February 2025 | Addendum to the Butterfield Specific Plan Environmental Impact Report
State Clearinghouse No. 2007091149

Atwell TK–8 School Project

City of Banning

Prepared for:

Beaumont Unified School District
Contact: Ana Gonzalez, Director of Facilities
350 West Brookside Avenue
Beaumont, California 92223
951.797.5373

Prepared by:

PlaceWorks
Contact: Jorge Estrada, Senior Associate
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com

PLACEWORKS

Table of Contents

Table of Contents

Appendices

Table of Contents

Figures **Page**

Tables **Page**

Table of Contents

This page intentionally left blank.

1. Introduction

1.1 BACKGROUND, PURPOSE, AND SCOPE

This document is an Addendum to the certified Butterfield Specific Plan Environmental Impact Report (Certified EIR) (State Clearinghouse No. 2007091149) for the proposed Atwell TK-8 School Project (proposed project). The Addendum has been prepared in accordance with the provisions of Section 21166 of the California Environmental Quality Act (CEQA) and Sections 15162 and 15164 of the CEQA Guidelines. The Certified EIR analyzed the environmental impacts associated with buildout of the Butterfield Specific Plan (Specific Plan or approved project), which is a 1,543-acre master planned community in the northwestern corner of the City of Banning. The approved project is predominantly residential, comprising single-family detached homes with simple architectural designs. Neighborhood parks, a public golf course option, community parks, schools, open spaces, and retail and commercial parcels are also included in the approved project. The Specific Plan has a variety of residential opportunities, including small, medium, and standard-lot single-family detached homes; various configurations of single-family detached cluster residences; and attached single or multifamily dwellings. Pursuant to the approved project, two school sites were included and consist of 11.7 acres and 11.3 acres, a total of 23 acres. The 11.7-acre school site is in Planning Area 20, the 11.3-acre school site is in Planning Area 68, and both sites were set aside as elementary school sites. The 11.7-acre school site in Planning Area 20 would be administered by the Beaumont Unified School District (District), and the 11.3-acre school site in Planning Area 68 would be administered by the Banning Unified School District.

In April 2012, after approval of the Specific Plan and Certified EIR, the Highland Springs Resort (Resort) and the Cherry Valley Acres and Neighbors and Cherry Valley Environmental Planning Group (CVAN) challenged the legality of the Certified EIR. An Addendum to the Certified EIR was prepared in 2016 (2016 EIR Addendum) as a result of the settlement agreement reached in 2014. The 2016 EIR Addendum analyzed a less intense development within the approved project's boundaries that included fewer residential units, the removal of several roadway extensions, and the removal of the private golf course. Additionally, modifications to the approved project resulted in the reconfiguration of planning areas in the Specific Plan area. If it is determined that one or both of the school districts do not require an identified school site, the Specific Plan allows residential development of the school site(s) at a density of up to 10 dwelling units per acre, as long as the overall dwelling unit total for the Specific Plan does not exceed 4,682 units. Additional school sites are permitted elsewhere in the Specific Plan area pursuant to state and school district location requirements and shall be designated if requested by the school districts.

The project analyzed in this Addendum entails development of the proposed project on Planning Area 20 of the Specific Plan which encompasses 20 acres. The proposed school campus would consist of three 2-story buildings and two single-story buildings, three surface parking lots with drop-off lanes, hardcourts, on-site playfields, on-site playgrounds, landscaping, and other site improvements.

1. Introduction

The purpose of this Addendum is to evaluate whether the proposed project would modify the approved project in such a way as to result in new environmental impacts or a substantial increase in the severity of previously identified significant effects or would otherwise trigger a need for subsequent environmental review under CEQA.

1.2 ENVIRONMENTAL PROCEDURES

Pursuant to CEQA and the State CEQA Guidelines, this Addendum focuses on whether implementation of the proposed project would require major revisions to the Certified EIR due to the potential for new significant environmental effects or a substantial increase in the severity of previously identified significant effects, pursuant to State CEQA Guidelines Section 15162.

Pursuant to Public Resources Code Section 21166 and Section 15162 of the State CEQA Guidelines, when an EIR has been certified or a negative declaration adopted for a project, no subsequent or supplemental EIR or negative declaration shall be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. (CEQA Guidelines § 15162[a])

1. Introduction

A supplement to an EIR (supplemental EIR), which is narrower in scope than a subsequent EIR, may be prepared if any of the above criteria apply, but "only minor changes or additions would be necessary to make the previous EIR adequately apply to the project in the changed situation" (CEQA Guidelines § 15163(a)). In the absence of the need to prepare either a subsequent or supplemental EIR, an addendum to a previously Certified EIR may be prepared. Section 15164 states:

> (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
>
> (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
>
> (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
>
> (d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
>
> (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence. (CEQA Guidelines § 15164)

This Addendum to the Certified EIR has been prepared because the District's evaluation of the proposed project has not indicated any of the circumstances requiring a subsequent or supplemental EIR is required. As demonstrated in Section 4 of this Addendum, the proposed project would not result in impacts that differ from the approved project, and it would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in CEQA Guidelines Sections 15162(a) and 15163(a). The proposed project is consistent with the Specific Plan and would not require changes to the approved project. This Addendum demonstrates that no substantial changes are proposed to the approved project or have occurred in the development area covered by the Specific Plan that would require major revisions to the Certified EIR or substantially increase the severity of previously identified significant effects. Therefore, the impacts of the proposed project are within the levels and types of environmental impacts disclosed in the Certified EIR.

The proposed project would not change the buildout assumptions made under the Specific Plan. As substantiated in Section 4 of this Addendum, the proposed project would not result in new significant impacts or substantially increase impacts of the approved project. As a result, no substantial changes in circumstances under Section 15162(a)(2) have occurred since the certification of the EIR that would indicate new significant impacts or substantially increase the severity of significant impacts previously identified.

In addition, no information that was not known and could not have been known at the time of the Certified EIR preparation has been revealed that shows new or substantially greater significant impacts would result (see CEQA Guidelines § 15162[a][3]). There are no new or different mitigation measures that would substantially

1. Introduction

reduce one or more significant impacts of the approved project but that are not adopted. The proposed project does not identify or require adoption of any further mitigation measures beyond those provided in the Certified EIR.

Since this Addendum does not identify new or substantially greater significant impacts, circulation for public review and comment is not necessary (CEQA Guidelines § 15164[c]). However, the District will consider this Addendum at a board meeting together with the previously certified EIR prior to adoption of the proposed project (CEQA Guidelines § 15164[d].

2. Environmental Setting

2.1 PROJECT LOCATION

At the regional level, the project site is in the City of Banning, Riverside County (see Figure 1, *Regional Location*). The city is bounded on the west by the city of Beaumont and on the north, south, and east by unincorporated areas of Riverside County.

At the local level, the project site is within the boundaries of the Specific Plan area (see Figure 2, *Local Vicinity*), which is in the western portion of the city. The project site consists of one legal parcel, Assessor's Parcel Number 408-120-051-7. The project site is a 20-acre development area in Planning Area 20 of the Specific Plan. The project site is bordered by Creekside Avenue to the west, Landmark Way to the north, single-family homes to the south, and Apex Street to the east (see Figure 3, *Aerial View*).

2.2 EXISTING LAND USE

The 20-acre project site is graded, undeveloped, and disturbed (see Figure 3). There are no existing structures or improvements on-site.

2.3 SURROUNDING LAND USE

The project site is in Planning Area 20 of the Specific Plan area. Existing residential uses associated with the Specific Plan are to the north, west, and south of the project site. Currently, the area immediately east of the project site is undeveloped. However, future development of the Specific Plan area will consist of residential land uses, open space, and roadways.

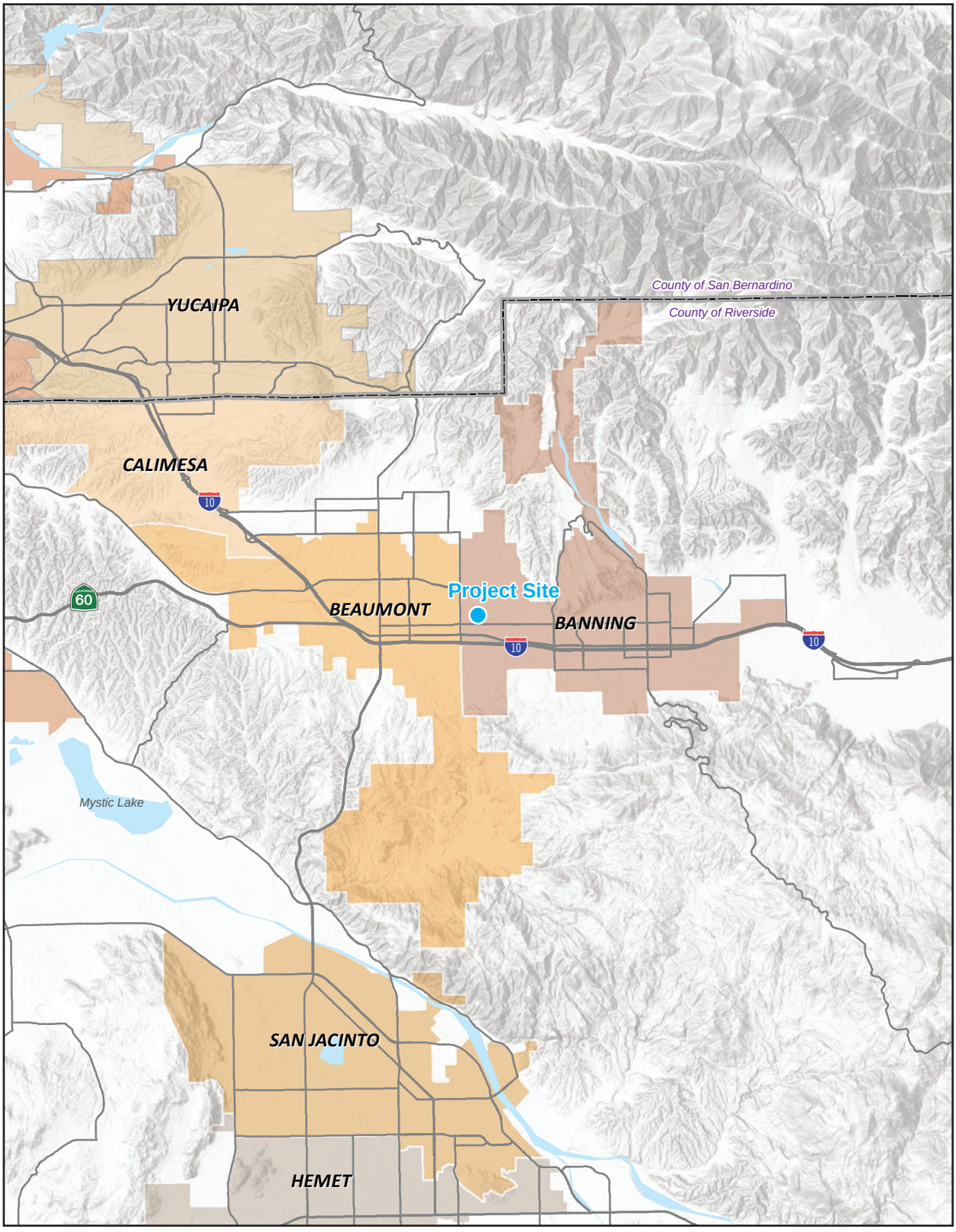
2.4 GENERAL PLAN AND ZONING DESIGNATION

As noted earlier, the project site is in Planning Area 20 of the Specific Plan. Under the Specific Plan, which serves as the zoning document for the project site, the site is designated as School (Banning 2017).

2. Environmental Setting

This page intentionally left blank.

Figure 1 - Regional Location



City Boundary

Note: Unincorporated county areas are shown in white.

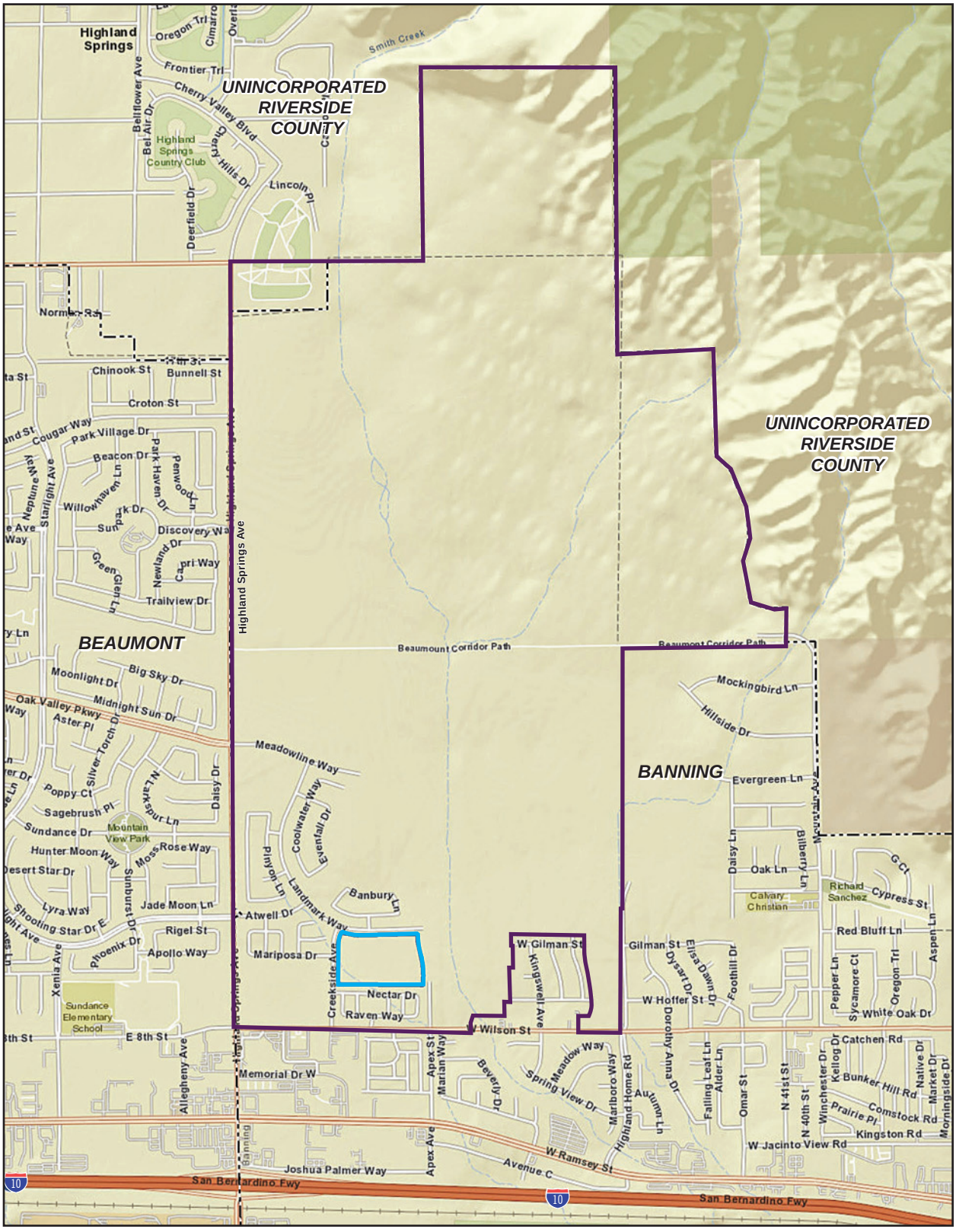
Source: Generated using ArcMap 2024.

0 3
Scale (Miles)

2. Environmental Setting

This page intentionally left blank.

Figure 2 - Local Vicinity



Source: Generated using ArcMap 2024.

2. Environmental Setting

This page intentionally left blank.

Figure 3 - Aerial View

Project Boundary
Specific Plan Boundary

0 375
Scale (Feet)

Source: Nearmap 2024; RuhnauClarke 2024.

2. Environmental Setting

This page intentionally left blank.

3. Project Description

3.1 PROJECT BACKGROUND AND PRIOR ENVIRONMENTAL ANALYSIS

Following is a summary of the development background and history associated with the proposed project, from the various environmental, City, and legal documents that have been prepared and adopted/approved over the past years for the Specific Plan.

3.1.1 Deutsch Property Specific Plan (1993)

The Specific Plan was originally called the Deutsch Property Specific Plan. The planning process for the Deutsch Property Specific Plan began in October of 1981 and culminated in the approval of the plan. In April 1984, a comprehensive entitlement program was initiated to have the City formally adopt the Deutsch Property Specific Plan. The City's process required preparation of a General Plan Amendment, Specific Plan, Zoning Amendment, and Environmental Impact Report (EIR). Those documents were completed in October 1984. On April 18, 1985, the Banning City Council certified the Final EIR and on June 25, 1985, the City Council approved a General Plan Amendment, Specific Plan, Zoning Amendment, and Pre-Zoning for the development area covered by the Deutsch Property Specific Plan. A subsequent request (Specific Plan Amendment No. 1992-03) was filed to amend and enlarge the area covered by the Deutsch Property Specific Plan, for which the Banning City Council certified a new EIR on October 26, 1993, and adopted the amended Specific Plan on November 9, 1993, by Ordinance No. 1133. A majority of the Deutch Property Specific Plan area was annexed to the City of Banning in 1985. The remainder, except 15.4 acres, was annexed into the City in 1995.

3.1.2 Butterfield Specific Plan (2012)

The City of Banning received an application on August 20, 2007, from Pardee Homes, the current property owner, for a comprehensive amendment to the Deutsch Specific Plan to provide an updated plan renamed the Butterfield Specific Plan. It should be noted that the Butterfield Specific Plan included the relocation of certain existing power transmission lines and a portion of the existing high pressure natural gas pipeline as well as the installation of underground electrical power lines and natural gas lines throughout the Specific Plan area. An EIR was prepared for the Butterfield Specific Plan. On March 27, 2012, the City of Banning City Council certified the Butterfield Specific Plan EIR, which analyzed adoption and implementation of the new Specific Plan. The EIR identified the following potentially significant impacts that would be reduced with implementation of mitigation measures.

- Aesthetics
- Biological Resources
- Cultural Resources
- Geology, Soils, and Seismicity

- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services and Utilities

The Certified EIR identified the following significant and unavoidable impacts:

- Air Quality
- Greenhouse Gas Emissions (Climate Change)
- Traffic and Transportation
- Water Supply

A Notice of Determination was posted by the Riverside County Clerk and submitted to the State Clearinghouse on March 30, 2012.

3.1.3 Butterfield Specific Plan and Settlement Agreement (2012–2017)

In April and June of 2012, the Resort and CVAN legally challenged the City of Banning's actions on the Butterfield Specific Plan pursuant to issues regarding compliance with CEQA. These challenges were consolidated into a single matter under Riverside County Superior Court Case No. 1296246. After the court issued a preliminary Statement of Decision in December 2013, the City, Pardee Homes, and the other parties in the action filed a Stipulation to Stay the Action to compromise, settle the claims raised in the action, and avoid further litigation. After negotiations, the parties agreed to a settlement in the later part of 2014. On December 9, 2014, the Banning City Council approved the Settlement Agreement as signed by all parties. The Court approved the Settlement Agreement on February 9, 2015.

In December 2016, the City of Banning prepared an Addendum to the Certified EIR (2016 EIR Addendum). The 2016 EIR Addendum analyzed the changes required to the approved project due to the settlement agreement between the City, project proponent, and petitioners (Resort and CVAN), which resulted in a less intense development that included fewer residential units, removal of several roadway extensions, and removal of the private on-site golf course. The changes resulted in a reduction of residential units from 5,387 dwellings units to 4,682 dwellings units (decrease of 525 dwelling units). Additionally, the golf course use in Planning Areas 35 and 39 would be replaced with a recreational area to include parks, open space, and other uses permitted under the approved project. The 2016 EIR Addendum concluded that the reduction in intensity would not result in any new significant impacts compared to the approved project analyzed in the Certified EIR.

On January 4, 2017, the City of Banning Planning Commission recommended that the Banning City Council approve the 2016 EIR Addendum. The Banning City Council, on February 14, 2017, adopted Resolution No. 2017-07, concurring with and approving minor modifications to the Butterfield Specific Plan, subject to new conditions of approval. The minor modifications, in compliance with the Settlement Agreement, were found to be in substantial conformance with the Specific Plan as approved in 2012, as allowed by Section 6.1.2 of the Specific Plan. Resolution No. 2017-07 also approved General Plan Amendment No. 16-2501, which amended the Banning General Plan Circulation Element to reflect the removal of the proposed extension of

Highland Home Road to Brookside Avenue and Cherry Valley Blvd., consistent with the provisions of the Settlement Agreement, and approved the Addendum to the Butterfield Specific Plan Final EIR.

3.2 PROPOSED PROJECT

Following is a detailed description of the proposed project and the various development features/elements and improvements that would be implemented as part of the proposed project.

3.2.1 Site Plan and Character

The District proposes to develop a new school campus that would serve 1,200 transitional kindergarten (TK) through 8th grade students on a 20-acre site in the Specific Plan area. The project site, which is in Planning Area 20, is bounded by Landmark Way, Creekside Avenue, and Apex Street (see Figure 3, *Aerial View*).

The District and developer have both signed a letter of intent for the District to receive the school site in a "super pad" condition, which entails grading of the site to a 2 percent grade in preparation for development of the site. The super pad condition also includes certification of the building pad by a registered soils engineer; completed frontage street improvements providing all necessary points of access to the site; and all wet and dry utilities are stubbed to the property line to allow for on-site connections.

3.2.2 Campus Amenities and Facilities

Table 1 provides a breakdown of the proposed project's campus building square footage, improvements, amenities, and facilities. As shown in the table, the proposed school would consist of three 2-story buildings (Buildings A, B, and C), two single-story buildings (Building D and Admin Building), three outdoor learning areas, three surface parking lots, hardcourts, three play fields, a lunch shelter, and other site improvements. Figure 4, *Conceptual Site Plan*, illustrates some of these school features and improvements.

Table 1 Proposed Project Site Development

Project Component	Square Footage
Construction	
Building A	26,843
Building B	25,441
Building C	31,798
Building D	14,450
Admin Building	34,420
Surface Work	
Surface Parking Lots	42,040
Drop-off Areas	41,273
Hardcourts	172,417
Running Track	28,617
Outdoor Learning Areas	31,083
Play Fields	370,364
Landscaping	95,634

3. Project Description

The two-story buildings would include classrooms for grades TK through 4th, a special day classroom, a design laboratory for science and design classes, and a library. One of the single-story buildings (Building D) would have classrooms for 7th and 8th grade students. The second single-story building would include the administrative offices, a multi-purpose room, a gym with lockers, and a food service area. Building A would have a building footprint of 13,422 square feet (SF) (26,843 SF total); Building B would have a building footprint of 12,721 SF (25,441 SF total); Building C would have a building footprint of 15,899 SF (31,798 SF total); Building D would have a building footprint of 14,450 SF (14,450 SF total); and Admin Building would have a building footprint of 34,420 SF (34,420 SF total). The proposed school campus would include the use of natural gas and electricity.

3.2.3 Access, Circulation, and Parking

3.2.3.1 VEHICULAR ACCESS, CIRCULATION AND PARKING

Regional access to the Specific Plan area, including the project site, is provided via Interstate 10. Local access to the project site is provided via W. Wilson Street, which is south of the project site, and via Landmark Way, Apex Street, and Creekside Avenue, which form the project site boundaries (see Figures 2 and 3, *Local Vicinity* and *Aerial View*). The proposed project would provide four driveways (see Figure 4, *Conceptual Site Plan*), serving three distinct pick-up/drop-off areas. Two driveways are proposed off Landmark Way. One of the driveways would provide ingress and egress access (full-access driveway) and would be used for bus drop off and for access to the northern parking area, which would be accessible to employees, parents, and visitors during normal school hours. The second driveway off Landmark Way would also provide egress access and be used for parent drop-off and for access to a second parking area. The other two driveways would be located off Creekside Avenue. The northern driveway would allow for ingress and be a part of the parent drop-off improvement and access point to the northwest parking area. The southern driveway would allow for ingress and egress and be the primary access point for kindergarten student drop-off and access to a southwest parking area. All four driveways would provide sufficient driveway sight distance.

On-site parking would be provided in three surface parking lots in the northwestern and southwestern portions of the project site (see Figure 4). Combined, the three parking lots would accommodate approximately 112 parking spaces.

3.2.3.2 PEDESTRIAN ACCESS AND CIRCULATION

Pedestrian and bicycle access to the project site would be provided via Creekside Avenue to the west, Landmark Way to the north, and Apex Street to the east, which form the western, northern, and eastern boundaries of the project site. Pedestrian access and circulation along the site frontages would be via the existing public sidewalks along the site boundary. Access to the school campus would be via internal walkways that would connect to the public sidewalks along Landmark Way and Creekside Avenue. Pedestrian crosswalks would be at the intersections of Creekside Avenue / Landmark Way and Apex Street / Landmark Way.

There are existing striped, on-street bike lanes along Creekside Avenue, Landmark Way, and Apex Street that are classified as Class II bike lanes (Banning 2024b). Low-speed streets where cyclists would be permitted to ride in the street or on the sidewalk are already provided abutting and surrounding the project site and

throughout the Specific Plan area. School crossing guards would be stationed at the designated crossing locations along Creekside Avenue and Landmark Way.

3.2.4 School Operation

3.2.4.1 TRADITIONAL SCHOOL

The new school campus would operate on a traditional two-semester academic calendar, with students in session from August through June. School hours would be from approximately 7:30 am to 3:45 pm, and some teachers and students may be on campus after school hours to attend various after-school programs and activities.

3.2.4.2 SCHOOL-RELATED EVENTS

The school would provide after-school programs for the students, such as special-interest clubs, and extracurricular activities that may end later than 3:45 pm. There may also be occasional nighttime and weekend events during the school year. Some of these events would be campuswide, such as school plays and open houses, and others would be grade specific, such as commencement.

3.2.5 Project Phasing and Construction

The proposed project is anticipated to be constructed in one phase in an approximately 24-month schedule; however, for purposes of the analysis conducted in this EIR Addendum an 11-month schedule was used with a start date of 2027. The project site is currently mass graded. Construction activities associated with the proposed project would include fine grading, trenching, building construction, architectural coating, asphalt paving, finishing, and landscaping. All construction staging and equipment storage would stay on the project site.

