dry years¹. This supply is greater than the Project's estimated demand, and therefore the **City's water supply is adequate to meet the Project demand** within normal, single dry and multiple consecutive dry water years.

Table ES-1: Project Supply and Demand Comparison

Estimated Project Water Demand	Projected Available Leftover Supply	Supply Capacity Sufficient to Meet	
(AFY)	Capacity (AFY) ¹	Project Demand?	
734	1,841	Yes	

¹ 2020 UWMP, City of Banning, May, 2021, Table 7.7 (Year 2045)



Introduction

Abbreviations

AF	Acre-feet
AFY	Acre-feet per year
AMSL	Above Mean Sea Level
BCVWD	Beaumont-Cherry Valley Water District
CEQA	California Environmental Quality Act
City	City of Banning
CWC	California Water Code
DWR	California Department of Water Resources
EIR	Environmental Impact Report
GIS	geographic information system
gpcd	Gallons per capita per day
Master Plan	City of Banning 2018 Integrated Master Plan
MSF	Million Square Feet
NTS	natural treatment system
SB	Senate Bill (California)
SCAG	Southern California Association of Governments
SGPWA	San Gorgonio Pass Water Agency
UWMP	City of Banning's Urban Water Management Plan
WSA	Water Supply Assessment

Introduction

1.0 INTRODUCTION

The purpose of this Water Supply Assessment (WSA) report is to satisfy the requirements under Senate Bill 610 (SB610), Water Code Section 10910 et seq., Senate Bill 221 (SB221), and Government Code Section 66473 that adequate water supplies are or will be available to meet the water demand associated with a proposed project. Senate Bill 610 stipulates when a project is subject to the California Environmental Quality Act (CEQA), then the appropriate water supply agency must provide an assessment on whether its total projected water supplies (determined by the water supply agency's Urban Water Management Plan) will meet the projected water demand. Either a proposed residential development of more than 500 dwelling units, a large commercial, industrial, or mixed-use development will trigger application of SB610.

Senate Bill 610 amended the portions of the California Water Code, including the Urban Water Management Plan (UWMP) Act (Section 10631) and described elements of a WSA (Sections 10910, 10911, 10912, 10913, and 10915). In this case, elements of a WSA are consistent with UWMPs by Section 10631 and different in that they are only required as part of the environmental review process for an individually qualifying project. In addition, SB221 requires that approval by a city or county of certain residential subdivisions, as defined by California Government Code Section 66473.7(a)(1), must include an affirmative written verification of sufficient water supplies.

Section 1 of this WSA describes the Project location and details, the existing and proposed land use designations of the Project site, the Project's relation to the City of Banning's 2020 Urban Water Management Plan, and the identification of the public water system supplying the Project and relevant information from the City of Banning's 2018 Integrated Master Plan (Master Plan); Section 2 provides a water demand analysis of the Project and compares with the projected water supplies for the Project and the City; Section 3 contains a discussion of the City's groundwater supplies; and Section 4 concludes the assessment by summarizing all findings.

1.1 LAW

Water Code Section 10910: (a) Any city or county that determines that a project, as defined in Section 10912, is subject to the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) under Section 21080 of the Public Resources Code shall comply with this part.

Water Code Section 10912: For the purpose of this section, the following terms have the following meanings:

(a) "Project" means any of the following:

1. A proposed residential development of more than 500 dwelling units.



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- 2. A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- 3. A proposed commercial building employing more than 1,000 persons or having more than 250,000 square feet of floor area.
- 4. A hotel or motel, or both, having more than 500 rooms.
- 5. A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- 6. A mixed-use project that includes one or more specified in this subdivision.
- 7. A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.

1.2 PROJECT DESCRIPTION AND LOCATION

The proposed Project includes the construction of one warehouse distribution building and associated truck docks, trailer parking and passenger parking improvements on approximately 95 acres. The Project is located on private property that is wholly located within the City and will be supplied by a public water system operated by the City. The Project, as proposed, comprises 5 separate parcels owned by FR Hathaway, LLC and would consist of one 1.4 MSF (million square feet) warehouse building and associated truck docks, trailer, and office parking as documented in the Overall Site Plan prepared by HPA Architecture dated June 21, 2022 (and re-referenced in Figure 2: Project Concept Plan). Therefore, the proposed developed acreage and floor area square footage trigger the need for preparation of a WSA pursuant to SB610.

The Project is located approximately 1,100-feet north of the intersection of Ramsey Street and Hathaway Street, in the eastern portion of the City. Figure 1 and Figure 2 show a vicinity map and concept plan of the Project, respectively. The main building would be accessed by four driveways tentatively, two located on Nicolet Street, one on Hathaway Street, and one on Wilson Street. The concept plan shows realignment of the westerly portion of Nicolet Street to incorporate more trailer parking on the proposed building site. There would be 1 remaining parcel located on the south side of Nicolet at First Industrial Way which would either be used for an above ground natural treatment system (NTS) basin or used for trailer parking with underground storm water retention.



Introduction





Proposed Site Boundary Major Street

Notes

1. Background Source: Google Earth, scaled to fit and adjusted based on approximation.



Project Location

Prepared by SHS on 2021-11-18 City of Banning, California

<u>Client/Project</u> FR Hathaway, LLC First Hathaway Logistics

2042611701

Figure No. **1**

Project Vicinty



Julie

City of Banning, California

Project Location

Prepared by SHS on 2022-07-12

2042611701

<u>Client/Project</u> FR Hathaway, LLC First Hathaway Logistics

Figure No. 2

Notes 1. Source: HPA Architecture Overall Site Plan Dated June 21, 2022.

 This is a conceptual plan. It is based on preliminary information which is not fully verified and may be incomplete. It is meant as a comparative aid in examining alternate development strategies and any quantities indicated are subject to revision as more reliable information becomes available.

