# 3.0 COMMENTS AND RESPONSES

Pursuant to Public Resources Code Section 21091(d) and the State of California Environmental Quality Act (CEQA) Guidelines Section 15088 a lead agency is required to evaluate comments received during the noticed comment period and prepare a written response for each comment relating to any significant environmental issues raised on the Draft Environmental Impact Report (EIR). Written responses to the comment letters received on the Draft EIR during the public review and comment period are provided in this chapter. All letters received during the public review period on the Draft EIR are provided in their entirety. Each letter is immediately followed by responses keyed to the specific comments. The letters are grouped by the affiliation of the commenting entity as follows: State agencies (A); local agencies (B); regional agencies (C); organizations (D); and individuals (E).

The written responses presented in this chapter describe the nature of any significant environmental issues raised and provide a good-faith, reasoned analysis in response. The range of responses includes providing clarification on the Draft EIR, making factual corrections, explaining why certain comments may not warrant further response, or simply acknowledging the comment for consideration by the decision-making bodies.

As described in Chapter 1.0, Introduction, the Draft EIR Comments and Response to Comments (RTC) (Chapter 3.0), and Draft EIR revisions (Chapter 4.0), together with the Draft EIR, constitute the Final EIR. At least 10 days prior to certifying an EIR, the City must provide a written response to a public agency on comments made by that agency which conform with the requirements of this division. Responses shall conform with the legal standards established for responses to comments on draft environmental impacts.

Where comments on the Draft EIR concern issues requiring technical expertise, the responses to comments, like the analysis in the Draft EIR, rely on the knowledge and professional analysis of qualified experts.

Text revisions to the Draft EIR are provided in Chapter 4.0 of this document.

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## A. STATE AGENCIES

A-1: State of California, California Air Resources Board, Stanley Armstrong, Air Pollution Specialist (January 12, 2024)

A-2: State of California, Department of Fish and Wildlife, John Dempsey, Environmental Scientist (January 26, 2024)

A-3: State of California, California Air Resources Board, Matthew O'Donnell, Chief, Risk Reduction Branch, Transportation and Toxics Division (January 30, 2024)

A-4: State of California, Department of Fish and Wildlife, Kim Freeburn, Environmental Program Manager (February 5, 2024)

A-5: State of California, Department of Justice, Rob Swanson, Deputy Attorney General, Bureau of Environmental Justice (December 21, 2023)

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**From:** Adam Rush
**To:** Sandra Calderon
**Cc:** JJ Jenkins
**Subject:** FW: Sunset Crossroads Draft EIR - SCAQMD file request
**Attachments:** image001.png

Sincerely,

Adam B. Rush, AICP
*Community Development Director*

**Community Development**
City of Banning

Direct Line: (951) 922-3131
Cell: (760) 219-2791
E: arush@banningca.gov

99 E. Ramsey Street
Banning, CA 92220
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**Sent:** Friday, January 12, 2024 9:22 AM
**To:** sghadimi@aqmd.gov
**Cc:** Adam Rush <arush@banningca.gov>; swang1@aqmd.gov; **Subject:** Sunset Crossroads Draft EIR - SCAQMD file request

Good morning, Sahar,

We've uploaded the files requested by SQAQMD to the Sharepoint site located at the link below.

https://lsaassoc-my.sharepoint.com/:f:/g/personal/theresa_wallace_lsa_net/EvaAFzCS7LpDm578CzeSDNwBdFfKQiNd-5VXXqkvNXkoEg?e=a4xcEP

The files are in the folder titled "SCAQMD file request".

Let me know if you have any questions.

Thank you,
**Ronald**

**From:** Adam Rush
**To:** Armstrong, Stanley@ARB
**Cc:** Sandra Calderon
**Subject:** RE: Sunset Crossroads Project DEIR
**Attachments:** image003.png
Sunset Crossroads Draft EIR - SCAQMD file request.msg
**Importance:** High

Mr. Armstrong,

Please see the attached email that was previously provided to the SCAQMD.

Sincerely,

Adam B. Rush, AICP
*Community Development Director*

**Community Development**
City of Banning

Direct Line: (951) 922-3131
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**From:** Armstrong, Stanley@ARB <stanley.armstrong@arb.ca.gov>
**Sent:** Friday, January 12, 2024 9:11 AM
**To:** Adam Rush <arush@banningca.gov>
**Subject:** Sunset Crossroads Project DEIR

Hi Adam,

I'm reviewing the DEIR for the sunset Crossroads Project DEIR. Could you please provide me with the AERMOD input and output files used in the Project's HRA? A-1-1

Stan

**Stanley Armstrong**
Air Pollution Specialist
Transportation &Toxics Division
1001 I Street
Sacramento, CA 95814

## Response to Letter A-1

State of California, California Air Resources Board
Stanley Armstrong, Air Pollution Specialist
January 12, 2024

### Response to Comment A-1-1

The California Air Resources Board (CARB) requested that the City provide the AERMOD input and output files used in the preparation of the Project's Health Risk Assessment (HRA). The requested AERMOD files were uploaded to a Sharepoint site on January 12, 2024. The City provided CARB with access to the Sharepoint site (via an email link) on January 16, 2024. This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR or supporting studies; therefore, no further comment is required.

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**From:** Adam Rush
**To:** Dempsey, John(Trey)@Wildlife
**Cc:** Beck, Carly@Wildlife; Machuca, Breanna@Wildlife
**Subject:** RE: DEIR for Sunset Crossroads Project, SCH No. 2021020011
**Date:** Friday, January 26, 2024 3:32:22 PM
**Attachments:** image003.png
**Importance:** High

Good Afternoon Mr. Dempsey,

Thank you for your email! I am confirming receipt. I will be discussing your request with the Applicant and the City's EIR Consultant.

I anticipate providing a response by close of business today. However, an answer is not determined by then, please be on the lookout for an email over this weekend.

Thank your time and patience!

Sincerely,

Adam B. Rush, AICP
*Community Development Director*

**Community Development**
City of Banning

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**From:** Dempsey, John(Trey)@Wildlife <John.Dempsey@Wildlife.ca.gov>
**Sent:** Friday, January 26, 2024 2:36 PM
**To:** Adam Rush <arush@banningca.gov>
**Cc:** Beck, Carly@Wildlife <Carly.Beck@wildlife.ca.gov>; Machuca, Breanna@Wildlife <Breanna.Machuca@Wildlife.ca.gov>
**Subject:** DEIR for Sunset Crossroads Project, SCH No. 2021020011

Good afternoon Adam,

The California Department of Fish and Wildlife would like to request a one-week extension to submit our comments on the DEIR for Sunset Crossroads Project, SCH No. 2021020011. The comment period ends on 1/30/2024 but would like to request until 2/6/2024. Please let me know if that is acceptable.

A-2-1

Thank you,

John

John (Trey) Dempsey
Environmental Scientist
California Department of Fish and Wildlife
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764

## Response to Letter A-2

State of California, Department of Fish and Wildlife
John Dempsey, Environmental Scientist
January 26, 2024

### Response to Comment A-2-1

The California Department of Fish and Wildlife (CDFW) requested a one-week extension to submit comments on the Draft EIR, noting the comment period was scheduled to end on January 30, 2024, and requested an extension to February 6, 2024. On January 29, 2024, the City granted the requested extension to the CDFW, who subsequently provided comments to the Draft EIR on February 5, 2024. This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR or supporting studies; therefore, no further comment is required.

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CALIFORNIA AIR RESOURCES BOARD

Gavin Newsom, Governor
Yana Garcia, CalEPA Secretary
Liane M. Randolph, Chair

January 30, 2024

Adam Rush
Community Development Director
City of Banning
99 East Ramsey Street
Banning, California 92220
arush@banningca.gov

*Sent via email*

Dear Adam Rush:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Sunset Crossroads Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2021020011. The Project proposes the construction and operation of 268,400 square feet of medical office, professional office, education, recreation, and commercial uses, up to 5,545,000 square feet of industrial land uses on an approximately 543-acre site. Of the proposed industrial land uses, the City plans to construct 330,000 square feet would be used for cold storage.[1] The proposed Project would result in 20,963 daily vehicle trips along local roadways, including 3,257 heavy-duty truck trips.[2] The Project is proposed within the City of Banning (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes. A-3-1

CARB submitted a comment letter, which is attached to this letter, on the Notice of Preparation (NOP) for the DEIR released in February 2021. CARB's comments, dated March 2, 2021, highlighted the need for preparing a health risk assessment (HRA) for the Project and encouraged the City and applicant to implement all existing and emerging zero emission technologies to minimize exposure to diesel particulate matter (diesel PM) and oxides of nitrogen (NOx) emissions for all neighboring communities, and to minimize the greenhouse gases that contribute to climate change. Due to the Project's proximity to residences already burdened by multiple sources of pollution, CARB's comments expressed concerns with the potential cumulative health risks associated with the construction and operation of the Project. A-3-1-A

[1] City of Banning. Sunset Crossroads Draft Environmental Impact Report. Page 3-4. Accessible at *https://files.ceqanet.opr.ca.gov/267351-3/attachment/mslMa09flKlFplfkUbbOlRocZUKU38sECvSJz85tZ3wpJSTJcrG9QgOnXC3ChA5bGBHFOlgfgrr3B2Bb0*

[2] City of Banning. Sunset Crossroads Draft Environmental Impact Report. Appendix J-2 (Traffic Analysis) Page 59. Accessible at *https://ceqanet.opr.ca.gov/2021020011/3*

CARB staff are concerned that the Project will expose nearby residential communities to elevated levels of air pollution beyond the existing baseline emissions at the Project site. Residences are located to the north, south, east and west of the Project site, with the closest residence located within 58 feet east of the Project site. In addition to residences, Hemmerling Elementary School, Sundance Elementary School, and Central Elementary School are all located within two miles of the Project site. These residences and schools are located near existing toxic diesel PM emission sources, which include existing industrial facilities, rail traffic along the Union Pacific rail line, and vehicular traffic along Interstate 10. A-3-2

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel PM emissions generated during the construction and operation of the Project would negatively impact neighboring communities. A-3-3

Through its authority under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)); In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25% of the census tracts as analyzed by the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the Project is within the top 15% for Pollution Burden and is considered a disadvantaged community.[3] The City must ensure that the Project does not adversely impact neighboring disadvantaged communities. A-3-3-A A-3-4

Industrial facilities, like the facilities described in the Project, can result in high volumes of heavy-duty diesel truck traffic, and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.[4] To better address regional air pollution and global climate change, Governor Gavin Newsom signed Executive Order N-79-20 on September 23, 2020. The Executive Order states: "It shall be a goal of the State that 100% of in-state sales of new A-3-4-A

[3] Pollution Burden represents the potential exposure to pollutants and the adverse environmental conditions caused by pollution.

[4] With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

passenger cars and trucks will be zero-emission by 2035. It shall be a further goal of the State that 100% of medium and heavy-duty vehicles in the State be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. It shall be further a goal of the State to transition to 100% zero-emission off-road vehicles and equipment by 2035 where feasible." The Executive Order further directs the development of regulations to help meet these goals. To ensure that lead agencies, like the City, stay in step with evolving scientific knowledge to protect public health from adverse air quality and greenhouse gas impacts from the transportation sector, which serves as the basis of the Governor's Executive Order N-79-20, CARB staff urges the City to plan for the use of zero-emission technologies within the Project area described in this letter.

A-3-4-A Cont

A-3-5

## The DEIR Used Inappropriate Trip Lengths When Modeling the Project's Air Quality Impacts from Mobile Sources

The City may have underestimated mobile source air pollutant emissions in the DEIR by relying on unrealistic truck trip lengths. The Project's operational air pollutant emissions were estimated using the California Emissions Estimator Model (CalEEMod). Based on CARB's review of the CalEEMod outputs found in Appendix C-1 (Air Quality Impact Analysis) of the DEIR, the City assumed approximately 59% of the total truck traffic would travel a distance of 40 miles, and 41% of the total truck traffic would travel a distance of 6.9 miles. The City states in the Chapter 4.3 (Air Quality) of the DEIR that these truck trip distances are based on South Coast Air Quality Management District's (SCAQMD) recommend 40 mile trip distance.[5] SCAQMD's recommended truck trip lengths were calculated using trip length data provided in the California Association of Governments (SCAG) 2016 Regional Transportation Plan, which includes many short trips in the Los Angeles Region that do not fully reflect the truck trip distances for the Project. Since trucks serving the Project may originate from the Ports of Long Beach and Los Angeles or other regions further than 40 miles, CARB urges the City to use Project-specific truck trip distances in their air quality impact analysis. Unless the City re-evaluates or provides substantiation for the designated truck trip lengths, the Project should include a mitigation measure or project design feature that restricts trucks from traveling a distance greater than what was analyzed in the DEIR.

A-3-6

A-3-7

A-3-8

A-3-9

[5] City of Banning. Sunset Crossroads Draft Environmental Impact Report. Page 4.3-44. Accessible at *https://files.ceqanet.opr.ca.gov/267351-3/attachment/I1Vlhk8hxFD3pYPascEWKNyiq_ZNtzQOSNGpa0QI3c5NjDJF5fTE26tvyJGiDPUGpaPIf7xACd8hOj590*

## The DEIR Did Not Fully Account for Air Pollutant Emissions from Heavy-Duty Trucks During On-Site Grading

The DEIR did not fully account for mobile source air pollutant emissions from grading operations during the Project's construction phase. According to Chapter 3.5.3.8 (Grading) of the DEIR, the construction of the Project would result in "approximately 2,266,112 cubic yards (CY) of cut and approximately 2,118,698 CY of fill"[6] Based on this cut and fill grading estimate, the construction of the Project would require 147,414 cubic yards of soil to be exported from the Project site. However, in Chapter 4.3 (Air Quality) of the DEIR, the Project's construction air quality analysis "assumes the site would be balanced (no import or export needed)."[7] The CalEEMod User Guide assumes that trucks importing or exporting soil from a project site can carry a maximum load of 16 cubic yards. Assuming each truck exporting soil from the Project site can carry a maximum load of 16 cubic yards, the Project's air quality analysis should have assumed a total of 9,213 truck trips would be required to export soil from the Project site. A-3-10 A-3-11

The City must remodel the Project's construction air pollutant emissions using accurate heavy-duty truck trip estimates and travel distances. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near construction haul routes could be exposed to diesel emissions that were not evaluated in the DEIR. The Final Environmental Impact Report (FEIR) should clearly state the total number of heavy-duty truck trips expected during Project construction so the public can fully understand the potential environmental and human health impacts of the Project on their communities. A-3-12 A-3-13

## The DEIR Does Not Analyze Potential Air Quality Impacts from the Project's Transport Refrigeration Units

Chapter 3 (Project Description) of the DEIR states approximately 330,000 square feet of the proposed light industrial uses would be used for cold storage. Warehouses containing cold storage are serviced by trucks with transport refrigeration units (TRU) to transport refrigerated goods to and from the facility.[8] However, based on CARBs review of the DEIR, A-3-14

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[6] City of Banning. Sunset Crossroads Draft Environmental Impact Report. Page 3-83. Accessible at *https://files.ceqanet.opr.ca.gov/267351-3/attachment/msIMa09flKlFplfkUbbOlRocZUKU38sECvSJz85tZ3wpJSTJcrG9QgOnXC3ChA5bGBHFOlgfgrr3B2Bb0*

[7] City of Banning. Sunset Crossroads Draft Environmental Impact Report. Page 4.3-15. Accessible at *https://files.ceqanet.opr.ca.gov/267351-3/attachment/l1Vlhk8hxFD3pYPascEWKNyiq_ZNtzQOSNGpa0Ql3c5NjDJF5fTE26tvyJGiDPUGpaPlf7xACd8hOj590*

[8] TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

the City did not model and report air pollutant emissions from TRUs. The air pollutant emission estimates, found in Table 4.3.L through Table 4.3.N of the DEIR, were modeled using the CalEEMod. Although CalEEMod can estimate air pollutant emissions from area, energy, and mobile sources, the current version of CalEEMod does not account for air pollutant emissions from TRUs. Since a portion of the Project will be used for cold storage, CARB urges the City to model and report the Project's air pollution emissions from TRUs using CARB's latest emission factors. The City should assume that a percentage of the Project's truck fleet is equipped with TRUs, and should estimate the idling duration for each TRU; estimates of TRU percentage and idling time should be conservative from a health protection standpoint.

A-3-15

A-3-16

## The Health Risk Assessment Used Inappropriate Assumptions When Modeling the Project's Health Risk Impacts from On-Site Transport Refrigeration Units

The HRA prepared for the Project and presented in Section 4.3 (Air Quality) of the DEIR, concluded that residences near the Project site would be exposed to diesel PM emissions that would result in cancer risks of 3.3 chances per million during Project operation. Since the Project's cancer risks are below the South Coast Air Quality Management District (SCAQMD) significance threshold of 10 chances per million, the DEIR concluded that the Project would result in a less than significant impact on public health. CARB has reviewed the Project's HRA and is concerned that the Project's cancer risk impacts may have been underestimated for the reasons detailed below.

A-3-17

In the HRA, the City "assumed that all refrigerated trucks would use the electrical hookups rather than operate their [TRUs]."[9] This assumption is based on Mitigation Measure AIR-2 that requires "all truck/dock bays serving cold storage facilities within the Project site to be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs."[10] Because of this assumption, the City assumed that all TRUs entering the Project site would be electric during its operation. Consequently, the City did not model or report potential cancer risk impacts associated with the idling of TRUs within the Project site or along local roadways in the DEIR. The City should not include mitigation measures when evaluating the Project's unmitigated health risk impacts. Unless the City plans to include a design measure in the FEIR that would require all trucks and trailers with TRUs to be plug-in capable and require all trucks to run in a zero-emission mode while at the facility, the City should model and report potential cancer risk impacts associated with diesel-powered TRUs

A-3-18

A-3-19

A-3-20

[9] City of Banning. Sunset Crossroads Draft Environmental Impact Report. Appendix C-2 (Health Risk Assessment). Page 4-6. Accessible at *https://ceqanet.opr.ca.gov/2021020011/3*

[10] City of Banning. Sunset Crossroads Draft Environmental Impact Report. Page 4.3-35. Accessible at *https://files.ceqanet.opr.ca.gov/267351-3/attachment/I1Vlhk8hxFD3pYPascEWKNyiq_ZNtzQOSNGpa0QI3c5NjDJF5fTE26tvyJGiDPUGpaPlf7xACd8hOj590*

operating within the Project site. The revised HRA should also evaluate potential cancer risks from diesel-powered TRUs traveling along local roadways serving the Project site. A-3-21

The cancer risks reported in the HRA did not account for the overlap of construction and operation of the Project. In the Chapter 4.3 (Air Quality) of the DEIR, the City states, "there is potential for overlap between construction and operational activity."[11] Although the City accounted for this overlap when modeling the Project's air quality analysis, they did not account for this overlap in the HRA. In the HRA, the City evaluated potential cancer risks only associated with the Project operation. To fully understand the Project's potential cancer risk impacts to nearby communities, the City should model the health risks associated with Project construction overlapping with Project operation in the HRA and report the findings in the FEIR. A-3-22 A-3-23

## The City Must Include More Mitigation Measures to Reduce the Project's Significant Impact on Air Quality and Public Health During Project Operation

The City concluded in Chapter 4.3 (Air Quality) of the DEIR that the combined operation and construction of the Project would result in a potentially significant impact on air quality. According to Table 4.3.J through Table 4.3.M, the combined construction and operation of the Project would expose nearby residences to volatile organic compounds (VOC) as high as 964 pounds per day, NOx as high as 439 pounds per day, carbon monoxide (CO) as high as 985 pounds per day, particulate matter less than 10 microns in size (PM10) as high as 219 pounds per day, and particulate matter less than 2.5 microns in size (PM2.5) as high as 66 pounds per day, which were all found to exceed the SCAQMD's significance thresholds. A-3-23-A

The City included two mitigation measures (Mitigation Measure AIR-1 and Mitigation Measure AIR-2). These mitigation measures include requiring all 50 horsepower or more off-road diesel-powered construction equipment to be equipped with Tier 4 Final engines, all vehicles with a gross weight greater than 14,000 pounds to meet or exceed 2010 model-year emissions equivalent engines standards, all on-site cargo handling equipment to be electric, diesel-powered heavy-duty trucks to idle less than five minutes, the installation of 50 Level 3 AC Class 8 electric vehicle truck chargers at tractor trailer parking spaces, and the installation of electric plug-ins for trucks and trailers with TRUs. Even after implementing these mitigation measures, the City concludes in the DEIR that the Project's combined construction and operational emissions of VOC, NOx, CO, PM10 and PM2.5 would result in a significant and unavoidable impact on air quality. A-3-23-B

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[11] City of Banning. Sunset Crossroads Draft Environmental Impact Report. Page 4.3-44. Accessible at *https://files.ceqanet.opr.ca.gov/267351-3/attachment/I1Vlhk8hxFD3pYPascEWKNyiq_ZNtzQOSNGpa0QI3c5NjDJF5fTE26tvyJGiDPUGpaPlf7xACd8hOj590*

Mitigation Measure AIR-2 includes requiring all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site to meet or exceed 2010 model-year emissions requirements. MM AIR-2 is nearly identical to CARB's Truck and Bus Regulation, which requires trucks, by law, to have 2010 or newer model year engine by January 1, 2023.[12] Once the Project is fully operational in the year 2027, trucks with a model year of 2009 or older would already have been required to comply with the regulation. Compliance with laws and regulations should not be used exclusively to mitigate the Project's impact on air quality. A-3-24