- **Utility Trenching.** Utility trenching would entail the project site to be excavated, and utility pipes, cables, and storm drainage systems would be laid in trenches and connected.
- **Construction.** Building, hardcourts, playfields, site improvements, and parking construction.
- **Architectural Coating.** Painting the new buildings.
- **Asphalt.** Paving within the project site for parking lots and hardcourts.
- **Finishing and Landscaping.** Finishing and landscaping would be implemented in the final three months of construction.

3. Project Description

This page intentionally left blank.

Figure 4 - Conceptual Site Plan

0 200
Scale (Feet)

Source: RuhnauClarke 2024.

3. Project Description

This page intentionally left blank.

4. Environmental Analysis

The section briefly summarizes the conclusions of the Certified EIR and discusses three conditions pursuant to CEQA Guidelines Section 15162 for impacts to each of the resource areas discussed herein.

> **Condition 1.** Whether or not the proposed project represents a substantial change that will require major revisions to the Certified EIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
>
> **Condition 2.** Whether or not substantial changes in the circumstances under which the proposed project is being undertaken will require major revisions to the Certified EIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
>
> **Condition 3.** If new information shows that the proposed project would have one or more new significant effects; that significant effects would be substantially more severe than previously described; that mitigation measures or alternatives previously found not to be feasible would be feasible and substantially reduce impacts, but project proponents decline to adopt them; or that new or previously rejected mitigation measures or alternatives would be feasible and would substantially reduce one or more project impacts, but project proponents decline to adopt them.

If none of the above conditions are met, the analysis identifies where impacts of the proposed project would not require major revisions to the Certified EIR or substantially increase the severity of previously identified significant effects that would trigger the need to prepare a subsequent or supplemental EIR under Sections 15162(a) and 15163(a).

4.1 AESTHETICS

4.1.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to aesthetics identified in the Certified EIR.

- **Scenic Vistas and Resources.** The Certified EIR determined that the most prominent scenic vista in the vicinity of the Specific Plan area is the view of the ridgelines and peaks of the San Bernardino Mountains. The Certified EIR determined that the visual character of the Specific Plan area would be dramatically altered due to mass grading and construction of homes and other facilities. The Specific Plan area was determined to not be visible from Interstate 10 (I-10) westbound due to foreground berms and landscaping and to be only intermittently visible from the eastbound lanes. The section of the I-10 that is approximately 0.4 mile south of the Specific Plan area's southern boundary is not designated a State Scenic Highway but is designated an "eligible" scenic corridor. The Specific Plan area was determined to be visible in the distant

background from State Route 243 (SR-243), a designated scenic highway that terminates south of I-10. The Specific Plan area contains a single oak tree, which is considered a scenic resource. With implementation of PDFs and Mitigation Measures AES-1, AES-4, AES-5, and AES-6, as well as compliance with the City's grading requirements and landscaping standards, the Certified EIR determined that the approved project's impacts with respect to scenic vistas and scenic resources would be less than significant. Additionally, the 2016 EIR Addendum concluded that because of the reduction in units and because the reduced project would maintain the same building heights as analyzed in the Certified EIR, the impacts would be generally consistent with the findings of the Certified EIR.

- **Visual Character.** The Certified EIR determined that the approved project would potentially impact the visual character and quality of the Specific Plan area and its surroundings over a substantial period of time. Development of the approved project would replace the vacant grassland character of the Specific Plan area with residential, institutional, commercial, and recreational. The visual character of the Specific Plan area would be permanently altered; however, the visual character or quality of the Specific Plan area would not be degraded. The design of the Specific Plan would reflect sensitivity to two on-site landforms, and grading concepts were developed to enhance the approved project's compatibility with existing valley and foothill topography. At buildout, the approved project would enhance the visual character and quality of the Specific Plan area and its surroundings. Nevertheless, the Certified EIR identified mitigation measures (AES-2, AES-6) and Project Design Features (PDF) to further reduce potentially significant impacts to visual character and quality of the site and surrounding area to less than significant levels. Potential adverse project effects are also reduced through implementation and compliance with the various existing regulations and ordinances. Additionally, the 2016 EIR Addendum concluded that because of the reduction in units and because the reduced project would maintain the same building heights as analyzed in the Certified EIR, the impacts would be generally consistent with the findings of the Certified EIR.

- **Light and Glare.** At the time the Certified EIR was prepared, the Specific Plan area had no sources of light or glare and did not create light or glare impacts on adjacent land uses. The approved project would result in new sources of light and glare typical of the suburban uses proposed. All developed area and trails would have 24-hour security lighting, and active recreation areas may have lighting for activities and events. Implementation of Mitigation Measures AES-5 and AES-7 and adherence to the requirements of the City's lighting ordinance would partially reduce residual light and glare impacts, but they would remain significant and unavoidable. The 2016 EIR Addendum concluded that because the reduced project would result in a 3.2 percent reduction in residential development and 1.2 percent reduction in non-residential development, there would be a reduction in the amount of light and glare resulting from development of the Specific Plan area. Despite the reduction in development, the reduced project analyzed in the 2016 EIR Addendum would not reduce the approved project's significant and unavoidable impacts related to light and glare. The 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR.

There have been neither changes in the project nor circumstances, nor has there been any new information that has arisen since the certification of the Certified EIR that would require additional environmental review or preparation of a subsequent or supplemental EIR.

4.1.2 Impacts Associated with the Proposed Project

Would the proposed project:

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the approved project would result in less than significant impacts on scenic vistas with the incorporation of mitigation measures. The project site is graded and surrounded by existing residential development and residential development under development in accordance with the approved project. Development of the project site with the proposed project would not affect scenic vistas not already analyzed and identified in the Certified EIR. Development would be regulated by the District and the provisions of the Specific Plan. Nonetheless, mitigation measures AES 3 and AES 4 would remain applicable to the proposed project and would ensure that implementation of the proposed project would not significantly impact a scenic vista. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR identified that a portion of SR-243, between Wesley Street and SR-74, is designated a Scenic State Highway; however, the Specific Plan area is not in the view corridor of SR-243. The proposed project would be developed within the boundaries of the approved project. The project site is located four miles northwest of the officially designated portion of SR-243 (Caltrans 2024). The project site is graded and does not contain any trees, rock outcroppings, or historic buildings. The proposed project would develop the project site with a new school campus. Nonetheless, mitigation measures AES-3 and AES-4 would remain applicable to the proposed project and would ensure that implementation of the proposed project would not significantly impact scenic resources within a State Scenic Highway. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) 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?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. At the time the Certified EIR was prepared, the Specific Plan area had a vacant grassland character. The Certified EIR concluded that development of the approved project would permanently alter the character of the Specific Plan area; however, the approved project would improve the visual quality of the area and would implement mitigation measures AES-1 through AES-6.

The proposed project would occur within the approved project's boundaries and includes development of the project site with a use permitted under the approved project, which was analyzed in the Certified EIR. Additionally, as with the approved project, the proposed project would be designed and constructed in accordance with the Specific Plan's design and development standards; and the proposed project would also be developed in accordance with District's standards. Furthermore, and as with the approved project, the proposed project would be required to adhere to the applicable Certified EIR mitigation measures to help mitigate any visual impacts resulting from the proposed project. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that light and glare as a result of the approved project could be created by lights of parking lots, landscaped areas, interior building lights, and/or use of exterior building materials that could be reflective. Short-term construction activities associated with the proposed project would be similar to those included as part of the approved project. Security lighting associated with construction activities would be required to be located away from nearby residential uses to the extent feasible to avoid potential impacts on adjacent properties, similar to construction activities occurring under the approved project. Therefore, construction impacts related to light and glare would be consistent with the findings under the Certified EIR.

The proposed project involves development of the project site with a use analyzed in the Certified EIR, which would be a source of artificial light and would incorporate mitigation measure AES-7 identified in the Certified EIR, which would reduce light and glare impacts to a less than significant level. Therefore, construction and operational impacts related to light and glare would be consistent with the findings under the Certified EIR.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.1.3 Aesthetic Mitigation Measures Identified in the Certified EIR

The following mitigation measures are taken directly from the Certified EIR and apply to and will be implemented for the proposed project. Where necessary, mitigation measures have been updated, refined, and/or supplemented to ensure mitigation is implemented as intended for the proposed project. Any changes to mitigation measures are identified here in ~~strikeout~~ text to indicate deletions and **bold underlined** text to signify additions.

It should be noted that mitigation measure AES-1 is not applicable to the proposed project because the proposed project is implementing a small portion of the Specific Plan area and does not include mass grading or clearing activities. Mitigation Measure AES-2 is not applicable to the proposed project because the proposed project is not located near a slope. Mitigation measure AES-5 is not applicable to the proposed project because

the District will be receiving the project site in a super pad condition and all mass grading will be completed. Mitigation measure AES-6 is not applicable to the proposed project because the proposed project is not located along Highland Springs Avenue.

MM AES-3 The ~~Project developer~~ **District** shall maintain the site free of debris, which shall be promptly removed from the site when found at least once a quarter and at least daily during construction, and the ~~Project developer~~ **District** shall monitor the site at least once a quarter and at least daily during construction to protect the site from illegal dumping.

MM AES-4 The ~~Project developer~~ **District** ~~and its successor(s) in interest inclusive of the HOA or Landscape Lighting and Maintenance District, if any~~, shall maintain perimeter walls, fencing, irrigation, and landscape in a satisfactory condition at all times. ~~Parkways and other l~~ **L**andscape features visible from the public right of way shall be maintained free of weeds and trash and graffiti shall be promptly removed.

MM AES-7 The lighting specifications proposed for the new school campus shall be consistent with lighting standards included in the **CALGreen Code and Title 24**~~Specific Plan and shall meet or exceed the lighting standards contained in the City's Municipal Code~~. The lighting plans must demonstrate the following: ~~to the satisfaction of the City of Banning Community Development Director:~~

- ~~Use of low-sodium lamps of 4,050 lumens or less where feasible, to provide for adequate public safety and security~~;
- A lighting standard that is shielded to direct illumination downward and to limit casting light and glare on adjacent properties;
- Exterior lighting, including street lights, landscape lighting, parking lot lighting, and lighting of the interior of parks and trails shall be sufficient to establish a sense of well-being for the pedestrian and sufficient to facilitate recognition of persons at a reasonable distance. Type (lighting standard) and placement of lighting shall be to the satisfaction of the ~~Community Development Director or designee~~ **DSA** and shall be consistent with the requirements of the **CALGreen Code and Title 24, but the District is encouraged to follow proposed design guidelines to mitigate effects of light and glare**~~City's most current lighting ordinance and the standards of the Specific Plan~~;
- A minimum of one foot-candle at ground level overlap provided in all exterior doorways and vehicle parking areas, and on outdoor pedestrian walkways presented on a photometric plan **prepared for the project**; and
- Outdoor light fixtures that are not covered by the Specific Plan's lighting standards shall be subject to the District's standards.

4.2 AGRICULTURE AND FORESTRY RESOURCES

4.2.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to agriculture and forestry resources in the Certified EIR.

- **Farmland.** The Certified EIR determined that the Specific Plan area is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. However, implementation of the approved project would convert 1,500 acres of Farmland of Local Importance to non-agricultural uses. At the time the Certified EIR was prepared, the Specific Plan area was not utilized for agricultural purposes. The Specific Plan area is vacant and undeveloped with intermittent agricultural uses and livestock grazing. The Certified EIR concluded that the approved project would result in less than significant impacts related to the conversion of farmland to non-agricultural uses. Additionally, the 2016 EIR Addendum concluded that the modifications to the approved project would not result in any new or more severe impacts related to the conversion of farmland to non-agricultural uses; impacts would be generally consistent with the findings of the Certified EIR.

- **Agricultural Use/Williamson Act.** The Certified EIR determined that the Specific Plan area was not zoned for agricultural uses and not under an active Williamson Act contract. The Certified EIR concluded that the approved project would result in less than significant impacts related to conflicts with existing agricultural zoning and William Act contracts. Additionally, the 2016 EIR Addendum concluded that the modifications to the approved project would not result in any new or more severe impacts related to the conflicts with existing agricultural zoning or Williamson Act contracts; impacts would be generally consistent with the findings of the Certified EIR.

- **Forest Land Zoning and Conversion of Forest Land.** The Certified EIR determined that the Specific Plan area is not zoned for and does not contain any forest land or timberland uses. The approved project would not convert forestland or timberland uses to non-forest use. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that modifications to the approved project would not result in any new or more severe impacts related to conflicts with forest land zoning or conversion of forest land to non-forest use; impacts would be generally consistent with the findings of the Certified EIR.

- **Other Environmental Changes.** The Certified EIR determined that the Specific Plan area is not zoned for forest land or timberland uses. Additionally, the Specific Plan area is not utilized for agricultural purposes or forest land at the time the Certified EIR was prepared. Although the approved project would convert Farmland of Local Importance to non-agricultural use, the Specific Plan area has not supported agricultural uses since 1988. The Certified EIR incorporated mitigation measure AGRI-1, which required all real estate transactions for residential and nonresidential transactions to include disclosure forms indicating the historical and intended continued small-scale, temporary livestock grazing to ensure impacts on agricultural resources remain less than significant. Additionally, the 2016 EIR Addendum concluded that modifications to the approved project would not result in any new or more severe impacts related to

other environmental changes resulting in impacts to forest land and agricultural resources; impacts would be generally consistent with the findings of the Certified EIR.

4.2.2 Impacts Associated with the Proposed Project

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the Specific Plan area, including the project site, was not designated as Prime Farmland, Unique Farmland of Statewide Importance. Additionally, the remaining 1,500 acres of Farmland of Local Importance, which includes the project site, have remained unused for agricultural purposes. The project site is graded, vacant, and disturbed. Therefore, as with the approved project, the proposed project would not result in impacts on farmlands. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that none of the parcels within the Specific Plan area, including the project site, are subject to a Williamson Act contract. The project site is graded, vacant, and disturbed. As with the approved project, the proposed project would not conflict with zoning for agricultural uses or a Williamson Act contract. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) 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])?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber,

aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (California Public Resources Code Section 12220[g]). Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (California Public Resources Code Section 4526).

The project site is graded and does not contain any forestland, not does it abut any such land. Additionally, the project site is within the Specific Plan area and is designated as School in the Specific Plan. Therefore, as with the approved project, the proposed project would not conflict with existing zoning for forest land or timberland zoned Timberland Production. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

d) Result in the loss of forest land or conservation of forest land to non-forest use?

No Impact/No Changes or New Information Requiring Preparation of an EIR. See response to Section 4.2(c). The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact/No Changes or New Information Requiring Preparation of an EIR. See responses to Sections 4.2(a), (b), and (c). The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.2.3 Agriculture and Forestry Resources Mitigation Measures Identified in the Certified EIR

No mitigation measures related to agricultural resources were identified in the Certified EIR.

4.3 AIR QUALITY

4.3.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to air quality identified in the Certified EIR.

- **Regional Air Quality Standards.** The Certified EIR concluded that construction of the approved project would result in air quality emissions that would exceed the South Coast Air Quality Management District (South Coast AQMD) construction thresholds. The Certified EIR concluded that mitigation measures

AQ-1 through AQ-7 would lessen construction-related impacts; however, even with implementation of mitigation measures, impacts would remain significant and unavoidable.

The Certified EIR concluded that the approved project's long-term air pollutant emissions would exceed the South Coast AQMD's operational thresholds. The Certified EIR identified project design features to reduce impacts; however, even with implementation of these features, impacts would remain significant and unavoidable.

- **Localized Air Quality Impacts.** The Certified EIR determined that the approved project would not generate carbon monoxide (CO) hot spots and nearby sensitive receptors would not be affected by project-related local air quality impacts. Therefore, impacts were determined to be less than significant.

- **Air Quality Management Plan Consistency.** The Certified EIR determined that the approved project would not be consistent with the Air Quality Management Plan (AQMP) because the approved project would exceed South Coast AQMD thresholds and would potentially result in a long-term impact on the region's ability to meet state and federal ambient air quality standards (AAQS). Impacts were identified as significant and unavoidable.

- **Odors.** The Certified EIR also determined that during the approved project's construction phase, potential odors may arise from construction equipment and the potential satellite wastewater treatment plant included as part of the approved project. The Certified EIR identified mitigation measures AQ-7 and AQ-8 to reduce odor impacts emanating from approved project construction and operation to a less than significant level.

- **Cumulative Air Quality Impacts.** The Certified EIR determined that emissions associated with construction and operation of the approved project would exceed the South Coast AQMD thresholds, resulting in a significant, cumulative air quality impact for which the project region is in nonattainment under an applicable State or National AAQS. Despite implementation of applicable feasible mitigation measures, project design features, and adherence with applicable rules and regulations, the approved project was determined to result in a significant unavoidable air quality impact.

4.3.2 Impacts Associated with the Proposed Project

Methodology

Methodology to evaluate air quality impacts under CEQA has been updated since the Certified EIR was adopted. South Coast AQMD has published updates on its website to the *Air Quality Analysis Guidance Handbook* that provides local governments with guidance for analyzing and mitigating project-specific air quality impacts. South Coast AQMD's most recent air quality analysis model, CalEEMod Version 2022.1, was utilized to compare the impacts of the approved project to the proposed project. Resulting construction and operational emissions are compared to the significance thresholds adopted by South Coast AQMD. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and the air quality modeling can be found in Appendix A.

4. Environmental Analysis

The analysis in this section is based partly on the following technical study, which is included as Appendix B to this EIR Addendum.

- *Health Risk Assessment Proposed Banning School Site*, PlaceWorks, September 2023

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR identified that the approved project would not be consistent with South Coast AQMD's AQMP because buildout of the approved project would exceed South Coast AQMD's thresholds and would potentially result in a long-term impact on the region's ability to meet State and National AAQS. Since the EIR was certified, South Coast AQMD adopted the 2022 AQMP in December 2022 (South Coast AQMD 2022).

The regional emissions inventory for the SoCAB is compiled by South Coast AQMD and the Southern California Association of Governments (SCAG). Regional population, housing, and employment projections developed by SCAG are based in part on cities' general plan land use designations. These projections form the foundation for the emissions inventory of the AQMP. These demographic trends are incorporated into SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), *Connect SoCal*, to determine priority transportation projects and vehicle miles traveled in the SCAG region (SCAG 2024). Because the AQMP strategy is based on projections from local general plans and SCAG's regional growth forecasts, projects that are consistent with the local general plan are considered consistent with the air-quality-related regional plan. As discussed in Section 4.14, *Population and Housing*, the proposed project entails the construction of a new school campus and would not introduce additional housing units or additional infrastructure facilities to the Specific Plan area. The proposed project would support the planned population anticipated for the Specific Plan area and would not induce substantial population growth in the area. Construction activities associated with the proposed project would result in short-term employment only and would end upon project completion.

As described under Impact 4.3(b), construction and operation of the proposed project would not result in air quality emissions that would exceed the South Coast AQMD thresholds. Moreover, the Certified EIR identified construction of school sites within Planning Area 20 and Planning Area 68. Therefore, the proposed project would not result in a substantial increase in magnitude of maximum daily air pollutant emissions compared to what was evaluated under the approved land uses in the Certified EIR. The proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR identified that construction and operation of the approved project would cumulatively contribute

to the nonattainment designations of the SoCAB. Mitigation measures AQ-1 through AQ-8 would reduce impacts to the extent feasible; however, air quality was identified as a significant and unavoidable impact in the Certified EIR. Applicable mitigation measures (AQ-1 through AQ-5 and AQ-7) are listed below under Section 4.3.3, *Air Quality Mitigation Measures Identified in the Certified EIR*.

Short-Term Regional Construction Impacts

Construction activities produce combustion emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the construction crew. Construction of the proposed project would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from site preparation, grading, building construction, paving, and architectural coating. Air pollutant emissions from construction activities on-site would vary daily as construction activity levels change. Maximum daily construction emissions associated with the proposed project are provided in Table 2. Mitigation measures identified for the approved project and applicable to the proposed project were included in the modeling, including Mitigation Measures AQ-1; AQ-3; and AQ-7, which requires use of offroad engines certified by the U.S. Environmental Protection Agency (EPA) as rated Tier 4 interim or higher.

Table 2 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs/day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Certified EIR Maximum Daily Emissions[3]	310	320	571	<1	489	104
South Coast AQMD Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Significant?	Yes	Yes	Yes	No	Yes	Yes
Year 2027						
Site Preparation	1	15	29	<1	8	4
Grading	1	20	37	<1	4	2
Building Construction	1	10	19	<1	1	<1
Building Construction, Paving, and Architectural Coating	66	18	32	<1	2	1
Maximum Daily Emissions	66	20	37	<1	8	4
South Coast AQMD Regional Construction Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2023.
Note: lbs/day = pounds per day
1 Based on the preliminary information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.
2 Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers. Includes dust control measures per Mitigation Measures AQ-1, low-VOC coating per Mitigation Measure AQ-3, and Tier-4 interim emissions for offroad equipment per Mitigation Measure AQ-7.
3 Based on the maximum daily construction emissions in Tables 4.3-5 through 4.3-9 in the Certified EIR.

The SoCAB is designated nonattainment for O_3, PM_{10}, $PM_{2.5}$ under the State standards and nonattainment for O_3, $PM_{2.5}$, and lead (Los Angeles County only) for National standards (CARB 2024). According to South Coast AQMD methodology, any project that does not exceed or can be mitigated to less than the daily threshold

values would not add significantly to a cumulative impact (South Coast AQMD 1993). As shown in Table 2, the maximum daily construction emissions for all criteria air pollutants would be less than their respective South Coast AQMD regional construction thresholds.

The proposed project would be developed in accordance with all applicable development and design standards identified in the Specific Plan and in accordance with the District's standards. Moreover, the Certified EIR identified construction of school sites within Planning Area 20 and Planning Area 68. Therefore, the proposed project would not result in a substantial increase in magnitude of maximum daily air pollutant emissions compared to what was evaluated under the approved land uses in the Certified EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Long-Term Regional Operational Impacts

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The Certified EIR determined that operation of the approved project would generate emissions that would exceed South Coast AQMD's operational thresholds even with mitigation incorporated.

As identified in the Traffic Study provided by DJ&A (2024) (see Appendix H), the proposed project would generate an estimated 2,724 weekday vehicle trips. As shown in Table 3, it is anticipated that operation of the proposed project would result in emissions that would not exceed the South Coast AQMD regional operation-phase significance thresholds.

Table 3 Maximum Daily Regional Operation Emissions

Source	Maximum Daily Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Certified EIR Maximum Daily Emissions[1]	805	794	5,682	6	1,047	204
South Coast AQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	Yes	Yes	Yes	No	Yes	Yes
Emissions						
Mobile[2]	9	4	60	<1	11	3
Area	4	<1	6	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Total	13	5	66	<1	11	3
South Coast AQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2023.
Notes: lbs: Pounds. Highest winter or summer emissions report.
[1] Based on the maximum daily emissions in Table 4.3-10 in the Certified EIR.
[2] Based on trip generation data provided by DJ&A (see Appendix H).

The proposed project is well within what was evaluated under the approved land uses in the Certified EIR and would generate nominal operational criteria air pollutant emissions compared to the South Coast AQMD regional significance thresholds and the approved project. In addition, emissions from building energy use would be minimized because the new school buildings would meet the current California Building Energy Efficiency Standards—future iterations of the California Building Standards Code are assumed to achieve greater energy efficiency performance.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. As concluded in the Certified EIR, siting of residences or other sensitive receptors on-site is not anticipated to result in a significant exposure or impact to CO from local roadways. Impacts were deemed less than significant, and no mitigation measures were required.

Localized Construction Impacts

Localized Significance Thresholds

Localized significance thresholds (LST) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare (South Coast AQMD 2008). They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the project site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA). The nearest off-site sensitive receptors are the single-family residences along Nectar Drive to the south.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 4 shows the maximum daily construction emissions (pounds per day) generated during on-site construction activities compared with the South Coast AQMD's screening-level LSTs, for sensitive receptors within 82 feet for NO_X, CO, PM_{10}, and $PM_{2.5}$. As shown in Table 5, the construction of the proposed project would not generate construction-related on-site emissions that would exceed the screening-level LSTs. Thus, project-related construction activities would not have the potential to expose sensitive receptors to substantial pollutant concentrations.

4. Environmental Analysis

Table 4 Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)[1]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
South Coast AQMD 1.31 Acre LST	**117**	**1,169**	**7.25**	**4.62**
Building Construction	9	15	0.10	0.09
Building Construction, Paving, and Architectural Coating	17	27	0.21	0.20
South Coast AQMD 3.50 Acre LST	**192**	**2,179**	**15.49**	**8.50**
Site Preparation	15	28	7.96	4.06
South Coast AQMD 4.00 Acre LST	**207**	**2,391**	**17.32**	**9.33**
Grading	19	35	3.97	1.60
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2008 and 2011.
Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment are included in the analysis. Screening level LSTs are based on a 82 ft receptor for NO_X, CO, PM_{10} and $PM_{2.5}$ in SRA 29.
[1] Where specific information for project-related construction activities or processes was not available modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.
[2] Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers. Includes dust control measures per Mitigation Measures AQ-1, low-VOC coating per Mitigation Measure AQ-3, and Tier-4 interim emissions for offroad equipment per Mitigation Measure AQ-7.

Table 5 Health Risk Assessment Results

Source	Cancer Risk (per million)		Chronic Hazard Index	Acute (1-Hour) Hazard Index	8-Hour Hazard Index
	Staff Exposure	Student Exposure			
Refined Modeling					
2a San Gorgonio Pass Hospital – generator 1	0.01	0.02	<0.001	n/a	n/a
2b San Gorgonio Pass Hospital – generator 2	0.01	0.02	<0.001	n/a	n/a
Screening Evaluation					
1a Cloverleaf Ent (ng boiler)	<0.001	0.02	<0.001	<0.001	<0.001
1b Cloverleaf Ent (generator)	0.02	0.13	<0.001	n/a	n/a
2c San Gorgonio (ng boiler 1)	0.001	0.05	<0.001	<0.001	<0.001
2d San Gorgonio (ng boiler 1)	0.001	0.05	<0.001	<0.001	<0.001
2e San Gorgonio (ng boiler 1)	0.001	0.05	<0.001	<0.001	<0.001
Summed, all Sources	**0.04**	**0.34**	**0.001**	**<0.001**	**<0.001**
South Coast AQMD Threshold	10	10	1.0	1.0	1.0
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**

Source: CARB HARP2 (2022) and South Coast AQMD Rule 1401 Screening Calculator (2017).