Project Concept Plan

Introduction

1.3 LAND USE

1.3.1 Existing Land Uses

The Project site has a General Plan land use and zoning overlay designation of Business Park, which is part of the City's commercial land use designation. According to the General Plan Land Use Element and Chapter 17.12 (Commercial and Industrial Districts) of the Banning Municipal Code, "light industrial manufacturing and office/warehouse buildings are appropriate in this designation. Restaurant and retail use ancillary to a primary use, and professional offices are also appropriate. Commercial development, such as large-scale retail (club stores, home improvement, etc.) and mixed-use projects may also be permitted, subject to a conditional use permit."²

The proposed Project does not require a General Plan Amendment or a Zone Change, as the proposed warehouse distribution development is a permitted use in the existing Business Park land use and zoning designation. However, since the Project is considered an industrial-use facility on a commercial land use zone, both industrial and commercial land-use unit water demand duty factors will be considered for this assessment (Section 2.1.4).

1.3.2 Existing Project Site Setting

The surface of the Project site is substantially disturbed from prior occupation and rough grading. Approximately 31 acres of the Project site (APNs 532-110-001 and -002) were previously developed and operated by the Orco Block and Hardscape Company with industrial buildings and staging of equipment and materials. The majority of equipment and materials were demolished and removed from the site between 2011 and 2012. The balance of the Project site composed of approximately 64 acres was cleared and rough graded in 2011 for a previously approved industrial warehouse development that was canceled due to changes in market demand.

The Project site generally maintains the existing topography of the surrounding area. The existing high point is approximately 2,330 feet above mean sea level (amsl) measured in the northwest corner of the site, and a low point is approximately 2,217 feet amsl in the southeast corner of the Project Site. Vegetation communities/land cover types on the Project site consist of graded/disturbed grassland and developed areas composed of engineered slopes, a remnant building and paved areas of the Orco Block and Hardscape Company, and existing underground utilities and stormwater infrastructure installed as part of the previously approved industrial warehouse development that was never completed. Overhead and underground utility lines also proceed through the site and along its perimeter and will be relocated and converted from overhead to underground as needed.

² City of Banning General Plan. Chapter III, Community Development, Land Use Element. Pages III-7 and III-8.



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1.3.3 Proposed Land Uses

The total square footage of the warehouse building would be 1,420,722, of which 20,000 square feet would consist of mezzanine office space and 20,000 square feet would be included in the building footprint³. The tenant or end user of the property has not been identified at this time; therefore, specific details about the future operation of the warehouse facility are not currently available. Because the end user is not known at the time of this writing, the Project Applicant has requested approval for the future warehouse to operate 24 hours a day/7 days per week depending on business/operational needs. In addition to the warehouse building, the Project would include vehicle, trailer, and truck parking as well as bike racks for bicycle parking.

A combination of drought-tolerant plant material including evergreen and deciduous trees, low shrubs, and masses of groundcovers will be installed throughout the Project site to create a cohesive and inviting environment for employees/visitors, pedestrians, and passing motorists. Prominent landscape focal points will be installed at street corners, along roadways, at building entrances, and in passenger vehicle parking lots. Monumentation landscaping featuring colorful accent trees, shrubs, and groundcover will be installed at key corners and driveway entries. Project landscaping would be designed to screen industrial buildings and any truck traffic passing through the Project site.

All landscaped areas would be equipped with a permanent, automatic, underground irrigation system conforming to City requirements and State Model Water Efficient Landscape Ordinance AB1881. The irrigation system will constitute a drip design to apply water slowly, allowing plants to be deep soaked and to reduce runoff. Landscaping is proposed for approximately 25 percent of the site (21 acres) with the remainder of the site consisting of building or hardscape. The Project concept plan is shown in Figure 2.

The Project also includes offsite utility work to connect to the City's potable water and sanitary sewer systems.

1.3.4 Project relation to Urban Water Management Plan

1.3.4.1 Law

Water Code Section 10910. (c) (1) The city or county, at the time it makes the determination required under Section 21080.1 of the Public Resources Code [CEQA], shall request each public water system identified pursuant to subdivision (b) to determine whether the projected water demand associated with a proposed project was included as part of the most recently adopted urban water management plan adopted pursuant to Part 2.6 (commencing with Section 10610).

(2) If the projected water demand associated with the proposed project was accounted for in the most recently adopted urban water management plan, the public water system may incorporate the requested

³ Per Overall Site Plan, First Hathaway Logistics Project, HPA Architecture, June 21, 2022



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information from the urban water management plan in preparing the elements of the assessment required to comply with subdivisions (d), (e), (f), and (g).

(3) If the projected water demand associated with the proposed project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment for the project shall include a discussion with regard to whether the public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses.

(4) If the city or county is required to comply with this part pursuant to subdivision (b), the water supply assessment for the project shall include a discussion with regard to whether the total projected water supplies, determined to be available by the city or county for the project during normal, single dry, and multiple dry water years during a 20-year projection, will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses, including agricultural and manufacturing uses.

Through its Public Works Department and Water Division, the City of Banning provides municipal water to its service area of approximately 16,908 acres (26 square miles), which includes some unincorporated areas of Riverside County (Appendix A, pg. 2-1). The City of Banning is the water supplier for the Project and has prepared a 2020 Urban Water Management Plan (Appendix A), that was adopted by City Council on June 1, 2021. This WSA relies on the information contained in the 2020 UWMP and references it in the supply and demand analysis and groundwater discussion in the sections that follow.

In accordance with an agreement dated December 23, 2003, the City of Banning and Beaumont-Cherry Valley Water District (BCVWD) jointly own and operate three groundwater wells. The City also purchases imported water from the San Gorgonio Pass Water Agency (SGPWA), which is a State Water Project contractor.

The projected potable water demands published in the City's 2020 UWMP were determined based upon population growth projections from Southern California Association of Governments (SCAG) and a City consumption rate of 234 gpcd (gallons per capita per day) in 2021 reducing by 1-percent annually through 2045 to account for passive savings (Appendix A, pg. 7-10). The 2020 UWMP used a population growth-based approach to estimating future water demand as opposed to a land use-based approach that follows the current and ultimate land uses.