To mitigate the Project's operational NOx emissions to a less than significant level after mitigation, CARB urges the City to include a measure that requires all heavy-duty trucks to be zero-emission and to install on-site infrastructure to support those zero-emission trucks. A-3-25

As presented below, CARB has many regulations that promote and eventually require the use of zero-emission trucks at freight facilities, such as the proposed Project. Specifically, the Advanced Clean Fleet Regulation would require all drayage trucks in California to be zero-emission by 2035. A-3-25-A To support trucks serving the Project that are already complying with the Advanced Clean Fleets regulation, CARB urges the City to require the infrastructure to support on-site zero-emission trucks at the start of Project operations. A-3-25-B A list of commercially-available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP).[13] The HVIP is a part of California Climate Investments to incentivize the purchase of zero-emission trucks. Based on CARB's review of the zero-emission trucks listed in the HVIP, there are commercially available electric trucks that can meet the cargo transportation needs of individual industrial uses proposed in the City today. CARB has implemented or is developing regulations that will require the use of zero-emission trucks. A-3-26

The list below details the CARB regulations that will result in the reduction of diesel PM and NOx emissions from trucks within California:

- **Drayage Truck Regulation:** The existing Drayage Truck Regulation requires all drayage trucks to operate with an engine that is a 2007 model year or newer.
- **Truck and Bus Regulation:** The Truck and Bus Regulation requires all trucks, including drayage, to have 2010 or newer model year engines by January 1, 2023. A-3-27
- **Heavy-Duty Low-NOx Omnibus Rule:** The Heavy-Duty Low-NOx Omnibus Rule requires truck emission standards to be reduced from 0.20 to 0.05 grams per brake horsepower-hour (g/bhp-hr) from 2024 to 2026, and to 0.02 g/bhp-hr in 2027.
- **Advanced Clean Trucks Regulation:** The Advanced Clean Trucks Regulation, approved by CARB on June 25, 2020, requires manufacturers to start the transition

[12] CARB. Truck and Bus Regulation Compliance Requirement Overview. June 18, 2019. Accessible at https://ww3.arb.ca.gov/msprog/onrdiesel/documents/fsregsum.pdf

[13] Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: *https://californiahvip.org/*

from diesel trucks and vans to zero-emission trucks beginning in 2024. The rule is expected to result in about 100,000 zero-emission trucks in California by the end of 2030 and about 300,000 by 2035. The Advanced Clean Trucks regulation is part of CARB's overall approach to accelerate a large-scale transition to zero-emission medium-and heavy-duty vehicles. CARB approved amendments to the Advanced Clean Trucks regulation in March 2021; the amendments help ensure that more zero-emission vehicles are brought to market. CARB directed staff to ensure that fleets, businesses, and public entities that own or direct the operation of medium- and heavy-duty vehicles in California purchase and operate ZEVs to achieve a smooth transition to ZEV fleets by 2045 everywhere feasible, and specifically to reach:

  - 100% zero-emission drayage trucks, last mile delivery, and government fleets by 2035
  - 100% zero-emission refuse trucks and local buses by 2040
  - 100% zero-emission capable utility fleets by 2040

- **Advanced Clean Fleets Regulation:** The Advanced Clean Fleets Regulation is part of CARB's overall strategy to accelerate a large-scale transition to zero-emission medium- and heavy-duty vehicles. This regulation works in conjunction with the Advanced Clean Trucks regulation. The regulation applies to trucks performing drayage operations at seaports and railyards, fleets owned by State, local, and federal government agencies, and high priority fleets. High priority fleets are those entities that own, operate, or direct at least one vehicle in California, and that have either $50 million or more in gross annual revenue, or that own, operate, or have common ownership or control of a total of 50 or more vehicles. The regulation affects medium- and heavy-duty on-road vehicles with a gross vehicle weight rating greater than 8,500 pounds, off-road yard tractors, and light-duty mail and package delivery vehicles. All drayage trucks entering seaports and intermodal railyards would be required to be zero-emission by 2035.

A-3-27 Cont

With the implementation of the regulations listed above, specifically the Advanced Clean Trucks Regulation, tenants at the proposed industrial/warehouse development must begin the transition from diesel trucks and vans to zero-emission trucks. To protect the air quality the residences near the Project site, CARB urges the City to include contractual language in tenant lease agreements requiring future tenants to use zero-emission trucks during their operation in the FEIR.

## Conclusion

To reduce the exposure of toxic diesel PM emissions in disadvantaged communities already disproportionally impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel PM emissions, NOx emissions, and emissions of the greenhouse gases that contribute to climate change. CARB

A-3-28

also urges the City to evaluate air pollutant emissions from heavy-duty trucks during onsite grading, analyze potential air quality impacts from trucks and trailers with TRUs serving the Project, and include diesel PM exposure to nearby residents from the operation of TRUs within the Project site and along local roadways in the HRA. A-3-29

CARB appreciates the opportunity to comment on the DEIR for the Project. Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

CARB staff can provide assistance with zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at *stanley.armstrong@arb.ca.gov*. A-3-30

Sincerely,



Matthew O'Donnell, Chief, Risk Reduction Branch

Attachment

cc: State Clearinghouse
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Yassi Kavezade, Organizer, Sierra Club
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Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

CALIFORNIA AIR RESOURCES BOARD

Gavin Newsom, Governor
Jared Blumenfeld, CalEPA Secretary
Liane M. Randolph, Chair

March 2, 2021

Adam Rush, Director
Community Development Department
City of Banning
99 E. Ramsey Street
Banning, California 92220
Submitted via email: arush@banningca.gov

Dear Adam Rush:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Notice of Preparation (NOP) for the Sunset Crossroads Specific Plan (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2021020011. The Project would allow for the construction and operation of up to 295,000 square feet of general commercial building space and 5,500,000 square feet of industrial/logistic building space. The proposed Project is located in the City of Banning (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

Freight facilities, such as the proposed industrial buildings, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.[1] CARB has reviewed the NOP and is concerned about the air pollution and health risk impacts that would result should the City approve the Project.

## I. The Project Would Increase Exposure to Air Pollution in Disadvantaged Communities

The Project, if approved, will expose nearby disadvantaged communities to elevated levels of air pollution. Residences are located to the north, east, west and south of the Project, with the closest residences located within 100 feet of the Project's eastern boundary. The community is surrounded by existing toxic diesel particulate matter (diesel PM) emission sources, which include existing industrial uses, vehicular traffic along Interstate 10 (I-10), and locomotive traffic along Union Pacific (UP) rail lines. Due to the Project's proximity to residences already disproportionately burdened by multiple sources of air pollution, CARB is concerned with the potential cumulative health impacts associated with the construction and operation of the Project.

A-3-31

[1] With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel PM emissions generated during the construction and operation of the Project would negatively impact the community, which is already disproportionally impacted by air pollution from existing industrial uses, locomotive traffic along UP rail lines, and vehicular traffic along I-10. A-3-32

## II. The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Operation.

Since the Project is near residential communities that are already disproportionately burdened by multiple air pollution sources, CARB urges the City and applicant to prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy-duty trucks. The HRA should also determine if the operation of the Project in conjunction with past, present, and reasonably foreseeable future projects or activities would result in a cumulative cancer risk impact on nearby residences. To reduce diesel PM exposure and associated cancer risks, CARB urges the City and applicant to include all the air pollution reduction measures listed in Attachment A of this comment letter in the HRA and DEIR. A-3-33

Since the Project description provided in the NOP does not explicitly state that the proposed industrial land uses would not be used for cold storage, there is a possibility that trucks and trailers visiting the Project site would be equipped with transport refrigeration units (TRU).[2] TRUs on trucks and trailers can emit large quantities of diesel exhaust while operating within the Project site. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near where these TRUs could be operating, would be exposed to diesel exhaust emissions that would result in a significant cancer risk impact to the nearby community. If the Project would be used for cold storage, CARB urges the City to model air pollutant emissions from on-site TRUs in the DEIR, as well as include potential cancer risks from on-site TRUs in the Project's HRA. If the Project will not be used for cold storage, CARB urges the City to include one of the following design measures in the DEIR: A-3-34

- A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project site; or A-3-35
- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use. A-3-36

[2] TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

Since the general commercial uses proposed under the Project include fuel sales, the DEIR should evaluate the Project's air quality and potential cancer risk impacts associated with on-site gas station operation. CARB is presently developing the Gasoline Service Station Industrywide Risk Assessment Supplemental Policy Guidance document that will provide strategies to reduce community-scale health impacts from new and existing gas stations. A draft guidance document is expected to be available for public review in Spring 2021. CARB can provide a copy of the guidance document to the City and applicant once it is made publicly available. Below is a preliminary list of CARB's recommended emission reduction strategies to reduce toxic air pollutant emissions from new gas stations: A-3-37

- Ensuring gas stations are equipped with enhanced vapor recovery systems; A-3-38
- Adding high-capacity vapor processors to high throughput gas stations; A-3-39
- Limiting the amount of throughput at gas stations; and A-3-40
- Configuring gas stations or locating gas station equipment away from receptors (e.g., raising the release height of a P/V valve). A-3-41

The HRA prepared in support of the Project should be based on the latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments),[3] CARB's Hotspots Analysis and Reporting Program (HARP2 model), and the South Coast Air Quality Management District's (SCAQMD) CEQA Air Quality Handbook.[4] The Project's mobile diesel PM emissions used to estimate the Project's cancer risk impacts should be based on CARB's latest 2021 Emission Factors model (EMFAC2021). Mobile emission factors can be easily obtained by running the EMFAC2021 Web Database: https://arb.ca.gov/emfac/emissionsinventory. A-3-42

The HRA should evaluate and present the existing baseline (current conditions), future baseline (full build-out year, without the Project), and future year with the Project. The health risks modeled under both the existing and the future baselines should reflect all applicable federal, state, and local rules and regulations. By evaluating health risks using both baselines, the public and City planners will have a complete understanding of the potential health impacts that would result from the Project. A-3-43

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3. Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.
4. SCAQMD's 1993 Handbook can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.

## III. The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Construction

In addition to the health risks associated with operational diesel PM emissions, health risks associated with construction diesel PM emissions should also be included in the air quality section of the DEIR and the Project's HRA. Construction of the Project would result in short-term diesel emissions from the use of both on-road and off-road diesel equipment. The OEHHA guidance recommends assessing cancer risks for construction projects lasting longer than two months. Since construction would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project site during construction. A-3-44

The HRA should account for all diesel PM emission sources related to Project construction, including, but not limited to, off-road mobile equipment, diesel generators, and on-road heavy-duty trucks. As previously stated in Section II of this letter, the cancer risks evaluated in the construction HRA should be based on the latest OEHHA guidance, CARB's HARP2 model, and SCAQMD's CEQA guidance. The cancer risks reported in the HRA should be calculated using the latest emission factors obtained from CARB's latest EMFAC and Off-road models. A-3-45

## IV. Conclusion

To reduce the exposure of toxic diesel PM emissions in disadvantaged communities already disproportionally impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel PM and $NO_x$ emissions, as well as the greenhouse gases that contribute to climate change. CARB encourages the City and applicant to implement the measures listed in Attachment A of this comment letter to reduce the Project's construction and operational air pollution emissions. A-3-46

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments. A-3-47

CARB appreciates the opportunity to comment on the NOP for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at stanley.armstrong@arb.ca.gov.

Sincerely,



Robert Krieger, Chief
Risk Reduction Branch
Transportation and Toxics Division

Attachment

cc: See next page.

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# ATTACHMENT A

## ATTACHMENT A

### Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

The California Air Resources Board (CARB) recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommended by CARB, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

### Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools. A-3-48

2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks. A-3-49

3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved equal to or exceed that of a Tier 4 engine. A-3-50

4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered. A-3-51

5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen ($NO_x$) standard starting in the year 2022.[1] A-3-52

[1] In 2013, CARB adopted optional low-$NO_x$ emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce $NO_x$ emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-$NO_x$ emission standard is available at: https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards.

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation. A-3-53

**Recommended Operation Measures**

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site. A-3-54

2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.[2] A-3-55

3. Include contractual language in tenant lease agreements that requires all TRUs entering the project site be plug-in capable. A-3-56

4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans. A-3-57

5. Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the project site be zero-emission. A-3-58

6. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available. A-3-59

7. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030. A-3-60

[2] CARB's technology assessment for transport refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf.

8. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,[3] Periodic Smoke Inspection Program (PSIP),[4] and the Statewide Truck and Bus Regulation.[5] A-3-61

9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site. A-3-62

10. Include contractual language in tenant lease agreements that limits on-site TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted, and the health impacts fully mitigated. A-3-63

11. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid. A-3-64

12. Including language in tenant lease agreements, requiring the installing of vegetative walls[6] or other effective barriers that separate loading docks and people living or working nearby. A-3-65

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[3] In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: https://ww2.arb.ca.gov/our-work/programs/ttghg.

[4] The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: https://www.arb.ca.gov/enf/hdvip/hdvip.htm.

[5] The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model-year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

[6] Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: https://ww2.arb.ca.gov/sites/default/files/classic//research/apr/past/13-306.pdf.

## Response to Letter A-3

State of California, California Air Resources Board
Matthew O'Donnell, Chief, Risk Reduction Branch, Transportation and Toxics Division
January 30, 2024

### Response to Comment A-3-1

This comment from California Air Resources Board (CARB) provides a general summary of the Project Description in the Draft EIR. The commenter correctly states the intended total square footage of commercial and industrial uses but misstates the site acreage as 543 acres (versus the 533.8 acres cited in the Draft EIR) and references the incorrect vehicle trip count. The Sunset Crossroads Supplemental Traffic Assessment (see Draft EIR Appendix J-3) states the Development Project would generate 20,496 daily vehicle trips, of which 3,330 would be truck trips. Furthermore, the commenter states that the City plans to construct 330,000 feet of cold storage uses. The City of Banning is the CEQA Lead Agency and is neither the applicant nor developer of the Development Project. This comment does not raise any issues concerning or relating to the adequacy of the environmental analysis in the Draft EIR; therefore, no further response is required.

### Response to Comment A-3-1-A

The commenter refers to its comment letter (dated March 2, 2021) concerning the Project's Notice of Preparation (NOP), which requested preparation of a Health Risk Assessment for the Project and encouraged the City to implement all existing and emerging zero-emission technologies to minimize diesel particulate emissions and oxides of nitrogen on neighboring communities, and to minimize the emission of greenhouse gases that contribute to climate change. Specific responses to the issues identified in the commenter's NOP letter are provided in the responses to Comments A-3-31 through A-3-65. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

### Response to Comment A-3-2

The commenter describes residences near the Project site and elementary schools located within two miles of the Project site, all of which are located near existing diesel PM emission sources and expresses concern that the Project will expose nearby residences to air pollution levels that exceed existing levels at the Project site. The comments are noted. The Draft EIR includes a localized significance thresholds (LST) analysis that documents the cumulative (existing plus project) air pollution levels (concentrations) at the nearest sensitive receptor, consistent with SCAQMD guidance. As detailed in Tables 4.3.O and 4.3.P of the Draft EIR, air pollution levels would not exceed the ambient air quality standards (AAQSs) at any location surrounding the Development Site during either construction or operation of the Development Project; therefore, nearby residents would not be exposed to harmful air pollution levels and there would not be a significant impact to the residents' health. Whether the Project's cumulative impacts are significant, rather than whether the Development Project merely increases emissions above the existing baseline, is the appropriate measure of Project impacts. Further, as described in the Air Quality Impact Analysis (Draft EIR, Appendix C-1):

> "The concentration increases shown in Table O [and Table P] occur near to the Development S at the school (Mount San Jacinto College satellite campus) receptor location across Sunset Avenue . . .It should be noted that there are closer receptors located to the west of the project site, however, when using the dispersion modeling, based on the atmospheric conditions, the model indicates that the pollutant concentrations would be the highest at the satellite campus".

These "closer receptors" are the residential uses located to the west of the Development Site in the Sun Lakes Community, which are approximately 50 feet from the Development Site boundary. The LST dispersion modeling included sensitive receptors at locations surrounding the Development Site in all directions; therefore, the results of the LST analysis demonstrate that no sensitive receptor in any direction would be exposed to harmful air pollution levels from either construction or operation of the Development Project. The modeling extended out sufficiently in all directions to demonstrate that the natural air dispersion of pollutants in the atmosphere would result in lower air pollutant levels the further a sensitive receptor is from the Development Site. As previously stated, the air pollution levels at Mount San Jacinto College (MSJC) campus would be greater than at any other location. Once construction is completed, as shown in Air Quality Impact Analysis (Figure 2, Appendix C-1), the Development Project will retain open space along the western site boundary. While the residential uses west of the Development Site are located approximately 50 feet from the property Line of the Development Site, these residences will be buffered from the building and operational area emissions and associated air quality and health impacts by the atmospheric dispersion by more than 700 feet of open space area and landscaping situated between the Development Project buildings and the property line.

As stated in Section 4.15 of the Draft EIR, Hemmerling Elementary School is located approximately 0.8 miles northeast of the Development Site and the Development Project's impacts were found to be less than significant. The nearest elementary schools cited by the commenter are located approximately 1.2 miles (Sundance Elementary School) and 2.0 miles (Central Elementary School) from the Development Site. The guidance governing the preparation of health risk assessment does not require an assessment of health impacts to all schools within two miles of a potential development site. This guidance is provided in the CARB's guidance document "Air Quality and Land Use Handbook: A Community Health Perspective" in which Figure 1-2 shows that potential cancer risk from truck activities is reduced to less than 10 per million 225 meters from the center of the source.

Further, as stated previously, and as shown in Figure 4-1 in the Draft EIR Appendix C-2 HRA, the risk assessment included locations (shown as green "plus" symbols) covering all sensitive receptors surrounding the Development Site in all directions, up to 2,870 feet east and 2,000 feet north of the Development site. While this does not extend to the stated schools, Figure 4-2 in the Draft EIR Appendix C-2 HRA, graphs the cancer health risk levels surrounding the Development site. As shown, due to prevailing winds and general atmospheric dispersion the cancer risk would only reach above 1 in one million in a small band along the northeast and east sides of the Development site. Everywhere else the cancer risk would be less than 1 in one million, including at all the stated schools. The SCAQMD threshold of significance is 10 in one million. While, in some cases the maximum health risk level is not the nearest sensitive receptor, due to atmospheric dispersion that causes pollutants to sail over nearby locations and land further out, in this case that is not happening as demonstrated in Figure 4-2 in Appendix C-2 of the Draft EIR. Thus, it is reasonable to conclude that health impacts to

receptors located further away than the modeled receptors shown in Figure 4-1 in the Draft EIR Appendix C-2 HRA would have proportionally reduced potential (and less than significant) for adverse health impacts and would also be less than significant Finally, the SCAQMD health risk threshold is for the incremental increase to health risks from the project emissions. There is no requirement to factor in any existing ambient TAC emissions to the HRA. No further response is required.

**Response to Comment A-3-3**

The commenter describes the purpose of Assembly Bill 617 (AB 617) as air quality legislation that highlights the need for emission reductions in communities with high pollution burdens like the project area. AB 617 was signed into law in July 2017, requiring new community-focused and community-driven action to reduce air pollution and improve public health in communities experiencing disproportionate burdens from exposure to air pollutants. Three of the 10 Statewide communities selected by the CARB in the first year of the AB 617 program are in the South Coast Air Basin (Basin). The nearest community to the Development Site was the San Bernardino, Muscoy area located in San Bernardino County. The Eastern Coachella Valley community (including the city of Coachella and unincorporated portions of Riverside County including the communities of Thermal, Oasis, Mecca, and North Shore) was selected for community monitoring in 2019. No portion of the City of Banning or its Sphere of Influence is currently located in a Community Air Protection Program (CAPP) established pursuant to AB 617.

The commenter notes that the passage of AB 617 was enacted to protect local communities from the effects of air pollution. However, AB 617 as chaptered, focuses on stationary sources of harmful air pollution and is not directly applicable to the Development Project, which has no stationary sources of air quality emissions. The Development Project's primary emissions are mobile source and off-road construction equipment, which are regulated by CARB.

As described in the LST analysis in Section 4.3.6.3 of the Draft EIR, localized emissions of PM10 would not exceed the AAQS during construction or operation of the Development Project. As the $PM_{10}$ emissions included in the LST analysis include all diesel PM plus other types of $PM_{10}$, this LST analysis demonstrates that Development Project emissions would not negatively impact neighboring communities. Additionally, the HRA further demonstrates that operation of the Development Project would not result in cancer risk or acute/health risks exposure in excess of established standards; therefore, operation of the Development Project would not negatively impact neighboring communities. No further response is required.

**Response to Comment A-3-3-A**

The commenter generally summarizes CalEPA's authority under Health and Safety Code section 38711 to identify disadvantaged communities and the factors considered in defining them. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-4**

The commenter states, without citation, that the census tract containing the Development Project is within the top 15 percent for pollution burden and is considered a disadvantaged community. The

Development Site is actually split between two census tracts, and both are large geographic areas. Census tract 6065043812 encompasses the northern portion of the Development Site, plus the Sun Lakes Country Club Community, and areas generally southwest of the Development Site. Census Tract 6065043813 encompasses the southern portion of the Development Site, plus areas to the south of Westward Avenue and extends east to include Morongo Band of Mission Indian tribal lands. Both census tracts extend a substantial distance from the Development Site (up to 13 miles to the east and 7.25 miles to the south) and include the heavily traveled Interstate 10 and Union Pacific Rail corridors, which currently contribute to the tracts' pollution burdens. The CalEnviroScreen 4.0 tool identifies pollution burden using the following exposures: ozone concentrations, $PM_{2.5}$ concentrations, diesel particulate concentrations, drinking water contaminants, residential childhood lead risk, pesticide use, toxic releases, traffic impacts, (hazardous material) clean-up sites, groundwater threats, hazardous waste sites, impaired waters, and solid waste sites, most of which are not pertinent to the neighborhoods surrounding the Development Site.