Development under the proposed project would not introduce new types of construction processes or activities compared to what was previously considered in the Certified EIR. Additionally, the proposed project would not result in developing a new area because the project site is within Planning Area 20, which was identified as a school site in the Certified EIR. Thus, it is not anticipated that development of the land uses accommodated under the proposed project would result in new or increase the severity of construction-related LST impacts compared to the land uses considered for the project site in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Construction Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In 2015, the Office of Environmental Health Hazards Assessment (OEHHA) adopted guidance for preparation of health risk assessments, which included the development of a cancer risk factor and non-cancer chronic reference exposure level for DPM over a 30-year time frame (OEHHA 2015). Currently, South Coast AQMD does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. The proposed project is anticipated to be completed in approximately 11 months, which would limit the exposure to off-site receptors. Furthermore, construction activities would not generate on-site exhaust emissions that would exceed the screening-level construction LSTs.

As mentioned previously, the proposed project would develop a new school campus to serve TK through 8th-grade students and would not introduce new types of construction processes or activities compared to what was previously considered in the Certified EIR. Therefore, the proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Localized Operational Impacts

Operational LSTs

The types of land uses that typically generate substantial quantities of criteria air pollutants and TACs include industrial (stationary sources) and warehousing (truck idling) land uses. The proposed project would involve the operation of a new school campus within Planning Area 20, which would be in accordance with the underlying Specific Plan designation and analyzed under the Certified EIR. Thus, the type of land use proposed under the proposed project would not be expected to generate substantial quantities of criteria air pollutants and TACs. Overall, it is not anticipated that development of the land uses accommodated under the proposed project would result in new or increased severity of operation-related localized air quality impacts compared to the land uses considered in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

CO Hotspot

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed-up and idle for longer periods

and are subject to reduced speeds. These pockets could exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations.

The Certified EIR identified that implementation of the approved project would not produce the volume of traffic required to generate a CO hotspot. Currently, the SoCAB is designated attainment under the California AAQS and National AAQS for CO. The South Coast AQMD does not currently have an adopted screening criteria to determine whether a project may have the potential to generate a CO hotspot; therefore, the screening criteria recommended by the Bay Area Air Quality Management District (BAAQMD) was utilized instead. According to BAAQMD, under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2023).

The proposed project would result in a maximum of 888 AM peak hour vehicle trips at buildout (DJ&A 2024). As identified in the Traffic Study, Landmark Way west of Creekside Avenue currently experiences up to 1,666 daily vehicle trips (see Appendix H). Utilizing the industry standard practice of dividing average daily vehicle trips by 10 to approximate peak hour trips, Landmark Way currently experiences an estimated 167 peak hour trips. Based on the Certified EIR, the approved project would generate 62,263 net daily trips or approximately 6,226 peak hour trips. Combined with trips generated by the proposed project, Landmark Way could experience up to 6,393 peak hour trips, which is less than BAAQMD's 44,000 vehicles per hour criteria. Therefore, the proposed project would not introduce new vehicle trips that may result in a CO hotspot when combined with existing traffic volumes, and impacts would be less than significant. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Health Risk Assessment

A project-specific health risk assessment (HRA) was prepared for the proposed project and is included as Appendix B to this EIR Addendum. The results of the HRA are provided in Table 5. The excess cancer risk was calculated to be 0.04 per million for adult school staff and 0.34 per million for students. In comparison to the threshold level of 10 in a million, carcinogenic risks are below the significance threshold value for both school staff and students. It should be noted that the summed risk for students is conservative because the risks from the screening level evaluation for residential receptors were added to the refined modeling results for school students. Cancer risks for school students would be less than the predicted screening level risks for 9-year residential receptors due to differences in the exposure duration, daily exposure frequency, and age sensitivity factors.

For non-carcinogenic effects, the chronic hazard index identified for each toxicological endpoint totaled less than one for both school staff and students. Therefore, chronic non-carcinogenic hazards are below the significance threshold. Additionally, the acute 1-hour and 8-hour non-carcinogenic hazards were also below the significance thresholds.

Based on a comparison to the carcinogenic and non-carcinogenic thresholds established by OEHHA and South Coast AQMD, hazardous air emissions generated from the emission sources within a quarter-mile radius are not anticipated to pose an actual or potential endangerment to students and staff occupying the project site and no mitigation measures are required.

Therefore, the proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that odor impacts from the approved project would be less than significant with implementation of mitigation measures AQ-7 and AQ-8. Similarly, the proposed project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, *Nuisance*, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project involves construction of a new school campus in the Specific Plan area and would not constitute one of the above land uses that are known sources of objectionable odors. Emissions from construction equipment, such as diesel exhaust and VOCs from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration and temporary and would not affect a substantial number of people.

Therefore, the proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.3.3 Air Quality Mitigation Measures Identified in the Certified EIR

The following mitigation measures are taken directly from the Certified EIR and apply to and will be implemented for the proposed project. Where necessary, mitigation measures have been updated, refined, and/or supplemented to ensure mitigation is implemented as intended for the proposed project. Any changes

to mitigation measures are identified here in ~~strikeout~~ text to indicate deletions and **underline bold** text to signify additions.

It should be noted that the last bullet point for AQ-5 is not applicable to the proposed project because the proposed project does not involve mass grading on a large scale and there are no interim conditions of the site that would need to be revegetated. It should be noted that mitigation measure AQ-6 is not applicable to the proposed project because the proposed project does not involve mass grading of the entire Specific Plan area. It should be noted that portions of AQ-7 are not applicable to the proposed project because the District will receive the project site as a super pad, and the master developer of the Specific Plan shall handle the traffic plan requirements as future development throughout the Specific Plan area continues. Mitigation measure AQ-8 is not applicable to the proposed project because the proposed project does not include a wastewater treatment plant.

MM AQ-1 ~~Prior to issuance of any Grading Permit, the Director of Public Works and the Building Official shall confirm that the Grading Plan, Building Plans, and specifications stipulate that,~~ **During grading,** in compliance with ~~SCAQMD~~ **South Coast Air Quality Management District (South Coast AQMD)** Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the ~~SCAQMD's~~ **South Coast AQMD's** Rules and Regulations. In addition, in accordance with ~~SCAQMD~~ **South Coast AQMD** Rule 402, the ~~Applicant~~ **District's Construction Contractor** shall implement dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:

- All active portions of the construction site shall be watered at least twice daily to prevent excessive amounts of dust;
- On-site vehicle speed shall be limited to ~~15~~ **25** miles per hour;
- All on-site roads shall be paved where feasible, watered as needed, or chemically stabilized;
- **Use of nontoxic soil stabilizers on unpaved roads and inactive areas to reduce wind erosion;**
- Visible dust beyond the property line which emanates from the project shall be prevented to the maximum extent feasible, **including use of street sweepers on paved roads once per month;**
- All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site;
- Track-out devices shall be used at all construction site access points;

- All delivery truck tires shall be watered down and/or scraped down prior to departing the job site; and
- Replace ground cover on disturbed areas quickly.

The District shall be responsible for ensuring that contractors comply with this measure during construction.

MM AQ-2 All trucks that are to haul excavated or graded material on-site shall comply with State Vehicle Code Section 23114 (Spilling Loads on Highways), with special attention to Sections 23114(b)(F), (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads. ~~Prior to the issuance of grading permits, the Applicant shall coordinate with the appropriate City of Banning Engineer on hauling activities compliance~~. **The District shall be responsible for ensuring that contractors comply with this measure during construction.**

MM AQ-3 ~~Prior to the issuance of building permits, t~~**T**he ~~City building official~~ **District** shall confirm that construction plans and specifications include the following measures, which shall be implemented to reduce ROG emissions resulting from application of architectural coatings:

- Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent;
- Coatings and solvents with a ROG content lower than required under Rule 113 shall be used;
- Construction and building materials that do not require painting shall be used to the extent feasible; and
- Pre-painted construction materials shall be used to the extent feasible.

MM AQ-4 Prior to ~~issuance of any Grading Permit~~ **the commencement of grading activities**, the ~~Director of Public Works and the Building Official~~ **District** shall confirm that the Grading Plan, Building Plans and specifications stipulate that, in compliance with SCAQMD Rule 403, ozone precursor emissions from construction equipment vehicles shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications, to the satisfaction of the ~~City Engineer~~ **District**. A set of maintenance records shall be provided to the ~~City~~ **District** before grading commences. The ~~City Inspector~~ **District** shall be responsible for ensuring that contractors comply with this measure during construction.

MM AQ-5 Prior to ~~issuance of any Grading Permit~~ **the commencement of grading activities**, the grading plan shall indicate dust management measures for review and approval by the ~~City Engineer~~ **District**, to identify viable dust control measures and include a monitoring plan to

be implemented throughout the construction phases of the ~~Specific Plan~~ **project site**. In accordance with the ~~Specific Plan and City's Municipal Code~~ **the District's standards**, the dust management measures shall minimize wind-blown particles by including:

- All applicable mitigation measures identified in ~~this EIR~~ **the Butterfield Specific Plan Environmental Impact Report (EIR)** (related to dust control) and otherwise required by the City or SCAQMD;
- An erosion and sediment control plan to minimize wind or waterborne transport of soils onto adjacent properties, streets, storm drains, or drainages; and
- ~~A Revegetation Plan to address interim conditions between initial grading and final site development. The Revegetation Plan, although focused on the control of wind and water erosion, shall considered compatibility with fuel modification zone requirements, drought tolerant landscape requirements, and potential ongoing livestock grazing. Special techniques such as wind fences shall also be considered, to minimize surface soil and dust during high wind events.~~

MM AQ-7 The following measures shall be implemented during construction to substantially reduce NO_X related emissions. They shall be included in the Grading Plan, Building Plans, and specifications. **The District shall be responsible for ensuring that contractors comply with these measures during construction:**

- Off-road diesel equipment operators shall be required to shut down their engines rather than idle for more than five minutes, and shall ensure that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation and ~~SCAQMD~~ **California Air Resources Board (CARB)** Rule 2449.
- ~~The following note shall be included on all grading plans:~~ **The following measure shall be specified in the District's Construction bid for the project** "The ~~City~~ **District** shall require construction contractors to utilize diesel powered construction equipment that meets EPA-Certified Tier ~~II~~ IV emissions standards, or higher according to the following:
  - ~~January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards at a minimum. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.~~
  - ~~Post-January 1, 2015:~~ All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with **Best Available Control Technology**

(BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are not less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- A copy of each unit's certified tier specification, BACT documentation, and CARB or ~~SCAQMD~~ **South Coast AQMD** operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

- ~~Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm"~~

- The contractor ~~and applicant, if the applicant's equipment is used,~~ shall maintain construction equipment engines by keeping them tuned and regularly serviced to minimize exhaust emissions.
- ~~Low sulfur fuel for stationary construction equipment shall be required. This is required by SCAQMD Rules 431.1 and 431.2.~~
- Existing power sources (i.e., power poles) shall be used when available.
- Construction parking shall be located on-site where possible and shall be configured to minimize traffic interference.
- Obstruction of through-traffic lanes shall be minimized by providing temporary traffic controls such as flag persons, cones and/or signage during all phases of construction when needed to maintain smooth traffic flow. Construction shall be planned so that lane closures on existing streets are kept to a minimum.
- Construction operations affecting traffic shall be scheduled for off-peak hours to the extent feasible.
- ~~Develop a traffic plan to minimize traffic flow interference from construction activities. The plan shall specify the times during which construction activities will occur and particular times when travel lanes cannot be blocked (e.g., peak traffic periods as directed by the affected City Engineer). The plans shall provide details regarding the placement of traffic control, warning devices and detours. As a supplement to the traffic plan, the construction contractor shall coordinate with the affected agency to determine the need for a public information program which would inform area residents, employers and business owners of the details concerning construction schedules and expected travel delays, detours, and blocking of turning movements lanes at intersections. The public information programs could utilize various media venues (e.g., newspaper, radio, television, telephone hot lines, internet website, etc.) to disseminate information such as:~~
  - ~~Overview of project information~~

- ~~Weekly updates on location of construction zones;~~
- ~~Times when construction activities will occur and when traffic delays, and blockage of intersection turning movements can be expected; and~~
- ~~Identification of alternate routes which could be used to avoid construction delays~~

4.4 BIOLOGICAL RESOURCES

4.4.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to biological resources identified in the Certified EIR.

- **Habitat and Special Status Species.** The Certified EIR determined that implementation of the approved project would result in the realignment and reconstruction of the Smith Creek corridor development of the entire Specific Plan area. The realignment and reconstruction of Smith Creek was determined to result in increased diversity and amount of native plants and other landscape vegetation along the creek banks and within the flow line. The Certified EIR stated that 31 species of special-status plants, 9 sensitive vegetation communities, and 36 species of special-status wildlife were recorded on or within the vicinity of the Specific Plan area. Despite the presence of these species, the Certified EIR determined that with the implementation of mitigation measures BIO-1 and BIO-2, impacts on species identified as a candidate, sensitive, or special-status species would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Sensitive Communities and Wetlands.** The Certified EIR determined that the approved project may result in impacts on drainages under jurisdiction of the United States Army Corps of Engineers, California Department of Fish and Wildlife, and/or the Regional Water Quality Control Board. To minimize impacts to on- and off-site jurisdictional areas, the Certified EIR identified mitigation measures BIO-3 to reduce impacts on jurisdictional water and wetlands to a less than significant level. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Wildlife Movement Corridors.** The Certified EIR determined that the Specific Plan area could serve as a wildlife movement corridor and that the addition of vegetation and trees as part of the approved project would provide additional habitat for migratory birds and other species on-site. The Certified EIR concluded that with the implementation of mitigation measures BIO-1, impacts on migratory birds would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Conflict with Policies.** The Certified EIR determined that the approved project would enhance vegetative cover within the Specific Plan area, including trees and shrubs. The Certified EIR concluded that the approved project would result in less than significant impacts. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Habitat Conservation Plans.** The Certified EIR determined that the approved project is with an area regulated by a Multiple Species Habitat Conservation Plan, which, among other things, establishes regulations protecting burrowing owl. The Certified EIR determined that the approved project would be required to implement mitigation measure BIO-2 to reduce impacts on burrowing owl to a less than significant level. Additionally, the Certified EIR determined that because the approved project would result in impacts on wetlands, the approved project would be required to implement mitigation measures BIO-3 and BIO-4 to reduce impacts on jurisdictional waters and wetlands to a less than significant level. Moreover, the approved project would be required to implement mitigation measure BIO-5 to reduce impacts on sensitive habitats including jurisdictional areas. The Certified EIR concluded that with the implementation of mitigation measures, impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.4.2 Impacts Associated with the Proposed Project

Would the proposed project:

a) Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR concluded that impacts related to habitat modification would be less than significant with the implementation of mitigation measures BIO-1 and BIO-2. The proposed project would occur within the same boundaries analyzed for the approved project in the Certified EIR. As shown in Figure 3, *Aerial View*, the project site is graded and disturbed. Also, mitigation measures BIO-1 and BIO-2 were already completed by the master developer during the project site's mass grading phase and do not apply to the proposed project. As with the approved project, the proposed project would result in less than significant impacts related to habitat modification. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR found several significant impacts related to riparian habitats, and mitigation measures were identified to mitigate

these losses. The proposed project is within the boundaries of the approved project; specifically, the project site is graded and disturbed and does not contain any riparian habitat or other sensitive natural community. The proposed project would not result in any substantial adverse effect on any riparian habitat or other sensitive natural community; no impacts would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR concluded that the approved project would result in several significant impacts related to wetland habitats, and mitigation measures were identified to mitigate these losses. The proposed project is within the boundaries of the approved project; specifically, the project site is graded and disturbed and does not contain any wetland habitat. The proposed project would not result in any substantial adverse effect on any state or federally protected wetlands; no impacts would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR concluded that the approved project would not interfere with the movement of wildlife, and impacts were determined to be less than significant. The proposed project is within the boundaries of the approved project; the project site is graded and disturbed. Therefore, as with the approved project, the proposed project would not interfere substantially with the movement of wildlife; impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR concluded that the approved project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance and impacts were determined to be less than significant. The proposed project is within the boundaries of the approved project. Additionally, the project site is graded and disturbed; no trees are within the boundaries of the project site. The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree

preservation policy or ordinance; no impacts would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the approved project would not conflict with the provisions of an adopted habitat conservation plan with the implementation of mitigation measures and impacts would be less than significant. The proposed project would occur within the boundaries of the approved project; the project site is graded and disturbed. The project site is within the boundaries of the Western Riverside County Multiple Species Conservation Plan boundaries; however, the project site is not within a criteria cell (RCA 2024). As with the approved project, the proposed project would not result in conflicts with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan; no impacts would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.4.3 Biological Resources Mitigation Measures Identified in the Certified EIR

The Certified EIR outlined a number of mitigation measures to reduce impacts on biological resources. It should be noted that mitigation measures BIO-1, BIO-2, BIO-4, and BIO-5 were already completed by the master developer during the project site's mass grading phase and do not apply to the proposed project. Mitigation Measure BIO-3 is not applicable to the proposed project because the project site does not contain any jurisdictional waters, and the proposed project would be developed within PA 20 of the Specific Plan.

4.5 CULTURAL RESOURCES

4.5.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to cultural resources identified in the Certified EIR.

- **Archaeological Resources.** The Certified EIR determined that no previously recorded cultural sites exist within the Specific Plan area boundaries; however, 10 archeological sites and 9 built environment cultural resources were identified within 1.0 mile of the Specific Plan area. While there are no identified archaeological resources within the Specific Plan area or within the areas proposed for infrastructure improvements, the Certified EIR determined that there is a potential to discover unknown resources during ground-disturbing activities. The Certified EIR identified mitigation measures CUL-2 and CUL-3 to reduce impacts on archaeological resources to a less than significant level. Additionally, the 2016 EIR Addendum

concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Historic Resources.** The Certified EIR determined that the Specific Plan area is located approximately 0.25 mile away from the Highland Springs Resort, which is considered a historic resource. Additionally, a field survey of the area indicated three historic-era sites and four isolated historic-era artifacts in the Specific Plan area. However, none of these resources meet the required criteria for listing. The Certified EIR determined that the approved project may result in potential impacts to unknown historical resources in the Specific Plan area near known refuse scatter. The Certified EIR identified mitigation measure CUL-3 to reduce impacts on unknown historical resources to a less than significant level. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Human Remains.** The Certified EIR determined that the approved project could encounter human remains. The Certified EIR identified mitigation measures CUL-2 and CUL-4, which would mitigate impacts to a level of insignificance. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.5.2 Impacts Associated with the Proposed Project

The analysis in this section is based partly on the following technical study, which is included as Appendix C to this EIR Addendum.

- *Phase 1 Cultural Resources Technical Report for Banning School*, Banning, Riverside County, California, ASM Affiliates, October 2024

a) Cause as substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that three historic-era sites are within the Specific Plan area; however, none of these resources meet the required criteria for listing in either the National Register or the California Register, and impacts would be less than significant with mitigation incorporated. The project site is graded, disturbed, and vacant; no historic-era structures are located within the boundaries of the project site. Moreover, the proposed project would be limited to the boundaries of PA 20 in the Specific Plan, on soils that have been previously disturbed. The proposed project would result in no impacts on historical resources. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the approved project could encounter archaeological resources, and with implementation of mitigation measures identified in the Certified EIR, impacts would be less than significant. The proposed project would occur within the boundaries of the approved project, specifically, within Planning Area 20. Additionally, the project site is graded and disturbed (ASM 2024). Thus, although subsequent grading and excavation (fine grading, utility trenching) would be part of the proposed project, they would disturb soils that were previously disturbed; therefore, the potential for encountering archeological resources during ground-disturbing activities is negligible; impacts would be less than significant. Also, mitigation measure CUL-2 was already completed by the master developer during the project sites mass grading phase and does not apply to the proposed project. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the approved project could encounter human remains and with implementation of mitigation measures identified in the Certified EIR impacts would be less than significant. The proposed project would occur within the boundaries of the approved project. Additionally, the project site is graded and disturbed. Thus, although subsequent grading and excavation (fine grading, utility trenching) would be part of the proposed project, they would disturb soils that were previously disturbed; therefore, the potential for encountering human remains would be negligible; impacts would be less than significant. Also, mitigation measure CUL-2 was already completed by the master developer during the project sites mass grading phase and does not apply to the proposed project. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.5.3 Cultural Resources Mitigation Measures Identified in the Certified EIR

It should be noted that the analysis for impacts on paleontological resources was moved to the Geology and Soils section of Appendix G of the State CEQA Guidelines. Mitigation measure CUL-1 is discussed in Section 4.7 of this EIR Addendum. It should be noted that mitigation measure CUL-1 was already completed by the master developer during the project sites mass grading phase and does not apply to the proposed project. Also, mitigation measure CUL-3 is not applicable to the proposed project because the proposed project would not be within 30 meters of the refuse scatter (LSA-PDH0601-H-2) within the Specific Plan.

4.6 ENERGY

4.6.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR acknowledged that the approved project would create a demand for more energy resources and must comply with the Building Energy Efficiency Standards (CCR Title 24). Energy impacts were analyzed under Section 4.12, *Public Services and Utilities,* of the Certified EIR.

- **Energy Facilities.** The Certified EIR determined that the approved project would result in the relocation, including undergrounding, of the Southern California Edison transmissions lines located within the Specific Plan area; replacement of existing poles; and construction of new power poles. The physical impact associated with the relocation, undergrounding, and construction of SCE transmission lines and poles would occur in areas already disturbed by approved project grading and construction activity. The Certified EIR concluded that impacts related to construction of new energy production and/or transmission facilities were less than significant with implementation of Mitigation Measure HAZ-6, which would ensure protection of both workers and the Southern California Gas Company (SoCalGas) pipeline during grading activities.

- **Energy Consumption.** The Certified EIR determined that the approved project's uses would be designed and constructed pursuant to applicable provisions of California Code of Regulations Title 24 and the City's energy and lighting efficiency standards. Additionally, the approved project would be required to comply with California's Energy Efficiency Standards for Residential and Nonresidential Buildings. The Certified EIR concluded that consumption of energy and cumulative energy utilization associated with buildout of the approved project were less than significant.

In January 2019, the Natural Resources Agency revised Appendix G of the CEQA Guidelines to include checklist items relating to evaluating the project's energy use during project construction or operation and relating to consistency with state or local plans for renewable energy or energy efficiency, capturing the requirements in Appendix F of the CEQA Guidelines. The Certified EIR was certified before these checklist topics were added to the CEQA Guidelines and therefore does not include a discussion related to these checklist topics. Because the environmental and regulatory settings for the proposed project have changed since the certification of the EIR, the following discussion is provided to update conditions relative to development of the proposed project.

4.6.2 Impacts Associated with the Proposed Project

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Short-Term Construction Impacts

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the approved project would not encourage the wasteful or inefficient use of energy and impacts would be less than significant.

Construction of the proposed project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions and would result in short-term transportation-related energy use.

Electrical Energy

Like the approved project, construction of the proposed project would require electricity use to power the construction equipment. The majority of construction equipment would be gas or diesel powered, and electricity would not be used to power most of the construction equipment. Electricity use during construction would vary during different phases of construction. Later construction phases could result in the use of electric-powered equipment for interior construction and architectural coatings. It is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Therefore, proposed project-related construction activities would not result in wasteful or unnecessary electricity demands. Overall, the impacts of the proposed project are within the levels and types of environmental impacts previously disclosed in the Certified EIR.

Natural Gas Energy

It is not anticipated that construction equipment would be powered by natural gas for either the approved project or the proposed project. Therefore, impacts would be less than significant with respect to natural gas usage. Overall, the impacts of the proposed project are within the levels and types of environmental impacts previously disclosed in the Certified EIR.

Transportation Energy

Transportation energy use during construction of the approved project and proposed project would come from delivery vehicles, haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered. The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction. In addition, all construction equipment would cease operating upon completion of proposed project construction. Thus, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure.

Furthermore, to limit wasteful and unnecessary energy consumption, the construction contractors would minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. Construction trips would also not result in unnecessary use of energy since the project site is centrally located and is served by the regional freeway systems (e.g., I-10) that provide the most direct routes from various areas of the region. Thus, energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary.

Conclusion

The proposed project would not result in any new or more severe significant construction-related energy impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Long-Term Impacts During Operation

Operation of the proposed project, similar to the approved project, would generate demand for electricity and natural gas and would result in transportation energy use. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; use of on-site equipment and appliances; indoor and outdoor lighting; and plug loads associated with monitors, speakers, and other small electronics.

Electrical Energy

Electrical service to the campus would be provided by Banning Electric Utility (BEU) through connections to existing off-site electrical lines as needed. As shown in Table 6, the new electricity demand from the proposed project would total 938,242 kilowatt-hours per year.

Table 6 Operation-Related Electricity Consumption

Land Use[1]	Electricity (kWh/year)
Proposed Classroom Buildings	865,262
Parking Lot	72,980
Total Electricity Consumption	**938,242**

Source: Appendix A.
Note: kWh=kilowatt-hour
[1] The electricity use per year is based on the proposed square footage of the school buildings and parking lot.

The Certified EIR stated that the approved project would comply with the energy use guidelines in Title 24 of the California Administrative Code. Similarly, the proposed project would be consistent with the requirements of the Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). The 2022 Title 24 standards became effective in January 2023 and would be more stringent than the standards that applied to the approved project.

In addition to the proposed building energy efficiency, BEU is required to comply with the State's Renewable Portfolio Standard (RPS), which mandates utilities to procure a certain proportion of electricity from eligible renewable and carbon-free sources and increasing the proportion through the coming years with an ultimate procurement requirement of 100 percent by 2045. The RPS requirements would support use of electricity by the proposed project that is generated from renewable or carbon-free sources. Therefore, the proposed project would generally be consistent with the goals outlined in Appendix F of the CEQA Guidelines regarding increasing energy efficiency, decreasing reliance on fossil fuels, and increasing renewable energy sources. Overall, operation of the proposed project would result in a less than significant impact related to electricity.

Impacts of the proposed project are within the levels and types of environmental impacts previously disclosed in the Certified EIR.

Natural Gas Energy

As seen in Table 7, *Operation-Related Natural Gas Consumption*, the total natural gas demand by the new classroom buildings would total 3,182,929 kilo-British thermal units per year.