1.4 IDENTIFICATION OF PUBLIC WATER SYSTEM

1.4.1 City of Banning 2018 Integrated Master Plan

The City of Banning 2018 Integrated Master Plan (Master Plan) "evaluates the performance and condition of the City's potable water, wastewater, and recycled water systems under existing and future conditions through year 2040. The objective is to develop a capital improvement plan (CIP) that guides the City of



Introduction

Banning (City) in the planning and development of water, wastewater, and recycled water system facilities required to meet system performance criteria for existing customers, as well as to support anticipated growth through the year 2040." (Appendix B, pg. ES-1).

1.4.2 Water Infrastructure in Project Vicinity

Per the Master Plan, the Project is located in the Main Pressure Zone. The Project could connect to a City-owned waterline in Hathaway Street which is shown in the Master Plan as having an 8-inch or less diameter per Figure ES.3 "Existing Potable Water System as Modeled" (Appendix B, pg. ES-9). Project will need to obtain approval through the City for any connections to City facilities.

When the Master Plan was written in 2018, a development called the Banning Business Park was proposed for the current Project location. It had a commercial/industrial land use, 65-acres, and a build-out year of 2040. The Project area is within long-term water improvement zone, so water pipe upgrades wouldn't be expected to happen in the near future.

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2.0 WATER SUPPLY PLANNING

Senate Bill 610 stipulates when a project is subject to CEQA, then the appropriate water supply agency must provide an assessment on whether its total projected water supplies (determined by the water supply agency's UWMP) will meet the projected water demand. In addition, SB221 requires that approval by a city or county of certain residential subdivisions, as defined by California Government Code Section 66473.7(a)(1), must include an affirmative written verification of sufficient water supplies.

This Water Supply Planning section compares the estimated Project demands with the estimated supply (derived from the 2020 UWMP) to address the above requirements of the CWC.

2.1 PROJECT WATER DEMAND

2.1.1 Law

Water Code Section 10910: (*c*) (*2*) *If the projected water demand associated with the proposed project was accounted for in the most recently adopted urban water management plan, the public water system may incorporate the requested information from the urban water management plan in preparing the elements of the assessment required to comply with subdivisions (d), (e), (f), and (g).*

(3) If the projected water demand associated with the proposed project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment for the project shall include a discussion with regard to whether the public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses.

2.1.2 Background

A development called the Banning Business Park was proposed for the current Project location and was included in the 2018 Master Plan. The Banning Business Park had 56 acres and 1,175,604 square feet of building space and had a WSA completed in 2009 verifying the estimated demand of 87 AFY⁴ would be met with adequate supply. When the 2020 UWMP was written, it incorporated the Master Plan and, therefore, accounts for the Banning Business Park demand estimates.

Since then, a new parcel has been purchased and added to the development, and ownership changed. Subsequently, the Business Park development plan went from a 12-building commercial space to the

⁴ Water Supply Assessment for the Banning Business Park, IW Consulting Engineers, Inc., June 9, 2009.



Water Supply Planning

current First Hathaway Logistics Project design of a 1.4 million-square-foot industrial warehouse distribution building.

2.1.3 City of Banning's Current and Future Water Demand

In 2020, the City of Banning had a service area population of 31,125 persons (Appendix A, pg. 2-10) and a total water consumption of 8,369 AF (Appendix A, pg. 6-7). See Table 1.

Table 1: City of Banning's Current Population and Water Demand⁵

	2020
Water Service Area Population	31,125
Consumption Rate GPCD	234
Total Water Consumption (AF)	8,369

Per the 2020 UWMP, Tables 2.5 and 6.6 detail the population and water demand projections and are summarized in Table 2 below. It is assumed the Project falls under CWC Section 10910 (c) (2), where a portion of its forecasted demand was accounted for in the 2020 UWMP by lieu of the previous Business Park design, and therefore its demand is partially reflected in the 2020 UWMP projection values. However, to remain conservative, the current Project's estimated demands will be considered an addition to the 2020 UWMP projected amounts.

Table 2: City of Banning's Project Population and Water Demand⁶

	2025	2030	2035	2040	2045
Water Service Area Population	38,180	45,235	52,290	59,345	66,400
Consumption Rate GPCD (includes 1% Annual Passive Savings)	222	211	201	191	181
Total Water Consumption (AF)	9,507	10,701	11,751	12,670	13,467

2.1.4 Project Unit Water Demand Duty Factor

Water service to the Project will be provided by the City of Banning. The City currently does not have an established unit water demand duty factor for land use categories. Therefore, this WSA provides a summary of the calculated unit water demand duty factors based on existing land use and historical water demands for each land use category. The project site is designated as a commercial land use.

⁶ 2020 UWMP, City of Banning, May, 2021, Table 2.5 and 6.6



⁵ 2020 UWMP, City of Banning, May, 2021

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To determine the total developed commercial land use area within the City boundaries, City staff provided a geographic information system (GIS) shapefile of the commercial parcels. This shapefile was used to determine which parcels are developed, and those parcels were summed for a total developed commercial area. The result is 269 acres of developed commercial parcels in City boundaries.

To determine the water demand duty factor for commercial water use, the total commercial water use in 2020 of 1,992 AFY (as stated in the 2020 UWMP, Table 6.3) is divided by the total developed commercial parcel area of 269 acres to obtain a unit water demand duty factor of 7.4 AFY per acre. Table 3 below provides a summary for the commercial unit water demand duty factor.

Table 3: Commercial Unit Water Demand Duty Factor for Project

Land Use	Annual Water Demand	Developed Commercial	Commercial Water
	(AFY)	Area (acres)	Demand (AFY per acre)
Commercial	1,992 ⁷	269 ⁸	7.4

As certain commercial buildings (such as those for lodging) can have up to 10-times the usage of an industrial warehouse building⁹, this unit water demand duty factor is likely an over-estimation of the current proposed development.