The CalEnviroScreen 4.0 tool uses average pollution burden and population characteristics to identify a specific tract's overall percentile score. In response to this comment CalEnviroScreen 4.0[1] was reviewed and it shows that the pollution burden percentile score for census tracts 0605043812 and 6065043813 are 54.3 and 72.8, respectively. While the two tracts are diverse communities, and tract 6065043813 is identified as an SB 535 Disadvantaged Community, it should be noted the diversity and socio-economic conditions of the cited census tracts are derived from tract-wide data and may not correspond to diversity and socio-economic conditions for the communities surrounding the Project site which are the receptors modeled in the Draft EIR. Due to the geographic extent of each tract, residents further away from the Development Site and the modeled receptors would have a proportionally reduced risk from Project activities.

Regardless, environmental justice is not a topic that is required to be evaluated or considered pursuant to CEQA Guidelines Sections 15120-15132 (Contents of Environmental Impact Reports) nor does CEQA require that air quality impacts be assessed based on a census tract level. Specifically for the evaluation of health impacts, only the geographic area in the immediate vicinity of the Development Site is required to be assessed because impacts dissipate as the distance from the Development site increases. The significance thresholds for health risks are no different between the general population and disadvantaged communities. These thresholds have been established to protect the most vulnerable populations, such as disadvantaged communities. The air quality analysis contained in the Draft EIR and supplemented in the Final EIR both demonstrate that the Development Project would not expose any sensitive receptor, which includes receptors located in disadvantaged communities, to substantial concentrations of localized criteria pollutants or diesel particulate matter (see Draft EIR, pages 4.3-52 to 4.3-56. See also *Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment* Final EIR Appendix C-4 and *Sunset Crossroads Supplemental Air Quality Assessment memo*, Final EIR Appendix C-5). A localized significance analysis was conducted for both construction and operational phases of the Development Project. The localized significance thresholds for Project were calculated using air dispersion modeling with ambient pollutant concentrations and Development Project emissions. As borne out by the localized emission analysis (see Draft EIR Section 4.3, Tables 4.3.O and 4.3.P), the

[1] The CalEnviroScreen model is available on the OEHHA website at oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

Development Project would not expose sensitive receptors to substantial pollutant concentrations during either construction or operational phases and impacts would be less than significant. The health risk assessment used a toxic air contaminant (TAC) emission dispersion model to address all on-site emission sources and vehicle emissions. TAC concentrations were translated into long-term carcinogenic and chronic and short-term acute health levels following SCAQMD risk assessment guidelines. As presented in Table 4.3.Q of the Draft EIR and Revised Table 4.3.Q in the Final EIR (Section 4.3) and in *Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment* (Final EIR, Appendix C-4), the cancer and non-cancer (chronic and acute) risk to the nearest sensitive receptors do not exceed established SCAQMD thresholds.

The HRA and LST analyses address potential impacts based on the distance separating the sensitive receptor and the emitting source, while regional air quality impacts are based on impacts to the Basin as a whole. There currently is no methodology to model the cumulative areawide or localized air quality health risks within a census tract. The Project could cumulatively contribute to an increase in health effects in the SCAB associated with VOC, $NO_X$, CO, $PM_{10}$, $PM_{2.5}$ because these air quality impacts exceed the regional significance thresholds. See Draft EIR Table 4.3.N and revised Table 4.3.N (Appendix C-4 of the Final EIR). Although SCAQMD has some of the most sophisticated air quality modeling and health impact evaluation capability of the State's air districts, it has not provided methodology, and modeling does not currently exist, to assess the specific correlation between mass emissions generated, cumulative increases from individual projects, and the effect on health from exceeding regional thresholds. At best, it would be speculative to assess whether or the extent to which the Project would contribute to adverse health effects from the air quality emissions that exceed SCAQMD thresholds either in the SCAB or in local census tracts. Therefore, no further analysis is required. See CEQA Guidelines Section 15145.

The SCAQMD's recommended thresholds of significance apply to individual development projects. In developing thresholds of significance for individual projects, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. The City relies on the SCAQMD's recommended methodology to evaluate cumulative impacts, which is to conclude that an impact considered to be significant on a project-specific basis would also cause a significant cumulative impact. No further response is required.

**Response to Comment A-3-4-A**

This commenter notes the diesel emissions that industrial facilities generate and generally describes the requirements of Executive Order N-79-20 which establishes goals, including dates, for the in-state sale of new zero-emissions passenger cars and trucks including medium and heavy-duty vehicles, off road vehicles and equipment, and drayage trucks. Executive orders are not binding on private projects such as this. *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-5**

Based on Executive Order N-79-20**,** the commenter asks the City to plan for the use of zero -emission technology in the Project area. As noted in the response to Comment A-3-4-A above, the specified

Executive Orders does not apply to this private development. Nevertheless, the Draft EIR contains measure that anticipate or require the use of zero-emissions technology. Mitigation Measure AIR-2 requires the installation of at least 350 Level 2 electric vehicle (EV) chargers for automobiles and light-duty vehicles within the public and employee parking areas of the Development Project. This mitigation also requires that "...all on-site cargo handling equipment including yard trucks, hostlers, yard goats, pallet jacks, forklifts and other on-site equipment shall be electric with the necessary electrical plug-in charging in the Development Project electrical system, buildings, and equipment storage and parking areas, and at buildout, "a minimum of 50 Class 8 electric vehicle (EV) truck chargers shall be installed at the tractor trailer parking spaces in logical locations to facilitate electric truck charging." These provisions of Mitigation Measure AIR-2 ensure that the Development Project does everything currently feasible and has taken significant steps toward electrification of both on-road vehicles and off-road support equipment. The Development Project also includes additional electric conduit and capability to accommodate additional E-Trucks as they become more commercially available in the future.

**Response to Comment A-3-6**

The commenter states that the City may have underestimated mobile source emissions by relying on unrealistic truck trip lengths. The original emissions analysis included in the DEIR and associated technical report assumed Class 8 (or Heavy-Heavy Duty) truck trip lengths would be 40 miles, consistent with the SCAQMD WAIRE Implementation Guidelines.[2] This assumption was applied to the Class 8 trucks, which represent approximately 59 percent of the total truck traffic to the Development site.[3] Approximately 41 percent of the truck traffic associated with the proposed project is expected to be smaller than Class 8 trucks, according to the traffic assessment conducted for the Development Project and included in the Draft EIR.[4] As described in Section 4.3 of the DEIR, the Air Quality analysis included an assumption that the smaller trucks (including Medium Duty, Light-Heavy Duty, and Medium-Heavy Duty trucks, herein referred to as "Medium Duty" trucks) would have trip lengths consistent with CalEEMod default trip lengths.

In response to this comment, an updated analysis was conducted to address both this comment and Comments B-2-11 and B-2-12 related to the trip lengths, as summarized in Section 4.3.6.2 of the Draft EIR and as updated in the *Sunset Crossroads Supplemental Air Quality Assessment* memo (Urban Crossroads, June 25, 2024). See Final EIR Section 4.3 and Appendix C-5. See also the response to Comment A-3-14 for the results of this updated modeling. The trip length for trucks by axle type was determined based on SCAQMD's published data from their Warehouse Actions and Investments to Reduce Emissions (WAIRE) Implementation Guidelines. Based on the WAIRE Implementation Guidelines, average truck trip lengths were separated into three categories: Class 2b-3 (2-axle), Class 4-7 (3-axle), and Class 8 (4+-axle, with average trip lengths of 15.3, 14.2, and 39.9 miles, respectively.) A weighted average trip length based on the number of 2, 3, and 4+ axle trucks was determined

[2] South Coast Air Quality Management District (SCAQMD). 2021. Rule 2305 Warehouse Indirect Source Rule. June. Website: www.agmd.gov/docs/default-source/planning/fbmsm-docs/waire-implementation-guidelines.pdf (accessed April 2024).

[3] LSA. 2023. Draft Environmental Impact Report - Sunset Crossroads: SCH NO. 2021020011. Appendix B: Proposed Project Trip Generation to Appendix J-3: Sunset Crossroads Supplemental Traffic Assessment. December.

[4] Ibid.

consistent with the traffic assessment for each of the industrial land use categories modeled in CalEEMod (33.25, 28.47, and 29.94 miles for 2-axel, 3-axel, and 4+ axel trucks, respectively.) Based on the updated truck trip lengths and inclusion of TRU emissions, the emissions totals for the Development Project were updated based on the updated CalEEMod run for truck trip lengths and the updated calculations for TRU emissions as described in Appendix C-4 of the Final EIR. See also *Sunset Crossroads Supplemental Air Quality Assessment memo* (Urban Crossroads, July 11, 2024), Final EIR Appendix C-5. The results of the updated emissions for the Development Project are summarized in revised Tables 4.3.M and 4.3.N of the Final EIR (also see Tables 5 and 6 in Appendix C-5 to the Final EIR). As shown in the tables in Appendix C-5 to the Final EIR, the incremental emissions that could occur based on the calculation based, on WAIRE Implementation Guidelines truck trip lengths and the addition of TRU emissions(see response to Comment A-3-18 below) would not result in a substantive increase in emissions that would not cause a new significant impact that was not previously disclosed in the Draft EIR. The supplemental HRA and air quality analysis have been attached to the Final EIR as Appendices C-4 and C-5, respectively, with corresponding revisions made to Section 4.3 of the Final EIR.

These revisions in modeling do not require recirculation of the Draft EIR. Under CEQA Guidelines Section 15088.5 (a), "Significant new information" requiring recirculation includes, for example, a disclosure showing that: (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented; (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; or (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. Under CEQA Guidelines Section 158088.5(b), recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The revised remodeling for additional truck trip lengths and addition of TRU emissions shows a minimal increase in emissions. Therefore, the additional modeling and updated totals do not change the significance determinations, and do not meet the criteria of "new information" warranting recirculation of the Draft EIR. No further response is required.

**Response to Comment A-3-7**

The commenter states that the 40-mile truck trip length used for the Project's operational emissions was incorrectly based on SCAQMD's recommended truck trip lengths, which were calculated using trip length data from the 2016 RTP that includes many short trips in the LA region that do not represent the truck trip distances for the Development Project, since the trucks may originate from the Ports of Los Angeles and Long Beach or other regions further than 40 miles. Please refer to the response to Comment A-3-6 describing an updated analysis in response to the question of truck trip lengths. The trip lengths specified in the SCAQMD WAIRE Implementation Guidelines are considered by SCAQMD to be the best estimates of truck trip lengths for warehouse projects in the SCAQMD region, and the Guidelines data shows, based on SCAQMD's assessment, that many heavy duty truck trips do not originate from or travel to the Ports, and that a 40-mile distance accuracy represents truck trip length for heavy duty trucks in the SCAQMD region. The other truck trip length assumptions also have been revised to conform to the WAIRE Implementation Guidelines as described in Comment A-

3-6. See *also Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment* (LSA July 2024) Final EIR Appendix C-4 and *Sunset Crossroads Supplemental Air Quality Assessment memo* (Urban Crossroads, July 11, 2024), Final EIR Appendix C-5. No further response is required.

**Response to Comment A-3-8**

The commenter urges the City to use Project-specific truck trip distances in the Project air quality impacts analysis. Because the tenants and specific uses of the buildings within the Development site are currently unknown, it is not feasible to calculate actual Development Project-specific truck lengths at this time. As described in the responses to Comments A-3-6 and A-3-7, the updated truck trip lengths were estimated by axle type based on SCAQMD's published data from the WAIRE Implementation Guidelines. See *Sunset Crossroads Supplemental Air Quality Assessment* memo (Urban Crossroads, June 25, 2024), Final EIR Section 4.3 and Appendix C-5. The Supplemental Air Quality Assessment Memo based on SCAQMD's WAIRE program and CalEEMod modeling parameters provide a best estimate of the trip length average and the consequent air quality impacts, and modeling based on this data complies with CEQA. See the response to Comment A-3-6. No further response is required.

**Response to Comment A-3-9**

The commenter requests that if the City does not reevaluate or substantiate the truck trip lengths, a mitigation measure or project design feature that restricts trucks from traveling distances greater than analyzed in the Draft EIR should be required. Please see responses to Comments A-3-6 and A-3-7, which substantiate trip lengths used in the Draft EIR and the supplemental analyses. The trucks that would operate on the Development Site would be owned and operated by building tenants, trucking companies, and/or independent operators and would not be under the control of the or the Project owner. As such, there is no mechanism to control or limit the distances traveled by trucks that are conducting business on the Development Site. As the truck trip lengths have been substantiated, the requested mitigation is not required. No further response is required.

**Response to Comment A-3-10**

This comment is an introduction to A-3-11 and states the Draft EIR did not fully account for mobile source emissions from the Project's construction phase; thus, no further response is required.

**Response to Comment A-3-11**

The commenter states that Chapter 3.5.3.8 (Grading) of the Draft EIR indicates Project construction would require export of 147,414 cubic yards of soil from the site, but Chapter 4.3 (Air Quality) assumes that the site would be balanced and no export or import of soil needed. The commenter calculates this soil export would require 9,213 truck trips which were not accounted for in the Air Quality analysis. The commenter bases this assumption on the stated cut and fill estimates which do not account for shrinkage/compaction/settlement that occurs during earthwork activities, and that soil export would not be required. As stated in Section 4.3.3.1 of the Draft EIR, of the Draft EIR, the Project's construction air quality analysis "…assumes the site would be balanced (no import or export needed)."

The full description in Chapter 3.5.3.8 (Grading) states: "No import or exporting of earthwork is anticipated; however, earthwork may be transferred between the two (2) grading phases." This was included in the construction modeling which specified two dedicated construction phases called "Mass Grading" which included 90 days for Phase 1 and 150 days for Phase 2 (as shown in the Draft EIR Appendix C-1 Appendix A) to accommodate all onsite earth moving and is reflected in the increases in equipment above default values for the mass grading operations. See Table K of the Draft EIR Appendix C-1. This is consistent with the assumption in Chapter 4.3 (Air Quality) that no soil export or import will be required. As the Draft EIR correctly identifies the extent Project-related grading activity and states the import and export of material from the site is not necessary, the additional truck trips anticipated by the commenter would not occur. Thus, the construction analysis includes all emissions associated with the movement of soil onsite during construction, and no further analysis or mitigation is required.

**Response to Comment A-3-12**

The commenter states, based on the assumption that truck trips exporting dirt from grading were not included in the Project Air Quality analysis, that the City must remodel the Project's construction air pollutant emissions and assess potential impacts from diesel emissions to residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near construction haul routes. As described in the response to Comment A-3-11, soil would not be exported off-site during grading operations. The construction analysis provided in the Draft EIR includes all emissions associated with the movement of soil on-site as shown in the Draft EIR Appendix C-1 Appendix and Table K of the Draft EIR Appendix C-1. See the response to Comment A-3-11. Thus, the remodeling suggested by the commenter is not necessary and no further response is required.

**Response to Comment A-3-13**

The commenter states the total number of heavy-duty construction truck trips should be stated in the Final EIR so that the impacts on human health can be fully understood. As described in the responses to Comments A-3-11 and A-3-12, no soil will be hauled off-site; therefore, no heavy-duty truck trips or emissions associated with off-site export would occur. The emissions generated during grading and construction have been appropriately accounted for and assessed in the Air Quality Impact Analysis and Chapter 4.3 of the Draft EIR, and no further analysis in the Final EIR is needed.

**Response to Comment A-3-14**

The commenter states that Draft EIR did not model and include analysis of air pollution emissions from transport refrigeration units (TRUs). The existing CARB TRU regulation (the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units [TRU] and TRU Generator Sets, and Facilities Where TRUs Operate [TRU ATCM], adopted in 2004 and amended in 2010 and 2011) requires all new TRUs (as of 2023) to have near-zero PM emissions (0.02 grams per brake horsepower-hour or lower). Additionally, CARB regulations effective October 2022 require that beginning December 31, 2023, all TRU owners turn over at least 15 percent of their truck TRU fleet (defined as truck TRUs operating in California) to zero-emissions (ZE) technology each year (for 7 years) and that all truck TRUs operating in California shall be ZE by December 31, 2029. Accordingly, TRU emissions will be minimal from approximately 2027 when buildings with cold storage capacity become operational until 2029, and by 2030, TRUs servicing the Project will have zero emissions and

will utilize the plug-in capability provided in all truck/dock bays that serve cold storage facilities as required by Mitigation Measure AIR-2. However, in response to comments received and to ensure a conservative analysis, the Final EIR updates the air quality analysis in Draft EIR Section 4.3, including the operational Health Risk Analysis (HRA) (addressed in response to Comment A-3-18 below), to include conservative estimate emissions from TRUs.

The operational emissions air quality impact analysis was revised to add a conservative estimate of emissions occurring from TRUs servicing the cold storage buildings. As described in the *Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment* (Final EIR, Appendix C-4), modeling assumptions used were very conservative (i.e., that all TRU engines would be diesel, would have the least efficient 25 horsepower engines, would run for 4 hours every time a truck is onsite, and all would be used for the 30-plus year life of the project) even though CARB's regulations require all diesel TRUs to be phased out by 2030, three years after the project is fully operational. The updated air quality analysis includes TRU emissions from onsite operations and operations while traveling on roads to and from the site. The *Sunset Crossroads Supplemental Air Quality Assessment* (Final EIR, Appendix C-5) fully describes the updated air quality analysis (see responses to Comments A-3-6 and A-3-7) and the resulting incremental change to Development Project emissions. Results of the updated emissions for the Development Project are summarized in revised Tables 4.3.M and 4.3.N of the Final EIR.

As shown in *Sunset Crossroads Supplemental Air Quality Assessment* (see Final EIR, Appendix C-5), the updates described above would result in minor emissions increases for the operational emissions, with VOC emissions increasing from an estimated 177 lbs per day to 191 lbs per day, $NO_X$ emissions increase from 432 lbs per day to 477 lbs per day, CO increases from 937 lbs per day to 946 lbs per day, $PM_{10}$ increases from an estimated 210 lbs per day to 218 lbs per day, and $PM_{2.5}$ increases from approximately 62 lbs per day to 64 lbs per day. Although emissions would slightly increase from the previous estimate, these revisions would not result in a substantive increase in emissions that would cause a new significant impact that was not previously disclosed in the Draft EIR.

Accordingly, this modeling does not require recirculation of the Draft EIR. Under CEQA Guidelines Section 158088.5(b), recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The revised modeling and the results show a minimal increase as a result of adding TRU emissions. Therefore, the additional modeling and updated totals do not change the significance determinations, and do not meet the criteria of "new information" warranting recirculation of the Draft EIR. No further response is required.

**Response to Comment A-3-15**

The commenter states CalEEMod model does not account for air pollutant emissions from TRUs. Please refer to the response to Comment A-3-14. No further response is required.

**Response to Comment A-3-16**

The commenter requests the City to model and report the Project's air pollution emissions from TRUs, assume that a percentage of the Project's truck fleet is equipped with TRUs, and should estimate the idling duration for each TRU, with conservative estimates from a health protections standpoint. As

described in the response to Comment A-3-14, regulations adopted by the CARB will result in the complete transition from diesel powered TRUs to zero-emission technology by the end of 2029, prohibiting all diesel TRU operations. As further stated in the response to Comment A-3-14, taking into account the timing of Project phasing and the implementation schedule of the CARB's regulation, TRU use would constitute less than 2 percent of the total DPM emissions (between 2025 and 2029), when full transition to zero-emission TRUs is required. The CARB regulation, in tandem with the plug-in capabilities required under Mitigation Measure AIR-2, would eliminate DPM emissions from TRUs. However, to provide a conservative analysis of the potential health risks of the proposed project during the operational phase, the emissions for the Development Project opening year (2027) were utilized as the estimated emissions for the 30-year exposure duration recommended by OEHHA for health risk assessment modeling, without accounting for future phase-in of electric TRUs or reductions in emissions from heavy-duty truck fleets. As described in the response to Comment A-3-14, this approach provides a conservative analysis of the potential future health risks to sensitive receptors in the project vicinity, including an assumption that TRU trucks would operate for up to 4 hours on site. Please see the response to Comment A-3-18 for all details of the conservative assumptions and the updated modeling results. As stated in Mitigation Measure AIR-2:

> All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric.

The electrification of loading docks/bays at cold storage uses is required under Mitigation Measure AIR-2. No further response is required.

**Response to Comment A-3-17**

The commenter states that its concern that the Project's cancer risk impacts may have been underestimated. The comment's concern is noted. This is an introductory statement, with no response required. Detailed comments and responses follow below.