Table 7 Operation-Related Natural Gas Consumption

Land Use	Natural Gas (kBTU/year)[1]
Proposed Classroom Buildings	3,182,929
Total Natural Gas Consumption	**3,182,929**

Source: Appendix A.
Note: kBTU=kilo-British thermal units.
[1] The natural gas use per year is based on the proposed square footage of the school buildings.

While the proposed project would result in an increase in natural gas demand, the new classroom buildings would be consistent with the requirements of the Building Energy Efficiency Standards. As a result, the proposed project would generally result in a decrease in per capita natural gas consumption from what would have occurred for the approved project due to the improvements in the Building Energy Efficiency Standards since the preparation of the Certified EIR. Compliance with these codes would decrease overall reliance on fossil fuels to meet the natural gas demands of the campus and comply with the goals outlined in Appendix F of the CEQA Guidelines. Therefore, operation of the proposed project, similar to development pursuant to the Certified EIR, would result in less than significant impacts with respect to natural gas usage. Overall, the impacts of the proposed project are within the levels and types of environmental impacts previously disclosed in the Certified EIR.

Transportation Energy

Both the approved project and proposed project would consume fuel and other forms of transportation energy during operations from the use of motor vehicles. Based on the Traffic Study, the proposed project is anticipated to generate an estimated 2,724 average daily vehicle trips (see Appendix H). While the fuel type and efficiency of vehicles used by the proposed project, such as the average miles per gallon of gasoline, is unknown, subsequent transportation energy consumption would be necessary to transport students and staff to and from the proposed campus. However, the proposed project is a local-serving land use and would draw attendance from adjacent and nearby residential areas that, without the proposed project, would need to travel elsewhere to attend a comparable school.

Fuel efficiency of vehicles after buildout would on average improve compared to vehicle fuel efficiencies experienced under existing conditions, thereby resulting in a lower per capita fuel consumption assuming travel distances, travel modes, and trip rates remain the same. The improvement in fuel efficiency would be attributable to the statewide fuel reduction strategies and regulatory compliances (e.g., Corporate Average Fuel Economy [CAFE] standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to land use development projects, but to car

manufacturers. Thus, the District does not have direct control in determining the fuel efficiency of vehicles manufactured and that are made available to staff and students. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing the population of the project site's region more fuel-efficient vehicle options.

The proposed project would also provide four driveways to efficiently facilitate traffic flow for pick-up/drop-off activities on campus, which would help to decrease transportation-related energy and reduce excessive idling. Furthermore, since vehicle fuel efficiencies would improve year over year through buildout, the proposed project is expected to result in a decrease in overall per-capita transportation energy consumption when compared to that of the approved project. As such, impacts would be less than significant with respect to operation-related fuel usage for the proposed project as compared to the approved project.

Conclusion

The proposed project would not result in any new or more severe significant operation-related energy impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. As mentioned previously, the Natural Resources Agency revised Appendix G of the CEQA Guidelines to include checklist item relating to consistency with state or local plans for renewable energy or energy efficiency in January 2019 to capture the requirements in Appendix F of the CEQA Guidelines. The Certified EIR was certified before this checklist topic was added to the CEQA Guidelines and therefore does not include a discussion related to this specific checklist topic.

The following evaluates consistency of the proposed project with California's Renewables Portfolio Standard program and SCAG's 2024-2050 RTP/SCS.

California Renewables Portfolio Standard Program

The State's electricity grid is transitioning to renewable energy under California's RPS Program. Eligible renewable sources under the RPS include wind, small hydropower, solar, geothermal, biomass, and biogas. The RPS goals have been updated since adoption of Senate Bill (SB) 1078 in 2002. In general, California has RPS requirements of 33 percent renewable energy by 2020 (SB X1-2), 40 percent by 2024 (SB 350), 50 percent by 2026 (SB 100), 60 percent by 2030 (SB 100), 90 percent by 2035 (SB 1020), and 100 percent carbon free by 2045 (SB 100 and SB 1020). The statewide RPS goal is not directly applicable to individual development projects but to utilities and energy providers such as BEU, which is the utility that would provide all of electricity needs for the proposed project. BEU's compliance with the RPS goals would support the State in meeting its objective in transitioning to renewable energy.

The Certified EIR did not specifically analyze energy because the topic was not officially part of the CEQA Guidelines' Appendix G checklist until January 1, 2019, when the Natural Resources Agency updated

Appendix G of the CEQA Guidelines. However, as shown in Section 4.3, *Air Quality*; 4.5, *Climate Change*; and Section 4.12, *Public Services and Utilities*, of the Certified EIR, the approved project would comply with applicable design standards such as the Building Energy Efficiency Standards. Similarly, the proposed project would be subject to the standards mentioned in the approved project, including the Building Energy Efficiency Standards and CALGreen. Because the proposed project would comply with the latest 2022 energy standards, it would offer an improvement over the energy standards of the approved project. Therefore, implementation of the proposed project would not conflict or obstruct plans for renewable energy and energy efficiency, and no impact would occur.

Consequently, the proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

SCAG's Regional Transportation Plan / Sustainable Communities Strategy

SCAG adopted the 2024-2050 RTP/SCS, *Connect SoCal*, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecast development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024).

As described in Section 4.14, *Population and Housing*, construction of the new school campus would support the planned population anticipated for the Specific Plan area and would not induce substantial population growth in the area. Furthermore, the new school would be a locally serving land use and, as described in Section 4.17, *Transportation*, the proposed project would not create significant impacts related to vehicle miles traveled (VMT) and can be excluded from VMT analysis. Therefore, implementation of the proposed project would not interfere with implementation of Connect SoCal.

Consequently, the proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.6.3 Energy Mitigation Measures Identified in the Certified EIR

The Certified EIR did not evaluate energy impacts, and therefore no mitigation measures were identified in the Certified EIR.

4.7 GEOLOGY AND SOILS

4.7.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to geology and soils identified in the Certified EIR.

- **Fault Rupture.** The Certified EIR determined that the approved project is within a seismically active region of Southern California that is subject to seismic activity associated with the San Andreas, San Jacinto, and Elison fault systems. The Certified EIR stated that the Specific Plan area is located between the active Banning Fault Zone to the east and the inactive Banning Fault Zone to the west. The central segment of the Banning Fault that traverses the northernmost quadrant of the Specific Plan area consists of two fault segments, one of which is governed by an Alquist-Priolo Fault Zone. The Certified EIR concluded that the approved project would result in less than significant impacts due to fault rupture given that the proposed buildings would be developed in accordance with building codes and setbacks established by the State and City. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Seismic Safety.** The Certified EIR determined that the approved project has the potential to be impacted by seismic events through the life of the project, but that the project impacts would be fully mitigated to the extent feasible and to acceptable levels of risks through implementation of mitigation measure GEO-1 and compliance with City-required building and grading requirements. The Certified EIR concluded that impacts would be less than significant with mitigation incorporated. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Liquefaction.** The Certified EIR determined that the Specific Plan area is in an area with a low potential for liquefaction. Therefore, impacts associated with seismic-related ground failure were determined to be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Landslides.** The Certified EIR determined that the Specific Plan area is in an area with moderate potential for landslides given the Specific Plan area's proximity to the foothills of the San Bernardino Mountains. Additionally, the approved project would be required to comply with the City's Building Code and would be required to implement mitigation measures GEO-2 and GEO-3 to reduce potential impacts related to ground failure. Therefore, impacts related to seismically induced ground failure were determined to be less than significant with mitigation incorporated. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Soil Erosion.** The Certified EIR determined that the approved project could result in a substantial increase in soil erosion resulting from grubbing and clearing of site vegetation in preparation for on-site grading activities. However, the Certified EIR determined that subsequent to development within the Specific Plan area, hydro-mulching and reseeding would support the temporary revegetation of the Specific Plan and would reduce impacts related to the loss of topsoil. Further, the Certified EIR determined that impacts related to the loss of topsoil would be reduced to a less than significant level with adherence to grading procedures outlined in the City's Municipal Code and implementation of best management practices. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Unstable Soils.** The Certified EIR determined that landslide and liquefaction impacts would be less than significant. The Certified EIR stated that the Specific Plan area is within an area of low potential for lateral spreading and ground subsidence. The Certified EIR determined that the Specific Plan area is not located on soil that is considered unstable or could be unstable as a result of the implementation of the approved project. However, given the slopes in the Specific Plan area, the Certified EIR required the implementation of mitigation measure GEO-2. The Certified EIR concluded that with the implementation of mitigation, impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Expansive Soils.** The Certified EIR determined that the Specific Plan area is within an area with a low potential for expansion; nonetheless, development under the approved project would be required to comply with the City's grading standards and design requirements with respect to expansive soils to ensure that potential risks to life and/or property would be less than significant. Additionally, the Certified EIR identified mitigation measure GEO-2 to reduce impacts related to expansive soils. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Septic Tanks.** The Certified EIR determined that the approved project would include the construction of a wastewater conveyance system, which would connect to an on-site satellite wastewater treatment plant. The approved project would not use septic tanks or alternative wastewater disposal systems. No impact would occur. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Paleontological Resources.** The Certified EIR determined that the approved project is underlain by sediments that have the potential to support unknown paleontological resources. As such, the Certified EIR determined that the development of the approved project could encounter paleontological resources. The Certified EIR identified mitigation measure CUL-1 to reduce impacts on unknown paleontological resources to a less than significant level. Additionally, the 2016 EIR Addendum concluded that the reduced

project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.7.2 Impacts Associated with the Proposed Project

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that a fault segment governed by an Alquist-Priolo Gault Zone is located in the northernmost quadrant of the Specific Plan area; however, areas proposed for improvement under the proposed project are not within the Alquist-Priolo Fault Zone. The project site is in the southern portion of the Specific Plan area and outside of an active fault zone or Alquist-Priolo Fault Zone. As with the approved project, the proposed project would be required to be constructed in accordance with the latest California Building Code standards and incorporate mitigation measures GEO-1 and GEO-3 from the Certified EIR to mitigate impacts to less than significant levels. Therefore, as with the approved project, impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

ii. Strong seismic ground shaking?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. As with the approved project, the proposed project would be subject to seismic ground shaking. However, the project site is not at a greater risk of seismic activity or impacts than other sites in southern California. Additionally, as with the approved project, the proposed project would be required to comply with the applicable design standards in the most recent California Building Code to reduce the potential for ground shaking impacts and would incorporate applicable mitigation measures identified in the Certified EIR, including GEO-1. The CBC contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. Compliance with the requirements of the CBC for structural safety during a seismic event would reduce hazards from strong seismic ground shaking. Therefore, as with the approved project, impacts would be less than significant with mitigation incorporated. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR found that the Specific Plan area is within an area of low liquefaction potential, and impacts were determined to be less than significant. The project site is within the boundaries of the Specific Plan area. Therefore, as with the approved project, impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

iv. Landslides?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that compliance with the City's Building Code and implementation of GEO-2 and GEO-3 would reduce the approved project's impacts related to landslides. The project site is graded and vacant and not located near any natural or manufactured slopes. The proposed project would not result in greater landslide impacts than the approved project. Additionally, as with the approved project, the proposed project would incorporate applicable mitigation measures GEO-1 and GEO-3 from the Certified EIR to reduce impacts to less than significant levels. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used. As with the approved project, the proposed project would be required to comply with the National Pollution Discharge Elimination System (NPDES) permit and control construction-related erosion through preparation of a Storm Water Pollution Prevention Plan (SWPPP), which specifies best management practices (BMP) for temporary erosion controls. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Therefore, soil erosion impacts from project-related grading and construction activities would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR.

Since the certification of the Certified EIR, the project site has been rough graded and has little variation in topography. No major slopes or bluffs are on or adjacent to the project site. After project completion, the project site would be developed with a new school campus and would not contain exposed or bare soil. Soil erosion from proposed project operation would not occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed

project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) Be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. Hazards from liquefaction and lateral spreading are addressed in Section 4.7.2(a)(iii), and landslide hazards are addressed in Section 4.7.2(a)(iv); as concluded in these sections, no significant impact would occur.

According to the geotechnical study conducted for the project site under the approved project, there is a low potential for subsidence in the Specific Plan area. Additionally, the Certified EIR determined that the Specific Plan area is not located on soil that is considered unstable or could be unstable as a result of approved project implementation. As with the approved project, the proposed project would be developed in accordance with the latest California Building Code design requirements and mitigation measures GEO-1 and GEO-3, which would mitigate any issues related to compressible soils. Therefore, as with the approved project, impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the Specific Plan area is in an area with a low potential for expansive soil. As with the approved project, the proposed project would be developed in accordance with the lates California Building Code standards. Additionally, as with the approved project, the proposed project would incorporate mitigation measures GEO-1 and GEO-3 from the Certified EIR to mitigate impacts related to expansive soils. These measures and requirements would be incorporated into the grading operations. Implementation of these measures would reduce potential expansive soils impacts to below a level of significance. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. As with the approved project, implementation of the proposed project would not involve the construction or use of septic tanks or other alternative wastewater disposal system. Therefore, no impact would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR identified that the Specific Plan area is underlain by sediments that have the potential to support paleontological resources. The project site is within the boundaries of the Specific Plan area—specifically, within PA 20, which is graded and disturbed. Also, mitigation measure CUL-1 was already completed by the master developer during the project site's mass grading. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.7.3 Geology and Soils Mitigation Measures Identified in the Certified EIR

The following mitigation measures are taken directly from the Certified EIR and apply to and will be implemented for the proposed project. Where necessary, mitigation measures have been updated, refined, and/or supplemented to ensure mitigation is implemented as intended for the proposed project. Any changes to mitigation measures are identified here in ~~strikeout~~ text to indicate deletions and **underline bold** text to signify additions.

MM GEO-1 All structures on the Project site shall be constructed pursuant to the most current applicable seismic standards, as determined by the ~~City of Banning (City) as part of the tract map, grading plan, and building permit review processes~~ **District's review process**, with building setbacks as recommended by the **DSA and California Geological Survey** ~~Project's Seismic Hazard Analysis (Geocon 2005)~~. Design criteria developed for project structures shall also be based on the most current standards of practice and design parameters suggested by the Structural Engineers Association of California based on the recommendations and amendments to the California Building Code by the Division of the State Architect for specific types of building and occupancies.

MM GEO-3 The Project site shall be constructed pursuant to the following mitigation measure contained in the City of Banning General Plan Subsequent EIR, Geotechnical Element:

- During the site grading, all existing vegetation and debris shall be removed from areas that are to receive compacted fill. ~~Any trees to be removed shall have a minimum of 95 percent of the root systems extracted.~~ Man-made objects shall be over excavated and exported from the site. Removal of unsuitable materials may require excavation to depths ranging from 2 to 4 feet or more below the existing site grade.

- All fill soil, whether on site or imported, shall be approved by the individual project soils engineer prior to placement as compaction fill. All fill soil shall be free from vegetation, organic material, cobbles and boulders greater than 6 inches in diameter, and other debris. Approved soil shall be placed in horizontal lifts or appropriate thickness as prescribed by the soils engineer and watered or aerated as necessary to obtain near-optimum moisture content.

- Fill materials shall be completely and uniformly compacted to not less than 90 percent of the laboratory maximum density, as determined by the American Society for Testing and Materials (ASTM) Test Method D-1557- 78, or equivalent test method acceptable to the **DSA**~~City Building Department~~.

- The Project soils engineer shall observe the placement of fill and take sufficient tests to verify the moisture content, uniformity, and degree of compaction obtained. In-place soil density should be determined by the sand-cone method, in accordance with ASTM Test Method D1556-64 (74), or equivalent test method acceptable to the **DSA**~~City Building Department~~.

- Finish cut slopes generally shall not be inclined steeper than 2:1 (horizontal to vertical). Attempts to excavate near-vertical temporary cuts for retaining walls or utility installation in excess of 5 feet may result in gross failure of the cut and may possibly damage equipment and injure workers. All cut slopes must be inspected during grading to provide additional recommendations for safe construction.

- Finish fill slopes shall not be inclined steeper than 2:1 (horizontal to vertical). Fill slope surfaces shall be compacted to 90 percent of the laboratory maximum density by either overfilling and cutting back to expose a compacted core or by approved mechanical methods.

- Foundation systems that utilize continuous and spread footings are recommended for the support of one- and two-story structures. Foundations for higher structures must be evaluated based on structure design and on-site soil conditions.

- Retaining walls shall be constructed to adopted building code standards and inspected by the Building Inspector.

- Positive site drainage shall be established during finish grading. Finish lot grading shall include a minimum positive gradient of 2 percent away from structures for a minimum distance of 3 feet and a minimum gradient of 1 percent to the street or other approved drainage course.

- Utility trench excavations in slope areas or within the zone of influence of structures should be properly backfilled in accordance with the following:

    - Pipes shall be bedded with a minimum of 6 inches of pea gravel or approved granular soil. Similar material shall be used to provide a cover of at least 1 foot over the pipe. This backfill shall then be uniformly compacted by mechanical means or jetted to a firm and unyielding condition.

    - Remaining backfill may be fine-grained soils. It shall be placed in lifts not exceeding 6 inches in thickness or as determined appropriate, watered, or aerated to near

optimum moisture content, and mechanically completed to a minimum of 90 percent of the laboratory maximum density.

- Pipes in trenches within 5 feet of the top of slopes or on the face of slopes shall be bedded and backfilled with pea gravel or approved granular soils as described above. The remainder of the trench backfill shall comprise typical onsite fill soil mechanically completed as described in the previous paragraph.

4.8 GREENHOUSE GAS EMISSIONS

4.8.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR analyzed global climate change and greenhouse gas emissions (GHG) emissions.

- **GHG Emissions.** The Certified EIR identified that GHG emissions impacts of the approved project were potentially significant. With implementation of mitigation measures GHG-1 and GHG-2, the approved project would be required to incorporate sustainable practices, including water, energy, solid waste, and transportation efficiency measures. While the approved project's design features and mitigation measures would reduce GHG emissions to the extent feasible, project-related incremental contributions and cumulative development would cause GHG impacts to remain significant and unavoidable.

- **Conflict with Applicable Plan, Policy, or Regulation.** The Certified EIR determined that the approved project would not obstruct or conflict with the statewide goals of Assembly Bill (AB) 32 and regional targets under Senate Bill (SB) 375. However, because measures implementing AB 32 and SB 375 require further action by other State and federal agencies and implementation and effectiveness is not ensured, the approved project's incremental contribution to climate change would be significant and unavoidable.

4.8.2 Impacts Associated with the Proposed Project

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases, into the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[1]

[1] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

4. Environmental Analysis

Information on manufacturing of cement, steel, and other "life cycle" emissions that would occur as a result of the project are not applicable and are not included in the analysis.[1] Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the State's SB 32 and AB 1279 inventory but treats this short-lived climate pollutant separately.[2] A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Addendum.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. As mentioned previously, the Certified EIR determined that the approved project-related incremental contributions and cumulative development would cause GHG impacts to remain significant and unavoidable. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Project-related construction and operation-phase GHG emissions are shown in Table 8. Implementation of the proposed project would result in the construction of a new school campus, which would generate GHG emissions. Consistent South Coast AQMD guidance, the annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the proposed project.

Table 8 Project-Related Operation GHG Emissions

Source	Approved Project Business-As-Usual GHG ($MTCO_2e$/Year)[3]	Proposed Project GHG ($MTCO_2e$/Year)	Percentage
Mobile[1]	110,747	1,242	73%
Area	18,387	3	<1%
Energy	15,715	363	21%
Water	9,672	17	1%
Solid Waste	3,125	54	3%
Refrigerants	—	<1	<1%
Amortized Construction Emissions[2]	3,473	16	1%

[1] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (CNRA 2018). Because the amount of materials consumed during the operation or construction of the Proposed Project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

[2] Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017a.).

Table 8 Project-Related Operation GHG Emissions

Source	Approved Project Business-As-Usual GHG ($MTCO_2e$/Year)[3]	Proposed Project GHG ($MTCO_2e$/Year)	Percentage
Total	**161,119**	**1,695**	100%

Source: CalEEMod, Version 2022.1. Appendix A.
Notes: $MTCO_2e$ = metric ton of carbon dioxide equivalent
[1] Vehicle trips provided by DJ&A (Appendix H).
[2] Total construction emission are amortized over 30 years per South Coast AQMD Working Group methodology (South Coast AQMD 2008).
[3] Based on the business-as-usual emissions in Table 4.5-2 in the Certified EIR.

Water demand, wastewater generation, solid waste generation, and energy demand for the project site would incrementally increase due to the introduction of a new school campus. However, as shown in Table 8, construction and operation of the proposed project would not generate annual emissions that would exceed the annual emissions identified in the Certified EIR. Furthermore, project-level emissions would not exceed the South Coast AQMD Working Group threshold of 3,000 metric tons of CO_2-equivalent ($MTCO_2e$) emissions.

Operational GHG emissions from building energy use would also be minimized because the school buildings shall be constructed to meet the latest Building Energy Efficiency Standards and CALGreen. Furthermore, as discussed in Section 4.3(b), it is anticipated that the construction activities and construction-related emissions under the proposed project would be similar to what was previously considered in the Certified EIR. Therefore, implementation of the proposed project is not anticipated to result in a substantial increase in GHG emissions compared to what was previously considered in the Certified EIR.

Consequently, the proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the approved project would be consistent with statewide goals of AB 32 and regional targets under SB 375. However, the measures implementing these regional and State plans require further action by other agencies and implementation is not ensured, thus the approved project's incremental contribution to climate change would remain potentially significant and unavoidable. The following evaluates consistency of the proposed project with CARB's Scoping Plan and SCAG's RTP/SCS.

CARB Scoping Plan

Since certification of the EIR, CARB has adopted the 2022 Climate Change Scoping Plan. The latest 2022 Climate Change Scoping Plan outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279 (CARB 2022). The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. However, new regulations

adopted by the State agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard and changes in the corporate average fuel economy standards (e.g., Pavley I and Pavley California Advanced Clean Cars program).

The proposed project's GHG emissions would be reduced through compliance with the programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32, SB 32, and AB 1279. Thus, the proposed project would not conflict with the statewide strategies identified to implement the CARB 2022 Scoping Plan. Therefore, there are no changes or new significant information which would require preparation of a supplemental or subsequent EIR.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

Since the certification of the Certified EIR, SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024).

In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region. Connect SoCal does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers.

The proposed project would occur as one of the two school sites identified in Specific Plan area of the Certified EIR. Specifically, the proposed project would develop Planning Area 20; Planning Area 68 was identified as the other school site. The proposed project would serve 1,200 TK through 8th grade students within the Specific Plan area. Construction of a new school campus would also reduce VMT and fuel usage by providing a closer option for students to attend. Therefore, the proposed project would not interfere with SCAG's ability to implement the regional strategies in Connect SoCal.

Consequently, the proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.8.3 Greenhouse Gas Emissions Mitigation Measures Identified in the Certified EIR

The following mitigation measures are taken directly from the Certified EIR and apply to and will be implemented for the proposed project. Where necessary, mitigation measures have been updated, refined, and/or supplemented to ensure mitigation is implemented as intended for the proposed project. Any changes to mitigation measures are identified here in ~~strikeout~~ text to indicate deletions and **underline bold** text to signify additions.

Portions of mitigation measure GHG-1 are not applicable to the proposed project because the majority of the measures apply to residential and community facility improvements. Additionally, the proposed project shall be constructed to meet the latest Building Energy Efficiency Standards and CALGreen Standards. Portions of mitigation measure GHG-2 are not applicable to the proposed project because the proposed project does not include residential or commercial development. It should be noted that mitigation measure GHG-3 is not applicable to the proposed project because this project is a smaller component within the larger Specific Plan, and the District does not have jurisdiction on the location of transit stops on city roadways.

MM GHG-1 ~~Prior to the issuance of building permits,~~ **t**~~T~~he following measures shall be reflected on ~~applicable tract maps,~~ building **plans**~~permits~~, improvement plans, landscape plans, and/or grading plans:

A. Green Building Practices

- ~~**Water Conservation** – All appliances such as showerheads, lavatory faucets and sink faucets shall comply with efficiency standards set forth in Title 20, California Administrative Code Section 1604(f). Title 24 of the California Administrative Code Section 1606(b) prohibits the installation of fixtures unless the manufacturer has certified to the California Energy Conservation compliance with the flow rate standards.~~
- ~~**Water Conservation** – Low-flush toilets shall be installed as specified in California State Health and Safety Code Section 17921.3 and the County Green Building Ordinance (as applicable in Riverside County).~~
- **Water Conservation** - All common area irrigation areas shall be capable of being operated by a computerized irrigation system which includes an on-site weather station/evapotranspiration (ET) gage capable of reading current weather data and making automatic adjustments to independent run times for each irrigation valve based on changes in temperature, solar radiation, relative humidity, rain, and wind. In addition, the computerized irrigation system shall be equipped with flow sensing capabilities, thus automatically shutting down the irrigation system in the event of a mainline break or broken head. All common area irrigation controllers shall also include a rain-sensing automatic shutoff.
- **Water Conservation** – Common-area landscaping shall emphasize drought-tolerant vegetation. Plants of similar water use shall be grouped to reduce over-irrigation of

low-water-using plants. Those areas not designed with drought-tolerant vegetation shall be gauged to receive irrigation using the minimal requirements.

- ~~**Water Conservation –** Residential occupants shall be informed as to the benefits of low-water-using landscaping and sources of additional information related to water conservation.~~
- ~~**Water Conservation –** Community center or recreational facilities with a pool amenity shall be conditioned to provide and use a pool cover to reduce water evaporation and retain heat.~~
- ~~**Water Conservation –** Water conservation standards shall be as noted in the Tier 1 measures of the 2010 California Green Building Standards.~~
- **Energy, Water, and Recycling** – The ~~builder~~ **District** shall ~~be conditioned to~~ provide the following:

    - Energy-efficient appliances
    - Energy-efficient indoor lighting
    - Water-efficient smart controllers for landscaping
    - Water-efficient plumbing in all buildings
    - ~~Integration of recycles into residential home design, creating areas in the home to promote recycling (additional trash cans in cabinets, etc.)~~
    - ~~Energy Efficiency standards shall be noted in the Tier 1 measures of the 20120 California Green Building Standards.~~

- ~~**Carbon Sequestration** – The builder shall plant an average of approximately 40 trees per landscaped acre (where landscaping is provided) as a means to capture (sequester) carbon dioxide emissions and to provide shade to the buildings, which can decrease the need for air conditioning.~~
- ~~**Green Education Program** – In order to increase awareness of green building practices and to promote water and energy conservation, the builder(s) will develop and implement a green educational program. The program will include but not necessarily be limited to a pamphlet that educates and promotes conservation practices that homeowners can implement, with specific guidance on landscaping with drought-tolerant plants, use of efficient irrigation systems, compact florescent lighting, and other measures that help lower greenhouse gas (GHG) emissions.~~
- **Energy Efficient Outdoor Lighting** – Lighting for public streets, parking areas, and recreation areas shall utilize energy-efficient light and mechanical, computerized, or photo cell switching devices to reduce unnecessary energy usage.
- ~~**Energy Conservation –** Community center or recreational facilities with a pool amenity shall be conditioned to install energy-efficient pumps and motors, such as variable speed motors~~.