For comparison purposes, an industrial water demand will also be determined for the Project. The industrial unit water demand duty factor is calculated in a similar manner as commercial. However, at the time this report was written, the industrial developed acreage was not available from the City. Therefore, this assessment will use the developed industrial area provided in a WSA for the Banning Distribution Center by Albert A. Webb Associates and dated November 3, 2017, where City staff provided area values. The 2017 industrial water use of 102 AFY (as stated in the 2020 UWMP, Table 6.3) is then divided by the total developed industrial land use area of 189 acres¹⁰ to obtain a unit water demand duty factor of 0.5 AFY per acre.

Table 4: Industrial Unit Water Demand Duty Factor for Project

Land Use	Annual Water Demand	Developed Industrial Area	Commercial Water
	(AFY)	(acres)	Demand (AFY per acre)
Industrial	102 ¹¹	189 ¹⁰	0.5

Both the commercial and industrial areas used above are calculated from total parcel sizes within the City boundaries and include landscaping, even though landscape irrigation is billed separately and quantified as a different sector in the 2020 UWMP (Table 6.3). Therefore, the total area of the Project will be used to

¹¹ 2020 UWMP, City of Banning, May, 2021, Table 6.3



⁷ 2020 UWMP, City of Banning, May, 2021, Table 6.3

⁸ Provided by City staff in a GIS shapefile that was analyzed and totaled for developed commercial area

⁹ U.S. Energy Information Administration, 2012 Commercial Buildings Energy Consumption Survey: Water Consumption in Large Buildings Summary, https://www.eia.gov/consumption/commercial/reports/2012/water/

¹⁰ Water Supply Assessment for Banning Distribution Center, Albert A. Webb Associates, November 3, 2017 (pg.2-7).

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calculate the *building* water demand, and irrigation will be an additional demand based estimated irrigation usage of proposed landscape areas.

2.1.5 Estimated Project Water Demand

2.1.5.1 Estimated Building Water Demand

The estimated building water demand is calculated by multiplying each unit water demand duty factor by the Project area. Again, since total land-use parcel sizes are used to derive the unit water demand duty factors for building water demand, the total Project area is in turn used to determine Project building demand. The total Project area is 95 acres.

Table 5 shows the calculated building demands for both commercial and industrial usage, 703 AFY and 48 AFY respectively. The two calculated demands provide a range of potential building water use for the proposed project.

Table 5: Estimated Building Water Demand

Land Use	Project Area (acres)	Unit Water Demand Duty Factor (AFY/acre)	Building Demand (AFY)
Commercial	05	7.4	703
Industrial	95	0.5	48

2.1.5.2 Estimated Landscape Water Demand

Per calculations from Stantec's landscape architecture team in October 2021, approximately 1.4 millioncubic-feet of water (or 31 AF) is estimated annually for landscape irrigation. Table 6 summarizes this demand.

Table 6: Estimated Landscape Water Demand

Water Usage	Irrigation Water Demand (cubic feet/year)	Landscape Demand (AFY)
Landscape	1,359,600	31

2.1.5.3 Estimated Construction Water Demand

Project construction will require water for dust control and other general construction activities. During construction, water is assumed to be provided from existing fire hydrants on Hathaway Street following the City's procedures. It is assumed grading will take approximately 7 months to move around 1,000,000 cubic yards of soil. Based on the EPA's *Guidance for Application for Dust Control Permit*, a rule of thumb



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is that it takes a minimum of 30 gallons of water to control dust from each cubic yard of material to be moved.¹²

The estimated construction water demand comes to 92 AF per Table 7.

Table 7: Estimated Construction Water Demand

Estimated Volume of	Construction Unit Rate	Construction Water	Construction Water
Material (cubic yards)	(gallon/cubic yard)	Demand (gallons)	Demand (AF)
1,000,000	30 ¹²	30,000,000	92

2.1.5.4 Estimated Project Water Demand Summary

To obtain a total water demand of the Project, it is important to understand the order of water demand use. First, Project construction will use City water, and when the Project is built and complete, the landscape and building will simultaneously use City water. There will effectively be three demand estimates, the construction demand and then "in-operation" demand for both commercial and industrial land-uses.

Table 8 summarizes the two demand totals when the Project is in operational use. The estimated demand during construction is 92 AF. After construction is complete, the annual water demand for the Project is estimated to be 734 AFY using a commercial unit water demand duty factor. Using an industrial unit water demand duty factor, the estimated demand is 79 AFY. Since the Project has a commercial land use designation, the property could potentially have a water demand closer to the estimated commercial demand in the future, and therefore 734 AFY is considered the Project's water demand.

Table 8: Estimated Project Water Demand – Operational Use

	Building Demand (AFY)	Landscape Demand (AFY)	Total Project Demand (AFY)
Commercial	703	31	734
Industrial	48	31	79

2.2 PROJECT WATER SUPPLY ASSESSMENT

This section identifies the sources of potable water that are available to and utilized by the City of Banning. The purpose of this section is to evaluate the water supplies that could be utilized by the proposed Project during normal, single-dry and multiple-dry water years over a twenty-five-year period

¹² EPA, Guidance for Application for Dust Control Permit, 2005, *https://www.epa.gov/sites/default/files/2019-04/documents/mr_guidanceforapplicationfordustcontrolpermit.pdf*



Water Supply Planning

(2021-2045 for multiple-dry-year and 2025-2045 for normal and single-dry years). Section 3.0 Groundwater Analysis contains additional required information regarding the City's groundwater supplies.

2.2.1 Law

Water Code Section 10910 (d)(1): The assessment required by this section shall include an identification of any existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed project, and a description of the quantities of water received in prior years by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), under the existing water supply entitlements, water rights, or water service contracts.

(2) An identification of existing water supply entitlements, water rights, or water service contracts held by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), shall be demonstrated by providing information related to all of the following:

(A) Written contracts or other proof of entitlement to an identified water supply.

(B) Copies of a capital outlay program for financing the delivery of a water supply that has been adopted by the public water system.

(C) Federal, state, and local permits for construction of necessary infrastructure associated with delivering the water supply.

(D) Any necessary regulatory approvals that are required in order to be able to convey or deliver the water supply.