**Response to Comment A-3-18**

The commenter describes the HRA's assumptions that TRUs would use electric hookups on the Project site, assumed that all TRUs would operate electrically, and that the Draft EIR did not model or report potential cancer risks from TRUs idling on the Project site or traveling along local roadways. As described in the responses to Comments A-3-14 and A-3-16, a conservative assessment of the potential emissions from TRUs was calculated for air quality emissions, and have been added to the operational HRA, both as onsite emissions while loading or unloading and offsite emissions while driving to or from the Development Site. Additionally, the HRA has been revised to include the two eastbound off-ramps closest to the project site, the eastbound I-10 exit at Sunset Avenue and the eastbound I-10 exit at Highland Springs Avenue and the westbound I-10 exit at Sunset Avenue. The truck emissions analysis in the Draft EIR assumed minimal TRU emissions due to phase out of diesel TRUs by 2029, but to respond to the commenter's concern, the revised air quality analysis includes a very conservative estimate of TRU emissions assuming all TRUs have 25 horsepower engines – the most polluting- rather than a fleet mix of less polluting and ZE or hybrid engines. The updated Table 4.3.Q from the DEIR below (Draft EIR results shown in strikeout, revised HRA results shown in

underline format), shows results from the revised HRA and demonstrates that the health risks from emissions of the most polluting type of TRU engines of diesel particulate matter and/or toxic air contaminants at any nearby sensitive receptor would not be substantially greater than that previously disclosed in the Draft EIR, Section 4.3 Air Quality, Table 4.3.Q and Appendix C-2 HRA, Table 4.C. Therefore, no new significant health impacts would result from the operation of TRU's on the Development site or the new location of the roadway or the added offramps.

## Revised Table 4.3.Q: Health Risk Levels for Nearby Residents and Students

| Location | Maximum Cancer Risk | Maximum Noncancer Chronic Risk (Hazard Index) | Maximum Noncancer Acute Risk (Hazard Index) |
|---|---|---|---|
| Residential & Student MEI Risks | ~~3.3~~3.8 in 1 million | 0.000~~8~~10 | 0.000~~5~~3 |
| Worker MEI Risks | ~~0.02~~0.25 in 1 million | 0.000~~1~~8 | 0.000~~1~~3 |
| **SCAQMD Significance Threshold** | **10 in 1 million** | **1.0** | **1.0** |
| **Significant?** | **No** | **No** | **No** |

Source: Compiled by LSA Associates, Inc. (March 2024).
Note: Revisions include the addition of TRU emissions to onsite and all roadway areas, truck and TRU emissions from I-10 offramps, and the relocation of the portion of Sunset Avenue away from the existing homes.
MEI = maximum exposed individual
SCAQMD = South Coast Air Quality Management District

As shown in Revised Table 4.3.Q, the results of the updated operational HRA (Final EIR, Appendix C-4), including emissions estimated to occur from diesel TRUs assumed to operate on all trucks servicing the Development Project cold-storage warehouses (proposed Buildings 5 and 6), plus the additional emissions from vehicles exiting I-10 to Sunset Avenue and Highland Springs Avenue made in response to Comment B-2-5; and the relocation of the portion of Sunset Avenue between Westward Avenue and Lincoln Street, 42 feet to the west made in response to D-6-29, would increase the cancer risk to the Residential and Student Maximum Exposed Individual (MEI) slightly from 3.3 in one million to 3.8 in one million. For the Worker MEI, the potential cancer risk would increase slightly from 0.02 in one million to 0.25 in one million. Though increased, these risk level remain well below the health risk thresholds established by the SCAQMD. As detailed in Revised Table 4.3.Q, the additional emissions shown in the updated tables and memo would not result in any new significant health risk impacts from those described in the Draft EIR. Additional details on the revised modeling and model outputs are included in the technical Memorandum included in Appendix C-4 of the Final EIR. Under CEQA Guidelines Section 158088.5(b), recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The revised modeling and the results show a minimal increase in emissions from adding TRU emissions. Therefore, the additional modeling and updated totals do not change the significance determinations, and do not meet the criteria of "new information" warranting recirculation of the Draft EIR. No further response is required.

### Response to Comment A-3-19

The commenter states the City should not include mitigation measures when evaluating the Project's unmitigated health risk impacts. The HRA emissions calculations did not include mitigation measures. As stated in the project specific HRA (included as Appendix C-2 to the Draft EIR) and as summarized Section 4.3.6.3 of the Draft EIR, the Project does not result in significant levels of localized emissions

(Draft EIR Tables 4.3.O and 4.3.P) so no mitigation is required. Furthermore, the health risk to nearby residents, students, and workers from Project-related toxic air contaminants would be below the SCAQMD's thresholds (see response to Comment A-3-18). Pursuant to CEQA Guidelines Section 15041, a Lead Agency has the authority to mitigate or implement changes to reduce or eliminate significant effects on the environment. Based on the aforementioned analysis, the health risk impacts associated with the construction and operation of the Project do not exceed established thresholds; therefore, no significant impact on the environment would occur and no mitigation for health risks impacts is necessary. No further response is required.

**Response to Comment A-3-20**

The commenter states the City should add a design measure requiring TRUs to be plug-in capable and run in zero emission mode on site or should model the potential cancer risk impacts associated with diesel-powered TRUs operating within the Project site. See the response to Comment A-3-18 regarding the percentage of TRU trucks and health impacts associated with TRU emissions and responses to Comments A-3-16 and A-3-18 regarding assumptions for the conservative calculation of TRU emissions. Mitigation Measure AIR-2 includes a requirement to provide plug-in capability:

> All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric.

This would allow hybrid and ZE TRUs to use facility electricity while on-site. As discussed in response to Comment A-3-18, HRA modeling was revised to conservatively account for emissions associated with on-site operation of diesel TRUs, potential TRU emissions from travel along roadways to and from the Project site. The HRA additionally included an assessment of the westward alignment of Sunset Avenue, which increased the distance between emission sources and the nearest sensitive receptors. The results of this reassessment are described in the response to Comment A-3-18, Final EIR Section 4.3, and Appendix C-4 to the Final EIR, and indicate that with the addition of TRU emissions, the health risks from emissions of diesel particulate matter and/or toxic air contaminants at any nearby sensitive receptor only increase, though the revised emissions would still be well and would not exceed the level of significance previously described in the Draft EIR, (see Section 4.3 Air Quality, Table 4.3.Q and Appendix C-2 HRA, Table 4.C), and remain less than significant. Therefore, no new significant impact would result from the revised analysis. See the response to Comment A-3-18. Furthermore, the Project includes the plug-in capability recommended by the commenter. No further response is required.

**Response to Comment A-3-21**

The commenter states the HRA should also evaluate the potential cancer risks from diesel-powered TRUs traveling along local roadways to the Project site. Please refer to the responses to Comments A-3-14, A-3-18, and A-3-20 for a full description of the revised air quality emissions calculations and health risk assessment that now include TRUs. No further response is required.

**Response to Comment A-3-22**

The commenter states that the Draft EIR identifies the potential for overlap between construction and operations and accounted for the overlap while modeling Air Quality impacts but not in the HRA, and the HRA only evaluated potential cancer risks associated with Project operation. The HRA did not include construction emissions overlapping with partial project operational emissions because the total toxic air contaminants (TAC) emissions from the fully operational Project would be greater than any combination of construction and partial Project operation. The Project operational TAC emissions would consist only of diesel particulate matter (DPM) from any point when both construction and partial operations overlap. As described by CARB[5], more than 90% of DPM is less than 1 µm in diameter (about 1/70th the diameter of a human hair), and thus is a subset of particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). The air quality and health risk analyses included emissions of two types of particulate matter, $PM_{10}$ and $PM_{2.5}$. As $PM_{10}$ includes all particulate 10 µm in diameter or smaller, it includes all $PM_{2.5}$ and DPM. Thus, using $PM_{2.5}$ is a closer approximation of DPM emissions than $PM_{10}$. The emissions from construction overlapping with partial Project operation are less the total emissions from the full project operations alone. This is stated in Chapter 4.3 of the Draft EIR. Tables 4.3.J through 4.3.M identifies that the maximum daily emissions of $PM_{2.5}$ during any of the 5 years of construction would be 17 lbs/day, while the maximum daily emissions of $PM_{2.5}$ from operations would be 62 lbs/day.

The HRA used the more conservative approach to represent DPM with the emissions of PM10, rather than $PM_{2.5}$. The HRA assumed the 207 lbs/day maximum $PM_{10}$ emission rate (shown in Table 4.3.N) would be continuously emitted throughout the entirety of each exposure period, starting from the commencement of construction in 2024. This encapsulates the health risks from construction by including the years when construction and operations overlap, but using the higher emission rate that would not occur until construction completes. The resulting health risk levels shown in Table 4.C of the HRA (see Draft EIR, Appendix C-2) apply to anyone living or working near the Project site within the zone of analysis from the start of construction throughout the entire residential exposure periods of 9 years for children and 30 years for adults and worker exposure period of 25 years. Additionally, the overall construction process would take approximately 5 years with construction emission rates varying tremendously throughout, while the operational emissions rate would be relatively constant. Thus, using the higher operations only emissions rate to determine HRA results is the most conservative (highest) health risk levels and are reported in the EIR. As the HRA evaluated a worst-case emission level when accessing health risk impacts, no new or additional health risk modeling is necessary. No further response is required.

**Response to Comment A-3-23**

The commenter states that to fully understand the Project's potential cancer risk to nearby communities, the City should model the health risks associated with Project construction overlapping with Project operation. Please refer to the response to Comment A-3-22. No further modeling is required.

[5] CARB, *Overview: Diesel Exhaust & Health*, Website: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health?corr (accessed May 2024).

**Response to Comment A-3-23-A**

The commenter correctly cites the quantity of emissions that would result from combined construction and operation of the Development Project at different stages of the Project development. The commenter correctly acknowledges the Draft EIR's conclusion that emissions of VOC, $NO_X$, CO, $PM_{2.5}$ and $PM_{10}$ would exceed established SCAQMD regional daily thresholds. However, while the Draft EIR states that nearby residences would be exposed to these emissions, due to atmospheric dispersion, that exposure would vary dramatically. See the response to Comment A-3-18. The Draft EIR's HRA thoroughly assesses how the pollutant emissions travel through the atmosphere and what the resulting health risks from the Project's pollutant emissions would be to residents surrounding the project site. See revised Table 4.3.Q and Appendix C-4 of the Final EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-23-B**

The commenter summarizes Mitigation Measures AIR-1 and AIR-2 and the Draft EIR's conclusion that combined construction (VOC) and operational (VOC, $NO_X$, CO, $PM_{2.5}$ and $PM_{10}$) emissions would result in significant and unavoidable air quality impacts. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-24**

The commenter summarizes a portion of Mitigation Measure AIR-2, stating that by the time the Project is fully operational in 2027, trucks will be required to comply with the CARB's Truck and Bus Regulation. This regulation mandates that diesel-powered vehicles with a gross weight rating greater than 14,000 pounds must have a 2010 or newer model year engine. The development of Mitigation Measure AIR-2 was in progress prior to the 2023 start date of CARB's Truck and Bus Regulation. Nonetheless, Mitigation Measure AIR-2 includes aspects of this regulation, among other emission reducing requirements, to ensure project compliance at effective date of the regulation.

CEQA Guidelines Section 15126.4(c) state in part:

> Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.

The commenter does not cite authority to support its statement that compliance with regulations and laws cannot be used exclusively to mitigate project impacts. Notwithstanding, Mitigation Measure AIR-2 identifies a variety of features and actions that do not exclusively rely on compliance with laws and regulations. As presented, the electrification features, design requirements, prohibition on non-electrical cargo handling equipment, and operational procedures detailed in Mitigation Measure AIR-2 provide a reasonable suite of regulatory and site-specific requirements to reduce the emission of air pollutants to the extent feasible. See also responses to Comments A-3-54, A-3-55, A-3-57, and A-3-59. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-25**

The commenter urges the City to include a measure requiring all heavy-duty trucks to be zero-emissions and to install on-site infrastructure to support these trucks. Beginning in January 2024, the CARB's Advanced Clean Truck (ACT) Rule is intended to, "…accelerate a large-scale transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8." Manufacturers would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales." [6] Pursuant to the Advanced Clean Fleet (ACF) Rule, fleet owners will, "…have the option to transition a percentage of their vehicles to meet expected zero-emission milestones, which gives owners the flexibility to continue operating combustion -powered vehicles as needed during the move toward cleaner technology. The flexibility is intended to take into consideration the available technology and the need to target the highest-polluting vehicles. For example, last mile delivery and yard trucks must transition by 2035, work trucks and day cab tractors must be zero-emission by 2039, and sleeper cab tractors and specialty vehicles must be zero-emission by 2042."[7].

The Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) attempts to accelerate the deployment of zero-emission and plug-in hybrid trucks and buses, and trucks equipped with electric power take off (ePTO) systems by providing vouchers that partially offset the cost of these vehicles. According to the HVIP (see https://californiahvip.org/impact/#deployed-vehicle-mapping-tool), 384 total vouchers were issued in the SCAQMD for heavy-duty (greater than 14,000 lbs gross vehicle weight) in 2023. The HVIP is a voluntary program. It must be noted that the HVIP will remain available to fleets purchasing zero-emission vehicles "…prior to compliance deadlines or in excess of regulatory requirements" including CARBs Advanced Clean Fleets (ACF) Rule.

The California Zero-Emission Vehicle Population Dashboard tracks when and where medium and heavy-duty zero-emission vehicles are deployed in California. Based on this dashboard (see https://californiahvip.org/industryinitiatives/#cazevdashboard) 1,027 zero-emission MHD vehicles have been deployed within the SCAQMD since 2011. While zero-emission trucks are becoming available, currently mandating that all heavy-duty trucks be zero-emission is not feasible mitigation. According to the HVIP (see californiahvip.org), there are currently 2 zero-emission HD trucks available in Riverside County. [8]

As the commenter noted, the Draft EIR already includes Mitigation Measure AIR-2 which requires the installation of infrastructure (50 electric truck chargers and additional conduit and electric capacity for the entire truck fleet) to support a zero-emission fleet of trucks as more electric trucks become available. Currently, and for the foreseeable future, requiring the Project to use all zero-emission trucks is economically and technologically infeasible, as such trucks are not commercially available on a large enough scale to serve the Project. Imposing mandatory requirements on the Project based on

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6 https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet, accessed May 7, 2024.

7 https://ww2.arb.ca.gov/news/california-approves-groundbreaking-regulation-accelerates-deployment-heavy-duty-zevs-protect, accessed May 7, 2024.

8 California Zero-Emission Vehicle (ZEV) Population Dashboard. Website: https://californiahvip.org/industry initiatives/#cazevdashboard. Accessed April 15, 2024.

an emerging, not yet established technology when the technological advances and timeframes for readily available quantities of such trucks are not known with any certainty, is not a feasible mitigation measure. No further response is required.

**Response to Comment A-3-25-A**

The commenter states that CARB has many regulations regarding promotion and future mandatory use of zero-emission heavy duty trucks at facilities such as the Development Project, mentioning only CARB's Advanced Clean Fleets (ACF) Rule. This rule only applies to trucks performing drayage operations at seaports and railyards, fleets owned by State, local, and federal government agencies, and high priority fleets. High priority fleets are those entities that own, operate, or direct at least one vehicle in California, and that have either $50 million or more in gross annual revenue; or that own, operate, or have common ownership or control of a total of 50 or more vehicles. The ACF rule requires manufacturers to only sell zero-emission medium- and heavy-duty trucks in California after 2036. High priority fleet purchases/leases of heavy-duty trucks must be 50 percent zero-emissions as of 2033. This zero-emission requirement increases to 100 percent of new heavy-duty truck purchases/leases beginning in January 2039.[9] Per the ACF Rule, internal combustion engines (ICEs) can continue to operate through their "useful life", a period extending 13 years from the model year the engine and emission control was first certified by CARB or 18 years/800,000 miles, whichever comes later. This rule does not apply to the Project applicant which will not be operating the completed Development Project, does not operate a high priority fleet, and will not be purchasing or leasing trucks. The rule will apply to future lessees that purchase or lease applicable vehicles. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-25-B**

The commenter urges the City to require infrastructure to support trucks that are already complying with CARB's ACF regulation. See the response to Comment A-3-25 for information on the Development Project's planned infrastructure for zero-emission trucks. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-26**

The commenter states that currently there are commercially available electric trucks included in the HVIP that can meet the cargo transportation needs of the proposed uses today. While the HVIP website identifies vehicle types that could be used during Project operations, the HVIP program website only lists counts of vehicles in operation, and it does not provide an individual or collective inventory of number of trucks that are commercially available for sale or lease. The current commercially availability of electric trucks is limited, and insufficient to serve the needs of the Development Project when it is fully operational. See the response to Comment A-3-25. End users

[9] CARB Advanced Clean Fleets Regulation – ZEV Milestones Option. Website: www.arb.ca.gov/resources/fact-sheets/advanced-clean-fleets-regulation-zev-milestones-option. Accessed April 2024.

would not be able to purchase sufficient quantity of electric trucks to serve the entire Project at this time. [10]

The Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program is a SCAQMD regulatory program to reduce air pollution from warehouse-related activities and is focused on emissions from vehicles that service large warehouses. The program applies to operators and owners of existing and new warehouses with floor space greater than or equal to 100,000 square feet within a single building (i.e., large warehouses) and establishes a point system for reduction of emissions either implementing a menu of items including purchasing/renting/leasing near-zero emission (NZE) and zero-emission (ZE) trucks (including Class 2b through 8 trucks) and yard equipment, installing on-site ZE charging or fueling infrastructure, and other measures intended to offset or reduce warehouse emissions. WAIRE rules allow for lessees operating warehouses to gain WAIRE points through purchase or lease of ZE trucks as they become available.

As stated in the response to Comment A-3-25, the Project includes 50 electric truck chargers and is designed to accommodate current and future commercial capacity of electric truck fleets. Additional conduit and electric capacity are proposed as part of the Project to increase the number of electric truck chargers to accommodate a 100 percent electric truck fleet once such a fleet becomes commercially feasible. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-27**

The commenter summarizes various CARB regulations requiring the use of emissions reducing truck engines and transitioning to manufacture and use of zero-emission medium and heavy-duty trucks by, for example, 2045 everywhere feasible which will result in a reduction of diesel particulate matter and $NO_X$ emissions. Further, the commenter urges the City to include contractual language in tenant lease agreements to require use of zero-emission trucks during project operation. The City will not be operating the Development Project and will not be party to any tenant lease agreements. As stated in the response to Comment A-3-25, regulations governing truck emissions will be changing over the lifetime of the Project and tenants operating the Project will be required to comply. Therefore, the Development Project includes the infrastructure necessary to support zero-emission trucks as they are added to fleets pursuant to these regulations. The provisions detailed in Mitigation Measures AIR-2 to facilitate the use of zero-emission vehicles, in tandem with CARB requirements to transition to clean zero-emission fleets, and the adherence to provisions of the WAIRE program will further reduce the emission of air pollutants. However, as stated in response to Comment A-3-25, requiring zero-emission trucks is economically and technologically infeasible, as such trucks are not commercially available on a large enough scale to serve the Project, and CEQA does not require imposition of mitigation that is infeasible. No further response is required.

**Response to Comment A-3-28**

The commenter states the Project should include existing and emerging zero-emission technologies to reduce exposure of disadvantaged communities to diesel particulate matter, and reduce $NO_X$

[10] California Zero-Emission Vehicle (ZEV) Population Dashboard. Website: californiahvip.org/industryinitiatives/#cazevdashboard. Accessed April 15, 2024.

emissions, and emissions of greenhouse gases that contribute to climate change. See the response to Comment A-3-4 regarding the project and disadvantaged communities. As stated in the responses to Comments A-3-24 through A-3-27, the Project provides the necessary electrification features to support the use of zero-emission vehicles both now and in the future. The Development Project implements actions required by the Riverside County Climate Action Plan (CAP) through the incorporation of project design features (PDFs) and Mitigation Measures AIR-2, and GHG-1 through GHG-7 (see Draft EIR, Sections 4.3 and 4.8). Additionally, Mitigation Measure AIR-1 has been revised to further reduce Project emissions during construction. See the response to Comment A-3-49. The PDFs and mitigation measures include, without limitation, installation of a minimum of 50 class 8 electric vehicle chargers; sufficiently sizing buildings' electrical rooms to hold additional panels needed to supply power for electrical charging systems for trucks; installing conduit from buildings' electrical rooms to all tractor trailer parking spaces to facilitate future electric truck charging; providing at least 350 Level 2 AC EV charges or the number of chargers or comply with minimum California Green Building Standard Code requirements, whichever is higher; the electrification of all truck/dock bays that serve cold storage facilities to allow plug-in capabilities and support use of stand-by and/or hybrid electric TRUs; contractual language in lease agreements restricting trucks and support equipment from non-essential idling longer than 3 minutes on-site; and requiring all on-site cargo-handling equipment be electric with necessary plug-in charging included in the design of the Development Project electrical system, buildings, and equipment storage and parking areas. The Development Project also requires the design of buildings exceeding Title 24 energy efficiency standards; use of only Energy Star appliances in all commercial and industrial land uses; and use of only electric landscaping equipment within the Development Site. As indicated in the Section 4.8 of the Draft EIR (Table 4.8.K, page 4.8-32); the Project is consistent with the Riverside County CAP's requirement to achieve at least 100 points indicating that its GHG impacts are not considered cumulatively considerable. In fact, the Project implements 586+ points. See also the response to Comment A-3-64 regarding the provision of rooftop solar on commercial and industrial uses. The stated measures will reduce Air Quality impacts and GHG emissions to the extent feasible.

CEQA does not require that infeasible or speculative mitigation be imposed. No further response is required.