B. Solid Waste Measures

- Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).
- ~~Shall comply with State model ordinance AB 1327, Chapter 18, California Solid Water Reuse and Recycling Access Act of 1991, which requires interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.~~

C. Transportation and Motor Vehicles

- Limit idling time for commercial vehicles, including delivery and construction vehicles, pursuant to applicable **California Air Resources Board** ~~SCAQMD and City~~ requirements.
- ~~Promote ride-sharing programs (e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a website or message board for coordinating rides). The actual percentage of potential ride sharing vehicle spaces will be determined in coordination with the City Planning Director or designee based on square footage and use type (e.g., shopping center, office, or fitness center, etc.) prior to approval of a site plan within the commercial land use Planning Areas.~~
- ~~Provide adequate bicycle parking near non-residential building entrances to promote cyclist safety, security, and convenience. Provide facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking).~~
- ~~All golf carts and Neighborhood Electric Vehicles (NEVs) shall be electrical powered only.~~

MM GHG-2 The ~~Butterfield Specific Plan shall be conditioned to allow the following uses (as reflected on future tract maps and commercial site plans), to further~~ **District shall** promote renewable energy resources, including:

- ~~Allowing rooftop solar on all structures, subject to City Municipal Code and related building permit provisions;~~
- ~~Allowing electric vehicle charging stations at all commercial, park, golf course, multi-family residential, and school areas, subject to a Conditional Use Permit Provide electric vehicle charging consistent with the California Green Building Standards Code Tier 2 voluntary standards.; and~~ **Provide electric vehicle charging consistent with California Green Building Standards Code Tier 2 voluntary standards.**
- ~~Allowing hydrogen vehicle fueling stations within the Commercial zone, subject to a Conditional Use Permit.~~

4.9 HAZARDS AND HAZARDOUS MATERIALS

4.9.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to hazards and hazardous materials identified in the Certified EIR.

- **Use and Transport of Hazardous Materials.** The Certified EIR determined that the construction and operation of new development under the approved project would result in less than significant impacts related to the transport, use, and/or disposal of hazardous materials with mitigation incorporated (HAZ-1 through HAZ-3). With the exception of the wastewater treatment plant, uses included as part of the approved project were not anticipated to generate significant quantities of hazardous materials or to generate significant quantities of hazardous wastes requiring transport. The Certified EIR concluded that impacts would be less than significant with mitigation incorporated. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Hazards to the Public.** The Certified EIR determined that construction and operation of new development included under the approved project could have resulted in hazards to the public or environment through the accidental upset or release of hazardous materials caused by accidental spillage of hazardous materials during construction or operation, or as a result of the exposure of contaminated soil during grading and trenching activities. The Certified EIR identified mitigation measures HAZ-3 through HAZ-8 to reduce impacts related to the accidental release of hazardous materials. The Certified EIR concluded that impacts would be less than significant with mitigation incorporated. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Hazards to Schools.** The Certified EIR determined that the approved project would result in development of residential, commercial, and park uses within 0.25 mile of a school site. While these uses would have likely stored or used hazardous materials, the Certified EIR determined that the small volume and low concentration of hazardous materials for these uses would make the risk of upset less than significant. The Certified EIR disclosed that Southern California Edison (SCE) maintains an easement that runs through the middle of the Specific Plan area in an east-west direction. The required setback between the SCE easement and the power line would be determined based on the kilovoltage (kV) of the power lines. The school sites would have complied with applicable setbacks to minimize impacts associated with the potential risk of upset, thereby reducing impacts to a less than significant level. The proposed schools would not have been located within 1,500 feet of the existing or related high-pressure gas line in the Specific Plan area. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Hazardous Materials Sites.** The Certified EIR determined that the Specific Plan area is not included on a list of hazardous materials sites; however, several sites within the vicinity of the Specific Plan were identified on hazardous materials sites. While these sites were identified as potential sources of hazardous materials, the Certified EIR determined that these sites represent a low risk due to their distance from the Specific Plan area. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Emergency Management Plans.** The Certified EIR determined that the Specific Plan area is within an area regulated by the City's Multi-Hazard Functioning Planning Document or the City's Emergency Operations Plan. The Certified EIR determined that the approved project could result in impacts related to the potential interference with these emergency plans due to interference with emergency access and off-site infrastructure improvements. However, the Certified EIR identified mitigation measures HAZ-9 and HAZ-10 to reduce impacts related to interference with emergency management plans and access. The Certified EIR concluded that impacts would be less than significant with mitigation incorporated. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Airport Hazards.** The Certified EIR determined that the Specific Plan area is located over three miles at its closest point to the Banning Municipal Airport. No other airports or private airstrips are located within two miles of the Specific Plan area. The Certified EIR concluded that no impacts would occur. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Wildfire.** The Certified EIR determined that the Specific Plan area is within an area designated as High and Very High Fire Hazard Severity Zone. The Certified EIR determined that with the implementation of mitigation measures HAZ-11 through HAZ-13, impacts related to wildland fires would be reduced to less than significant level. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.9.2 Impacts Associated with the Proposed Project

The analysis in this section is based partly on the following technical studies, which are included as Appendices D and E, respectively, of this EIR Addendum.

- *Preliminary Environmental Assessment Equivalent Report New School Site 5800 Landmark Way*, Ninyo & Moore Geotechnical & Environmental Sciences Consultants, April 9, 2024

- *Geological and Environmental Hazards Assessment Report 20-Acre Site in Banning*, PlaceWorks, February 2024

4. Environmental Analysis

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the approved project would include land uses that would have some utilization of and/or association with toxic and/or hazardous substances. The anticipated nature and quantity of materials utilized in the Specific Plan area would be typical of those common in commercial operations and residential uses. The Certified EIR determined that with implementation of mitigation measures the risk of impacts associated with hazardous materials would be reduced to a less than significant level. The proposed project would result in the development of a new school campus within the boundaries of the approved project. Specifically, the proposed project would be developed within Planning Area 20 of the Specific Plan area, which was identified as a school site. All activities performed pursuant to the proposed project would be required to comply with the existing federal, State, and local regulations governing hazardous materials storage, handing, and management as with the approved project, including those associated with existing permits issued to the Specific Plan area. Construction activities proposed as part of the proposed project would continue to be required to comply with mitigation measures HAZ-1 and HAZ-3 to reduce short-term impacts related to hazardous waste and materials.

Furthermore, the project site is within the boundaries of the approved project and is in an area that has been previously graded during development activities of the approved project. Therefore, the risk of encountering contaminated soils during the construction phase of the proposed project is extremely low. However, if contaminated soils are encountered, health and safety procedures per the requirements of federal and state regulations would be implemented. Because no demolition is proposed, workers would not be exposed to risks of asbestos-containing materials or lead-based paint. The proposed project would result in less than significant impacts. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project would not involve construction materials or practices that would create a greater hazard to the public or the environment compared to the approved project. During operation of the proposed project, activities that use or store hazardous materials are required to maintain records regarding the storage, use, and disposal of hazardous materials. As with the approved project, the proposed project would adhere to all applicable federal and State regulations that govern hazardous materials and waste management would help to minimize reasonably foreseeable upsets or accidents involving the release of hazardous materials into the environment; impacts would be less than significant. Moreover, the proposed project would continue to comply with mitigation measure HAZ-5, requiring the removal of potentially hazardous waste, soil, and debris from the site.

A Preliminary Environmental Assessment (PEA) was prepared for the proposed project by Ninyo & Moore and is included as Appendix D of this Addendum. The PEA detected arsenic in concentrations ranging from 1.03 to 1.95 milligram per kilogram (mg/kg), which is less than the Department of Toxic Substances Control–established Upper Bound concentration of 12 mg/kg. Additionally, organochlorine pesticides were not detected above the laboratory limits in the soil samples collected. The PEA concluded that conditions indicative of releases or threatened releases of hazardous substances were not identified (Ninyo & Moore 2024).

A Geological and Environmental Hazards Assessment Report (GEHA) was prepared for the proposed project by PlaceWorks (Appendix E). The GEHA did not identify any significant hazards related to the project site apart from seven high-pressure distribution lines just beyond 1,500 feet from the project site. The GEHA recommended a Water Pipeline Safety Hazard Assessment. A discussion of the findings of the Water Pipeline Safety Hazard Assessment is in Section 4.10, *Hydrology and Water Quality*, of this EIR Addendum.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project entails the development of a new school campus within the boundaries of the approved project. It should be noted that one other school campus was proposed within the boundaries of the approved project, in Planning Area 68. The nearest existing school to the project site is Sundance Elementary School, approximately 0.6 mile to the west in the city of Beaumont. The proposed project does not include elements or aspects that would create or otherwise result in hazardous emissions. As with the approved project, the proposed project would result in less than significant impacts. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the Specific Plan area is not listed on a hazardous materials site compiled pursuant to Government Code Section 65962.5. The proposed project is within the boundaries of the approved project. The project site is identified as a school site on the Department of Toxic Substances Control's EnviroStor database and is identified as a "school investigation" project. As previously discussed, a PEA was prepared for the proposed project and concluded that that conditions indicative of releases or threatened releases of hazardous substances were not identified. The project site is not listed as a hazardous waste site on a list of hazardous materials sites compiled pursuant to Government code Section 65962.5. No impact would occur. The proposed project would not result in any new or more severe significant impacts than those

identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

e) 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 or excessive noise for people residing or working in the project area?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the Specific Plan area, at its closest point, is more than three miles west of the Banning Municipal Airport. The project site is within the boundaries of the approved project. The project site is not within an airport land use plan or within two miles of a public airport or public use airport. The proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area; no impacts would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project is within the boundaries of the approved project. The Specific Plan area does not contain any emergency facilities, nor does it serve as an emergency evacuation route. The proposed project would not interfere with the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As with the approved project, the proposed project would comply with the design requirements of these plans. Impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project is within the boundaries of the approved project. The Certified EIR determined that the approved project is in a Very High Fire Hazard Severity Zone (FHSZ); however, the approved project would incorporate applicable fuel modifications and mitigation measures to decrease the risk of wildfires. According to the California Department of Forestry and Fire Protection (CAL FIRE) map, "Very High Fire Hazard Severity Zones in Local Responsibility Area: Banning," the project site itself is not in a very high FHSZ (CalFire 2009); therefore, impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.9.3 Hazards and Hazardous Materials Mitigation Measures Identified in the Certified EIR

The following mitigation measures are taken directly from the Certified EIR and apply to and will be implemented for the proposed project. Where necessary, mitigation measures have been updated, refined, and/or supplemented to ensure mitigation is implemented as intended for the proposed project. Any changes to mitigation measures are identified here in ~~strikeout~~ text to indicate deletions and **underline bold** text to signify additions.

It should be noted that mitigation measures HAZ-4 through HAZ-13 are not applicable to the proposed project. Mitigation measure HAZ-4 is not applicable because the project site does not contain an abandoned well, and HAZ-4 has already been implemented by the master developer. Mitigation measures HAZ-5 and HAZ-10 are not applicable because the District would receive the project site in a super pad condition; thus, the proposed project's construction activities would not entail mass grading of the project site. Mitigation measure HAZ-6 is not applicable because the proposed project is not in proximity of the high-pressure gas pipeline nor does the proposed project include any modifications to the existing high-pressure gas pipeline. Mitigation measure HAZ-7 is not applicable because the proposed project does not entail replacement of the high-pressure gas line. Mitigation measure HAZ-8 is not applicable because the proposed project does not entail the installation of above-ground fuel storage tanks. Mitigation measure HAZ-9 has been implemented by the master developer. Mitigation measure HAZ-11 is not applicable because the proposed project does not include a subdivision. Mitigation measure HAZ-12 is not applicable because the proposed project would not remain as undeveloped open space for six months or more following buildout of the Specific Plan. Mitigation measure HAZ-13 has been implemented by the master developer.

MM HAZ-1 The grading plans shall indicate methods to address potential contamination discovered during construction as well as safety considerations for on-site construction personnel and the general public. Details of the plan shall include, but not be limited, to the following:

- Procedures for identification of contaminated soil during earthmoving operations;
- Immediate measures to protect workers and the public from exposure to contaminated areas (e.g., fencing or hazard flagging, covering of contaminated soils with plastic, etc.) and prevent migration of the contaminants to the surrounding environment; and
- Steps to be taken following initial discovery of contaminated soils. Notification shall be made to the local environmental health officials ~~and the City's construction inspector(s)~~ immediately following identification of previously unknown contamination within the construction area. In the event hazardous substances are encountered during site grading, work shall immediately cease in the area and the property owner/developer shall retain a qualified hazardous materials engineer to assess the impacts and prepare a response plan using risk-based cleanup standards applicable to residential land use. Upon approval of the response plan by the **Banning** Fire Department or other agency, as applicable, the engineer shall obtain any required permits, oversee the removal of such features and/or

conduct the response work to the satisfaction of the **Banning** Fire Department or other agency, as applicable, until closure status is attained.

MM HAZ-2 As part of construction specifications, procedures for the fueling and maintenance of construction vehicles shall be required to minimize the potential for accidental release of hazardous materials. This shall include locating the refueling and maintenance areas a minimum of 500 feet from occupied residential uses. Drip pans shall be placed under motorized equipment when parked on the site to prevent soil contamination from dripping oil or other fluids.

MM HAZ-3 Hazardous construction waste management practices are to be implemented pursuant to the BMPs contained in the California Stormwater BMP Handbook (2009) and shall include the following:

- All hazardous construction wastes as defined by Title 22 Division 4.5, or listed in 40 CFR Parts 110, 117, 261, or 302, including but not limited to, petroleum products, concrete curing compounds, palliatives, septic wastes, stains, wood preservatives, asphalt products, pesticides, acids, paints, solvents, roofing tar, sandblasting grid mixed with lead-, cadmium-, or chromium-based paints, asbestos, or PCBs, that cannot be reused or recycled shall be disposed of by a licensed hazardous waste hauler.

- Wastes shall be stored in sealed containers constructed of suitable material and shall be labeled as required by Title 22 CCR, Division 4.5 and 49, CFR Parts 172, 173, 178, and 179.

- Waste containers shall be stored in temporary containment facilities that should comply with the following requirements:

  - Temporary containment facilities shall provide for a spill containment volume equal to 1.5 times the volume of all containers able to contain precipitation from a 25-year storm event plus the greater of 10 percent of the aggregate volume of all containers or 100 percent of the largest tank within its boundary, whichever is greater.

  - Temporary containment facilities shall be impervious to the materials stored at their locations for a minimum contact time of 72 hours.

  - Temporary containment facilities shall be maintained free of accumulated rainwater and spills. In the event of spills or leaks, accumulated rainwater and spills should be placed into drums after each rainfall. These liquids shall be handled as hazardous waste unless testing determines them to be non-hazardous.

  - Sufficient separation shall be provided between stored containers to allow for spill cleanup and emergency response access.

  - Incompatible materials such as chlorine and ammonia shall not be stored in the same temporary containment facility.
  - Throughout the rainy season, temporary containment facilities shall be covered during non-working days and prior to rain events.

- Storage drums shall not be overfilled and wastes should not be mixed.
- Unless watertight, containers of dry waste shall be stored on pallets.
- Herbicides and pesticides shall not be over-used. Only the amount needed shall be prepared. Apply surface dressings in several small applications as opposed to one large application. Allow time for infiltration and avoid excess material being carried off-site by runoff. Do not apply such chemicals immediately prior to rain events. All persons applying pesticides must be certified in accordance with federal and State regulations.
- Paint brushes and equipment for water and oil-based pants should be cleaned within a contained area and shall not be allowed to contaminate soil, watercourses, or drainage systems. Waste paints, thinners, solvents, residues, and sludges that cannot be recycled or reused shall be disposed of as hazardous waste by a licensed hazardous waste hauler.
- Hazardous waste storage areas on site shall be located away from storm drains or water courses and away from moving vehicles and equipment to prevent accidental spills.
- Containment berms shall be used in fueling and maintenance areas and where the potential for spills is high.
- Potentially hazardous waste shall be segregated from nonhazardous construction site debris.
- Liquid or semi-liquid hazardous materials shall be stored in appropriate containers and under cover.
- Hazardous waste collection sites shall be designated on site away from watercourses and drainage systems, and shall be clearly labeled.
- Hazardous materials shall be stored in containers and protected from vandalism.
- All employees and subcontractors shall receive on-site training in hazardous waste storage and disposal procedures.
- Areas treated with chemicals shall be identified with appropriate warning signage.
- Place a stockpile of spill clean-up materials where it will be readily accessible.

- Inspect and verify that activity-based BMPs are in place prior to the commencement of associated activities. While activities associated with the BMP are underway, BMPs shall be inspected on a weekly basis.

- A copy of hazardous waste manifests shall be maintained onsite for access by **the District** ~~City inspectors~~.

4.10 HYDROLOGY AND WATER QUALITY

4.10.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to hydrology and water quality identified in the Certified EIR.

- **Water Quality.** The Certified EIR determined that impacts to surface water quality could occur during construction activities, when portions of the Specific Plan area are left fallow with temporary vegetative cover. While impacts could occur both on- and off-site during project construction, the Certified EIR determined that impacts would be limited to the Specific Plan area following completion of the off-site facilities. Construction activities could have also resulted in the discharge of pollutants such as soil and grease from equipment, trash from worker and construction activities, nutrients from fertilizers, heavy metals, pathogens, and other substances. Accordingly, the approved project was required to prepare a Storm Water Pollution Prevention Plan (SWPPP), which would have included erosion and sediment BMPs. The project would also be required to implement construction-phase Model Progression Specifications aimed at minimizing impacts to water quality. Therefore, the Certified EIR determined that implementation of these required BMPs and compliance with existing ordinances would ensure that construction water quality impacts would be less than significant. Implementation of the approved project would have converted existing undeveloped lands to urban and open space uses, resulting in an increase in the amount of impervious surfaces on the site, which would have increased stormwater runoff generation and flows while also introducing pollutants associated with the proposed uses that could be carried in runoff and discharged into receiving waters. To further minimize operational water quality impacts, the approved project included site design BMPs in the Master Drainage Plan and Land Development Plan for the project. Therefore, the Certified EIR determined that impacts would be less than significant with implementation of BMPs. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

  The Certified EIR also determined that impacts to groundwater quality could occur throughout the life of the approved project. The Specific Plan area is underlain by the Beaumont Basin. Additionally, the Specific Plan area is a recharge area for the Beaumont Basin as a result of stormwater or snow melt flowing in Smith Creek from higher elevations, ponding in the creek channel or the channel's floodplain, and ponding outside of the creek area due to sheet flow. The recharge function of Smith Creek would have been retained and enhanced as part of the creek realignment proposed as part of the approved project. The use of recycled water on the site would have introduced a new source of water on the site and would have

increased the quantity of water available for groundwater recharge through on-site percolation, as would the potential import of water allocated to the City as a result of the State Water Project. The Certified EIR determined that discharge of recycled water into recharge areas on the site would require the Applicant to meet Individual Waste Discharge Requirements and Water Recycling Requirements and obtain a Master Recycling Permit from the Regional Water Quality Control Board. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Groundwater.** The Certified EIR determined that the approved project would generate a water demand of 4,224 acre feet per year (AFY); the approved project's total potable water demand at buildout was estimated to be 2,800 AFY and non-potable water demand was estimated to be 1,344 AFY. Following the implementation of water conservation features, the total projected water demand was estimated to be 3,103 AFY. The Certified EIR identified that the approved project included an on-site groundwater recharge system to offset additional approved project-related water demand. The Certified EIR determined that the approved project would result in 1,194 AFY of recycled water to serve non-potable water demands for the approved project. Moreover, the approved project would generate approximately 470 AFY of stormwater drainage runoff, a portion of which would percolate into the Beaumont Basin and serve to increase the City's groundwater. The Certified EIR concluded that with the implementation of mitigation measure WS-1, impacts on groundwater resources and availability would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Drainage.** The Certified EIR determined that the approved project would alter the existing drainage pattern within the Specific Plan area; however, these alterations would provide enhanced drainage capacity, eliminate potential downstream impacts associated with an increase of on-site impervious surface, and reduce flooding hazards within and downstream of the Specific Plan area. The Certified EIR determined that alteration of the existing drainage pattern would be beneficial. However, the Certified EIR determined that construction and operational BMPs would be required to reduce potential alterations to drainage patterns resulting from grading and construction activities associated with implementation of the approved project. The Certified EIR also determined that implementation of mitigation measure HWQ-1 would reduce impacts related to existing drainage patterns to a less than significant level. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Stormwater Runoff.** The Certified EIR determined that future development under the approved project, including on- and off-site improvements, was determined to result in changes to the absorption rates, drainage patterns, and the corresponding rate and amount of surface runoff to the existing Specific Plan area. The approved project would result in an increase in impervious surface areas as compared to the conditions at the time the Certified EIR was prepared. The approved project would include upgrades to drainage and stormwater facilities that would either prevent site development from exceeding existing downstream capacity or result in an increase in capacity. The Certified EIR determined that the approved

project would introduce urban uses to an undeveloped area with corresponding increases in potential pollutants. The approved project would require the implementation of BMPs to reduce impacts related to water pollutants. The Certified EIR concluded that with the implementation of BMPs, impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Floodplain.** The Certified EIR determined that a portion of the Specific Plan area is located within a 100-year floodplain. Pursuant to the approved project's Master Drainage and Grading Plans, all building pads would be developed to an elevation that would be free from flood hazard for the 100-year frequency storm event. The approved project was designed to effectively drain into the Smith Creek and/or Pershing Channel, including improvements to reduce the potential for flooding due to sheet flow or flash flood conditions. Additionally, the approved project requested a Conditional Letter of Map Revision from the Federal Emergency Management Agency (FEMA) to revise the exiting FEMA floodplain maps for the Specific Plan area to reflect the "as built" condition. The Certified EIR concluded that with the implementation of mitigation measure HWQ-1, impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Flooding.** The Certified EIR determined that the Specific Plan area is not within an area mapped as an inundation area of any dam nor are there any levees on or near the Specific Plan area. The proposed North Basin at the northern edge of the Specific Plan area was determined to be able to drain approximately 20 acre-feet of runoff. In addition, the backbone drainage system associated with the Specific Plan would have included areas for storm drain detention and would have mitigated runoff. However, the Certified EIR required the implementation of mitigation measure HWQ-1 to minimize potential flooding impacts to a less than significant level. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Inundation.** The Certified EIR determined that the Specific Plan area is not in an area subject to inundation from a seiche or tsunami. However, the Specific Plan area includes several areas that would be subject to the threat of mudflow during storm events. The approved project would include a series of debris/detention basins that would mitigate impacts related to mudflow that could occur during a major storm event. The Certified EIR determined that compliance with flood control measures imposed by regional and local agencies and compliance with the Specific Plan Drainage Plan would further reduce impacts associated with mudflow. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.10.2 Impacts Associated with the Proposed Project

The analysis in this section is based partly on the following technical study, which is included as Appendix F to this EIR Addendum.

- *Water Pipeline Safety Hazard Assessment Atwell TK-8 School Project*, PlaceWorks, August 2024

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. As with the approved project, the proposed project is required to comply with the applicable federal and State stormwater regulations. The proposed project's construction activities would be required to be implemented in accordance with the NPDES Construction General Permit for Storm Water Order No. 2022-057-DWQ. Compliance entails filing a Notice of Intent and preparation of a SWPPP specifying BMPs that would be implemented as part of the project's construction phase to minimize pollution of stormwater prior to and during grading and construction. The proposed project would also be required to prepare an erosion and sediment control plan and implement BMPs to control erosion debris and construction-related pollutants.

The District is not regulated under the City municipal separate storm sewer system (MS4) permit, and the Phase II Small MS4 permit for K-12 school districts and community colleges has not yet been issued by the State Water Resources Control Board. In the interim and as with the approved project, the proposed project is required to comply with the post-construction performance standards under the Construction General Permit. Impacts would be less than significant.

Increasing the amount of on-site impervious surfaces would increase surface water runoff by reducing natural absorption into the soil. The proposed project would occur within the boundaries of the approved project and would develop a use analyzed in the Certified EIR. As with the approved project, the proposed project would incorporate mitigation measures identified in the Certified EIR to reduce impacts to groundwater quality to a less than significant level.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that development of the approved project would add impervious surfaces to a graded site that has the capability to recharge some runoff into the groundwater table. The proposed project is within the boundaries of the approved project. Both the approved project and the proposed project are within the service area of the City of Banning for water services. The City's water system relies on groundwater and imported water from the State Water Project. The proposed project does not include a new or different use not

analyzed in the Certified EIR. The proposed project's development is within the scope of development identified in the Certified EIR. As with the approved project, the City is anticipated to have sufficient water supplies for normal, single-dry, and multiple dry years to support the proposed project. Nonetheless, the proposed project would incorporate applicable mitigation measures from the Certified EIR to ensure impacts on groundwater are reduced to less than significant levels. Impacts would be less than significant.

As with the approved project, the proposed project is within the Coachella Valley–San Gorgonio Pass Groundwater Basin, which is identified as a medium-priority basin (DWR 2024). According to the San Gorgonio Pass Groundwater Sustainability Plan, the City of Banning diverts surface water from the San Gorgonio River into percolation ponds in the lower Banning Canyon to recharge the Banning Canyon Storage Unit. Additionally, gravel- and sand-bedded canyons provide for quick percolation during winter and spring months and during infrequent thundershowers. Additional recharge occurs at the City of Banning Wastewater Treatment Facility. (San Gorgonio Pass Subbasin 2022) Both the approved project and the proposed project are not within a recharge area. The proposed project would not impede sustainable groundwater management of the basin. Impacts would be less than significant.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in a substantial erosion or siltation on- or off-site?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the approved project would alter the drainage pattern within the Specific Plan area; however, the alterations would be beneficial. The proposed project would not modify the approved project's Master Drainage Plan. With respect to erosion and siltation on- or off-site, the proposed project, as with the approved project, would be required to comply with the NPDES Construction General Permit to control erosion and siltation impacts during the construction phase. Impacts would be less than significant.