The City of Banning receives supplies from one or more water wholesalers. SB610 requires this assessment to document wholesale supplies received by: i) describing the quantities of water received from each wholesaler in prior years; ii) identifying existing entitlements, water rights, and/or water service contracts held by the City for the wholesale supply; iii) provide proof of entitlements, water rights, service contracts, relevant capital outlay programs, and construction permits for necessary infrastructure to deliver wholesale supplies, if any; and iv) regulatory approvals required to convey or deliver the wholesale supply.

Table 9 below documents where each of the above requirements can be found in the 2020 UWMP.



Water Supply Planning

Table 9: Supply Assessment in 2020 UWMP¹³

CWC Requirement	Section found in 2020 UWMP
Describing the quantities of water received from each wholesaler in prior years	Sections 3.3 and 3.5
Identifying existing entitlements, water rights, and/or water service contracts held by the City for the wholesale supply	Sections 3.2, 3.3, 6.4, 7.4, 7.5 and 8.3
Provide proof of entitlements, water rights, service contracts, relevant capital outlay programs, and construction permits for necessary infrastructure to deliver wholesale supplies, if any	N/A
Regulatory approvals required to convey or deliver the wholesale supply	Sections 7.4 and 7.5

2.2.2 City of Banning Urban Water Management Plan (2020 update)

2.2.2.1 Water Conservation Act of 2009

The Water Conservation Act of 2009 (also known as Senate Bill X7-7 or SB X7-7) is a California state law that requires the state to reduce urban water consumption by 20% by the year 2020. It originated as a bill written by Democratic Senator Darrell Steinberg and was enacted on November 10, 2009. The 2020 UWMP states on page 6-8:

"Due to reductions of water in the San Joaquin Delta, the Legislature drafted the Water Conservation Act of 2009 (SBx7-7) to protect statewide water sources. The legislation called for a 20 percent reduction in water use in California by the year 2020. The legislation amended the water code to call for 2020 and 2015 water use targets in the 2010 UWMPs, updates or revisions to these targets in the 2015 UWMPs and allows the Department of Water Resources (DWR) to enforce compliance to the new water use standards. Beginning in 2016, failure to comply with interim and final targets will make the City ineligible for grants and loans from the State needed to attain water self-sufficiency by 2020.

Since the City does not use recycled water, a 10-year instead of a 15-year rolling average baseline was previously calculated. The City's baseline water use is 315 GPCD, which was obtained from the 10-year period January 1, 2001 to December 31, 2010."

Table 10 below shows how the daily water use was derived, and Table 11 shows SB X7-7 water use targets and what the City achieved.

¹³ 2020 UWMP, City of Banning, May, 2021



Water Supply Planning

Year	Total Water Use (AF)	Population	Per Capita (GPCD)	
2010	8,485	29,603	256	
2009	9,259	28,751	287	
2008	9,606	28,551	300	
2007	10,245	28,193	324	
2006	10,245	28,234	324	
2005	9,427	28,250	298	
2004	10,424	28,055	332	
2003	10,043	27,608	324	
2002	9,808	25,662	341	
2001	10,032	24,639	363	
		10-yr. Baseline (2001-2010) (SB7: 10608.20)	315	
5-yr. Baseline (2006-2010) 298 (SB7: 10608.22)				
		Colorado River HR:	346	

Table 10: City of Banning Water Use (GPCPD)¹⁴

Table 11: City of Banning SB X7-7 2020 Water Use Targets (GPCD)¹⁵

Min. Reduction Requirement (10608.22)	20% Target (10608.20) (b)(1)	5% Reduction from Regional Target (10608.20) (b)(3)
283	252	200
2020 Per Capita Target:		252
	Interim (2015) Target:	284

The 2020 UWMP goes on to describe, "The selected SB X7-7 target is 252 GPCD (20% from its 10-year baseline) because this amount is greater than 200 GPCD (5% reduction from the Colorado River HR's target). Since the City's minimum reduction requirement of 283 GPCD is greater than the regional target of 211 GPCD, the City must select Method 1 (252 GPCD) as its 2020 water use target. Therefore, the City's compliance target for 2020 per capita water consumption was 252 GPCD in accordance with Section 10608.22 of the Code."

The City was able to achieve both its interim (2015) target and final 2020 target. By continuing to focus on water conservation, the City anticipates being able to maintain its consumption rates below the SBx7-7 target.

¹⁵ 2020 UWMP, City of Banning, May, 2021, Table 6.5



¹⁴ 2020 UWMP, City of Banning, May, 2021, Table 6.4

Water Supply Planning

Other sections in the 2020 UWMP detail how the SB X7-7 target can continue to be met by describing the City's water supply reliability, water shortage contingency planning, and demand management measures. Table 12 lists where these sections can be found in the 2020 UWMP.

Table 12: 2020 UWMP Section Locations to Supplement SB X7-7

Topic	Section found in 2020 UWMP
Water Supply Reliability	Section 7
Water Shortage Contingency Planning	Section 8
Demand Management Measures	Section 9

2.2.3 Public Water System's Total Projected Supplies

The City of Banning obtains its water supply from groundwater, and there are three sources that provide most of the City's groundwater supply: 1) replenishment credits from purchasing and infiltrating imported water from SGPWA within the Beaumont Basin, 2) diverted surface water from the Whitewater River that recharges the Banning Canyon Storage Unit, and 3) other City wells in the surrounding groundwater basins.

Based on the above projected water sources, there is currently a surplus of supply available to the City of Banning Therefore, the demand has always been met and can be seen as equal to the supply. For 2020, the demand of 8,369 AF was supplied and is also considered 2020's supply volume.

Per Section 7.7 in the 2020 UWMP, "As indicated by the tables on the following pages, the City does not expect to have a water supply shortage through 2045. To be clear, although the tables show that local groundwater pumping will not be sufficient for certain years (during dry years through 2032), the City has additional groundwater supplies available based on the safe yield of the subbasins and the City's storage account. Furthermore, the City's subbasin safe yield and storage account volumes are not expected to be affected during droughts lasting up to five years. Finally, droughts will be addressed by following the criteria of the City's Water Shortage Contingency Plan (WSCP) along with implementation of the regional contingency plans. For these reasons, the City is confident that water supplies are adequate to meet demands for all weather conditions through 2045."