**Response to Comment A-3-29**

The commenter reiterates its request that emissions from heavy-duty trucks during grading and, air quality impacts from TRU trucks be assessed, and that the HRA be updated to include health impacts from diesel particulate matter exposure from TRU use on site and along local roadways. Please refer the responses to Comments A-3-11 through A-3-14, A-3-16, A-3-18, A-3-20, and A-3-24 through A-3-26. No further response is required.

**Response to Comment A-3-30**

The commenter states CARB staff can provide assistance with zero-emission technologies and emission reduction strategies, and requests to be included on distribution of the Final EIR. The City acknowledges this comment and will provide CARB with the Final EIR as requested. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**The CARB included their March 2, 2021 comment letter to the Project's Notice of Preparation (NOP). The responses to Comments A-3-31 through A-3-65 address these NOP comments.**

**Response to Comment A-3-31**

The commenter summarizes the locations of residences near the Development Site and states the community is currently surrounded by existing diesel particulate matter sources. The commenter further states the Project, if approved, would further expose nearby disadvantaged communities already disproportionally exposed to multiple sources of air pollution to elevated levels of pollution. Please refer to the response to Comment A-3-4. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-32**

The commenter notes that the AB 617 was enacted to protect local communities from the effects of air pollution. However, AB 617 as chaptered focuses on stationary sources of harmful air pollution and is not directly applicable to the Project which has no stationary sources of air quality emissions. See the response to Comment A-3-3. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-33**

The comment restates the Project is near residential communities that are already disproportionally burdened by multiple air pollution sources, asks that an HRA be prepared that assesses potential project and cumulative health risks, and that the project include all mitigation measures in Attachment A to the letter. See the response to Comment A-3-2. The EIR includes LST analyses that account for all potential construction and operational health risks from the Project and construction emissions of diesel PM along with ambient pollution levels. Additionally, the EIR includes an HRA that also accounts for all operational health risks from the Project emissions of diesel PM. As stated in the previous responses, the HRA prepared (and revised) for the project, indicates the nearest modeled receptors would not be exposed to cancer or acute/chronic health risks above that exceed established SCAQMD thresholds.

The results from the revised HRA indicate the Development Project would increase the existing cancer risk level by 3.8 in one million. See revised Table 4.3.Q and Final EIR, Appendix C-4. The suggestion of assessing the health risks from the combination of the project's emissions with past, present, and reasonably foreseeable future projects or activities is noted. A cumulative HRA is typically not done for a project of this size. SCAQMD has not provided methodology, and modeling does not currently exist, to assess the specific correlation between mass emissions generated, cumulative increases from individual projects, and the effect on health. In contrast, for extremely large regional projects (unlike the Development Project), the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources and include cumulative impacts. Moreover, as shown in Figure 4-2 in the DEIR Appendix C-2 HRA, air emissions and their associated health impacts dissipate significantly beyond 225 meters. There are no comparable projects within a ½ mile of the Development Project. In addition, the detailed cumulative emissions information from all other projects needed to provide an evaluation of such projects in an HRA is not available. The air pollution

reduction measures in Attachment A of the comment letter are addressed below in responses to Comments A-3-48 through A-3-65. No further response is required.

**Response to Comment A-3-34**

The commenter states the NOP did not explicitly state the proposed industrial uses would not be used for cold storage, but if it is, asks that emissions from on-site TRUs be modeled in the air quality analysis and HRA and include proposed project design features if the Project will not be used for cold storage. A response to this comment was addressed in responses to Comments A-3-14 and A-3-16. The HRA has been revised to include the two eastbound off-ramps closest to the project site, the eastbound I-10 exit at Sunset Avenue and the eastbound I-10 exit at Highland Springs Avenue and the westbound I-10 exit at Sunset Avenue (see Final EIR, Appendix C-4). While The truck emissions analysis in the Draft EIR assumed minimal TRU emissions due to phase out of diesel TRUs by 2029, to respond to the public comments, the revised air quality analysis includes a very conservative estimate of TRU emissions assuming all TRUs have 25 horsepower engines – the most polluting- rather than a fleet mix of less polluting and ZE or hybrid engines. Section 3.0 of the Draft EIR indicates the Project could accommodate up to 330,000 square feet of cold storage use. The air quality and HRA analyses prepared for the Project accounted for this potential cold storage use. See also the response to Comment A-3-18 regarding the results of the revised HRA. As demonstrated in the revised HRA (see Appendix C-4 of the Final EIR), even with the inclusion of TRUs, the cancer and acute/chronic health risks at nearby receptors would not exceed the level of significance established by the SCAQMD. No further response is required.

**Response to Comment A-3-35**

The commenter requests that if buildings will not be used for cold storage, tenant lease agreements include contractual language to prohibit operation of TRUs within the Development Site. This request is noted. As indicated in response to Comment A-3-34, the Project includes cold storage facilities which will require use of TRUs. As previously stated in the responses to Comments A-3-2 and A-3-14, the revised LST and HRA analysis did not identify levels of air pollutants in excess of established SCAQMD thresholds. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-36**

This commenter requests that if buildings will not be used for cold storage, a restrictive covenant be placed on parcels that prohibit use of TRUs that would prohibit use of TRUs unless a conditional use permit is obtained. Please refer to the response to Comment A-3-35. No further response is required.

**Response to Comment A-3-37**

The commenter requested that the Draft EIR evaluate air quality and potential cancer risks associated with operation of the proposed travel center. The Draft EIR HRA includes the gas station operational emissions. Section 4.1.2 of the HRA (see Draft EIR Appendix C-2) describes how the gas station emissions were characterized in the HRA. As further stated in Section 4.1.4 of the HRA, "…the TACs included in this HRA include DPM (as $PM_{10}$ and $PM_{2.5}$) from the diesel vehicle exhaust, 1,3-butadiene, benzene, ethylbenzene, methyl ethyl ketone (MEK), naphthalene, propylene, styrene, toluene, and xylenes (all components of ROG) from the gasoline vehicle exhaust, and benzene, ethylbenzene, and

naphthalene from the gasoline station operations." The referenced CARB Technical Guidance brought the former CARB guidance for gas-station analysis current to include the latest OEHHA guidelines and incorporated the more recent CARB regulations and AERMOD mode and includes tools for screening-level HRAs. The HRA cited in the Draft EIR is a site-specific analysis that addressed the latest OEHHA guidelines, incorporated the latest CARB regulations, and used the latest modeling software available, and therefore would address the 2022 CARB guidance. The Supplemental Policy Guidance provides for cumulative analysis (in the event there are multiple gas stations in the project vicinity, which is not the case here), and includes recommendations for local Governments and Air Districts to reduce emissions from gas stations, but not project-specific requirements. As stated in previous responses, the Development Project is subject to SCAQMD permitting requirements. The HRA (which fully considered gas station operations) indicated no significant health impact risk resulting from project operation. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-38**

The commenter recommends enhanced vapor recovery systems to reduce toxic air pollutant emissions from new gas stations. The construction and operation of fuel dispensing uses at the proposed travel center will conform to all appropriate regulatory requirements, including SCAQMD Rule 461, which requires CARB certified vapor recovery systems for underground storage tanks and annual throughput of 600,000 gallons or more. It is estimated that the proposed travel center will pump between 200,000 and 250,000 gallons of fuel per month; therefore, adherence to Rule 461 would be required. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-39**

The commenter recommends adding high-capacity vapor processors to high throughput gas stations to reduce toxic air pollutant emissions. The construction and operation of fuel dispensing uses at the proposed travel center will conform to all appropriate regulatory requirements of the CARB and SCAQMD. See the response to Comment A-3-38. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-40**

The commenter recommends limiting the amount of throughput to reduce toxic air pollutant emissions form new gas stations. The construction and operation of fuel dispensing uses at the proposed travel center will conform to all appropriate regulatory requirements. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-41**

The commenter recommends configuring gas stations or locating gas station equipment away from receptors to reduce exposure from toxic air pollutant emissions. The travel center is proposed to be located in the northeast portion of the Development Site within the area with the other commercial land uses, convenient to the vehicles accessing I-10, at least 500 feet from the nearest sensitive receptor (which are homes southeast of the intersection of Lincoln Street and Sunset Avenue).

Additionally, the construction and operation of fuel dispensing uses at the proposed travel center will conform to all appropriate regulatory requirements of CARB and SCAQMD for vapor recovery systems. Based on the analysis shown in Appendix C-2 HRA of the Draft EIR, the Development Project would not expose any sensitive receptors to substantial toxic air pollutant emissions from the complete project operational emissions, including the gas station. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-42**

The commenter states the HRA should be based on the latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessment), CARB's Hotspots Analysis and Reporting Program (HARP2 model), and the SCAQMD, Air Quality Handbook. The mobile diesel PM emissions should be based on CARB's 2021 Emissions Factor Model (EMFAC2021). As stated in Section 4.1 of the HRA which is included in Appendix C-2 of the Draft EIR and summarized in Section 4.3 of the Draft EIR:

> For the purposes of an HRA, short-term emissions are of concern for analyzing acute health impacts, and long-term emissions are of concern for analyzing chronic and carcinogenic health impacts. A screening-level multi-pathway assessment has been conducted. This technique was chosen as recommended in the OEHHA *Air Toxic Hot Spots Program Risk Assessment Guidelines* (2015).
>
> This HRA has been conducted using three models: the CARB's California Emissions Factor Model, Version 2021 (EMFAC2021) for vehicle emissions factors and percentages of fuel type within the overall vehicle fleet, the United States Environmental Protection Agency's (EPA) AERMOD air dispersion model to determine how the TACs would move through the atmosphere after release from sources both on site and on surrounding roadways, and the CARB's HARP model to translate the pollutant concentrations from AERMOD into individual health risks at the nearby sensitive receptor locations.

The HRA prepared for the Development Project was developed using the guidance and modeling recommended by the commenter. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-43**

The commenter requests that the HRA evaluate baseline (current conditions), and future (with and without the Project), and that the HRA reflect all applicable federal, State, and local rules and regulations. The HRA as updated identified a Project-related increase to the cancer risk of 3.8 in one million from a 30-year exposure. See Draft EIR Section 4.3.6.3, Final EIR Section 4.3.6.3, and Final EIR Appendix C-4. The HRA is based on the "worst-case" that the maximum project emissions would occur continuously over the 30-year period. The HRA evaluates the future year with Project scenario. The existing and future baselines are essentially an undeveloped site without any emissions, there is nothing to include in an HRA. Thus, the HRA provides the public and City decision makers with a complete understanding of the potential health risks that would result from Project construction and operations. The HRA does reflect all applicable federal, State, and local rules and regulations. This

comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-44**

The commenter states the health risks associated with construction as well as operational diesel PM emissions should be included in the air quality section of the Draft EIR and HRA. As described in the response to Comment A-3-22, the HRA is based on the period when the total of operational and construction emissions would be the greatest which is full operation of the Project. This is because throughout construction, only a portion of the Development Project would be operating. The sum of the construction and incremental operational emissions is never greater than just the total operational emissions after construction is completed. The health risk levels shown in Final EIR revised Table 4.3.Q would be applicable to anyone living near the Development site from the start of construction throughout the entire exposure periods of 9 years for children and 30 years for adults Additionally, the overall construction process would take approximately 5 years with construction emission rates varying tremendously throughout, while the operational emissions rate would be relatively constant. Thus, using the higher operations only emissions rate for HRA results is the most conservative (highest) health risk levels as reported in the EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-45**

The commenter restates the HRA should include construction emissions from all construction-related equipment and comply with specified models and guidance**.** See the responses to Comments A-3-42 and A-3-44. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-46**

The commenter restates final design of the Project should include existing and emerging zero emission technologies to reduce toxic diesel PM exposure in disadvantaged communities and the NOx and greenhouse emissions that contribute to climate change. Please refer to the responses to Comments A-3-4, A-3-25, A-3-26, and A-3-28. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-47**

The commenter cautions that the comments provided on the NOP do not constitute an admission or concession that it substantively agrees with the lead agency on any issues not raised. This comment is noted and does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-48**

The commenter recommends the following construction measures for air pollution reduction measures for warehouses and distribution centers: use the cleanest possible construction practices and equipment, including the elimination of idling of diesel equipment and the provision of

infrastructure to support zero and near-zero equipment and tools. While it is not feasible to totally eliminate all idling of diesel-powered equipment, the Development Project during construction will comply with CARB's 2007 In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation) limiting the idling of all construction diesel vehicles to no more than 5 consecutive minutes. Requirements of Mitigation Measure AIR-1 include measures such as the use of electric construction equipment if feasible, use of Tier 4 engines (or equivalent) during construction if electric construction equipment is not available, and low volatile compound (VOC) paints with a maximum concentration of 30 grams/liter. See additional mitigation measures in A-3-49 below. These requirements must be incorporated into the construction plans prior to the issuance of any construction permits and will be confirmed through the City's mitigation and monitoring program. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-49**

The commenter recommends the following construction measures for air pollution reduction measures for warehouses and distribution centers:

- Eliminating the idling of diesel-powered equipment and
- Plan for the necessary infrastructure to support zero and near-zero emission construction equipment and tools.

While it is not feasible to totally eliminate all idling of diesel-powered equipment, the Development Project during construction will comply with CARB's 2007 In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation) limiting the idling of all construction diesel vehicles to no more than 5 consecutive minutes. Regarding the commenter's request to provide a charging area for electric-powered construction equipment can charge, the following mitigation has been added to Mitigation Measure AIR-1, Draft EIR, pg 4.3-34:

**MM AIR-1**

- Plans submitted for grading permit issuance and building permit issuance shall specify a designated area of the construction site where electric or non-diesel vehicles, equipment, and tools can be fueled or charged. The provision of temporary electric infrastructure for such purpose shall be approved by the utility provider, Banning Electric Utility (BEU). If BEU does not approve the installation of temporary power for this purpose, the establishment of a temporary electric charging area will not be required. If electric equipment will not be used on the construction site because the construction contractor(s) does not have such equipment in its fleet (as specified in this Mitigation Measure below), the establishment of a temporary electric charging area also will not be required. If the contractor(s) equipment fleet includes this equipment and BEU approval is secured, the temporary charging location shall be established upon issuance of grading permits and building permits.

- If electric or non-diesel off-road trucks and construction support equipment, including but not limited to hand tools, forklifts, aerial lifts, materials lifts, hoists, pressure washers, plate compactors, and air compressors are available in the construction contractor's equipment fleet and can fulfill the construction requirements during the building, construction, paving, and architectural coating phases of Project construction, such equipment shall be used during on-site construction. This requirement shall be noted on plans submitted for building permit issuance.

- Construction contractors shall maintain records of all off-road diesel construction equipment associated with on-site construction to document that each off-road diesel construction equipment used meets required emission standards. Records shall be kept on-site for the duration of construction activities and shall be made available for periodic inspection by City staff or their designee.

- During construction activities, the City shall conduct periodic inspections to verify compliance with construction-related mitigation measures pursuant to the Mitigation Monitoring and Reporting Program.

- The City of Banning shall verify that these requirements have ~~his two-part measure has~~ been incorporated into construction plans prior to issuance of any construction permits and during architectural coating activities.

These additional mitigation measures further support the conclusions in the Draft EIR and are not evidence of a new or greater impact not previously disclosed. No further response is required.

**Response to Comment A-3-50**

The commenter recommends the following construction measure for air pollution reduction measures for warehouses and distribution centers: that construction contracts require off-road diesel equipment be equipped with Tier 4 or equipment that incorporates retrofits that achieve emission reductions equivalent or equal to Tier 4 equipment except for specialized equipment for which this is not available. This is already required mitigation. Please refer to the Response to Comment A-3-48. No further response is required.

**Response to Comment A-3-51**

The commenter recommends the following construction measure for air pollution reduction measures for warehouses and distribution centers: that construction contracts require off-road equipment with a power rating below 19 kw (approximately 25 hp) used during construction be battery powered. The anticipated equipment list that will be used for construction of the Development Project is shown in Table 4.3.G of the Draft EIR. The construction analysis in the Draft EIR only includes diesel construction equipment of 46 hp (approximately 34 kw) or more. The presumption is that smaller equipment would not be diesel powered and would most likely be electric. This measure was considered. Although the commercial availability of such equipment is uncertain,

the majority of emissions during construction would come from heavy-equipment, and there would be only relatively minor emission reductions achieved by the usage of battery powered equipment. Electric or battery powered equipment will be utilized if feasible. See the response to Comment A-3-49. No further response is required.

**Response to Comment A-3-52**

The commenter recommends the following construction measure for air pollution reduction measures for warehouses and distribution centers: that construction contracts include language requiring heavy-duty trucks entering the site during grading and construction activity be model year 2014 or later and meet CARB's low-$NO_X$ standard starting in year 2022. Heavy duty trucks used during construction will comply with applicable regulations and requirements in effect when construction commences. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-53**

The commenter recommends the following construction measure for air pollution reduction measures for warehouses and distribution centers: that construction contracts include language requiring all equipment and fleets to be in compliance with current air quality regulations It is reasonable to expect the operators of fleets and construction contractors exercise appropriate diligence to ensure compliance with applicable regulations. See the response to Comment A-3-49 which requires construction contractors to maintain records onsite documenting this compliance. No further response is required.

**Response to Comment A-3-54**

The commenter recommends that tenant lease agreements include contractual language to use the cleanest technologies available and to provide the necessary infrastructure to support zero-emission vehicles operating on site. This recommendation is to too vague to be implemented as stated. Mitigation Measure AIR-2 includes the following:

- At buildout of the industrial land uses a minimum of 50 ~~Level 3 AC~~ Class 8 electric vehicle (EV) truck chargers shall be installed at the tractor trailer parking spaces in logical locations to facilitate electric truck charging. These charges shall have the power rating sufficient to charge a Class 8 truck battery.

- For the warehouse/industrial portions of the Development Project, the buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for installation of electric charging systems for electric trucks and power transport refrigeration units (TRUs). Conduit shall be installed from the electrical room to all tractor trailer parking spaces in logical locations on site to facilitate future electric truck charging.

- All on-site cargo handling equipment including yard trucks, hostlers, yard goats, pallet jacks, forklifts and other onsite equipment shall be electric with the necessary electrical plug-in charging included in the

design of the Development Project electrical system, buildings, and equipment storage and parking areas.

- At buildout, the Development Project shall include the higher value of either:
    - At least 350 Level 2 AC EV chargers; or
    - A percentage of total parking spaces with Level 2 AC EV chargers to comply with the minimum requirements of CCR, Title 24, Part 11: California Green Building Standards Code.
    - All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric.

In addition, as described in Section 3.5.3.10 (page 3-98) of the Project Description of the Draft EIR, the Development Project includes many energy efficient project design features that lessen emissions and promote cleaner technology. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-55**

The commenter recommends that tenant lease agreements include contractual language that lease agreement require electrification of loading/unloading docks and trailer spaces to support trucks with TRUs. As described in the on page 4.3-35 of the Draft EIR, Mitigation Measure AIR-2 requires the installation of the infrastructure to support zero-emission trucks and other vehicles. In particular, this measure states:

> All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric.

This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-56**

The commenter recommends that tenant lease agreements include contractual language requiring that all TRUs entering the Development Site have plug-in capability. As stated in the response to Comment A-3-14, the existing CARB TRU regulation requires all new TRUs (as of 2023) to have near-zero PM emissions. Additionally, CARB has regulations under development (Part 1 approved in February 2022), requiring, beginning December 31, 2023, that all TRU owners turn over at least 15 percent of their truck TRU fleet (defined as truck TRUs operating in California) to zero emissions (ZE) technology each year (for 7 years) and that all truck TRUs operating in California shall be ZE by

December 31, 2029. Furthermore, as stated in the response to Comment A-3-54, the Development Project provides infrastructure to support plug-in TRUs. Fleet operators' compliance with existing CARB regulations will result in limited number of TRUs without plug in capability from the time the cold storage buildings become operational and December 31, 2029, when such TRUs will be mandatory. The availability of features supporting plug-in TRUs would ensure long-term operation of the Development Project will support the use of TRUs with plug-in capability. No further response is required.

**Response to Comment A-3-57**

The commenter recommends that tenant lease agreements include contractual language requiring tenants to use zero-emission light- and medium duty delivery trucks. This recommendation to too vague to be implemented as stated, as the operator of individual warehouse uses may not exert total control over the light- and medium duty delivery trucks that service a particular warehouse use. Generally, as stated in the response to Comment A-3-25, the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) accelerates the deployment of zero-emission and plug-in hybrid trucks and buses by providing vouchers that partially offset the cost of these vehicles. The inventory of vehicles eligible under this program include a variety of light- and medium-duty vehicles including step-vans, panel trucks, and delivery vans. Furthermore, the WAIRE program establishes a point system for reduction of emissions with compliance, either by implementing a menu of items including purchasing/renting/leasing near-zero emission (NZE) and zero emission (ZE) yard equipment, installing on-site ZE fueling stations, and other measures intended to offset or reduce warehouse emissions. WAIRE rules allow for lessees operating warehouses to gain WAIRE points through purchase of ZE heavy-duty trucks as they become available.