It should be noted that the project site is currently graded and contains exposed dirt. As with the approved project, the proposed project is required to comply with the post-construction performance standards under the Construction General Permit. As with the approved project, the proposed project would introduce impermeable surface on the project site and there would be no bare or disturbed soil that would be vulnerable to erosion or siltation. Areas within the project site would be paved, landscaped, or developed with buildings or structures. Impacts would be less than significant.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR determined that the approved project would alter the drainage pattern within the Specific Plan area; however, the alterations would be beneficial. The proposed project would not modify the approved project's Master Drainage Plan. As with the approved project, the proposed project is not anticipated to substantially alter the project site drainage pattern in a manner that would substantially increase the rate or amount of surface runoff which would result in flooding on- or off-site. A portion of the project site is in Letter of Map Revision (LOMR) 19-09-2247P, and a portion of the project site is in Zone X (Area of Minimal Flood Hazard) of the FEMA Flood Insurance Rate (FIRM) Map Number 06065C0812G (FEMA 2008). The LOMR removed the project site from the 1 percent flood zone. Nevertheless, mitigation measure HWQ-1 will remain applicable to the proposed project.

The proposed project would not result in any new or more severe significant impact than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project does not include any modifications to the approved project's Master Drainage Plan. The approved project's drainage system was designed to adequately handle stormwater flows generated by the 100-year storm. The proposed project would not alter the approved project's storm drainage facilities. The proposed project would develop the project site with a use that was analyzed in the Certified EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

iv. Impede or redirect flood flows?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR concluded that the approved project is located within a flood hazard zone. As previously discussed, since the certification of the Certified EIR, a LOMR was issued that removed the eastern project site from the 1 percent flood zone; the western portion of the project site is identified as being in Zone X. Impacts would be less than significant. Nevertheless, mitigation measure HWQ-1 will remain applicable to the proposed project. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4. Environmental Analysis

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR concluded that the approved project is a flood hazard zone. As previously discussed, since certification of the Certified EIR, a LOMR was issued that removed the eastern portion of the project site from the 1 percent flood zone; the western portion of the project site is identified as being in Zone X. Impacts would be less than significant. Nevertheless, mitigation measure HWQ-1 will remain applicable to the proposed project.

The project site is not adjacent to coastal water or in proximity to water storage facilities. However, a Water Pipeline Safety Hazard Assessment was prepared by PlaceWorks and is included as Appendix F. A pipeline flooding analysis was conducted for all the identified pipelines to determine the depth and location of water flow within the surrounding streets in the event of a pipeline leak or rupture. The results of the pipeline flooding analysis is provided in Table 9. As demonstrated in the table, any potential break in any of the water pipelines located within 1,500 feet of the project site would not result in significant flooding at the project site.

Table 9 Street Flow

Pipeline Diameter	Pipeline Location	Release Rate (cfs)	Street Width (ft)	Depth of Flow in Street (in)	Exceeds Street Carrying Capacity?[1]
12-inch	Landmark Way	3.93	70	3.2	No
12-inch	Apex Street	3.93	60	3.1	No
12-inch	Creekside Avenue	3.93	52	3.2	No
12-inch	Swift Drive	3.93	48	3.0	No
12-inch	North Highland Springs Avenue	3.93	32	4.1	No
18-inch	West Wilson Street	8.84	40	3.0	No
24-inch	West Wilson Street	15.71	40	4.1	No

[1] Assuming 6-inch curbing for residential and collector streets.

As with the approved project, the proposed project would not be subject to inundation due to a tsunami or seiche.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Porter-Cologne Water Quality Control Act (Section 13000 et seq., of the Water Code), and the federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act) require that comprehensive water quality control plans be developed for all waters within the State of California. The project site is within the jurisdiction of the Colorado River Regional Water Quality Control Board (RWQCB). Water quality information

for the Colorado River watershed is contained in the Colorado River Basin Plan (Basin Plan), most recently updated in August 2024.

The Basin Plan describes actions by the RWQCB and others that are necessary to achieve and maintain water quality standards. The RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface water. Permits are issued under several programs and authorities. The terms and conditions of these discharge permits are enforced through a variety of technical, administrative, and legal means. The RWQCB ensures compliance with the Basin Plan through its issuance of NPDES Permits, Waste Discharge Requirements, and Water Quality Certifications pursuant to Section 401 of the Clean Water Act. With adherence to State and local water quality regulations, the proposed project's potential to generate pollutants and impact water quality during construction and operation would be less than significant. Development within the project site would not degrade water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. Therefore, the proposed project would not result in water quality impacts that would conflict with the Colorado River Basin Plan. Impacts would be less than significant.

The Sustainable Ground Water Management Act requires local agencies to form groundwater sustainability agencies (GSA) for high and medium priority basins. GSAs develop and implement groundwater sustainability plans (GSP) to avoid undesirable results and mitigate overdraft within 20 years. The Certified EIR determined that the approved project is in the Coachella Valley–San Gorgonio Basin, which is identified as a medium-priority basin (DWR 2024). The San Gorgonio Pass Subbasin GSA is the GSA for the Coachella Valley–San Gorgonio Basin and prepared a GSP that was released in January 2022. The proposed project would develop the project site with a use that was analyzed in the Certified EIR and would not introduce a new use to the project site. Therefore, the water demand associated with the developed condition of the project site would be the same or similar to what was analyzed in the Certified EIR. Development of the proposed project is not anticipated to result in a conflict with the implementation of a GSP.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.10.3 Hydrology and Water Quality Mitigation Measures Identified in the Certified EIR

The following mitigation measures are taken directly from the Certified EIR and apply to and will be implemented for the proposed project. Where necessary, mitigation measures have been updated, refined, and/or supplemented to ensure mitigation is implemented as intended for the proposed project. Any changes to mitigation measures are identified here in ~~strikeout~~ text to indicate deletions and **<u>underline bold</u>** text to signify additions.

MM HWQ-1 The following measure~~s~~ shall be reflected in ~~applicable Tentative Tract Maps (TTMs),~~ site plans, grading plans, and/or improvement plans to the satisfaction of the ~~City Engineer~~ **<u>District</u>**~~, prior to applicable plan/permit approval~~:

- All building pads within the Specific Plan shall be constructed so that they are free from flood hazard for the 100-year frequency storm by elevating finished floor elevations above the 100-year level of flood protection.

- ~~The depths of flow in the Project's streets shall not exceed top of curb elevations for the 10 year frequency storm event.~~

- ~~Streets shall be oriented to allow for maximum potential conveyance of regional flooding during significant storm events to expedite the passage of storm flows through the Specific Plan area.~~

- ~~The Specific Plan will be phased so that 100-year flood protection is ensured in all areas of development. Interim improvements (such as temporary debris basin, earthen channels/berms, check dams, sand bag barriers, or other temporary best management practices (BMP) and flood protection measures; refer to Mitigation Measure HWQ-1, bullet Nos. 6 and 7, below) shall be provided as development progresses to protect against flooding, erosion, siltation, and water quality impacts.~~

- ~~All subdivisions implemented as part of the Specific Plan shall be required to detain any incremental increase in drainage within the Project boundary until the Riverside County Flood Control and Water Conservation District Master Drainage Plan ("Banning" – Zone 5) is fully implemented downstream of the Project site.~~

- ~~Construction of each phase shall include an assessment of the size and flow patterns of the adjacent undeveloped areas of the Specific Plan site. Interim phase on-site facilities shall provide developed phases with required flood protection pursuant to Code.~~

- ~~Temporary basins shall be constructed to meet detention requirements and earthen channels/berms shall be used to divert and convey flows.~~

4.11 LAND USE AND PLANNING

4.11.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to land use and planning identified in the Certified EIR.

- **Established Community.** The Certified EIR determined that since the Specific Plan area was vacant and undeveloped at the time the Certified EIR was prepared, there was no continuous established community within the Specific Plan area that could be divided as a result of the approved project. The Certified EIR concluded that the approved project would continue a pattern of existing development surrounding the Specific Plan area and would not physically divide an established community. No impact would occur. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or

more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Land Use Compatibility.** The Certified EIR determined that the approval of the approved project and its associated General Plan Amendment would mitigate potential inconsistencies with applicable policies in the City's General Plan. The Certified EIR determined that the approved project would be consistent with all other planning and policy documents regulating land use within the Specific Plan area. Following the requested zone change included as part of the approved project, the Certified EIR determined that the approved project would not result in conflicts with the City's Zoning Ordinance. The Certified EIR also determined that the approved project would be consistent with the SCAG Regional Transportation Plan. The Certified EIR concluded that the approved project would not conflict with land use policy or plan, and impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

There have been neither changes in the project nor circumstances, nor has there been any new information that has arisen since the certification of the Certified EIR that would require additional environmental review or preparation of a subsequent or supplemental EIR.

4.11.2 Impacts Associated with the Proposed Project

a) Physically divide an established community?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. As with the approved project, the proposed project would not result in the physical division of an established community. The proposed project consists of the development of a new school campus on the project site, which is within Planning Area 20 of the Specific Plan area. All improvements would occur within the confines of the project site and project development would not introduce roadways or other infrastructure improvements that would bisect the existing residential communities (or those under construction) surrounding the project site. The proposed project would not physically change or disrupt the surrounding neighborhood's street patterns or otherwise impede movement through the neighborhoods. The proposed project would implement a component of the approved project and would further facilitate the creation of a community within the Specific Plan area. Implementation of the Specific Plan would not introduce a new land use that could disrupt existing land use patterns. Therefore, as with the approved project, the proposed project would not physically divide an established community; impacts would be less than significant.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. As with the approved project, the proposed project would implement the Specific Plan within the boundaries of the Specific Plan area. Specifically, the proposed project consists of the development of a new school campus, which was a use that is permitted and contemplated under the Specific Plan and was analyzed in the Certified EIR. Development of the proposed project would be implemented in a manner that is not detrimental to the project or its surroundings. The proposed project has been designed and would be developed in accordance with all applicable development and design standards identified in the Specific Plan and in accordance with the District's standards. Compliance with the applicable development and design standards would be ensured through the District's development review process.

Therefore, as with the approved project, the proposed project would not result in a conflict with an adopted land use plan, policy, or regulation; impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.11.3 Land Use and Planning Mitigation Measures Identified in the Certified EIR

No mitigation measures related to land use were identified in the Certified EIR.

4.12 MINERAL RESOURCES

4.12.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to mineral resources identified in the Certified EIR.

- **Mineral Resources.** The Certified EIR determined that the Specific Plan area is located in Mineral Resource Zone 3, which is defined as an area containing mineral deposits, the significance of which cannot be evaluated from available data. No classified or designated mineral deposits of statewide or regional significance are known to occur within the Specific Plan area. Additionally, the Specific Plan area is not delineated as an important mineral resource recovery stie within the City's General Plan. The Certified EIR concluded that no impacts would occur. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.12.2 Impacts Associated with the Proposed Project

a) 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?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The project site, as with the approved project, does not contain any known mineral resource that would be of value to the region and the residents of the State. As with the approved project, no impact would occur under the proposed project. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The proposed project is designated and zoned as SP. As with the approved project, development of the proposed project would not 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. No impact would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.12.3 Mineral Resources Mitigation Measures Identified in the Certified EIR

No mitigation measures related to mineral resources were identified in the Certified EIR.

4.13 NOISE

4.13.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to noise identified in the Certified EIR.

- **Construction Transportation Noise.** The Certified EIR determined that during construction of the approved project, there would be a need to transport construction equipment and materials to the Specific Plan area. Additionally, construction workers would commute on area roads to the Specific Plan area. The Certified EIR concluded that the approved project would not result in significant noise impacts due to transportation to construction site; impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that there would be 15.4 fewer acres disturbed than what was analyzed in the Certified EIR, and impacts related to construction traffic noise would be the same as those identified in the Certified EIR.

- **On-Site Construction Noise.** The Certified EIR determined that construction activities would have resulted in a periodic, temporary increase in ambient noise levels. Construction associated with development accommodated by the Specific Plan was anticipated to occur over a 30-year period. Construction activities would consist of grading, trenching, paving, and building construction. Groundborne noise would occur during the initial site preparation activities that occur during earthmoving and soils compaction. High groundborne noise levels and other miscellaneous noise levels could have been generated during these activities due to the operation of heavy-duty equipment. Construction activities did not include the use of pile drivers. The City's General Plan EIR acknowledges that noise associated with future construction activities would impact adjacent uses; however, such impacts would be short term and cease upon completion. The General Plan EIR also identifies general and construction mitigation measures, which were incorporated into the City's Noise Ordinance and included in the Certified EIR as mitigation measures NOI-1 and NOI-2. The Certified EIR concluded that impacts would be less than significant with mitigation incorporated. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **On-Site Construction Vibration.** Construction activities associated with the approved project were anticipated to generate varying degrees of groundborne vibration. Groundborne vibration generated by construction activity, particularly grading and excavation, would be readily perceivable at 25 feet from the source, but would not exceed applicable annoyance thresholds. Therefore, groundborne vibration generated during construction would primarily impact sensitive uses within or adjacent to 25 feet of project-related activity. Vibration levels were anticipated to reach up to 87 vibration velocity decibels (VdB) for construction activities generating large earthmoving equipment and heavy trucks. This would exceed the 80 VdB threshold for residences and the 83 VdB threshold for institutional uses during infrequent events. To reduce construction vibration impacts, mitigation measure NOI-3 prohibits the use of on-site construction equipment generating higher than 0.049 root-mean square velocity (RMS) within 25 feet of any sensitive use and limits the use of equipment exceeding this standard to less than 30 events per day. Therefore, the Certified EIR determined that impacts with respect to construction vibration would be mitigated to a less than significant level.

- **Long-Term Transportation Noise.** The Certified EIR determined that long-term development within the Specific Plan area associated with the approved project would result in additional traffic on adjacent roadways, which would increase vehicular noise in the area. Following approved project implementation, noise levels at a distance of 100 feet from the roadway centerline would range from approximately 61.4 to 68.0 dBA. These noise levels did not account for noise attenuation provided by building insulation, intervening topography, setbacks, perimeter block walls, adjacent streets and/or drainage channels, or landscaping. The approved project would exceed the allowable noise increase thresholds (3 dBA or greater) on Highland Home Road between D Street and Wilson Street, on Highland Springs Avenue between Starlight Avenue and 8th Street, and on Highland Springs Avenue between 8th Street and 6th Street.

  Improvements associated with future development along Highland Springs Road between Starlight and 8th Street would include perimeter block walls along the frontage to provide sound attenuation as well as building insulation in future buildings and structures to reduce noise impacts to sensitive receptors (e.g.,

residences). Such improvements were determine to not be required for the segment of Highland Springs Road between 8th Street and 6th Street because there are no sensitive receptors (residences) along this portion of the roadway.

In addition to the 20 dBA noise attenuation reduction for closed windows, the Certified EIR determined that NOI-4 would be required to reduce mobile noise impacts to sensitive receptors along Highland Home Road between D Street and Wilson Street. Mitigation NOI-4 requires completion of a focused noise study to determine specific noise reduction measures, if required, to ensure that development under the Specific Plan meets the City's exterior and interior noise standards. Therefore, the Certified EIR determined that the Specific Plan would result in less than significant long-term mobile noise impacts with mitigation incorporated. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Long-Term Stationary Noise.** The Certified EIR determined that the approved project would develop the Specific Plan area with new single- and multifamily residential uses. Noise generated from these uses would primarily occur during daytime activity hours. The City's Municipal Code includes procedures for complaints and enforcement or violations of the noise standards by individual homeowners. Therefore, the Certified EIR concluded that noise impacts to surrounding uses following implementation of the approved project would be less than significant.

  The non-residential uses proposed as part of the approved project could increase noise levels around them. The proposed wastewater treatment plant would be constructed indoors and is therefore not anticipated to generate a significant increase in ambient noise. However, mitigation measure NOI-5 would be required to ensure that the proposed wastewater treatment plant would adhere to noise level thresholds established by the City.

  Activities at loading docks associated with the proposed commercial uses under the approved project could generate noise levels around 76.5 dBA at 50 feet. However, the commercial and other non-residential uses included as part of the approved project were not anticipated to require a significant amount of truck deliveries, and the amount of truck trips would be relatively low. Therefore, noise associated with large truck and smaller cargo van deliveries would be less than significant. However, mitigation measure NOI-5 would be required to reduce potential noise impacts. The Certified EIR concluded that impacts would be less than significant with mitigation incorporated. As a result, there would be fewer stationary noise sources attributable to the 2016 Addendum than what was analyzed in the Certified EIR, impacts related to stationary noise would be the same as those identified in the Certified EIR.

- **Airport Noise Hazards.** The Certified EIR determined that the Specific Plan area is more than three miles at its closest point to the Banning Municipal Airport. The Certified EIR concluded that no impact would occur. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.13.2 Impact Associated with the Proposed Project

A background discussion on the noise regulatory setting and the noise modeling can be found in Appendix G.

Ambient Noise Monitoring

Measurements at three short-term (15-minute) locations were conducted around the project site. All measurements were conducted Tuesday, September 3, 2024. The short-term sound level meter used (Larson Davis LxT) for noise monitoring satisfies the American National Standards Institute (ANSI) standard for Type 1 instrumentation. The short-term sound level meter was set to "slow" response and "A" weighting (dBA). The meter was calibrated prior to and after each monitoring period. All measurements were at least 5 feet above the ground and away from reflective surfaces. Temperatures were hot, approximately 97 degrees Fahrenheit, with wind speeds of 8 miles per hour and 16 percent relative humidity during the noise measurements. Short-term measurement locations are described below; shown on Figure 5, *Approximate Noise Monitoring Locations*; and results are summarized in Table 10.

Table 10 Short-Term Noise Measurements Summary in A-Weighted Sound Levels

Monitoring Location	Description	15-minute Noise Level, dBA						
		L_{eq}	L_{max}	L_{min}	L_{50}	L_{25}	L_{8}	L_{2}
ST-1	Adjacent to Landmark Way across from Swift Drive and residential uses to the north. 9/3/24, 11:38 am	58.3	80.7	40.9	46.0	50.5	61.1	67.5
ST-2	Adjacent to Creekside Avenue approximately 195 feet north of residential uses along Nectar Drive. 9/3/24, 11:57 am	57.0	77.2	43.4	48.2	51.3	59.7	67.6
ST-3	Adjacent to Apex Street approximately 45 feet north of residential uses along Nectar Drive. 9/3/24, 11:18 am	53.1	73.4	36.1	40.3	45.0	55.4	63.7

Source: PlaceWorks 2024. See Appendix G.

- **Short-Term Location 1 (ST-1)** was on the eastbound side of Landmark Way near its intersection with Swift Way, approximately 40 feet south of the Landmark Way centerline. A 15-minute noise measurement began at 11:38 am on Tuesday, September 3, 2024. The noise environment is characterized by infrequent traffic noise on Landmark Way, which included some heavy-duty vehicles enroute to a construction site on Creekside Avenue. Noise levels measured 58.3 dBA L_{min} to 80.7 dBA L_{max} during the measurement period at ST-1.

- **Short-Term Location 2 (ST-2)** was on the northbound side of Creekside Avenue, approximately 290 feet north of its intersection with Nectar Drive and approximately 30 feet east of the Creekside Avenue centerline. A 15-minute noise measurement began at 11:56 am on Tuesday, September 3, 2024. The noise environment is characterized primarily by residential activity at the residences south of the measurement location and construction vehicles idling near and entering a construction site approximately 290 feet south of the project site at Nectar Drive and Creekside Avenue. Noise levels measured 57.0 dBA L_{eq} and 77.2 dBA L_{max} during the measurement period at ST-2.

Figure 5 - Approximate Noise Monitoring Locations

Project Boundary

ST-X Short-Term Noise Measurement Locations (3)

0 375
Scale (Feet)

Source: Nearmap 2024.

4. Environmental Analysis

This page intentionally left blank.

- **Short-Term Location 3 (ST-3)** was on the southbound side of Apex Street, approximately 40 feet west of the Apex Street centerline. A 15-minute noise measurement began at 11:18 am on Tuesday, September 3, 2024. The noise environment is characterized by infrequent traffic noise on Apex Street and distant traffic noise on the nearby arterial roadway, Wilson Way, approximately 560 feet south of the measurement location. Noise levels measured 53.1 dBA L_{eq} and 73.4 dBA L_{max} during the measurement period at ST-3.

Noise Sensitive Receptors

Noise-sensitive residential receptors are adjacent to the project site as a result of the approved project. Residential receptors are to the north across Landmark Way, to the west across Creekside Avenue, and to the south. There are existing masonry walls along residential property lines shielding backyard areas of residential receptors along Verde Way to the north, Nectar Drive to the south, and Mariposa Drive and Reed Place to the west of the project site.

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. Following is a discussion of the potential construction and operation noise impacts as a result of the proposed project.

Construction Noise Impacts

Noise generated by on-site construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each phase of construction involves different types of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest three pieces of equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The expected construction equipment mix was estimated and categorized by construction activity using the Federal Highway Administration Roadway Construction Noise Model (RCNM). Average noise levels from project-related construction activities are calculated by modeling the three loudest pieces of equipment per activity phase. Equipment for grading and site preparation is modeled at spatially averaged distances (i.e., from the acoustical center of the general construction site to the property line of the nearest receptors) because the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors for mobile equipment. Building construction and architectural coating are measured from the edge of the proposed buildings to the nearest sensitive receptors. Additionally, paving is measured from the edge of the nearest paving areas to the nearest sensitive receptors. Construction noise modeling does not account for existing masonry walls at adjacent residential property lines, which could provide up to 6 dBA reduction based on existing wall heights. The results summarized in Table 11 take into account the nearest receptors. Construction noise levels at a reference distance of 50 feet would range between 74 dBA and 85 dBA L_{eq} throughout the construction period.

Table 11 Project-Related Construction Noise Levels

Construction Activity Phase	Noise Levels in dBA L_{eq}						
	RCNM Reference Noise Level	Receptor to North		Receptor to South		Receptor to West	
		Exterior	Interior	Exterior	Interior	Exterior	Interior
Distance in feet	**50**	**325[1]**	**350[1]**	**245[1]**	**255[1]**	**260[1]**	**275[1]**
Site Preparation	83	67	46	69	49	69	48
Grading	84	68	47	70	50	70	49
Distance in feet	**50**	**245[1]**	**270[1]**	**125[1]**	**135[1]**	**125[1]**	**140[1]**
Building Construction	72	64	43	70	49	70	49
Architectural Coating	68	60	39	66	45	66	45
Distance in feet	**50**	**110[1]**	**135[1]**	**90[1]**	**100[1]**	**90[1]**	**105[1]**
Paving	79	72	50	74	53	74	53

Source: FHWA's RCNM software. See Appendix G for modeling inputs and results.
Note: dBA Leq = Energy-Average (Leq) Sound Levels.
[1] Distances measured using Google Earth (2024).

The nearest sensitive receptors to the project site include single-family homes approximately 90 to 325 feet to the north, south, and west of the various construction stages, as shown in Table 11. Construction equipment mix is anticipated to be similar to that of the approved project and include concrete saws, dozers, excavators, tractors, loaders, backhoes, excavators, graders, forklifts, generators, welders, air compressors, pavers and paving equipment, and rollers. This construction equipment was modeled using RCNM. Proposed project construction noise levels would range between 60 dBA and 74 dBA L_{eq} at the nearest sensitive receptors throughout the construction phases. Assuming a 20 dBA reduction due to residential building facades with windows open condition, proposed project construction noise would be reduced to a range of 39 dBA to 53 dBA L_{eq} at the interior spaces of the nearest noise-sensitive residential uses. Furthermore, construction noise levels are expected to be up to 6 dBA lower for receptors to the north, up to 4 dBA lower for receptors to the west, and up to 2 dBA for receptors to the south, based on existing property line wall heights and receiver elevations with respect to the project site elevation.

Proposed project construction would comply with the provisions of the City of Banning Code of Ordinances, Section 8.44.090 (E), and would not cause sound levels to exceed 55 dBA at any time in the interior of the nearest occupied residence. Additionally, no construction activities would occur between the hours of 6:00 pm and 7:00 am in accordance with the provisions of Section 8.44.090 (E). Therefore, the proposed project would not exceed City noise standards for construction noise. No new significant impacts or impacts of greater severity than those identified in the Certified EIR, and the level of impact remains unchanged from the Certified EIR.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Mobile-Source Noise Impacts

The proposed project would generate an increase in total daily trips compared to existing daily trips, specifically along Creekside Avenue. A project will normally have a significant effect on the environment related to traffic

noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an outdoor environment. Noise levels above 65 dBA CNEL are normally unacceptable at sensitive receptor locations such as residences, schools, and noise environments in these areas would be considered degraded. Based on this, a significant impact would occur if the following traffic noise increases occur relative to the existing noise environment or exceed 65 dBA CNEL.

Traffic noise increases are calculated using a version of the FHWA RD-77-108 Traffic Noise Prediction Model. The traffic noise prediction model takes into account the following inputs: average daily traffic volumes; vehicle mix; speeds; number of lanes; and day, evening, and night traffic splits. Model inputs associated with transportation noise were provided by the traffic engineer, DJ&A (Appendix H). Traffic noise modeling does not account for existing masonry walls at adjacent residential property lines.

Table 12 shows that the addition of proposed project trips would result in an increase of up to 8 dBA over existing conditions. Existing land uses adjacent to the project site are developed with property line noise walls or under construction and without noise sensitive receptors that would be exposed to project traffic noise level increases. Furthermore, with the addition of proposed project traffic, traffic noise levels along Creekside Avenue, Apex Street, Atwell Drive, Starlight Avenue, and Landmark Way would be up to 60 dBA CNEL at 50 feet from the centerline and would not exceed the normally acceptable land use compatibility threshold of 60 dBA CNEL at all residential uses. As with the approved project, proposed project traffic noise impacts would be less than significant.