2.2.3.1 Normal Water Year

In the 2020 UWMP, Table 7.1 (pg. 7-14) shows the normal water year projections of supply to not only meet demands in the twenty-year span but have an "Available Leftover Supply Capacity" ranging from 46,851 AF in 2025 to 7,631 AF in 2045. Table 13 summarizes these projections below.



Water Supply Planning

Table 13: City of Banning	Water Supply Availability & Demand Projections Normal Water
Year (AF) ¹⁶	

Water Sources	2025	2030	2035	2040	2045
	Populati	on			
Water Service Area Population	38,180	45,235	52,290	59,345	66,400
Consumption Rate (GPCD) Including 1% Annual Passive Savings	222	211	201	191	181
	Supply	,			
Groundwater Pumped (Total)	8,508	8,574	8,595	8,542	8,476
Pumped from Beaumont Basin Storage Account	999	2,126	3,156	4,128	4,991
Total Anticipated Use of Supplies (Estimated Production)	9,507	10,700	11,751	12,670	13,467
Total Available Supply	56,358	52,388	44,066	33,124	21,098
Demand					
Total Estimated Demand	9,507	10,701	11,751	12,670	13,467
Supply/Demand Comparison					
Available Leftover Supply Capacity	46,851	41,687	32,315	20,454	7,631

2.2.3.2 Single Dry Water Year

From Table 7.2 in the 2020 UWMP (pg. 7-15), the single dry water year projections also show adequate supply to meet demands in the 20-year span, with an "Available Leftover Supply Capacity" ranging from 46,375 AF in 2025 to 4,393 AF in 2045. In every year, the single dry water year is expected to consume 105-percent the normal water year amount for both supply and demand. Table 14 summarizes these projections below.

¹⁶ 2020 UWMP, City of Banning, May, 2021, Table 7.1



Water Supply Planning

Table 14: City of Banning Water	Supply Availability 8	& Demand Projections S	Single Dry
Year (AF) ¹⁷		-	

Water Sources	2025	2030	2035	2040	2045	
Population						
Water Service Area Population	38,180	45,235	52,290	59,345	66,400	
Consumption Rate (GPCD) Including 1% Annual Passive Savings	222	211	201	191	181	
	Supply	1			·	
Groundwater Pumped (Total)	8,508	8,574	8,595	8,542	8,476	
Pumped from Beaumont Basin Storage Account	1,461	2,652	3,767	4,790	5,659	
Total Anticipated Use of Supplies (Estimated Production)	9,969	11,226	12,362	13,332	14,135	
Total Available Supply	56,344	52,360	43,774	32,068	18,528	
Normal Year Supply	9,507	10,700	11,751	12,670	13,467	
% of Normal Year	105%	105%	105%	105%	105%	
	Deman	d				
Total Dry Demand	9,969	11,226	12,362	13,332	14,135	
Normal Year Demand	9,494	10,691	11,773	12,697	13,462	
% of Normal Year	105%	105%	105%	105%	105%	
Supply/Demand Comparison						
Available Leftover Supply Capacity	46,375	41,134	31,412	18,736	4,393	

2.2.3.3 Multiple Consecutive Dry Water Years

The multiple consecutive dry water years cover a 24-year span in 2020 UWMP Tables 7.3 through 7.7 (pg. 7-16 through 7-20), with an "Available Leftover Supply Capacity" ranging from 51,982 AF in 2022 to 1,841 AF in 2045. In every year, the multiple dry water year is expected to consume between 102 and 108-percent the normal water year amount for both supply and demand. Table 15, Table 16, Table 17, Table 18, and Table 19 summarize these projections below.

¹⁷ 2020 UWMP, City of Banning, May, 2021, Table 7.2



Water Supply Planning

Table 15: City of Banning Water Supply Availability & Demand Projections Multiple DryYears (2021-2025) (AF)18

Water Sources	2021	2022	2023	2024	2025	
Population						
Water Service Area Population	32,536	33,947	35,358	36,769	38,180	
Consumption Rate (GPCD) Including 1% Annual Passive Savings	232	229	227	225	222	
	Supply	/				
Groundwater Pumped (Total)	8,508	8,508	8,508	8,508	8,508	
Pumped from Beaumont Basin Storage Account	999	999	999	999	1,176	
Total Anticipated Use of Supplies (Estimated Production)	9,507	9,507	9,507	9,507	9,684	
Total Available Supply	60,105	60,759	59,996	59,233	59,179	
Normal Year Supply	9,507	9,507	9,507	9,507	9,507	
% of Normal Year	100%	100%	100%	100%	102%	
	Deman	d				
Total Dry Demand	8,865	9,419	9,172	9,443	9,684	
Normal Year Demand	8,443	8,721	8,993	9,258	9,494	
% of Normal Year	105%	108%	102%	102%	102%	
Supply/Demand Comparison						
Supply-Demand (Difference)	642	88	335	64	0	
Supply/Demand (%)	107%	101%	104%	101%	100%	
Available Leftover Supply Capacity	51,240	51,982	50,912	50,124	49,559	

¹⁸ 2020 UWMP, City of Banning, May, 2021, Table 7.3



Water Supply Planning

Table 16: City of Banning Water Supply Availability & Demand Projections Multiple DryYears (2026-2030) (AF)19

Water Sources	2026	2027	2028	2029	2030
	Populati	on			
Water Service Area Population	39,591	41,002	42,413	43,824	45,235
Consumption Rate (GPCD) Including 1% Annual Passive Savings	220	218	215	213	211
	Supply	/			
Groundwater Pumped (Total)	8,521	8,534	8,548	8,561	8,574
Pumped from Beaumont Basin Storage Account	1,713	2,259	1,890	2,117	2,337
Total Anticipated Use of Supplies (Estimated Production)	10,234	10,793	10,438	10,678	10,911
Total Available Supply	56,358	56,298	54,275	52,621	51,449
Normal Year Supply	10,045	10,334	10,623	10,912	11,200
% of Normal Year	100%	100%	100%	100%	100%
Demand					
Total Dry Demand	10,234	10,793	10,438	10,678	10,911
Normal Year Demand	9,747	9,993	10,234	10,468	10,697
% of Normal Year	105%	108%	102%	102%	102%
Supply/Demand Comparison					
Supply-Demand (Difference)	0	0	0	0	0
Supply/Demand (%)	100%	100%	100%	100%	100%
Available Leftover Supply Capacity	46,124	45,505	43,837	41,943	40,538