While the use of zero-emission light- and medium-duty truck may not be suited for all business operations, it is reasonable to consider the individual warehouse operators would comply with applicable WAIRE program requirements, utilize existing incentives offered under the HVIP, use such vehicles as they become financially and commercially available and feasible, and utilize the on-site zero-emission infrastructure provided under Mitigation Measure AIR-2. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-58**

The commenter recommends that tenant lease agreements include contractual language requiring all TRUs, trucks, and cars entering the Project site be zero emission. Please refer to responses to Comments A-3-1-A, A-3-4-A, A-3-5, A-3-20, A-3-25, A-3-25-A, A-3-25-B, A-3-26, A-3-27, A-3-28, and A-3-30 related to the implementation of regulations mandating the transition to zero emission TRUs and heavy-duty trucks and infeasibility to requiring their use when the Development Project first becomes operational. Regarding requiring the use of zero-emission light- and medium duty delivery trucks, see response to Comments A-3-55 and A-3-56. Regarding passenger vehicles, it is infeasible to require tenant leases to obligate employees and/or patrons to exclusively utilize zero emission vehicles. Mitigation Measure AIR-2 requires the installation of the greater of 350 Level 2 AC EV chargers or a percentage of total parking spaces with Level 2 AC EV chargers to comply with the minimum requirements California Green Building Standards Code which will facilitate use of ZE and NZE

passenger vehicles. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-59**

The commenter recommends that lease agreements include contractual language requiring all service equipment (e.g., yard equipment, pallet jacks, forklifts) used within the Project site be zero emission. As previously stated in the response to Comment A-3-5, Mitigation Measure AIR-2 includes this requirement as follows:

> All on-site cargo handling equipment including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment shall be electric with the necessary electrical plug-in charging included in the design of the Development Project electrical system, buildings, and equipment storage and parking areas.

No further response is required.

**Response to Comment A-3-60**

The commenter recommends that tenant lease agreements require all heavy-duty trucks entering the site to be model year 2014 or later, expedite a transition to zero-emission and to be fully zero emission by 2030. Due to the technological and financial constraints, it is not feasible to require use of only ZE heavy-duty trucks by 2030. Sufficient ZE heavy duty trucks will not be available to serve the Development Project by 2030, and therefore is not a feasible requirement. See the responses to Comments A-3-5, A-3-25, and A-3-27. Incentives allowed under the HVIP and operators' implementation of the WAIRE program will facilitate the transition of fleets to zero-emission trucks as they become more commercially available. Also, effective in 2033 or 2036 depending on the type of truck, CARB's Advanced ACF Rule requires fleet purchases/leases of heavy-duty trucks be 50 percent zero-emissions depending on the type of heavy-duty truck. See CARB Advanced Clean Fleets Regulation – ZEV Milestones Option[11]. This zero-emission requirement increases to 100% of new heavy-duty truck purchases/leases beginning in either January 2036 or January 2039 depending on the type of heavy-duty truck. Per the ACF Rule, internal combustion engines (ICEs) can continue to operate through their "useful life", a period extending 13 years from the model year the engine and emission control was first certified by CARB or 18 years/800,000 miles, whichever is later. As an allowance for the transition of ICE vehicles out of truck fleets is provided in the AFC rule, in tandem with regulations to prohibit the sale/lease of ICE trucks after 2039, electrification of fleets will occur over the course of Project operations, but it is infeasible to meet the suggested requirement when project operations commence. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-61**

The commenter recommended lease agreements require tenant be in and monitor compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), and the Statewide Truck and Bus Regulation. These requirements apply only to owners of on road trucks and may not be applicable

[11] www.arb.ca.gov/resources/fact-sheets/advanced-clean-fleets-regulation-zev-milestones-option.

to tenants, and therefore the requirements cannot be imposed in lease agreements. Mitigation Measure AIR-2 states, in part:

> Every tenant shall be required to train staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Facility operators shall also be required to maintain records on site demonstrating compliance and make records available for inspection by the City of Banning, SCAQMD, and State upon request.

As the compliance with the CARB regulations cited in the comment is required of truck and truck fleet owners, it is reasonable compliance would occur. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-62**

The commenter recommends including contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes on site. In response to other comments requesting that truck idling be restricted to three minutes on site, the following modification to Mitigation Measure AIR-2, Draft EIR, pg 4.3-35 has been added to the Final EIR:

> Tenant lease agreements for the Development Project shall include contractual language restricting trucks and support equipment from nonessential idling longer than ~~5~~ 3 minutes while on site. The idling restriction will be presented on signs at the entrance to the industrial portions of the Development Project as well as at loading docks and truck parking areas.
>
> All facility operators shall train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

This modification further supports the conclusions in the Draft EIR and is not evidence of a new or greater impact not previously disclosed. No further response is required.

**Response to Comment A-3-63**

The commenter recommends including contractual language in tenant lease agreements limiting on-site TRU engine run time to no more than 15 minutes. Mitigation Measure AIR-2 includes a requirement to provide plug-in capability at all loading and trailer storage area, which would allow TRUs still in operation to use facility electricity while on-site. As stated in Mitigation Measure AIR-2 as revised:

> All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric.

While the Development Project may include up to 330,000 square feet of cold storage, the plug-in features for TRUs provided in Mitigation Measure AIR-2 would ensure limited idling of TRUs would occur on-site. Effective in 2030, all TRUs must be ZE so any idling of TRU engines would not result in DPM. Furthermore, as cited in the response to Comment B-2-5, a revised HRA has been prepared to identify potential health risks impacts of TRU's. Neither the original nor revised HRA identified health

risks in excess of established SCAQMD thresholds. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment A-3-64**

The commenter requests the installation of roof-top solar panels to the extent feasible with a capacity that matches the maximum allowed for distributed solar collections to the grid. Electricity to the Development Project would be provided by Banning Electric Utility (BEU), which currently has a renewable portfolio of 81.3 percent (2022)[12], far exceeding the State's target of 50% by 2030. As described on page 4.8-9, Section 4.8 of the Draft EIR, SB 100 requires BEU's portfolio to be 100 percent renewable by 2045. BEU is in competition with other utilizes which likewise are required to increase their renewable portfolios. According to the U.S. Census, the City's median income in 2022 was $54,083 and the poverty rate was 18.9%; therefore, it is important that electricity rates for residents remain affordable as the City's renewable portfolio grows to meet State requirements. To keep electricity costs down for residents, the City needs to enter into long-term renewable energy purchase contracts in as large amount as possible to obtain favorable rates for renewable sources. The City enforces mandatory building code requirements for solar roofs in new development, which currently include mandatory solar roofs on residential development and solar-ready roofs for non-residential development, which has recently been changed to (1) installation of solar panels with the capacity to generate at least 20 percent of commercial buildings' expected electricity consumption; and (2) installation of solar on industrial buildings with the capacity to generate the expected electricity consumption of the office space of the warehouse. s The City currently has an abundance of solar generation from residential developments during daylight hours such that the daylight electrical load is extremely depressed. BEU's entire system load has actually recently been dropping below 10 MW during some middays. During daylight hours this results in BEU being forced to "dump" excess electricity, including the electricity from its current solar power purchase agreement, into the California Independent System Operator (CAISO)[13] wholesale markets. BEU us usually paid very little for this electricity. During daylight hours, the CAISO wholesale prices frequently go negative due to the glut of solar on the grid. BEU has had to pay the CAISO to accept excess energy generated. The exception to this may occur on very hot summer days when BEU may not be over-resourced. However, for the majority of the year, additional solar cannot be used in the BEU's distribution system. BEU would likely have to dump any additional solar generated as a result of solar use on the Development Site into the CAISO wholesale markets. Therefore, the City prefers that new commercial and industrial uses refrain from installing solar roofs and purchase electricity from BEU to facilitate and support the utility's long-term renewable energy contracts to the extent allowed by law. As required under Title 24, the proposed Project buildings will be designed and constructed to include solar-ready roof and included the limited solar required for commercial and office space in the industrial buildings, but the installation of solar panels beyond those required is not anticipated at this time. This comment does

12 Email confirmation from Jim Steffans, Banning Electric Utility, May 3, 2024, 12:09 PM.

13 The California Independent System Operator (CAISO) is a non-profit Independent System Operator (ISO) serving California.[1] It oversees the operation of California's bulk electric power system, transmission lines, and electricity market generated and transmitted by its member utilities. CAISO delivering 300 million megawatt-hours of electricity each year and managing about 80% of California's electric flow.

not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment A-3-65**

The commenter requests the inclusion of language in tenant lease agreements requiring the installation of vegetative walls or other effective barriers that separate loading docks and people living or working nearby. The Development Project has been planned to shield the loading docks from the adjacent residential communities. For example, Building 5 along Sunset Avenue is oriented to have the loading docks on the opposite side of the building from the residential community across the street. The employee entrance to the building faces the residential community. This same orientation is present for Building 9 and Building 10 along Highland Home Road whereby the loading docks are located on the opposite side of the building from the residential community across the street. In addition, the employee entrance for Building 9 is located approximately 650 ft from the nearest residence. There is approximately an 800 ft buffer between Building 10 and Highland Home Road.

Furthermore, the Specific Plan (see Draft EIR, Appendix B) details the requirements that landscaping and streetscape requirements along local and internal Project roadways, providing a buffer to residential areas located east and south of the site. While the Specific Plan details the location, extent, and type of landscaping provided within the Development Site, it must be noted the installation and maintenance of landscaping within the Development Project must further adhere to the requirements established for fuel management zone in the Development Project's Fire Protection Plan (see Draft EIR, Appendix G-2). This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

February 5, 2024
Sent via email

Adam Rush, Community Development Director
Community Development Department
City of Banning
99 East Ramsey Street
Banning, CA 90220

Subject: Draft Environmental Impact Report, Sunset Crossroads Specific Plan Industrial and Commercial Development Project, State Clearinghouse No. 2021020011

Dear Adam Rush:

The California CDFW of Fish and Wildlife (CDFW) received and reviewed the Draft Environmental Impact Report (DEIR) from the City of Banning for the Sunset Crossroads Specific Plan Industrial and Development Project (Project), State Clearinghouse No. 2021020011, pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

A-4-1

**CDFW ROLE**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub Resources Code, § 21069, CEQA Guidelines, § 15381 ) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G Code, § 1600 et seq ) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G Code, § 2050 et seq ), the Project proponent may seek related take authorization as provided by the Fish and Game Code

CDFW issued Natural Community Conservation Plan approval and take authorization in 2004 for the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) as per Section 2800, et seq , of the California Fish and Game Code The MSHCP established a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit The City of Banning is a permittee to the MSHCP and is responsible for implementation of the MSHCP and its associated Implementation Agreement CDFW is providing the following comments as they relate to the project s consistency with the MSHCP and CEQA.

A-4-1 Cont

## PROJECT DESCRIPTION AND SUMMARY

**Location:** The 533.8-acre Project site is located south of Interstate Highway 10 within the San Gorgonio Pass, an east-west trending valley situated between the San Bernardino and the San Jacinto Mountains, on Assessor Parcel Numbers 537-110-003 through –005, 536-110-007 and –008, 537-110-011 through –013, 537-120-025 537-120-028 through –036. The northern portion of the Project is located in the City of Banning (City) while the southern portion is within the City's Sphere of Influence (SOI in unincorporated Riverside County (County).

**Description:** The City of Banning's (City: Lead Agency) proposed Project would develop medical offices, professional offices, education, recreational and commercial uses, including travel center retail uses, a fueling facility, and a hotel with 125 rooms n the 47.9-acre northern portion of development site. The Project also includes 392 0-acres for industrial uses and cold storage, a battery energy storage systems facility 65.6-acres of land designated for open space, broken down as 53 0-acres for resources and 12.6-acres for open parks. Approximately 28 3-acres of development site would include internal circulation features

A-4-1-A

This development would lead to partial or complete grade and fill of portions of unnamed tributary northeast of Pershing Creek, an unnamed ponded area Smith Creek, and Highland Wash, both of which are within the boundary of the Coachella Valley Groundwater Basin, San Gorgonio Pass Subbasin

## COMMENTS AND RECOMMENDATIONS

Based on the documents for review, CDFW offers the comments and recommendations on the DEIR to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the environmental document. CDFW recommends the additional measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 2108.6; CEQA Guidelines, § 15097)

A-4-2

**Western Riverside County Multiple Species Habitat Conservation Plan**

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed project and applicable general plans and regional plans, including habitat conservation Plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP.

A-4-3

To be considered a covered activity, Permittees need to demonstrate that the proposed actions are consistent with the MSHCP, the Permits, and the Implementing Agreement. The City is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. To demonstrate consistency with the MSHCP, as part of the CEQA review, the City shall ensure the Project pays Local Development Mitigation Fees and other relevant fees as set forth in Section 8.5 of the MSHCP; and demonstrates compliance with: 1) the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (Section 6.1.2 of the MSHCP); 2) the Protection of Narrow Endemic Plant Species (Section 6.1.3 of the MSHCP); 3) the Urban/Wildlands Interface Guidelines (Section 6.1.4 of the MSHCP); 4) the policies set forth in the Additional Survey Needs and Procedures (MSHCP Section 6.3.2; and 5) the Best Management Practices and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP.

A-4-4

**Specific Comments**

**Comment #1: Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools**

The MSHCP Protection of Species Associated with Riparian/Riverine and Vernal Pool Resources Section 6.1.2 indicates that if avoidance of onsite impacts to Section 6.1.2 resources is not feasible, then the impacts should be identified and mitigated for through a Determination of Biologically Equivalent or Superior Preservation (DBESP) process prior to or in parallel with CEQA. Implementation of the requirements of MSHCP Section

A-4-5

6.0 are intended to provide full mitigation under CEQA by mitigating Project impacts to the extent feasible and ensures that there is no conflict with the MSHCP, a requirement of CEQA Environmental Impact Report, Biological Resources, Section 4 subitem f. CDFW appreciates the Applicants and Project team filing their DBESP during November of 2023.

A-4-5 Cont

The DEIR identifies 1.07acres of impacts to Smith Creek, Highland Wash, and Pershing Creek as a result of development, however it is not clear which portions will be impacted, avoided, and conserved through easements. The DEIR provides maps regarding future design and open space areas, but does not display which areas would be conserved or avoided riparian/riverine resources serving as mitigation. CDFW recommends the DEIR include a map detailing all proposed onsite riparian/riverine impacts and mitigation, including acreages, as well as the accompanied habitat viability analysis.

A-4-6

The DEIR further states that the Project would increase cumulative flow through the aforementioned onsite streams as described in Mitigation Measures HYD-1 and HYD-2. CDFW requests a pre-Project and post-Project study to ensure that the appropriate levels of sediment transport and deposition, floodplain modification, and potential stream bed incision at, above, and below each of the proposed stream crossings to be included in the DBESP and accompanied any future Lake and Stream Alteration Agreement. However, without this information during CEQA review, the lead agency may not be able to adequately determine if the proposed stream crossings and associated Project would have long term permanent impacts onsite and downstream, where the sediment transport is crucial.

A-4-7

**Comment #2: Additional Survey Needs and Procedures:**

Project construction and activities may result in injury or mortality of burrowing owl, disrupt natural burrowing owl breeding behavior, and reduce reproductive capacity. Additionally, the Project may impact breeding, wintering, and foraging habitat for the species. Habitat loss could result in local extirpation of the species and contribute to local, regional, and State-wide declines of burrowing owl.

A-4-8

CDFW recommends the inclusion of the following measure in the final EIR per the edits below (edits are in ~~strikethrough~~ and **bold**), and also included in Attachment 1 "Mitigation Monitoring and Reporting Program":

**MM BIO-7 Burrowing Owl Impacts.** A 30-day pre-construction survey for burrowing owls is required prior to future ground-disturbing activities (e.g.) vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the RCA and the wildlife Agencies and will need to coordinate in the future with the RCA

A-4-9

A-4

and the wildlife agencies, including the possibility of preparing a **Burrowing Owl Protection and Relocation Plan** prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure that burrowing owl have not colonized the site since it was last disturbed. If burrowing owls are found ~~the same coordination described above will be necessary.~~, **all activities likely to affect the animal(s) shall cease immediately and regulatory agencies shall be contacted, within 48 hours of detection, to determine appropriate management actions.**

A-4-9 Cont

1) A Burrowing Owl Protection and Relocation Plan shall be prepared in accordance with guidelines in the CDFW staff report on Burrowing Owl (March 2006) and MSHCP The Burrowing Owl Protection and Relocation Plan shall describe proposed avoidance, minimization, relocation, and monitoring as applicable. The Burrowing Owl Protection and Relocation Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls may also be required in the Burrowing Owl Protection and Relocation Plan. The applicant shall implement the Burrowing Owl Protection and Relocation Plan following CDFW and USFWS review and concurrence. A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Protection and Relocation Plan. The letter shall be submitted to CDFW prior to the start of Project activities. When a qualified biologist determines that burrowing owls are no longer occupying the Project site per the criteria in the Burrowing Owl Protection and Relocation Plan, Project activities may begin.
    a. Please provide a Burrowing Owl protection and relocation (including maps of suitable burrow locations, ground squirrel occupancy, etc) specifically including a Relocation plan with alternatives for review and approval by CDFW

**Mitigation Measures for Project Impacts to Biological Resources**

A-4-10

**MM BIO-8, Burrowing Owl Protection and Relocation Plan.** Within 90 days of the commencement of grading, a Burrowing Owl Protection and Relocation Plan would be drafted, reviewed **and approved** by CDFW to ensure MSHCP guidelines for protection and/or relocation are followed. As part of that plan, one-way doors shall be installed as part of a passive relocation program. Burrowing Owl Burrows shall be hand-excavated by qualified biologist when determined to be unoccupied and backfilled to ensure animals do not re-enter. Disturbance to active burrows shall be minimized to the extent feasible.

~~If less than three pairs of burrowing owl are identified on the Development Site during~~

A-4

pre-construction surveys no additional mitigation is required If three or more pairs of burrowing owl are identified, MSHCP guidelines require additional conservation land to be set aside to off-set the significant impact to burrowing owl within a survey area In all scenarios, including the detection of additional burrowing owls, mitigation and equivalency will be achieved through the development project following all MSHCP guidelines and the direction of the Environmental Programs Department, Western Riverside County Regional Conservation Authority, and/or the Wildlife Agencies

A-4-10 Cont

**Additional Recommendations**

**Native Landscaping** To ameliorate the water demands of this Project, CDFW recommends incorporation of water-wise concepts in Project landscape design plans In particular, CDFW recommends xeriscaping with locally native California species, and installing water efficient and targeted irrigation systems (such as drip irrigation) Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants, more information on native plants suitable for the Project location and nearby nurseries is available at CALSCAPE https //calscape org/ Local water agencies/districts and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought tolerant locally native species demonstration gardens (for example the Riverside-Corona Resource Conservation District in Riverside). Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website https //saveourwater com/.

A-4-11

**Weed Management Plan.** A weed management plan should be developed for the Project site and implemented during the duration of this long-term Project On-going soil disturbance promotes establishment and growth of non-native weeds As part of the Project, non-native weeds should be prevented from becoming established The Projects site should be monitored via mapping for new introductions and expansions of non-native weeds

A-4-12

**Mitigation and Monitoring Reporting Plan**

CDFW recommends updating the DEIRs's proposed Biological Resources Mitigation Measures to include mitigation measures recommended in this letter Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments[(Pub Resources Code, § 21081 6; CEQA Guidelines, § 15126 4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the City in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4; (2) specific; (3) detailed (i e , responsible party timing specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation, monitoring, and/or reporting program (Pub Resources Code, § 21081 6, CEQA Guidelines, § 15097). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.

A-4-13

Based on the documents for review, CDFW offers the comments and recommendations on the DEIR to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the environmental document. CDFW recommends the additional measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 2108 6; CEQA Guidelines, § 15097)

A-4-2

**Western Riverside County Multiple Species Habitat Conservation Plan**

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed project and applicable general plans and regional plans, including habitat conservation Plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP.

A-4-3

To be considered a covered activity, Permittees need to demonstrate that the proposed actions are consistent with the MSHCP, the Permits, and the Implementing Agreement. The City is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. To demonstrate consistency with the MSHCP, as part of the CEQA review, the City shall ensure the Project pays Local Development Mitigation Fees and other relevant fees as set forth in Section 8.5 of the MSHCP; and demonstrates compliance with: 1) the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (Section 6.1.2 of the MSHCP); 2) the Protection of Narrow Endemic Plant Species (Section 6.1.3 of the MSHCP); 3) the Urban/Wildlands Interface Guidelines (Section 6.1.4 of the MSHCP); 4) the policies set forth in the Additional Survey Needs and Procedures (MSHCP Section 6.3.2; and 5) the Best Management Practices and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP.

A-4-4

**Specific Comments**

**Comment #1: Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools**

The MSHCP Protection of Species Associated with Riparian/Riverine and Vernal Pool Resources Section 6.1.2 indicates that if avoidance of onsite impacts to Section 6.1.2 resources is not feasible, then the impacts should be identified and mitigated for through a Determination of Biologically Equivalent or Superior Preservation (DBESP) process prior to or in parallel with CEQA. Implementation of the requirements of MSHCP Section

A-4-5

6 0 are intended to provide full mitigation under CEQA by mitigating Project impacts to the extent feasible and ensures that there is no conflict with the MSHCP, a requirement of CEQA Environmental Impact Report, Biological Resources, Section 4 subitem f. CDFW appreciates the Applicants and Project team filing their DBESP during November of 2023.

A-4-5 Cont

The DEIR identifies 1.07acres of impacts to Smith Creek, Highland Wash, and Pershing Creek as a result of development, however it is not clear which portions will be impacted, avoided, and conserved through easements. The DEIR provides maps regarding future design and open space areas, but does not display which areas would be conserved or avoided riparian/riverine resources serving as mitigation. CDFW recommends the DEIR include a map detailing all proposed onsite riparian/riverine impacts and mitigation, including acreages, as well as the accompanied habitat viability analysis.