Thus, the proposed project would not result in any new or more significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Parking Lot Noise Impacts

The residences located north of the project site along Verde Lane and west of the site along Reed Place could be exposed to noise due to vehicles idling, doors opening and closing, and voices in the driveways. These activities would occur for short periods of approximately 10 to 20 minutes during student drop-off in the morning and student pick-up midafternoon. However, these periods are short term and would occur only during the daytime. Based on measurements taken by PlaceWorks during student drop-off at an elementary school for a similar project, the average noise level measured 55 dBA L_{eq} at 40 feet. The distance from the nearest school drop-off area to the nearest residential receptor to the north (195 feet) and west (250 feet) would result in school drop-off noise levels of 39 dBA and 41 dBA L_{eq} at the nearest residential property lines to the west and north, respectively, without accounting for the existing masonry walls. The proposed project's parking lot noise would comply with the City of City Banning Code of Ordinances, Section, 8.44.070, Maximum Residential Noise Levels, and would not exceed daytime base ambient noise level standards of 55 dBA L_{eq}. Therefore, parking lot noise impacts would be less than significant.

4. Environmental Analysis

The proposed project would not result in any new or more significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Playfield Noise

The proposed project would include playfields and hard courts. The nearest sensitive receptors to the proposed playfields would be the residences to the south, approximately 100 feet from the edge of the nearest playfield. Soccer games/practices typically generate noise level of 60 dBA L_{eq} at 15 feet from the soccer field. This noise level is associated with two full soccer teams scrimmaging, coaches and referees, and approximately 40 total spectators. At 100 feet, noise levels would attenuate to approximately 52 dBA L_{eq} at the nearest residences to the south, without accounting for the existing masonry walls. This would not exceed the City of Banning daytime hourly noise standard of 55 dBA during the hours of 7:00 am to 10:00 pm. Therefore, playfield noise impacts would be less than significant.

The proposed project would not result in any new or more significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Stationary Noise

The proposed project would include rooftop heating, ventilation, and cooling (HVAC) equipment for the proposed school buildings. Rooftop HVAC units would generate noise levels of up to 74 dBA at 5 feet, and due to distance attenuation would be reduced to 45 dBA at 135 feet (York 2006). The nearest residential receptors would be approximately 210 feet to the west of the nearest proposed project building with rooftop HVAC. Not accounting for rooftop parapets, HVAC noise levels at the residential receptors to the west would be approximately 42 dBA for a single unit and approximately 45 dBA for multiple units. Proposed project HVAC noise would comply with the City of Banning Code of Ordinances Section 8.44.070 and would not exceed daytime or nighttime base ambient noise level standards of 55 dBA and 45 L_{eq}, respectively. Therefore, no significant stationary noise changes to existing uses would occur.

The proposed project would not result in any new or more significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

General Plan Consistency Analysis

The City's exterior noise compatibility standard for school uses is assumed to be up to 65 dBA CNEL (considered normally acceptable). The proposed project would primarily be affected by traffic on Creekside Avenue, Landmark Way, and Apex Street, which border the project site to the west, north, and east, respectively. Table 12 shows the project-related increases in traffic noise along these roadways.

Table 12 Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet

	Segment		Traffic Noise Increase in dBA CNEL					
Roadway	From	To	Existing No Project	Existing with proposed project	Increase	Opening Year No Project	Opening Year with proposed project	Increase
Highland Springs Ave	Atwell Dr	to the North	70	70	<1	70	70	1
Highland Springs Ave	Atwell Dr	W Wilson St	70	71	<1	70	71	1
Creekside Ave	Landmark Way	W Wilson St	49	57	8	49	57	8
Apex St	Landmark Way	W Wilson St	53	55	2	53	55	2
Apex St	W Wilson St	to the South	50	51	1	50	51	1
Atwell Dr	Highland Springs Ave	Landmark Way	55	59	4	55	59	5
Starlight Ave	Highland Springs Ave	to the West	59	60	1	59	60	1
Landmark Way	Apex St	Creekside Ave	52	57	4	53	57	4
Landmark Way	Creekside Ave	Atwell Dr	54	57	4	54	57	4
Landmark Way	Atwell Dr	to the North	56	58	3	57	58	2

Source: Project traffic provided by DJ&A (2024).
See Appendix G for modeling inputs and results.

As shown in Table 12, traffic noise levels along Creekside Avenue would be 57 dBA CNEL at a distance of 50 feet. The nearest proposed school building would be as close as 65 feet from the Creekside Avenue centerline. Traffic noise levels along Landmark Way would be 57 dBA CNEL at a distance of 50 feet. The nearest proposed school building would be as close as 175 feet from the Landmark Way centerline. Traffic noise levels along Apex Street would be 55 dBA CNEL at a distance of 50 feet. The nearest proposed playfield would be as close as 80 feet from the Apex Street centerline. At these distances, traffic noise levels would range between 52 dBA and 57 dBA CNEL at the nearest proposed school buildings and playfields. The exterior noise levels at the proposed school buildings and playfields would not exceed the normally acceptable land use compatibility standard of 65 dBA CNEL for school uses. Impacts would be less than significant.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. Potential vibration impacts associated with development projects are usually related to the use of heavy construction equipment during the demolition or grading phases of construction. Construction can generate varying degrees of ground vibration depending on the construction procedures and equipment. Construction equipment generates vibration that spreads through the ground and diminishes with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

For reference, a peak particle velocity of 0.20 in/sec PPV is used as the limit for nonengineered timber and masonry buildings (which would apply to the off-site surrounding residential structures) (FTA 2018). The Certified EIR applied an 80 VdB residential threshold. Table 13 shows typical construction equipment vibration levels and reference vibration levels at a distance of 25 feet. The nearest construction activity would occur closest to the residences to the south of the project site. The closest residential buildings to the project site are 100 feet to the south.

Table 13 Vibration Impact Levels for Typical Construction Equipment

	in/sec PPV							
	Reference Levels at 25 Feet		Residential Receptors to North at 145 feet		Residential Receptors to South at 100 feet		Residential Receptors to West at 130 feet	
Equipment	PPV (in/sec)	VdB	PPV (in/sec)	VdB	PPV (in/sec)	VdB	PPV (in/sec)	VdB
Vibratory Roller	0.21	94	0.015	71	0.026	76	0.018	73
Large Bulldozer	0.089	87	0.006	64	0.011	69	0.008	66
Caisson Drilling	0.089	87	0.006	64	0.011	69	0.008	66
Loaded Trucks	0.076	86	0.005	63	0.010	68	0.006	65
Jackhammer	0.035	79	0.003	56	0.004	61	0.003	58

Table 13 Vibration Impact Levels for Typical Construction Equipment

	in/sec PPV							
	Reference Levels at 25 Feet		Residential Receptors to North at 145 feet		Residential Receptors to South at 100 feet		Residential Receptors to West at 130 feet	
Equipment	PPV (in/sec)	VdB	PPV (in/sec)	VdB	PPV (in/sec)	VdB	PPV (in/sec)	VdB
Small Bulldozer	0.003	58	0.000	35	0.000	40	0.000	37

Source: FTA 2018.
See Appendix G for modeling inputs and results.

As shown in Table 13, typical construction equipment, aside from vibratory rollers, produces vibration levels of less than 0.2 in/sec PPV and less than 90 VdB at 25 feet. Assuming construction would occur along the project site boundary, the nearest structures to the proposed construction activities would be approximately 100 feet south of the proposed project. Vibration levels attributable to a vibratory roller would attenuate to approximately 0.026 in/sec PPV and 76 VdB at 100 feet. The City of Banning does not have an established threshold for assessing construction vibration impacts. The FTA maximum acceptable vibration standard of 0.2 in/sec PPV for nonengineered timber and masonry buildings and 80 VdB for residences, per the Certified EIR, is applied for assessing vibration impacts from proposed project construction-related activities. Construction vibration levels would not exceed the FTA threshold of 0.2 in/sec PPV or the Certified EIR 80 VdB threshold at adjacent residential uses to the proposed project. Therefore, vibration impacts from construction would be less than significant.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project are to excessive noise levels?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The nearest airport to the project site is the Banning Municipal Airport, approximately 4.5 miles southeast. As with the approved project, the proposed project would not expose people residing or working in the area to excessive noise levels. Therefore, no impact would occur. The proposed project would not result in any new or more severe significant impacts than those identified the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.13.3 Noise Mitigation Measures Identified in the Certified EIR

The following mitigation measures are taken directly from the Certified EIR and apply to and will be implemented for the proposed project. Where necessary, mitigation measures have been updated, refined, and/or supplemented to ensure mitigation is implemented as intended for the proposed project. Any changes to mitigation measures are identified here in ~~strikeout~~ text to indicate deletions and **underline bold** text to signify additions.

4. Environmental Analysis

It should be noted that mitigation measure NOI-4 is not applicable to the proposed project because the proposed project does not include improvements to Highland Home Road nor is the project site along or near Highland Home Road. Mitigation measure NOI-5 is not applicable because the proposed project does not include the development of commercial uses, wastewater treatment plant, or golf course clubhouse in proximity to residential uses.

MM NOI-1 ~~As a condition of approval of all grading and building permits, the Applicant~~ **The District** shall comply with the following list of noise reduction measures ~~subject to inclusion of additional provisions at the discretion of the City Building Official as appropriate~~:

- ~~Excavation, grading, and other n~~**N**oise-intensive construction activities related to the proposed project shall be restricted to the hours of operation allowed under Section 8.44.090.E, Noise Prohibited – Unnecessary Noise Standard – Construction, Landscape Maintenance or Repair, of the City Municipal Code. Any deviations from these standards shall require the written approval of the City Building Official. The days and hours shall also apply to any servicing of equipment and to the movement of materials to and from the site.

- The **District**~~developer~~ shall require, as a condition of contract, that all construction equipment operating on the site be equipped with mufflers and sound control devices (e.g., intake silencers and noise shrouds) no less effective than those provided on the original equipment, and no equipment shall have an unmuffled exhaust.

- The **District**~~developer~~ shall require all contractors, as a condition of contract, to maintain and tune-up all construction equipment to minimize noise emissions.

- Stockpiling and vehicle staging area shall be located a minimum of 500 feet from occupied residences,[1] and screened from these uses by a solid noise attenuation barrier where necessary to achieve City Municipal Code-required noise attenuation levels.

    - Solid noise attenuation barriers (temporary barriers or noise curtains) with a sound transmission coefficient (STC) of at least 20 shall be used along project boundaries adjacent to sensitive receptors, where noise monitoring, performed by a qualified noise monitor, indicates exceedance of City Municipal Code noise levels for more than 15 minutes in any 1-hour period.
    - Construction activities that occur outside the allowable hours per City standards (6 p.m. to 7 a.m.) shall require approval of the City Building Official based on demonstration of unusual circumstances and avoidance of significant impacts to neighboring sensitive receptors. Construction noise exceeding City standards (i.e.,

[1] Each doubling of distance reduces the noise by approximately 4.5 dBA, so for peak construction noise such as scrapers, an exterior noise level of 84 dBA at 50 feet reduces to 70.5 dBA at 400 feet, with a 20 dBA typical noise reduction from closed windows, results in an interior noise level of 50.5 dBA, without any further consideration of attenuation by intervening topography, structures, or perimeter walls

interior noise in excess of 50 A-weighted decibels [dBA] or exterior noise in excess of 65 dBA) and statutory time limits is anticipated, and shall require implementation of additional noise attenuation measures such as temporary noise "curtains" to reduce construction noise to meet City standards, or offer the affected sensitive receptors the option of temporary relocation at the ~~Developer's~~ **District's** expense for the duration of the impact.

- All stationary construction equipment (e.g., air compressors, and generators, etc.) shall be operated as far away from the residential and institutional uses as feasible. If this is not feasible, the equipment shall be shielded with temporary sound barriers, sound aprons, or sound skins to the satisfaction of the ~~Building Official~~ **District**.
- In areas subject to potentially significant construction noise impacts, the **District**~~developer~~ shall be required to monitor and document compliance with all applicable noise level limits.
- Construction haul routes for large equipment and material import/export shall be specified to minimize the use of routes affecting sensitive receptors (e.g., residential, parks, hospitals, schools, and convalescent homes, etc.). To the extent feasible, construction phasing for individual subdivisions shall be designed to avoid the need for construction vehicles and related construction traffic to traverse occupied residential neighborhoods. In all cases, trucks shall utilize a route that is least disruptive to sensitive receptors. Construction trucks shall, to the extent feasible, avoid weekday and Saturday a.m. and p.m. peak hours (7 a.m. to 9 a.m. and 4 p.m. to 6 p.m.).

MM NOI-2 ~~Prior to the issuance of each grading or building permit, the~~**The District**~~Applicant~~ shall ~~submit to the Building Official~~ **prepare** a proposed Construction Noise Monitoring Program to respond to and track complaints pertaining to construction noise, throughout demolition and/or grading. Throughout and/or grading, these measures shall include the following:

- A procedure and phone numbers for notifying the **District,** City Building and Safety Department staff and Banning Police Department (during regular construction hours and off-hours);

- A sign prominently posted on-site containing the permitted construction days and hours and complaint procedures and the name and phone number of the person(s) to notify in the event of a problem. The sign shall also include a listing of both the City and construction contractor's telephone numbers (during regular construction hours and off-hours);

- The designation of an on-site construction complaint and enforcement manager for the Project. The manager shall act as a liaison between the Project and its neighbors. The manager's responsibilities and authority shall include the following:

  - An active role in monitoring project compliance with respect to noise;

- Ability to reschedule noisy construction activities to reduce effects on surrounding sensitive receivers;
- Site supervision of all potential sources of noise (e.g., material delivery, construction staging areas, construction workers, debris box pick-up and delivery) for all trades;
- Intervening or discussing mitigation options with contractors; and
- Conducting a preconstruction meeting shall be held with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, and posted signs, etc.) are completed.

MM NOI-3 The **District**~~Applicant~~ shall, through contract specifications, prohibit the use of any on-site construction equipment generating greater than 0.049 RMS (greater than 79 VpD **[vapor pressure deficit]**) within 25 feet of any sensitive use or limit the use of equipment exceeding this standard to less than 30 events per day.

4.14 POPULATION AND HOUSING

4.14.1 Summary of Impact Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to population and housing identified in the Certified EIR.

- **Population Growth.** The Certified EIR determined that the approved project would generate a population directly in the City and region for approximately 30 years, extending from 2012 through 2042. The Certified EIR determined that the approved project-generated population would be within the forecast population increase for the City projected to 2035 by the City's General Plan, SCAG's RTP, and the Western Riverside Council of Governments. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.
- **Housing.** The Certified EIR determined that the Specific Plan area is vacant and undeveloped with intermittent agricultural uses and livestock grazing. The approved project would not result in the displacement or removal of housing or people. The Certified EIR concluded that no impacts would occur. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.14.2 Impacts Associated with the Proposed Project

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. Development of the project site would occur in compliance with the approved project. The proposed project involves the construction of a new school campus and would not introduce additional housing units or additional infrastructure facilities to the Specific Plan area. The proposed project would support the planned population anticipated for the Specific Plan area. As with the approved project, the proposed project would not induce substantial unplanned population growth in the area either directly or indirectly; impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Certified EIR did not identify any housing in the Specific Plan area, including the project site. As shown in Figure 3, *Aerial View*, the project site is graded, disturbed, and vacant. As with the approved project, the proposed project would not displace any existing people or housing that would necessitate the construction of replacement housing elsewhere. Therefore, as with the approved project, no impact would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.14.3 Population and Housing Mitigation Measures Identified in the Certified EIR

No mitigation measures related to population and housing were identified in the Certified EIR.

4.15 PUBLIC SERVICES

4.15.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to public services identified in the Certified EIR.

- **Fire Protection.** The Certified EIR determined that the approved project would create an urban planned community that would result in an increase in demand for fire protection services and facilities. The Certified EIR determined that with the incorporation of mitigation measures PSU-1, HAZ-6, and HAZ-10 through HAZ-12, impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded

that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Police Protection.** The Certified EIR determined that the approved project would generate a population (14,168 persons) that would result in an increase in demand for police protection services and facilities. To finance any new facilities or the expansion of existing facilities, the City assesses a Police Facilities Fee on all new development. Additionally, the Certified EIR determined that the approved project would result in indirect contributions to the City's General Fund through sales and property taxes, thus providing financial support for expanded police operations. The Certified EIR also determined that with the incorporation of mitigation measure PSU-2, impacts on police protection services and facilities would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **School.** The Certified EIR determined that the approved project would generate a student population within the service areas of the Banning Unified School District and Beaumont Unified School District. The Certified EIR stated that the approved project would be required to comply with Government Code Section 65995 and pay prevailing school facility impact fees at the time of building permit issuance, which would provide full mitigation pursuant to Senate Bill 50 and the California Government Code. The Certified EIR also determined that the approved project identified two school sites within the Specific Plan area. The Certified EIR concluded that with the payment of school impact fees and implementation of mitigation measure PSU-3, impacts to public school facilities would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Parks and Recreation.** The Certified EIR determined that the approved project would generate a population requiring park and recreational facilities. The approved project would provide park and recreational facilities within the Specific Plan area to serve the approved project's future residents. Additionally, the Certified EIR determined that the approved project would pay applicable City imposed park facilities fees. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Libraries.** The Certified EIR determined that the approved project would result in an increase in the area's population and community demand for library services. The Certified EIR concluded that the approved project would contribute toward the City's General Fund revenue, which would proportionally increase revenue to the local library districts that could be used to expand existing facilities. Future development occurring under the approved project would be required to pay any applicable Library Facilities Fee that would be levied on new future development within the Specific Plan area. Additionally, the Certified EIR determined that the approved project provides school sites within the Specific Plan area that would include on-site libraries that could be used jointly with the library districts and would provide a location for a new

community center. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.15.2 Impact Associated with the Proposed Project

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

a) Fire protection?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project would occur within the approved project boundaries identified in the Certified EIR. The proposed project would develop the project site with a new school campus, which is a use that was analyzed in the Certified EIR and permitted under the Specific Plan. The proposed project is anticipated to serve 1,200 TK through 8th grade students, which is within the projected student population identified in the Certified EIR. The proposed project would not introduce a new use nor result in the exceedance of the population analyzed in the Certified EIR. Impacts would be less than significant. The proposed project would not result in the need for new or additional fire protection services or facilities. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Police protection?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project would develop the project site with a new school campus. The proposed project would serve 1,200 TK through 8th grade students, which is within the projected student population identified in the Certified EIR. The proposed project would not introduce a new use nor result in the exceedance of the population analyzed in the Certified EIR. The proposed project would not result in the need for new or additional police services or facilities. Impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) Schools?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project does not include a use that would generate a population. The proposed project would develop the project site with a new school campus that would serve the projected student population within the Specific Plan area in accordance with mitigation measure PSU-3. Impacts would be less than significant. The proposed

project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

d) Parks?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The proposed project does not include a use that would directly generate a population growth. The proposed project would serve the residential population within the Specific Plan and surrounding the Specific Plan area. See response to Section 4.16.a, below. As substantiated in this section, the proposed project would result in no impact on parks. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

e) Other public facilities?

No Impact/No Changes or New Information Requiring Preparation of an EIR. Demand for library services is generated by the population within a library's service area. The proposed project would not directly increase population in the project site and would not create a demand for library services. The proposed project would serve the projected student population for the approved project. No impact would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.15.3 Public Services Mitigation Measures Identified in the Certified EIR

It should be noted that mitigation measures PSU-1 and PSU-2 are not applicable to the proposed project. Mitigation measure PSU-1 is not applicable because the project site has been dedicated to the District for the development of a public school facility and the proposed project would be developed in accordance with the District's standards. Mitigation measure PSU-2 is not applicable because the proposed project does not include the construction of residential uses. Mitigation measure PSU-3 has been implemented by the master developer.

4.16 RECREATION

4.16.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to recreation identified in the Certified EIR.

- **Parks.** The Certified EIR determined that the residential portion of the approved project would increase the demand for parkland. The Certified EIR identified that the approved project would include parkland and recreational facilities within the Specific Plan area. Construction of the proposed recreational facilities within the Specific Plan area would be subject to all applicable mitigation measures identified in the Certified EIR to address construction related impacts. Additionally, the approved project would generate

sales and property tax revenue to support the operation and maintenance of the on-site facilities through the City's General Fund to offset any physical deterioration that may occur due to increased public usage. The Certified EIR concluded that impacts would be less than significant with the implementation of mitigation. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.16.2 Impact Associated with the Proposed Project

a) Would the project 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?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The proposed project does not include a use that would directly result in population growth, which would increase the use of existing parks or other recreational facilities. The proposed project's school use is anticipated to serve the residents of the approved project. The proposed project is anticipated to serve approximately 1,200 TK through 8th grade students, which is within the projected student population analyzed in the Certified EIR. No impact would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The proposed project would feature a number of on-site amenities that would serve the school's student population, which include playfields, hardcourts, and play structures. The proposed project would not involve any construction of recreational facilities beyond what is proposed to serve the school's student population. Additionally, the proposed project's implementation does not propose or require construction or expansion of existing recreational facilities in the City and would occur within the boundaries of the Specific Plan area. The physical impacts associated with construction of the proposed project were analyzed in the Certified EIR. Implementation of the proposed project would result in no impacts. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.16.3 Recreation Mitigation Measures Identified in the Certified EIR

There are no mitigation measures related to recreation identified in the Certified EIR that are applicable to the proposed project.

4.17 TRANSPORTATION

4.17.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to transportation identified in the Certified EIR.

- **Conflict with an Applicable Plan, Ordinance, or Policy.** The Certified EIR determined that the approved project would result in conflicts with the City's General Plan despite implementation of mitigation measures TRF-1 through TRF-4. In addition to the implementation of mitigation measures, the Certified EIR determined that traffic improvements in Banning, Beaumont, and Riverside County would be needed to reduce traffic-related impacts. However, certain improvements are under the control of jurisdictions other than the City of Banning; therefore, certain improvements cannot be guaranteed to be constructed in a timely manner. The Certified EIR concluded that impacts would be significant and unavoidable. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Congestion Management Program.** The Certified EIR determined that the approved project would result in conflicts with the Riverside County Congestions Management Plan facilities. The Certified EIR identified mitigation measures to reduce impacts to these facilities. However, as the improvements identified in the mitigation measures TRF-1 through TRF-4 are outside the control of the City and the project applicant, timely implementation of these improvements cannot be guaranteed. The Certified EIR concluded that impacts would remain significant and unavoidable. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Transportation Hazards.** The Certified EIR determined that the approved project's roadways are designed and would be constructed in compliance with the City of Banning, County of Riverside, Caltrans, and other relevant regulating agency development standards, requirements, and regulations. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Emergency Access.** The Certified EIR determined that the approved project would not result in any impacts related to inadequate emergency access as the approved project would not change the circulation system of emergency access routes. No impact would occur. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Conflicts with an Adopted Policy, Plan, or Program.** The Certified EIR determined that the approved project would result in the addition of pedestrian, bicycle, and neighborhood electric vehicles facilities that would provide safe paths for pedestrians, bicycles, and neighborhood electric vehicles throughout the

Specific Plan area. The Certified EIR determined that the approved project would not conflict with the performance of transit systems within the area or with adopted plans or programs related to pedestrian, bicycle, and transit facilities. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.17.2 Impacts Associated with the Proposed Project

The analysis in this section is based partly on the following technical study, which is included as Appendix H to this EIR Addendum.

- *Atwell TK-8 School Traffic Study*, DJ&A, P.C., August 20, 2024

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

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project would develop the project site with a new school campus, which is a use that was analyzed in the Certified EIR and permitted under the Specific Plan. The proposed project would serve the residents of the approved project. The Certified EIR determined that the approved project at completion would generate 62,263 average daily trips. The proposed project would not increase the number of residents projected for the approved project and would not increase the student population generated by the approved project. Therefore, the proposed project is not anticipated to increase the average daily trips for the approved project than what was projected in the Certified EIR.

According to the traffic study prepared by DJ&A for the proposed project (Appendix H), the proposed project would generate a total of 2,724 weekday trips with 888 peak morning trips and 192 peak evening trips at the project site. Because the proposed project is within the boundaries of the approved project and includes a use that was analyzed in the Certified EIR, the proposed project's trips are encapsulated in the average daily trips calculated for the approved project.

The City of Banning follows roadway design standards published by the County of Riverside. County Standard Plan No. 208 requires that any non-residential driveway be at least 150 feet from the flowline of an intersecting street. It should be noted that the proposed project includes a total of four driveways serving three distinct pick-up/drop-off areas. The "Parent" pick-up/drop-off driveway in the northwest corner of the site has two driveways, an ingress from Creekside Avenue and an egress to Landmark Way is approximately 225 feet in length. The "Bus" pick-up/drop-off on the north side of the site is approximately 180 feet in length, and the "Kinder" pick-up/drop-off on the southwest corner is approximately 250 feet long. These pick-up/drop-off areas are proposed to accommodate school activities on site and to minimize queuing onto either Creekside Avenue or Landmark Way. The proposed driveways would not conflict with the County of Riverside Standard Plan No. 208. No impact is anticipated.

Additionally, all four project driveways are anticipated to operate at an acceptable level of service given the low traffic volumes on Landmark Way and Creekside Avenue. No dedicated right-turn lanes are proposed or required for any of the four project driveways along Creekside Avenue and Landmark Way. The "Parent" pick-up/drop-off egress-only driveway on Landmark Way would operate as a right-turn-only vehicle movement.

All collector roadways adjacent to the project site, including Apex Street, Landmark Way, Creekside Avenue, and Atwell Drive, feature Class II on-street buffered bicycle lanes. Sidewalks are present on both sides of these roadways as well. Marked crosswalks are present at the intersection of Landmark Way and Apex Street and Landmark Way and Atwell Drive. These two intersections are recommended to serve as the designated pedestrian and bicycle crossing locations for students accessing the school from neighborhoods north of Landmark Way. Between Atwell Drive and Apex Street, no pedestrian crosswalks are provided across Landmark Way. There are limited pedestrian access points on the north side of Landmark Way within this segment. The only access is available at Landmark Way and Swift Drive. "No Pedestrian Crossing" signs are recommended on Landmark Way at Swift Drive and Creekside Avenue to reinforce use of the existing crosswalks at Atwell Drive and Apex Street. The existing striped crosswalks are consistent with the Manual on Uniform Traffic Control Devices (MUTCD), 11th edition. Signage indicating school crossing locations are required in the MUTCD. No additional pedestrian or bicycle crossing locations are recommended at this time. School crossing guards would be stationed at the designated crossing location across Creekside Avenue at Landmark Way and at the intersections of Landmark Way and Apex Street and Landmark Way and Atwell Drive. No existing or planned public transit services provide connections to the project site or its surroundings.