¹⁹ 2020 UWMP, City of Banning, May, 2021, Table 7.4



Water Supply Planning

Table 17: City of Banning Water Supply Availability & Demand Projections Multiple DryYears (2031-2035) (AF)²⁰

Water Sources	2031	2032	2033	2034	2035
Population					
Water Service Area Population	46,646	48,057	49,468	50,879	52,290
Consumption Rate (GPCD) Including 1% Annual Passive Savings	209	207	205	203	201
	Supply	,			
Groundwater Pumped (Total)	8,578	8,582	8,587	8,591	8,595
Pumped from Beaumont Basin Storage Account	2,889	3,448	2,991	3,198	3,400
Total Anticipated Use of Supplies (Estimated Production)	11,467	12,030	11,578	11,789	11,995
Total Available Supply	52,388	51,152	47,941	45,186	42,932
Normal Year Supply	11,510	11,820	12,131	12,441	12,751
% of Normal Year	100%	100%	100%	100%	100%
Demand					
Total Dry Demand	11,467	12,030	11,578	11,789	11,995
Normal Year Demand	10,921	11,139	11,351	11,558	11,760
% of Normal Year	105%	108%	102%	102%	102%
Supply/Demand Comparison					
Supply-Demand (Difference)	0	0	0	0	0
Supply/Demand (%)	100%	100%	100%	100%	100%
Available Leftover Supply Capacity	40,921	39,123	36,363	33,396	30,937

²⁰ 2020 UWMP, City of Banning, May, 2021, Table 7.5



Water Supply Planning

Table 18: City of Banning Water Supply Availability & Demand Projections Multiple DryYears (2036-2040) (AF)²¹

Water Sources	2036	2037	2038	2039	2040
	Populati	on			
Water Service Area Population	53,701	55,112	56,523	57,934	59,345
Consumption Rate (GPCD) Including 1% Annual Passive Savings	199	197	195	193	191
	Supply	,			
Groundwater Pumped (Total)	8,584	8,574	8,563	8,553	8,542
Pumped from Beaumont Basin Storage Account	3,970	4,546	4,018	4,213	4,404
Total Anticipated Use of Supplies (Estimated Production)	12,554	13,120	12,581	12,766	12,946
Total Available Supply	44,066	41,749	37,439	33,658	30,390
Normal Year Supply	13,084	13,419	13,752	14,087	14,420
% of Normal Year	100%	100%	100%	100%	100%
Demand					
Total Dry Demand	12,554	13,120	12,581	12,766	12,946
Normal Year Demand	11,956	12,148	12,334	12,516	12,692
% of Normal Year	105%	108%	102%	102%	102%
Supply/Demand Comparison					
Supply-Demand (Difference)	0	0	0	0	0
Supply/Demand (%)	100%	100%	100%	100%	100%
Available Leftover Supply Capacity	31,512	28,629	24,859	20,892	17,443

²¹ 2020 UWMP, City of Banning, May, 2021, Table 7.6



Water Supply Planning

Table 19: City of Banning Water Supply Availability & Demand Projections Multiple Dry Years (2041-2045) (AF)²²

Water Sources	2041	2042	2043	2044	2045
	Populati	on			
Water Service Area Population	60,756	62,167	63,578	64,989	66,400
Consumption Rate (GPCD) Including 1% Annual Passive Savings	189	187	185	183	181
	Supply	1			
Groundwater Pumped (Total)	8,529	8,516	8,502	8,489	8,476
Pumped from Beaumont Basin Storage Account	4,978	5,558	4,956	5,130	5,256
Total Anticipated Use of Supplies (Estimated Production)	13,507	14,074	13,458	13,619	13,732
Total Available Supply	33,124	29,799	24,477	19,757	15,573
Normal Year Supply	14,730	15,039	15,348	15,657	15,967
% of Normal Year	100%	100%	100%	100%	100%
Demand					
Total Dry Demand	13,507	14,074	13,458	13,619	13,732
Normal Year Demand	12,864	13,031	13,194	13,352	13,462
% of Normal Year	105%	108%	102%	102%	102%
Supply/Demand Comparison					
Supply-Demand (Difference)	0	0	0	0	0
Supply/Demand (%)	100%	100%	100%	100%	100%
Available Leftover Supply Capacity	19,617	15,725	11,019	6,139	1,841

2.3 PROJECT WATER SUPPLY AND DEMAND COMPARISON

Based on a comparison of the projected supply among any normal, single dry, or multiple consecutive dry water years, the lowest available leftover supply capacity the City predicts is 1,841 AF in 2045 after a five-year period of multiple dry years²³.

²³ 2020 UWMP, City of Banning, May, 2021, Table 7.7 (Year 2045)



 $^{^{\}rm 22}$ 2020 UWMP, City of Banning, May, 2021, Table 7.7

Water Supply Planning

As calculated in Section 2.1.5, the estimated demand during construction for the First Hathaway Logistics Project is 92 AF. After construction is complete, the annual water demand for the Project is estimated to be 734 AFY using a commercial unit water demand duty factor.

The minimum available leftover supply capacity is greater than the Project's estimated demand, and therefore the **City's water supply is adequate to meet the Project demand** within normal, single dry and multiple consecutive dry water years. Table 20 shows the comparison.

Table 20: Project Supply and Demand Comparison

Estimated Project Water Demand	Projected Available Leftover Supply	Supply Capacity Sufficient to Meet
(AFY)	Capacity (AFY) ²³	Project Demand?
734	1,841	Yes

Assuming this Project's demand is an additional demand to what is analyzed in the 2020 UWMP, the City's current commercial water demand would increase by up to 734 AFY annually and require the City to revise commercial water demand projections in the 2025 UWMP update.