A-4-6

The DEIR further states that the Project would increase cumulative flow through the aforementioned onsite streams as described in Mitigation Measures HYD-1 and HYD-2. CDFW requests a pre-Project and post-Project study to ensure that the appropriate levels of sediment transport and deposition, floodplain modification, and potential stream bed incision at, above, and below each of the proposed stream crossings to be included in the DBESP and accompanied any future Lake and Stream Alteration Agreement. However, without this information during CEQA review, the lead agency may not be able to adequately determine if the proposed stream crossings and associated Project would have long term permanent impacts onsite and downstream, where the sediment transport is crucial.

A-4-7

**Comment #2: Additional Survey Needs and Procedures:**

Project construction and activities may result in injury or mortality of burrowing owl, disrupt natural burrowing owl breeding behavior, and reduce reproductive capacity. Additionally, the Project may impact breeding, wintering, and foraging habitat for the species. Habitat loss could result in local extirpation of the species and contribute to local, regional, and State-wide declines of burrowing owl.

A-4-8

CDFW recommends the inclusion of the following measure in the final EIR per the edits below (edits are in ~~strikethrough~~ and **bold**), and also included in Attachment 1 "Mitigation Monitoring and Reporting Program".

**MM BIO-7 Burrowing Owl Impacts.** A 30-day pre-construction survey for burrowing owls is required prior to future ground-disturbing activities (e.g.) vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the RCA and the wildlife Agencies and will need to coordinate in the future with the RCA

A-4-9

A-4

and the wildlife agencies, including the possibility of preparing a **Burrowing Owl Protection and Relocation Plan** prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure that burrowing owl have not colonized the site since it was last disturbed. If burrowing owls are found the same coordination described above will be necessary , **all activities likely to affect the animal(s) shall cease immediately and regulatory agencies shall be contacted, within 48 hours of detection, to determine appropriate management actions.**

A-4-9 Cont

1) A Burrowing Owl Protection and Relocation Plan shall be prepared in accordance with guidelines in the CDFW staff report on Burrowing Owl (March 2006) and MSHCP. The Burrowing Owl Protection and Relocation Plan shall describe proposed avoidance, minimization, relocation, and monitoring as applicable. The Burrowing Owl Protection and Relocation Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls may also be required in the Burrowing Owl Protection and Relocation Plan. The applicant shall implement the Burrowing Owl Protection and Relocation Plan following CDFW and USFWS review and concurrence. A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Protection and Relocation Plan. The letter shall be submitted to CDFW prior to the start of Project activities. When a qualified biologist determines that burrowing owls are no longer occupying the Project site per the criteria in the Burrowing Owl Protection and Relocation Plan, Project activities may begin.
    a. Please provide a Burrowing Owl protection and relocation (including maps of suitable burrow locations, ground squirrel occupancy, etc) specifically including a Relocation plan with alternatives for review and approval by CDFW

**Mitigation Measures for Project Impacts to Biological Resources**

**MM BIO-8, Burrowing Owl Protection and Relocation Plan.** Within 90 days of the commencement of grading, a Burrowing Owl Protection and Relocation Plan would be drafted, reviewed **and approved** by CDFW to ensure MSHCP guidelines for protection and/or relocation are followed. As part of that plan, one-way doors shall be installed as part of a passive relocation program. Burrowing Owl Burrows shall be hand-excavated by qualified biologist when determined to be unoccupied and backfilled to ensure animals do not re-enter. Disturbance to active burrows shall be minimized to the extent feasible.

A-4-10

~~If less than three pairs of burrowing owl are identified on the Development Site during~~

A-4

pre-construction surveys, no additional mitigation is required. If three or more pairs of burrowing owl are identified, MSHCP guidelines require additional conservation land to be set aside to off-set the significant impact to burrowing owl within a survey area. In all scenarios, including the detection of additional burrowing owls, mitigation and equivalency will be achieved through the development project following all MSHCP guidelines and the direction of the Environmental Programs Department, Western Riverside County Regional Conservation Authority, and/or the Wildlife Agencies.

A-4-10 Cont

Additional Recommendations

**Native Landscaping.** To ameliorate the water demands of this Project, CDFW recommends incorporation of water-wise concepts in Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California species, and installing water efficient and targeted irrigation systems (such as drip irrigation). Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants. More information on native plants suitable for the Project location and nearby nurseries is available at CALSCAPE https://calscape.org/. Local water agencies/districts and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought tolerant locally native species demonstration gardens (for example the Riverside-Corona Resource Conservation District in Riverside). Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website https://saveourwater.com/.

A-4-11

**Weed Management Plan.** A weed management plan should be developed for the Project site and implemented during the duration of this long-term Project. On-going soil disturbance promotes establishment and growth of non-native weeds. As part of the Project, non-native weeds should be prevented from becoming established. The Projects site should be monitored via mapping for new introductions and expansions of non-native weeds.

A-4-12

Mitigation and Monitoring Reporting Plan

CDFW recommends updating the DEIRs's proposed Biological Resources Mitigation Measures to include mitigation measures recommended in this letter. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments[(Pub. Resources Code, § 21081.6, CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the City in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4, (2) specific, (3) detailed (i.e., responsible party, timing specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation, monitoring, and/or reporting program (Pub. Resources Code, § 21081.6, CEQA Guidelines, § 15097). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.

A-4-13

A-4

Per Public Resources Code section 21081 6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP, Attachment 1)

A-4-13 Cont

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals

## ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

A-4-14

## CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR for the Sunset Crossroads Project, State Clearinghouse No. 2021020011, to assist in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts. CDFW requests that City of Banning address the CDFW's comments and concerns and recirculate the DEIR prior to adoption of the final EIR for the Project. Questions regarding this letter or further coordination should be directed to John Dempsey, Environmental Scientist, at john.dempsey@wildlife.ca.gov.

Sincerely,

DocuSigned by
Kim Freeburn
[illegible]

Kim Freeburn,
Environmental Program Manager

ec: California Department of Fish and Wildlife
Carly Beck, Senior Environmental Scientist Supervisor
Carly.Beck@wildlife.ca.gov

Office of Planning and Research, State Clearinghouse
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Western Riverside County Regional Conservation Authority
Tricia Campbell
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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

**Attachment A: Draft Mitigation and Monitoring Reporting Plan**

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.
that is primarily responsible for implementing the mitigation measure.

| **Biological Resources (BIO)** | | |
|---|---|---|
| **Mitigation Measure (MM)** | Timing | **Responsible Party** |
| **MM BIO-7 Burrowing Owl Impacts.** A 30-day pre-construction survey for burrowing owls is required prior to future ground-disturbing activities (e.g.) vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the RCA and the wildlife Agencies and will need to coordinate in the future with the RCA and the wildlife agencies, including the possibility of preparing a **Burrowing Owl Protection and Relocation Plan**<br><br>prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure that burrowing owl have not colonized the site since it was last disturbed. If burrowing owls are found ~~the same coordination described above will be necessary~~. **All activities likely to affect the animal(s) shall cease immediately and regulatory agencies shall be contacted, within 48 hours of detection, to determine appropriate management actions.** | 30-day preconstruction survey | City of Banning or Project Applicant |

| | | |
|---|---|---|
| **MM BIO-8, Burrowing Owl Protection and Relocation Plan.** Within 90 days of the commencement of grading, a Burrowing Owl Protection and Relocation Plan would be drafted, reviewed and approved by CDFW to ensure MSHCP guidelines for protection and/or relocation are followed. As part of that plan, one-way doors shall be installed as part of a passive relocation program. Burrowing Owl Burrows shall be hand-excavated by qualified biologist when determined to be unoccupied and backfilled to ensure animals do not re-enter. Disturbance to active burrows shall be minimized to the extent feasible.<br><br>~~If less than three pairs of burrowing owl are identified on the Development Site during pre-construction surveys, no additional mitigation is required.~~ If three or more pairs of burrowing owl are identified, MSHCP guidelines require additional conservation land to be set aside to off-set the significant impact to burrowing owl within a survey area. In all scenarios, including the detection of additional burrowing owls, mitigation and equivalency will be achieved through the development project following all MSHCP guidelines and the direction of the Environmental Programs Department, Western Riverside County Regional Conservation Authority, and/or the Wildlife Agencies. | Within 90 days of the commencement of grading | City of Banning or Project Applicant |

## Response to Letter A-4

State of California, Department of Fish and Wildlife
Kim Freeburn, Environmental Program Manager
February 5, 2024

### Response to Comment A-4-1

The commenter provides an explanation of the role of CDFW in the CEQA process as a trustee agency and a responsible agency and its focus on providing biological expertise during public agency review efforts under CEQA. The commenter indicates that its focus is on those aspects of the Project that may affect California fish and wildlife and those aspects of the Project that it by law may be required to carry out or approve through exercise of its regulatory authority under the Fish and Game Code and as a trustee agency. The commenter also identifies its participation in and approval of the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) and the role of the City of Banning as a permittee under the MSHCP, and its responsibility for implementation of the MSHCP and its associated Implementation Agreement. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

### Response to Comment A-4-1-A

The commenter provides a general summary of the location and description of the Project and incorrectly states that the development would lead to partial or complete grade and fill of portions of an unnamed tributary northeast of Pershing Creek, an unnamed ponded area, Smith Creek and Highland Wash, which are within the boundary of the Coachella Valley Groundwater Basin, San Gorgonio Pass Sub-basin. The commenter accurately summarizes the project location, development proposal and the features within the Development Site as described in the Draft EIR. As noted in the Chapter 3.0 Project Description, Section 3.5.3.1 of the Draft EIR, Planning Areas 13 through 19 (totaling 40.5 acres) are designed to retain three deeply incised existing natural drainages (from east to west: Pershing Wash, Smith Creek, and Highland Wash) and associated features within the Development Site. No grading or development would be permitted within Planning Areas 13 through 19 other than temporary activities required for the construction of roadway crossings (Lincoln Street and Highland Home Road) and utility infrastructure; however, any land disturbance beyond these features would be returned to substantially pre-construction conditions to maintain the natural vegetation and topography of the Open Space – Resources areas. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

### Response to Comment A-4-2

The commenter provides a general statement about its intent to offer comments and recommendations to assist the City in adequately identifying, avoiding and/or mitigating the Project's significant or potentially significant direct and indirect impacts on biological resources, along with editorial comments. The commenter recommends that its proposed revisions and measures be included in a science-based monitoring program that contains adaptive management strategies as part of the project's mitigation monitoring and reporting program. In addition to incorporation of various recommendations made by the commenter as detailed below, MM BIO-14 in the Draft EIR,

which requires preparation of a Habitat Restoration and Monitoring Plan (HRMP) has been revised and expanded in order to detail the plan for removal of non-native invasive species (enhancement) and planting and maintenance of native riparian species (restoration) to increase the function and value of the currently disturbed drainage features following mitigation. MM BIO-14 requires that the HRMP be designed to assure that installation of the proposed mitigation will result in an outcome that would be biologically equivalent or superior to an avoidance measure. The revised MM BIO-14 is included below with additions to the original mitigation measure identified with underline and deletions identified with ~~strikeout~~:

**MM BIO-14** If habitat mitigation on the Development Site or at land contributed by the applicant is the selected means of mitigation, then as part of the restoration effort, a Habitat Restoration and Monitoring Plan (HRMP) will be prepared by a qualified restoration consultant and will be reviewed and approved by the City prior to commencement of construction activities on the Development Site. ~~The HRMP will include species information, success criteria and mapped location(s) for the proposed on-site riparian/riverine mitigation, and a habitat viability analysis for the proposed new areas of riparian vegetation.~~ The exact location of the proposed riparian restoration areas (whether on-site or off-site) will be provided to the City for review and approval. ~~The plan will be prepared by a qualified restoration consultant and will be utilizing local native plant species in the planting pallet. This plan typically includes a 5-year monitoring element to ensure that restoration efforts are successful~~. If off-site mitigation areas are selected, the applicant shall have control of the mitigation area prior to commencement of construction. However the off-site mitigation option is not anticipated at this time.

The HRMP shall provide a plan for removal of non-native invasive species (enhancement) and planting of native riparian species (restoration) which will increase the function and value of the currently disturbed drainage features following mitigation and will be designed to assure that installation of the proposed mitigation will result in an outcome that would be biologically equivalent or superior to an avoidance measure. The HRMP will include species information, success criteria and mapped location(s) for the proposed on-site riparian/riverine mitigation, and a habitat viability analysis for the proposed new areas of riparian vegetation and will also include:

- Removal of non-native invasive species, such as tamarisk (*Tamarix aphylla*), giant reed (*Arundo donax*), and castor bean (*Ricinus communis*);
- Removal of trash and debris associated with human disturbance will be removed.
- Planting of boxed riparian trees, container plantings, and hand broadcasting, with Riparian/Riverine species to be planted to match the existing riparian/riverine trees and include plant species such as Fremont cottonwood (*Populus fremontii*), Goodding's black willow, arroyo willow (*Salix lasiolepis*), and/or mule fat and, along the upland

benches, planting of more upland species such as scale broom (*Lepidospartum squamatum*), California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), brittlebush (*Encelia californica*), pinebush (*Ericameria pinifolia*), and deerweed (*Lotus scoparius*).

- Planting of plants with mycorrhizal fungi and root hormone during planting to increase survivability. Following the installation of the plant material, mulch will be used at boxed trees and container plants for additional moisture and protection.

- Maintenance and monitoring for 5-years following the installation, to include:

  - Irrigation for the first three years, if feasible.

  - If instigated, removal of irrigation after year three to allow the plants to acclimate to existing climatic conditions during the last two years of monitoring, to ensure that the vegetation has long-term survivability.

  - Monitoring by a qualified biologist quarterly for the first year, then annually for years two through five.

  - A qualitative assessment will be completed by the qualified biologist and reported to the Wildlife Agencies, and will include Development Site specific photo locations and an aerial photograph (with drone) documenting vegetation progress.

  - To determine if the restoration has been successful, minimum success criteria at the end of five years will be specified in the HRMP. If the minimum success criteria is not achieved, then the applicant shall be responsible for taking the appropriate corrective measures, as determined by a qualified restoration ecologist. Correction actions will continue until the success criteria have been met.

- A Weed Management Plan prepared by a qualified biologist and approved by CDFW will be prepared prior to commencing of grading on the Development Site setting forth best management practices (BMPs) to reduce the amount of non-native weedy species introduced into the Development Project during construction activities. The plan will focus on specific BMPs that will be used to reduce the risk of spreading non-native invasive seeds within the Development Project during construction, to include, but not limited to annual monitoring of sprouting vegetation in early spring, removing non-native invasive species, and utilizing water-wise native landscaping in the surrounding development areas. The purpose of the Weed Management Plan is to substantially reduce the potential for weeds to grow on-site and then

monitor the Development Site and implement BMP so that weeds that do occur on-site can be removed before they go to seed.

The revisions to MM BIO-14 described in the Final EIR provide additional environmental protection and clarify and amplify the scope and contents of the HRMP and do not result in any additional environmental impacts. Under applicable provisions of CEQA Guidelines §§15088.5(a)(1) and (3), additional information and additional mitigation measures require recirculation only if they are new and significant, narrowly defined as (1) changes to an EIR that deprive the public of a meaningful opportunity comment on substantial, adverse environmental project impacts, or (2) a feasible way to mitigate or avoid an effect that the project proponent declines to adopt. The mitigation measure modifications in the Final EIR are responsive to CDFW comments and neither result in adverse environmental impacts nor identify mitigation measures the applicant declines to adopt; therefore, the modifications do not constitute new information. See CEQA Guidelines §15088.5(b).

**Response to Comment A-4-3**

The commenter states that a CEQA document should discuss any inconsistencies between a proposed project and applicable general plans and regional plans including habitat conservation plans and natural community plans including an assessment of impacts to the Western Riverside Multiple-Species Conservation Plan (MSHCP) and to be considered a covered activity, that Permittees must demonstrate that the proposed actions are consistent with the MSHCP, permits and Implementing Agreement. Broadly, each Section of the Draft EIR identifies applicable general plan policies and the Development Project's consistency with them. This requested assessment is provided in Section 4.4 Biological Resources of the Draft EIR. Sections 4.4.4.4 and 4.4.6.5 of the Draft EIR identify general plan policies applicable to the Development Project and discuss the Development Project's consistency with those policies. MSHCP requirements are specifically detailed in Section 4.3.4.3 of the Draft EIR. Where potential impacts are identified, the Draft EIR identifies mitigation measures necessary to reduce potential impacts to biological resources and to implement the Project in a manner consistent with the MSHCP. As part of its obligation under their terms, the City will assure that the Project is implemented in accordance with the City Implementing Agreement and related permits. See the response to Comment A-4-4.

**Response to Comment A-4-4**

The commenter requests the City demonstrate consistency with the MSHCP by ensuring the payment of appropriate fees and compliance with applicable provisions of the MSHCP. The City is a party to the Implementing Agreement for the MSHCP. In accordance with the requirements of the Implementing Agreement, the City adopted Municipal Code Chapter 15.72 addressing the MSHCP. Banning Municipal Code Chapter 15.72.100 states that MSHCP fees will be calculated in accordance with the MSHCP Mitigation Fee Implementation Manual and payment of local development mitigation fees will be required no later than at the issuance of a building permit. MSHCP mitigation fees are also identified in Section 4.4.4.3 of the Draft EIR. In addition, Section 4.4 Biological Resources of the Draft EIR included a discussion of impacts and required mitigation related to narrow endemic plant species, riparian/riverine resources, urban/wildland interfaces, and other survey needs for MSHCP covered species. Section 4.4.4.3 of the Draft EIR indicates that the Development Site is in an area where multiple surveys are required under the MSHCP. As stated in Section 4.4.2.1 (pages 4.4-3 and -4) the

following surveys were conducted on the Development Site and included in **Appendix D** of the Draft EIR, and appropriately incorporated into the Draft EIR:

- *Results of 2020–2021 Wet Season Fairy Shrimp Focused Surveys, Banning, Riverside County, California*; Sunset Crossroads EIR, Wood Environment & Infrastructure Solutions, Inc., June 2023;
- *Focused Surveys for the Burrowing Owl, Banning, Riverside County, California*; Sunset Crossroads EIR, Wood Environment & Infrastructure Solutions, Inc., June 2023;
- *Dry Soil Analysis and Cyst Culturing for the Detection of Federally-Listed Large Branchiopods at the Sunset Crossroads Development Project, Banning, Riverside County, California*; Sunset Crossroads EIR, Helm Biological Consultants, June 2023;
- *Delineation of Jurisdictional Waters, Banning, Riverside County, California*; Sunset Crossroads EIR, Wood Environment & Infrastructure Solutions, Inc., June 2023;
- *Los Angeles Pocket Mouse Focused Survey, Banning, Riverside County, California*; Sunset Crossroads EIR, Wood Environment & Infrastructure Solutions, Inc., June 2023;
- *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Banning, Riverside County, California;* Sunset Crossroads EIR, Wood Environment & Infrastructure Solutions, Inc., June 2023;
- *Narrow Endemic Plant Species Survey Report, Banning, Riverside County, California*; Sunset Crossroads EIR, Wood Environment & Infrastructure Solutions, Inc., June 2023; and
- *Western Riverside County Multiple Species Habitat Conservation Plan Determination of Biologically Equivalent or Superior Preservation Report;* Sunset Crossroads EIR, Wood Environment & Infrastructure Solutions, Inc., June 2023.

As such and as detailed in response to Comment A-4-3, the Draft EIR sufficiently address the requirements of the MSHCP.

**Response to Comment A-4-5**

The commenter provides details regarding the intent of Section 6.0 of the MSHCP and the requirement to prepare a DBESP to mitigate impacts if avoidance of onsite impacts to Section 6.1.2 resources is not feasible and acknowledges receipt of the DBESP submittal in November of 2023. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment A-4-6**

The commenter recommends preparing a map detailing the 1.07 acres of project-related impacts to Smith Creek, Highland Wash, and Pershing Creek showing the areas that will be impacted, avoided, and conserved and that will be accompanied by a habitat viability analysis. The information recommended by the commenter is provided in Tables 4.4.C and 4.4.D of Section 4.4, Biological

Resources, of the Draft EIR and described in detail in Appendix D-6, Jurisdictional Delineation, to the Draft EIR and depicted in Figure 6 to Appendix D-7, MSHCP Consistency Analysis, to the Draft EIR. Figure 4.4-1 Vegetation of the Development Site in Section 4.4.3.1 of the Draft EIR shows the location of riparian/riverine habitat on the Development Site. As discussed in Appendix D-6, the 1.07 acres of impacted riparian/riverine habitat will be limited to the road crossings. These crossings, as shown in Figure 3-7 in Chapter 3.0, Project Description, of the Draft EIR, would occur at Lincoln Street. This mitigation requirement is described in MM BIO-13 and this information will also be included in the HRMP as discussed in mitigation measure MM BIO-14. As detailed in that Mitigation Measure, the HRMP will be reviewed and approved by the City prior to implementation. The HRMP will identify the specific locations of the Development Project impact areas and the location of the restoration sites. The HRMP will include the requested habitat viability analysis.