In summary, the proposed project would not conflict with any program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

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

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The Natural Resources Agency revised Appendix G of the CEQA Guidelines to include a checklist item relating to VMT in December 2018. The Certified EIR was certified before the VMT checklist topic was added to the CEQA Guidelines and therefore does not include a discussion related to VMT.

The Certified EIR determined that the approved project would generate 62,263 trips. Implementation of the proposed project would not result in an increase in the number of vehicles or truck trips compared to the approved project because the proposed project does not include a use not analyzed in the Certified EIR and is within the intensity of development analyzed in the Certified EIR. Moreover, as part of the Land Use and Climate Innovation (formerly Office of Planning and Research) Guidelines, local serving schools, such as the proposed project, are identified as not creating significant impacts related to VMT and can be excluded from VMT Analysis. The proposed project would not result in an increase in VMT compared to the approved project. No impact would occur.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

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

No Impact/No Changes or New Information Requiring Preparation of an EIR. The approved project includes a circulation plan that would reduce the potential for circulation conflicts both on- and off-site. Development of the project site has been factored into the traffic analysis for the Certified EIR. Additionally, according to the traffic study prepared for the proposed project (Appendix H), all four proposed project driveways would provide sufficient driveway sight distance. There are no significant horizontal curves proposed along Creekside Avenue and Landmark Way in the vicinity of the proposed project driveway locations. Impacts related to traffic hazards due to a geometric design feature would not occur.

The proposed project would develop the project site with a new school campus. Moreover, the proposed project would not introduce an incompatible use to the area as the surrounding area is planned for residential uses; the proposed project would introduce a use that would serve the approved project's residents. No impacts related to incompatible uses would occur.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

d) Result in inadequate emergency access?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The approved project's circulation plan provides emergency access and access to nearby uses. The approved project's circulation plan was designed to be responsive to the needs of the community to provide unimpeded access for emergency vehicles to and within the Specific Plan area. Development of the project site with the proposed project would not result in changes to the circulation plan that would result in inadequate emergency access and would meet the standards of the City for access points and roadway design. Additionally, the proposed project would be subject to review by the Division of the State Architect (DSA), who oversees design and construction for K-12 schools. Specifically, the proposed project would be required to comply with all design standards established by DSA, including Policy 07-03, "Fire Department and Emergency Access Roadways and School Drop-Off Areas." The purpose of this policy is to establish requirements based on State Fire Marshal Regulations in Titles 19 and 24 of the California Code of Regulations and the California Vehicle Code for fire and emergency access roadways on public school or community college campuses, including fire and emergency access roadways combined with student drop-off and pick-up areas.

Also, the proposed project would be required to incorporate all applicable design and safety requirements from the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City. Adherence to these codes and standards is ensured through DSA's development review process,

ensuring that proposed access and circulation improvements meet all applicable regulations and standards. Impacts would be less than significant.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.17.3 Transportation Mitigation Measures Identified in the Certified EIR

There are no mitigation measures identified in the Certified EIR that are applicable to the proposed project.

4.18 TRIBAL CULTURAL RESOURCES

4.18.1 Summary of Impacts Identified in the Certified EIR

Impacts related to tribal cultural resources were not analyzed in the Certified EIR because the topic was not officially part of the CEQA Guidelines' Appendix G checklist until January 1, 2019, when the Natural Resources Agency updated Appendix G of the CEQA Guidelines. Therefore, the analysis of tribal cultural resources impact is new in this Addendum. However, the Certified EIR indicated that with implementation of mitigation measures, impacts on culturally significant impacts would be less than significant.

4.18.2 Impacts Associated with the Proposed Project

Would the project 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) 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)?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. Public Resources Code Section 21080.3.1(b), requires the lead agency to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the project prior to the release of negative declaration, mitigated negative declaration, or environmental impact report for a project. This requirement applies to all projects on or after July 1, 2015. Because this is an Addendum to the Certified EIR, the notification and consultation for tribal cultural resources (TCR) requirements pursuant to Public Resources Code, Section 21080.3.1, do not apply to the proposed project, and no tribal consultation was required or performed.

Additionally, the Certified EIR determined that the Specific Plan area has the potential to contain culturally significant resources. The Certified EIR concluded that with implementation of the mitigation measures identified in the Certified EIR, impacts to these resources would be less than significant. The proposed project would occur within the boundaries of the approved project and the project site is mass graded for development.

All cultural resources mitigation measures outlined in the Certified EIR were already completed by the master developer during the project sites mass grading phase and to not apply to the proposed project.

Therefore, the proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

No Impact/No Changes or New Information Requiring Preparation of an EIR. As stated in Section 4.18.a.i, the notification and consultation requirements pursuant to Public Resources Code, Section 21080.3.1, do not apply to the proposed project because this is an Addendum. Additionally, the project site has been mass graded for development. The proposed project would not adversely impact any of the resources criteria outlined in Public Resources Code Section 5024.1. No impact would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.18.3 Tribal Cultural Resources Mitigation Measures Identified in the Certified EIR

No mitigation measures related to tribal cultural resources were outlined in the Certified EIR.

4.19 UTILITIES AND SERVICE SYSTEMS

4.19.1 Summary of Impacts Identified in the Certified EIR

The following summarizes the approved project's environmental impacts related to utilities and service systems identified in the Certified EIR.

- **Potable Water Supply.** The Certified EIR determined that the City has vested rights to extract groundwater from the Banning, Banning Bench, and Banning Canyon Basins. The City also has vested appropriative and developed water rights to the Cabazon Basin. The Beaumont Basin is an adjudicated basin. Moreover, the approved project would create up to 117 AFY of additional stormwater supply for recharge into the Beaumont Basin. The Certified EIR determined that the approved project would not cause the City to exceed its rights in any of the groundwater basins from which it obtains its supply. Additionally, the Certified EIR determined that the projected water demands of the approved project would not require additional extraction from the Cabazon and Banning Basins. These basins are unadjudicated and would not require permits or agreements for additional groundwater extraction. While the approved project would not result in water demands that would require additional extraction from

existing groundwater basins and would not require new or expanded entitlements, mitigation measure WS-1 would be required to ensure that if additional wells are needed, significant environmental impacts would not occur. Additionally, the Certified EIR identified that the approved project's Water Supply Assessment accounted for the impacts of climate change on the availability of the City's imported water supply and determined that no additional analysis was required. Nonetheless, the Certified EIR identified mitigation measure WS-2 to reduce the approved project's cumulative impact on water supply to a less than significant level. The Certified EIR concluded that with the implementation of mitigation, impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Potable Water System.** The Certified EIR identified that the approved project included several water supply and quality features included as PDFs and also proposed the construction of water treatment, storage, and transmission facilities to meet the approved project's water demand. As part of the 2012 Specific Plan Project's storage and transmission system, three to four aboveground storage tanks with a total capacity of 3.5 million gallons were proposed to serve the approved project. Additional water treatment, storage, and transmission facilities included an optional on-site satellite treatment facility, three pump stations, subsurface pipelines, and an off-site sewer lift station. All treatment processes would occur in an enclosed structure. The lift station would be located on a commercial lot in a screened building. The pump stations would also be within an enclosure. In order to ensure the approved project would result in less than significant impacts, the Certified EIR determined that the project would be required to comply with Mitigation Measure PSU-4, which requires fair market compensation for private land acquisition required for off-site infrastructure if City-owned parcels are not available, and a general biological assessment for off-site aboveground infrastructure. The Certified EIR concluded that with implementation of PSU-4, impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Sewer.** The Certified EIR determined that the approved project required either the expansion of existing City wastewater treatment facilities or the construction of a satellite wastewater treatment facility within the Specific Plan area. The Certified EIR determined that potential impacts associated with proposed off-site expansion would be less than significant or can be mitigated with the implementation of mitigation measures PSU-4 and PSU-5 to a less than significant level. The Certified EIR determined that the approved project would generate approximately 1.34 million gallons per day (without conservation) of wastewater at full buildout, not including adjustments based on future water demand reductions due to conservation. With completion of the proposed wastewater treatment facility, there would be an excess capacity of 1.76 million gallons per day after all the approved project's needs are addressed. Approved project-generated wastewater would be handled by either the City's existing treatment plant or potential optional on-site satellite wastewater treatment plant. Alternatively, or in combination with the planned expansion of the City's treatment plant, the approved project would supplement the City's wastewater treatment capacity through the construction and operation of a satellite wastewater treatment plant on-site. The proposed satellite plant would have the capacity to treat the estimated wastewater generated by the approved project

at buildout and additional wastewater generated by existing uses located nearby. Moreover, the proposed on-site water treatment plant would require a permit pursuant to the Regional Water Quality Control Board and would be operated pursuant to RWQCB requirements. Additionally, with the payment of required connection fees and compliance with required regulatory agency permits, the Certified EIR concluded that impacts would be less than significant. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Solid Waste.** The Certified EIR determined that the approved project would increase the total Citywide generation of solid waste; however, with the implementation of mitigation measure PSU-6, impacts to landfill facilities would be less than significant. Additionally, the Certified EIR determined that the approved project would be fully compliant with all federal, State, and local requirements for solid waste diversion and recycling, and with mitigation, impacts with respect to solid waste would be reduced to a less than significant level. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Energy Facilities.** The Certified EIR determined that the approved project is an amendment and restatement of the Deutsch Property Specific Plan, which was included in the City's 10-year Electric System Master Plan. Because the approved project proposed fewer residential units and similar commercial square footage as the Deutsch Specific Plan, the approved project was within the demand footprint analyzed for the Deutsch Specific Plan. The Certified EIR determined that no additional supplies were required to support the approved project, and the development would not require or result in the construction of new energy production facilities. The approved project included the relocation of certain existing power transmission lines and a portion of the existing high pressure natural gas pipeline as well as the installation of underground electrical power lines and natural gas lines throughout the Specific Plan area. As required by mitigation measure HAZ-6, precautions would be required to avoid the existing SoCalGas pipeline that crosses the Specific Plan area. With the implementation of mitigation, impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

- **Communication Facilities.** The Certified EIR determined that cable, internet, and phone services would be extended within the Specific Plan area by their providers as part of the dry utility installations. Cell towers to serve the area were in place at the time the Certified EIR was prepared. Installation of facilities and cabling necessary to support telecommunications would be performed by the service provider as each tract in the Specific Plan area was developed. The Certified EIR concluded that impacts would be less than significant. Additionally, the 2016 EIR Addendum concluded that the reduced project would not result in any new or more severe significant impacts than those identified in the Certified EIR; impacts would be similar as those identified in the Certified EIR.

4.19.2 Impact Associated with the Proposed Project

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. Following is a discussion of the proposed project's potential impacts on water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunication facilities.

Water

The proposed project would develop the project site with a new school campus. The proposed project would not introduce a new land use not analyzed in the Certified EIR and would not exceed the anticipated total school acreage analyzed in the Certified EIR. The proposed project would not substantially alter the approved project's utility plan including the approved project's potable water plan.

No changes to proposed construction activities would occur under the proposed project; the project site was previously mass graded in anticipation of future development under the Specific Plan. As such, no changes to the temporary demand for water and the associated demand for water infrastructure during construction would occur under the proposed project.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Wastewater

The proposed project would not substantially alter the approved project's utility plan, including the approved project's master sewer plan. The proposed project would not introduce a new land use not analyzed in the Certified EIR and would not exceed the anticipated total school acreage analyzed in the Certified EIR.

No changes to proposed construction activities would occur under the proposed project; the project site was previously mass graded in anticipation of future development under the Specific Plan. As such, no changes to wastewater flows and the demand for wastewater infrastructure would occur during construction.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Stormwater Infrastructure

The proposed project would not substantially alter the Approved project's utility plan, including the approved project's master storm drainage plan. As with the approved project, the proposed project would be required to comply with the standard conditions identified in the Certified EIR. The approved project's stormwater system was designed to adequately handle stormwater flows generated by the 100-year storm. The proposed project

would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Energy, Natural Gas, and Telecommunication

The proposed project would develop the project site with a new school campus with a similar intensity and density analyzed in the Certified EIR. As with the approved project, the proposed project would be served by the City's Electric Department for electricity services, Southern California Gas Company for natural gas services, and Verizon California for phone services. Both Verizon and Time Warner offer internet services. The proposed project would not introduce a new use not analyzed in the Certified EIR. Further, the proposed project would be required to comply with energy efficiency standards in Title 24 of the California Administrative Code and Appliance Efficiency Regulations. The proposed project would also comply with CALGreen requirements related to energy and water conservations. These measures would decrease electricity and gas consumption. The proposed project is not anticipated to operate less efficiently than the approved project. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

Conclusion

The Certified EIR assumed the approved project's land uses would consume natural gas. The proposed project may require Southern California Gas Company connections. The utility infrastructure improvements to be implemented with the proposed project are assessed as part of the proposed project and analyzed throughout this Addendum. Furthermore, construction activities associated with this infrastructure would be required to comply with the applicable mitigation measures identified in the Certified EIR. Impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR.

Based on the foregoing analysis, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The City would provide water services to the approved project and proposed project. As with the approved project, the proposed project would develop the project site with a new school campus. The proposed project would not introduce a new land use not analyzed in the Certified EIR and would not exceed the anticipated total school acreage analyzed in the Certified EIR. The proposed project would not result in an increase in water demand that would require the construction or relocation of new or expanded water systems. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) Result in a determination by the waste water treatment provider, which serves or may serve the project that has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project would develop the project site with a new school campus; the proposed project would be consistent with the development assumptions in the Certified EIR. As with the approved project, wastewater generated by the proposed project would be treated at the City's Wastewater Treatment Plant. The City's Wastewater Treatment Plant and the approved project's Satellite Wastewater Treatment Plant would have adequate capacity to receive and treat wastewater generated by the proposed project, approved project, and existing commitments. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project would be consistent with the development assumptions in the Certified EIR. As with the approved project, the proposed project would generate solid waste during construction and operation from the proposed school campus. The City of Banning, Banning Unified School District, Beaumont Unified School District, Western Riverside Council of Governments, and Waste Management have in place a recycling program in the Beaumont and Banning Unified School Districts that manages waste reduction and waste recycling programs in the District. As with the approved project, the primary landfills serving the disposal needs for the City of Banning are Lamb Canyon Landfill, El Sobrante Landfill, and Badlands Landfill. According to the California Department of Resources Recycling and Recovery (CalRecycle), the Lamb Canyon Landfill has a cease operation date of April 2032 and has a maximum daily capacity of 5,000 tons per day. The El Sobrante Landfill has a cease operation date of January 2051 and has a maximum daily capacity of 16,054 tons per day, and the Badlands Landfill has a cease operation date of January 2059 and a maximum daily capacity of 5,000 tons per day (CalRecycle 2024). Based on available capacities of the existing landfills, adequate capacity is available to serve the solid waste needs of the proposed project. Impacts would be less than significant.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. Similar to the approved project, the proposed project would be required to comply with the applicable provisions of the California Building Code and CALGreen standards. Additionally, the California Integrated Waste Management Act of 1989 (AB 1989) primarily guides solid waste management in the State and emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste

management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. In addition to AB 939, SB 1374 requires that the proposed project implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous construction debris. The proposed project would comply with the applicable regulations associated with solid waste, including AB 939 and SB 1374. Impacts would be less than significant.

The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.19.3 Utilities and Service Systems Mitigation Measures Identified in the Certified EIR

There are no mitigation measures in the Certified EIR related to utilities and service systems that are applicable to the proposed project.

4.20 WILDFIRE

4.20.1 Summary of Impacts Identified in the Certified EIR

Impacts related to wildfire were not analyzed in the Certified EIR because the topic of wildfire was not officially part of the CEQA Guidelines' Appendix G until January 1, 2019, when the Natural Resources Agency updated Appendix G of the CEQA Guidelines. Therefore, the analysis of wildfire impact is new in this Addendum.

4.20.2 Impact Associated with the Proposed Project

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

A State Responsibility Area (SRA) is an area where CAL FIRE is the primary emergency response agency responsible for fire suppression and prevention (Cal Fire 2024a). The project site is not within an SRA and is not in an area classified as a very high FHSZ by CAL FIRE (Cal Fire 2024b, 2009). The nearest lands designated as a very high FHSZ in a local responsibility area (LRA) is approximately a mile northeast of the project site (CalFire 2009). The nearest lands within an SRA and classified as a very high FHSZ are approximately 1.5 mile northeast of the project site (Cal Fire 2024).

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact/No Changes or New Information Requiring Preparation of an EIR. The proposed project is within the boundaries analyzed for the approved project in the Certified EIR. The approved project was not identified as an emergency facility nor was the approved project identified as an emergency evacuation route by the City's Emergency Operations Plan (Banning 2007). The primary emergency operation center (EOC) for the City is the police station at 128 E. Ramsey Street, and the alternate EOC location is Banning City Yard at 176 E. Lincoln Street (Banning 2007). The primary and alternate EOCs are 4.2 miles and 4.5 miles, respectively,

east of the project site. The proposed project would develop the project site with a new school campus. The proposed school use is not anticipated to substantially impair the City's adopted emergency response plan or emergency evacuation plan. No impact would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project is within the boundaries analyzed for the approved project in the Certified EIR. The project site is not located in proximity to steep slopes where high winds can exacerbate winds. The areas immediately surrounding the project site are proposed to be developed with residential uses in accordance with the approved project. The proposed project would develop the project site with a new school campus. Additionally, no wildlands exist within the immediate vicinity of the project site. The proposed project is not anticipated to exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) Require the installation of 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?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The proposed project is within the boundaries analyzed for the approved project in the Certified EIR. The Certified EIR determined that the installation of associated infrastructure to support the approved project would result in less than significant impacts with the implementation of mitigation. The proposed project would result in the development of the project site with a new school campus. As with the approved project, the proposed project would be served by the City for electrical services, Southern California Gas Company, Verizon California for telephone services, City for potable water services, and the City for wastewater services. The proposed project would connect to the approved project's planned utility lines. The proposed project does not require the installation or maintenance of infrastructure including roads, fuel breaks, emergency water sources, power lines, or utilities that may exacerbate fire risk or ongoing impacts to the environment. Impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

d) 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?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. The project site is partially within Zone X, an area of minimal flood hazard, and within LOMR 19-09-2247P, which removed the project site from the 1 percent flood hazard zone, as identified by the FEMA FIRM (FEMA 2008). The project site is fully graded and relatively flat. Additionally, the project site is not in proximity to steep slopes or natural drainage courses. The project site and surrounding area are graded and relatively flat. The proposed project is not anticipated to 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. Impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

4.20.3 Wildfire Mitigation Measures Identified in the Certified EIR

No mitigation measures related to wildfire were identified in the Certified EIR as the evaluation of wildfire impacts was not required at the time the Certified EIR was prepared.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

4.21.1 Impacts Associated with the proposed project

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number of restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. All applicable mitigation measures identified in the Certified EIR to avoid and reduce impacts have been integrated into the proposed project, and with these mitigation measures, the proposed project would not substantially degrade the quality of the environment. The proposed project would not significantly affect fish or wildlife habitat or species. The project site is disturbed, graded, and mostly devoid of sensitive biological resources.

Additionally, with respect to cultural resources, all applicable mitigation measures identified in the Certified EIR to avoid and reduce impacts have been integrated into the proposed project, and with these mitigation measures, the proposed project would not eliminate important examples of the major periods of California history or prehistory. The project site is disturbed, graded, and mostly devoid of cultural resources.

Therefore, the proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Does the project have impacts that are individually limited, but cumulative considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future project.)

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. A cumulative impact would occur if the proposed project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future project for each resource area. As demonstrated in this Addendum, any construction or operation impacts would either be less than significant or mitigated to a less than significant level, and there would be no long-term significant operational impacts. The proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant/No Changes or New Information Requiring Preparation of an EIR. As demonstrated in this Addendum, the proposed project would not result in any new or more severe significant impacts than those identified in the Certified EIR. Consequently, the proposed project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

This page intentionally left blank.

5. Findings

As indicated in this Addendum, the impacts of the proposed project have already been adequately identified and addressed in the Certified EIR, and no substantial changes have occurred with respect to the circumstances under which the project is undertaken that would require major revisions to the Certified EIR. Analysis of the proposed project shows that there are no new significant environmental effects and no substantial increase in the severity of previously identified significant effects.

Impacts beyond those identified in the Certified EIR would not be expected to occur as a result of the proposed project, which would still be subject to all applicable, previously required mitigation measures from the Certified EIR. The proposed project would not result in any new information of substantial importance that would have new, more severe impacts, new mitigation measures, or new or revised alternatives from what was identified in the Certified EIR.

Based on the record as a whole, there is no substantial evidence that the proposed project would result in significant environmental impacts not previously studied in the Certified EIR, and accordingly, the project changes would not result in any conditions identified in CEQA Guidelines, Section 15162. Thus, a subsequent EIR is not required for the changes to the project, and the District adopts this Addendum to the Butterfield Specific Plan EIR in accordance with CEQA Guidelines Section 15164.

5. Findings

This page intentionally left blank.

6. List of Preparers

6.1 BEAUMONT UNIFIED SCHOOL DISTRICT

Ana Gonzalez, Director of Facilities Planning

6.2 PLACEWORKS

Malia Durand, Associate Principal (Principal in Charge)

Jorge Estrada, Senior Associate (Project Manager)

Christhi Mrosla, Associate

Chris Shields, Senior Associate, Noise

Emily Parks, Associate, Air Quality and GHG

Cary Nakama, Graphic Artist

5. Findings

This page intentionally left blank.

7. References

ASM Affiliates (ASM). 2024. Phase 1 Cultural Resources Technical Report for Banning School, Banning, Riverside County, California. (Appendix C)

Banning, City of. 2005. City of Banning General Plan: Community Development. http://banning.ca.us/DocumentCenter/View/663/GP-Ch-III-Community-Development?bidId=.

———. 2007. City of Banning Emergency Operations Plan. http://banning.ca.us/DocumentCenter/View/2777/Banning-EOP---Final-Part-2--Rev1212?bidId=.

———. 2017. Butterfield Specific Plan Land Use Plan. https://banningca.gov/Archive.aspx?ADID=1872.

———. 2021. City of Banning General Plan Land Use and Zoning Map. http://banning.ca.us/DocumentCenter/View/5462/Banning_GeneralPlan-and-Zoning-2021?bidId=.

———. 2024a. City of Banning Municipal Code: Division II: Land Use Districts. https://library.municode.com/ca/banning/codes/code_of_ordinances?nodeId=TIT17ZO_DIVIILAUSDI.

———. 2024b. City of Banning Active Transportation Plan. http://banning.ca.us/DocumentCenter/View/14360/DRAFT-Banning-ATP-042524.

Bay Area Air Quality Management District (BAAQMD). 2023, May. California Environmental Quality Act Air Quality Guidelines. https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines.

California Air Pollution Control Officer's Association (CAPCOA). 2022, April. CalEEMod, California Emissions Estimator Model User Guide, Version 2022.1. Prepared by: ICF in collaboration with Sacramento Metropolitan Air Quality Management District. https://www.caleemod.com/user-guide.

California Air Resources Board (CARB). 2005, April. Air Quality and Land Use Handbook: A Community Health Perspective. https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf.

———. 2022, December. 2022 Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf.

———. 2024. Area Designations Maps/State and National. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.

7. References

California Department of Forestry and Fire Protection (Cal Fire). 2009. Very High Fire Hazard Severity Zone in LRA. https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map/upload-1/banning.pdf.

———. 2024a State Responsibility Area. https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/.

———. 2024b. State Responsibility Area Viewer. https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1.

California Department of Transportation (Caltrans). 2013, September. Technical Noise Supplement ("TeNS"). https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf.

———. 2020. Transportation and Construction Vibration Guidance Manual. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.

———. 2024. California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

California Department of Resources Recycling and Recovery (CalRecycle). 2024. Solid Waste Information System. https://www2.calrecycle.ca.gov/SolidWaste/Activity.

California Department of Water Resources (DWR). 2024. Sustainable Groundwater Management Act Basin Prioritization Map. https://gis.water.ca.gov/app/bp-dashboard/final/.

DJ&A, P.C. (DJ&A). 2024. Atwell TK-8 School Traffic Study. August 20, 2024. (Appendix H)

Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map. https://msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/mscprintb_gpserver/j3658d9e813504c9b8b9738b5bdfa32c5/scratch/FIRMETTE_a1f4652e-f49e-4aa2-a34a-96c7417013a9.pdf.

Ninyo & Moore Geotechnical & Environmental Sciences Consultants. 2024. Preliminary Environmental Assessment Work Plan New School Site 5800 Landmark Way. October 20, 2023. (Appendix D)

Office of Environmental Health Hazard Assessment (OEHHA). 2015, February. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf.

Regional Conservation Authority (RCA). 2024. RCA Multiple Species Habitat Conservation Plan Information Map. https://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=2b9d4520bd5f4d35add35fb58808c1b7.

7. References

San Gorgonio Pass Subbasin Groundwater Sustainability Agency. 2022. San Gorgonio Pass Subbasin Groundwater Sustainability Plan. https://www.sgpgsas.org/wp-content/uploads/2022/01/Final_SGPGSP_1230_2021-web.pdf.

Southern California Association of Governments (SCAG). 2024, April 14. Connect SoCal Plan: The 2024–2050 Regional Transportation Plan / Sustainable Communities Strategy of the Southern California Association of Governments. https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx.

South Coast Air Quality Management District (South Coast AQMD). 1993. California Environmental Quality Act Air Quality Handbook.

———. 2008, July. Final Localized Significance Threshold Methodology. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf.

———. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf.

———. 2022, December. Final 2022 Air Quality Management Plan. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16.

———. 2023, March (revised). South Coast AQMD Air Quality Significance Thresholds. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25.

7. References

This page intentionally left blank.

Appendices

Appendix A Air Quality and Greenhouse Gas Modeling Data

Appendices

This page intentionally left blank.

Appendices

Appendix B Health Risk Assessment

Appendices

This page intentionally left blank.

Appendices

Appendix C Cultural Resources Report

Appendices

This page intentionally left blank.

Appendices

Appendix D Preliminary Environmental Assessment Equivalent Report

Appendices

This page intentionally left blank.

Appendices

Appendix E Geological and Environmental Hazards Assessment Report

Appendices

This page intentionally left blank.

Appendices

Appendix F Water Pipeline Safety Hazard Assessment

Appendices

This page intentionally left blank.

Appendices

Appendix G Noise Modeling Data

Appendices

This page intentionally left blank.

Appendices

Appendix H Traffic Study

Appendices

This page intentionally left blank.