Groundwater Analysis

3.0 GROUNDWATER ANALYSIS

With groundwater the primary source of supply for the City of Banning (and in turn for the proposed Project), SB610 requires specific groundwater information be included in the WSA.

3.1 LAW

Water Code Section 10910 (f): If a water supply for a proposed project includes groundwater, the following additional information shall be included in the water supply assessment:

(1) A review of any information contained in the urban water management plan relevant to the identified water supply for the proposed project.

(2) A description of any groundwater basin or basins from which the proposed project will be supplied. For those basins for which a court or the board has adjudicated the rights to pump groundwater, a copy of the order or decree adopted by the court or the board and a description of the amount of groundwater the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), has the legal right to pump under the order or decree. For basins that have not been adjudicated, information as to whether the department has identified the basin or basins as over drafted or has projected that the basin will become over drafted if present management conditions continue, in the most current bulletin of the department that characterizes the condition of the groundwater basin, and a detailed description by the public water system or the city or county if either is required to comply with this part pursuant to subdivision (b), of the efforts being undertaken in the basin or basins to eliminate the long-term overdraft condition.

(3) A detailed description and analysis of the amount and location of groundwater pumped by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), for the past five years from any groundwater basin from which the proposed project will be supplied. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.

(4) A detailed description and analysis of the amount and location of groundwater that is projected to be pumped by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), from any basin from which the proposed project will be supplied. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.

(5) An analysis of the sufficiency of the groundwater from the basin or basins from which the proposed project will be supplied to meet the projected water demand associated with the proposed project. A water supply assessment shall not be required to include the information required by this paragraph if the public water system determines, as part of the review required by paragraph (1), that the sufficiency of

Groundwater Analysis

groundwater necessary to meet the initial and projected water demand associated with the project was addressed in the description and analysis required by paragraph (4) of subdivision (b) of Section 10631.

3.1.1 Review of Urban Water Management Plan (CWC Section 10910 (f)(1))

The City of Banning's 2020 Urban Water Management Plan update (prepared by West & Associates Engineering/John Robinson Consulting, Inc) on behalf of the City of Banning was adopted by the City Council on June 1, 2021. Agency Urban Water Management Plans are needed because:

- waters of California are a limited and renewable resource subject to increasing Californian demands
- the conservation and efficient use of urban water supplies are of statewide concern
- conservation and efficient use of water shall be actively pursued to protect both the people of the state and their water resources
- conservation and efficient use of urban water supplies shall be a guiding criterion in public decisions
- that urban water suppliers shall be required to develop water management plans to achieve conservation and efficient use

The 2020 UWMP includes information on the groundwater analysis; current and projected water demands through 2045; a description of the various groundwater basins; the reliability of the water supply, projected supply and demand comparisons, water shortage plans; and water demand management efforts.

Specific to the groundwater analysis, the 2020 UWMP focuses on several important topics, such as basin descriptions, historic use, projected use, and sufficiency of the basins. Table 21 shows where each pertinent section can be found in the 2020 UWMP.

Table 21: Relevant Groundwater Sections in 2020 UWMP

CWC Requirement	Section found in 2020 UWMP
Groundwater Basin Descriptions (CWC Section 10910 (f)(2))	Section 3.4
Historic Use of Groundwater (CWC Section 10910 (f)(3))	Section 3.5
Projected Use of Groundwater by the City (CWC Section 10910 (f)(4))	Section 3.5.1 and 7.7
Sufficiency of Groundwater Basin (CWC Section 10910 (f)(5))	Section 3.5



Conclusion

4.0 CONCLUSION

Relying upon the City of Banning's 2020 Urban Water Management Plan update, the purpose of this WSA is to answer whether the City's total projected water supplies available during normal, single dry, and multiple consecutive dry water years projection could meet the projected water demand associated with the Project in addition to the public water system's existing and planned future uses.

As the 2020 UWMP projections incorporate the public water system's existing and planned future uses, it is sufficient to use the "Available Leftover Supply Capacity" listed in Table 13 through Table 19. Also, the 2020 UWMP only quantifies water demand in major categories (i.e., as commercial, industrial, agricultural, etc.) and therefore demand estimates can only be calculated to those levels.

The Project site has a commercial land use designation. Using a commercial unit water demand duty factor, the water demand is estimated to be 734 AFY. It should be noted that the current Project design is for industrial use, which would have a calculated water demand of approximately 79 AFY. But since the Project has a commercial land use designation, the property could potentially have a water demand closer to the estimated commercial demand in the future, and therefore 734 AFY is considered the Project's water demand. Prior to Project completion, the estimated demand during construction is 92 AF.

The minimum available leftover supply capacity the City predicts is 1,841 AF in 2045 after a five-year period of multiple dry years²⁴. This supply is greater than the Project's estimated demand, and therefore the **City's water supply is adequate to meet the Project demand** within normal, single dry and multiple consecutive dry water years.

²⁴ 2020 UWMP, City of Banning, May, 2021, Table 7.7 (Year 2045)



References

5.0 **REFERENCES**

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- City of Banning. November 2017. Water Supply Assessment, Banning Distribution Center. Received Nov. 4, 2021

APPENDICES Appendix A-B

Appendix A City of Banning's 2020 Urban Water Management Plan

Appendix A CITY OF BANNING'S 2020 URBAN WATER MANAGEMENT PLAN

The City of Banning's 2020 Urban Water Management Plan can be found here: <u>http://www.banning.ca.us/DocumentCenter/View/8877/Final-Draft-Revised-2020-UWMP---Banning_May-</u> <u>2021?bidId=</u>



Appendix B City of Banning's 2018 Integrated Master Plan

Appendix B CITY OF BANNING'S 2018 INTEGRATED MASTER PLAN

The City of Banning's 2018 Integrated Master Plan can be found here: <u>http://banning.ca.us/DocumentCenter/View/5666/Final-Banning-Integrated-Master-Plan-revision-11</u>