**Response to Comment A-4-7**

The commenter requests a sediment transport study for areas above and below each drainage crossing within the Development Site and the findings included in the DBESP and future Lake and Streambed Alteration Agreement (1602 permit). This requirement is addressed in Section 4.10.1 Hydrology of the Draft EIR. In addition, MM BIO-16 has been added to the Draft EIR and MM HYD-1 has been updated to further address the Sediment Transport and Scour Analysis described in the Hydrology Section of the Draft EIR and MM HYD-1 and MM HYD-2 and to impose a performance standard to confirm that there would be no long term permanent significant impacts onsite and downstream of the Development Site. While the Development Site is not located within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) and is not subject to the provisions of this plan, through project design and application of mitigation measures, the Development Project is consistent with the CVMSHCP, specifically in regard to sediment transport. Mitigation Measure M BIO-16 requires avoidance of significant changes to downstream sediment transport and deposition, floodplain modification, and potential streambed aggradation or incision above and below each of the proposed stream crossings consistent with the CVMSHCP and requires preparation of a sediment transport and scour analysis for review and approval by the City and RCA prior to construction of any drainage crossing on the Development Site. A similar study was conducted by Albert A. Webb and Associates for the City and RCA with respect to the Sun Lakes Boulevard Extension Project, which runs east/west through the central portion of the Development site. The drainage crossings that were studied included, but were not limited to, proposed corrugated pipe culverts and concrete-lined box culverts. The results of the study determined that a concrete-lined box culvert in the referenced drainages would have nearly no sediment deposition. Although the study did not completely rule out the possibility of some sediment deposition, the study did not consider it significant and found it would not lead to long-term permanent impacts either on-site or downstream. As indicated in Section 4.4.6.1 in the FEIR, it is anticipated based on the results of the sediment deposition analysis performed by Albert A. Webb and Associates for the City of Banning's Sun Lakes Boulevard extension Project, which adjoins the Project Site and crosses the same drainages that the concrete-lined box culvert in the referenced drainages would have nearly no sediment deposition. However, as identified in MM BIO-16 and HYD-1, if the results of the Project specific sediment transport and scour analysis determine that the proposed concrete-lined box culvert option would have a significant impact on the sedimentation transport system, then MM the applicant is required to either mitigate the impacts of the design to less than significant or to consider other methods of on-site drainage crossing.

**Response to Comment A-4-8**

The commenter states that the proposed Development Project may result in injury or mortality of burrowing owl, disrupt burrowing owl breeding behavior, and reduce the reproductive capacity. The commenter also states that the Development Project may impact breeding, wintering, and foraging habitat for the species, resulting in local extirpation of the species and contribute to local, regional, and State-wide declines of burrowing owl. During protocol-level surveys, a single pair of burrowing owls was identified within the southeastern corner of the Development Site. Based on the presence of this species within the Development Site, the above statements are accurate. Mitigation Measures MM BI0-7 and MM BIO-8 address the potential impacts to burrowing owl and the Draft EIR concludes that implementation of these mitigation measures would reduce potential impact to this species to less than significant. This comment does not raise a specific CEQA issue or comment on the adequacy of the CEQA analysis. No revisions are needed in the FEIR, and no further response is required.

**Response to Comment A-4-9**

The commenter states that a 30-day pre-construction survey is required prior to any vegetation clearing or ground disturbing activities. If no construction activities occur within that 30-day window additional surveys will be required. If burrowing owl are observed, a Burrowing Owl Protection and Relocation Plan will be required prior to ground disturbance. If present, all construction activities likely to affect the animal(s) shall cease immediately and regulatory agencies contacted within 48 hours to determine appropriate actions. The commenter requests a Burrowing Owl Protection and Relocation Plan including maps of suitable burrow locations and other alternatives. Mitigation Measures MM BIO-7 and MM BIO-8 of the Draft EIR address these matters and required the requested pre-construction survey and cessation of construction activity in the vicinity of any identified burrowing owl as well as preparation of a Burrowing Owl Protection and Relocation Plan. This comment does not raise a specific CEQA issue or comment on the adequacy of the CEQA analysis. No revisions are needed in the FEIR, and no further response is required.

**Response to Comment A-4-10**

The commenter provides a general comment regarding MM BIO-8 and requests that a sentence regarding the number of burrowing owl pairs identified be removed. The sentence states that if less than three burrowing owl pairs are present, no additional mitigation measures are required. This statement refers to the mitigation measures associated with additional conservation land that would be required if three or more burrowing owls were identified. This statement is accurate and reflects the standards in the MSHCP. Removal of this statement will have no effect on the Development Project impacts, and would retain the intent of the mitigation measure. This sentence has been removed from the mitigation measure. This comment does not raise a specific CEQA issue or comment on the adequacy of the environmental analysis, no further response is required.

**Response to Comment A-4-11**

The commenter recommends the Development Project incorporate water-wise concepts including xeriscaping with locally native California species and installing water efficient and targeted irrigation systems (such as drip irrigation). City policies, specifically Policy OS 2.3, encourage the use of native, drought-resistant landscape planting. Section 4.6 of the Specific Plan emphasizes the use of a drought-tolerant, native California landscaping palette. As the installation and maintenance of Development

Project landscaping will be required to conform to City requirements and the landscape guidelines detailed in the governing Specific Plan, the Project will address this request. The commenter also provides an explanation of the value of native plants to support species and provides more information on where these plants and drought-tolerant landscaping and water efficient irrigation systems can be found. Section 4.6.2 Irrigation of Appendix B Specific Plan identifies irrigation concepts that will be considered in Development Project landscaping to reduce water usage, including the use of drip systems and efficient rotators. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment A-4-12**

The commenter requests the development of a long-term weed management plan to limit the growth and establishment of non-native weeds. Mitigation Measure MM BIO-14, identified in response to Comment A-4-2, has been modified to include preparation and implementation of a Weed Management Plan. This update to MM BIO-14 has been included in Section 4.4 Biological Resources of the FEIR. The Specific Plan includes landscape guidelines that promote the use of native drought-tolerant landscapes. It is reasonable to conclude installation and maintenance of the Development Project landscape plan (per the guidelines of the governing Specific Plan) will sufficiently limit the propagation of non-native weedy species. This comment does not raise a specific CEQA issue or comment on the adequacy of the CEQA analysis, and no further response is required.

**Response to Comment A-4-13**

The commenter recommends updating the Draft EIR mitigation measures to include the revisions identified in the attached form mitigation monitoring and reporting program. The EIR is consistent with these requests without further revision. The attachment to the comment letter proposes revisions to MM BIO-7 and MM BIO-8. As indicated there, MSHCP Guidelines applicable to the Project require immediate contact of Riverside County Transportation and Land Management Agency Environmental Programs Division if owls are observed onsite and MM BIO-7 requires cessation of activity in the vicinity of the identified owl while consultation takes place with CDFW and USFWS. With respect to the change requested to MM BIO-8, see response to Comment A-4-10. The commenter notes, and the City concurs, that mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments. The commenter also requests the upload of information related to special status species and natural communities identified during project-specific surveys be uploaded to the California Natural Community Data Base. As evidenced by the commenter's comments, the Draft EIR and supporting information was made available to agencies and the public during the 45-day public review period (12/15/23 – 1/31/24). This comment does not raise a specific CEQA issue and does not make reference to the adequacy of CEQA analysis. No revisions are needed in the FEIR, and no further response is required.

**Response to Comment A-4-14**

The commenter notes the requirement for payment of fees at the time the Notice of Determination is filed. The City acknowledges and accepts this requirement. No additional CEQA issues are raised, no revisions are needed in the FEIR, and no further response is required.

## Sunset Crossroads Project

Robert Swanson <Robert.Swanson@doj.ca.gov>

Thu 12/21/2023 3:17 PM

To:Adam Rush <arush@banningca.gov>

Good afternoon,

Do you have an email notification list for the Sunset Crossroads project? If so, could you please add me to the list? A-5-1

Thank you,

**Rob Swanson**
Deputy Attorney General | Bureau of Environmental Justice
California Department of Justice
1300 I Street, 15th Floor | Sacramento, CA 95814
Tel.: 916-210-7808
He/him/his

Hours: M-Th, out F

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## Response to Letter A-5

State of California, Department of Justice
Rob Swanson, Deputy Attorney General, Bureau of Environmental Justice
December 21, 2023

### Response to Comment A-5-1

The California Department of Justice, Bureau of Environmental Justice (DOJ BEJ) questioned if the City maintained an email notification list for the Project, and if so, could the City add the DOJ BEJ to the list. Pursuant to Public Resource Code Section 21092.2, the City has added the DOJ BEJ to its distribution/notification list for the Project. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

## B. REGIONAL AGENCIES

B-1: South Coast Air Quality Management District, Sahar Ghadimi, Air Quality Specialist (January 2, 2024)

B-2: South Coast Air Quality Management District, Sam Wang, Program Supervisor (January 30, 2024)

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# Technical Data Request for the Sunset Crossroads Project.

Sahar Ghadimi <sghadimi@aqmd.gov>

Tue 1/2/2024 11:34 AM

To:Adam Rush <arush@banningca.gov>
Cc:Sam Wang <swang1@aqmd.gov>

Dear Adam Rush,

South Coast AQMD staff received the Notice of Availability of a Draft Environmental Impact Report (EIR) for the Sunset Crossroads Project (South Coast AQMD Control Number: RVC231221-01). Staff is currently in the process of reviewing the Draft EIR.

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod, Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources
  (i.e. truck operations).

B-1-1

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff ASAP. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.
Thank you.

Sincerely,

*Sahar Ghadimi*
Air Quality Specialist, CEQA IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
(909) 396-2392
sghadimi@aqmd.gov

## Response to Letter B-1

South Coast Air Quality Management District
Sahar Ghadimi, Air Quality Specialist
January 2, 2024

### Response to Comment B-1-1

The South Coast Air Quality Management District (SCAQMD) acknowledged receipt of the Notice of Availability (NOA) of the Draft EIR and noted their review of the document. The SCAQMD further requested live modeling and emission calculation files used to quantify the air quality impacts resulting from construction and or operation of the Project including:

- CalEEMod input files
- Live EMFAC files
- Any emission calculation file(s) (live versions of the Excel file and not PDFs) used to calculate emission sources (e.g., truck operations)

On January 9, 2024, the commenter again requested (via email) this information from the City. This information was provided electronically to the commenter on January 12, 16, and 17, 2024 via an email link to a protected Sharepoint site. The commenter confirmed receipt of this data on January 23, 2024. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
arush@banningca.gov
Adam Rush, M.A., AICP
Community Development Director
99 E. Ramsey Street Banning, CA 92220

January 30, 2024

**Notice of Availability of a Draft Environmental Impact Report (EIR) for the Sunset Crossroads Project (Proposed Project)**

The South Coast Air Quality Management District (South Coast AQMD) appreciates the opportunity to review the above-mentioned document. The City of Banning is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, which are organized by topic of concern. B-2-1

South Coast AQMD's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project would construct 533.8 gross acres for industrial, general commercial, and open space uses. The Proposed Project site would be developed pursuant to a General Plan Amendment and a Specific Plan (Sunset Crossroads Specific Plan) which proposes to develop: 1) up to 268,400 square feet for commercial uses; 2) a hotel with 125 rooms and comprised of approximately 90,000 square feet within a 47.9-acre portion of the site designated for freeway-oriented General Commercial land uses; 3) up to 5,545,000 square feet of industrial land uses within a 392.0-acre portion of the site; and 4) the remaining 89.0. acres designated as an Open Space-Resource (52.8 acres), Open Space-Parks (12.6 acres), or assigned for circulation features (23.6 acres).[1] After reviewing aerial photographs of the site, South Coast AQMD staff found that the nearest sensitive receptor, an existing residential development, is located 50 feet from the project site.[2] The Proposed Project would be built in four phases, beginning in April 2023 and completing in July 2027, spanning approximately 51 months. The Proposed Project is located on the northwest corner of Sunset Avenue and Bobcat Road.[3] B-2-1-A

South Coast AQMD Comments

*Inconsistencies and Incorrect Information in Emission Calculations*

According to Appendix C - Air Quality Impact Analysis, the Lead Agency utilizes California Emissions Estimator Model (CalEEMod) version 2020.4.0 to analyze the Proposed Project's regional and localized construction and operational emissions and the findings are presented in Tables L to V.[4] However, the CalEEMod output tables only show a portion of operational B-2-1-B

[1] Air Quality Impact Analysis, Appendix C, p. 10.
[2] *Ibid.*, p. 17.
[3] *Ibid.*, p. 10.
[4] *Ibid.*, p. 38.

emissions; the construction and operational emissions reports for each project phase for Annual, Summer (daily), Winter (daily), and their mitigated emissions are not in the Appendix C.[5] It is important to show how the maximum daily emissions were derived from using Summer and/or Winter emissions estimates from the CalEEMod modeling as such information is essential for identifying and applying the necessary mitigation measures. Therefore, it is recommended that the Air Quality Impact Analysis document in Appendix C of the Draft EIR include all of the CalEEMod output files for each project phase for Summer, Winter, and Annual emissions. B-2-1-B Cont

In addition, while the CalEEMod output files analyze the Proposed Project's construction impacts, the construction emissions are not presented in the Air Quality Impact Analysis in Appendix C. B-2-2 Furthermore, the regional and localized emissions do not match the emissions shown in the CalEEMod output files. For instance, in the Draft EIR, the total emissions of nitrogen oxides (NOx) during construction for Year 2024 in the CalEEMOD output tables show 139.7 pounds per day (lbs/day) (see p. 71) while Appendix C - Air Quality Impact Analysis shows the total NOx emissions during construction as 42 lbs/day (see Table N, p. 54). This substantial difference between what was calculated using CalEEMod versus what was presented in Appendix C needs to be addressed and the Draft EIR revised accordingly. B-2-3

According to the project description, the Proposed Project will build 330,000 square feet of high cube cold storage[6] and cold storage warehouses utilize trucks and trailers which are equipped with on-site Transportation Refrigeration Units (TRUs). Typically, small diesel engines provide power to TRUs which generate large quantities of diesel exhaust emissions while operating. However, the on-site TRU emissions associated with this cold storage facility have not been included in the CalEEMod output files, which indicates that the criteria pollutant emissions have been underestimated. Thus, it is also recommended that the Air Quality Impact Analysis document in Appendix C of the Draft EIR estimate the emissions from TRUs and include those emissions into the CalEEMod modeling files. These changes will likely necessitate a re-calculation of the operational emissions and a reassessment of the significance determination, which will need to be reflected in the Final EIR. B-2-4

*Health Risk Assessment (HRA) Operational Analysis*

South Coast AQMD's review of the operational HRA modeling files noted that the main truck route from the Proposed Project's site to the I-10 freeway on- and off-ramps is located on the northeast and west of the site and the truck route passes through the residential neighborhoods. While the truck route leading to the on-ramp has been identified and accounted for in the air quality impact assessment, the truck route leading to the off-ramp has not been included in the analysis indicating that the diesel particulate matter (DPM) emissions from heavy-duty trucks and the associated cancer risk during project operation have been underestimated. As such, the HRA needs B-2-5 to be updated to include this missing information. Furthermore, the receptor spacing in the AERMOD modeling file is set at 25 meters near the Proposed Project's site but is changed to 100 meters near the offsite mobile sources, even though the nearest residential receptor is 50 feet (approximately 15 meters) away. This alteration in spacing could potentially result in an underestimation of cancer risk, especially for the receptors situated along the truck route toward the I-10 ramp. This discrepancy needs to be corrected. B-2-6

[5] *Ibid.*, p. 79.

[6] Air Quality Impact Analysis, Appendix C, p. 13.

In addition, based on the HRA modeling files in Appendix C, the analysis assumed that all refrigerated trucks would use the electrical charging ports 100 percent of the time in lieu of operating their TRUs powered by diesel internal combustion engines. However, it is important to note that the Draft EIR neither identifies electrical charging ports as a project feature nor proposes electrical chargers as a mitigation measure. Considering the potential lack of on-site plug-in capability for battery charging for some refrigerated trucks, the reliance on electrical hookups for all TRUs is not appropriate when analyzing the HRA, because it omits the on-site DPM emissions from TRUs in the analysis resulting in an underestimation of the cancer risk. B-2-7 B-2-8

Lastly, based on a review of aerial photographs, South Coast AQMD staff identified a railroad adjacent to and north of the Proposed Project. The Draft EIR should be revised to explain if transportation by rail will be utilized during construction and/or operation for the Proposed Project. If so, locomotive emissions will need to be included in the air quality analysis and HRA in the revised Draft EIR. B-2-9

*Trip Generation Rates and Truck Trip Lengths*

Following a review of the analysis of vehicle miles traveled (VMT)[7] and the HRA, the project trip generation rates, as outlined in the VMT analysis tables in the Draft EIR and the trip generation rates specified in Table 4.8 of the HRA (utilized in the AERMOD dispersion model) are inconsistent. For example, the trip generation rate associated with Building 1 in the VMT analysis is 538 trips per day, while the trip generation rate associated with Building 1 in the HRA AERMOD modeling file is 481 trips per day. In addition, according to the Air Quality Analysis in Appendix C, a truck trip length of 40 miles was assumed.[8] However, in the CalEEMod output files, only a portion (59 percent) of truck trips is assumed to drive 40 miles, while the remainder of the truck trips are driving 6.9 miles for 41 percent of the time. Thus, the CalEEMod calculations appear to underestimate the truck emissions. Please address these inconsistencies between the Draft EIR and the CalEEMod output files, update the analysis accordingly by recalculating the emissions, air quality analysis, and HRA, and include the revised results in the Final EIR. B-2-10 B-2-11 B-2-12

*Emission Reductions From Health Risk Strategies*

When certifying an EIR for a project retain the authority to include any additional information deemed relevant to assessing and mitigating the environmental impacts. South Coast AQMD is concerned about the potential public health impacts of siting sensitive populations within the proximity of existing air pollution sources (e.g., freeway, railroad). For this reason, prior to approving future development projects, the Lead Agency is recommended to consider the impacts of air pollutants on people who will live in a new project and provide effective mitigation. Additionally, South Coast AQMD suggests that the Lead Agency review and apply the guidance provided in: 1) the California Air Resources Board (CARB) Air Quality Land Use and Handbook: A Community Health Perspective[9] which provides criteria for evaluating and reducing air B-2-13

[7] Vehicle Miles Traveled (VMT), Appendix J, p. 15.
[8] Air Quality Impact Analysis, Appendix C, p. 57.
[9] California Air Resources Board (CARB), Air Quality Land Use and Handbook: A Community Health Perspective, April 2005. Available at: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf

pollution impacts associated with new projects involving land use decisions; and 2) CARB's technical advisory which contains strategies to reduce air pollution exposure near high-volume roadways.[10]

B-2-13 Cont

Many strategies are available for residential receptors to reduce being exposed to particulate matter, including, but not limited to, HVAC systems equipped with filters rated at a minimum efficiency reporting value (MERV) 13 or higher air filtration capabilities. In some cases, MERV 15 or better is recommended, for building design, orientation, location, vegetation barriers, landscaping screening, etc. Enhanced filtration units are capable of reducing exposure. However, enhanced filtration systems have limitations. For example, filters rated MERV 13 or higher are able to screen out greater than or equal to 50% of DPM[11] but they have no ability to filter out volatile organic compound (VOC) emissions. Also, in a study that South Coast AQMD conducted to investigate filters rated at MERV 13 or better in classrooms,[12,13] a cost burden is expected to be within the range of $120 to $240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary, including costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, the filters would not have any effect unless the HVAC system is running. Therefore, when in use, the increased energy consumption from each HVAC system should be evaluated in the Draft EIR. While the filters operate 100 percent of the time when the HVAC is in use while the residents are indoors, the environmental analysis does not generally account for the times when the residents are not using their HVAC and instead have their windows or doors open or are moving throughout the common space outdoor areas of the Proposed Project. Furthermore, when used filters are replaced with new filters, emissions associated with trucks delivering the new filters and waste disposal trucks transporting the used filters to disposal sites should be evaluated in the Draft EIR Therefore, any presumed effectiveness and feasibility of a particular HVAC filter should be carefully evaluated in more detail based on supporting evidence before assuming they will sufficiently alleviate exposure to DPM emissions.

B-2-14

*Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures and Project Design Considerations*

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

B-2-15

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

[10] CARB's Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways. Available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf

[11] U.S. EPA, "What is a MERV rating?" Available at: https://www.https://www.epa.gov/indoor-air-quality-iaq/what-merv-rating.

[12] South Coast AQMD, Draft Pilot Study of High-Performance Air Filtration For Classroom Applications, October 2009. Available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf.

[13] International Journal of Indoor Environment and Health, Pilot Study of High-Performance Air Filtration For Classroom Applications, November 2012. Available at: https://onlinelibrary.wiley.com/doi/10.1111/ina.12013.

1) Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

   Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2) Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

   Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3) At a minimum, require the use of a 2010 model year that meets CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. All heavy-duty haul trucks should meet CARB's lowest optional low-NOx standard starting in 2022. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document. Include the requirements in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. Regular inspections should be conducted by the Lead Agency to the maximum extent feasible to ensure compliance.

B-2-15 Cont

4) Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

5) Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation Measures for Operational Air Quality Impacts from Other Area Sources

1) Maximize the use of solar energy by installing solar energy arrays.
2) Use light-colored paving and roofing materials.
3) Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1) Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2) Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3) Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4) Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5) Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

B-2-15 Cont

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporating additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1) State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[14]
2) South Coast AQMD 2022 Air Quality Management Plan,[15] specifically:
   a. Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures
   b. Appendix IV-B – CARB's Strategy for South Coast
   c. Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measures
3) United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.[16]

B-2-16

*South Coast AQMD Air Permits and Role as a Responsible Agency*

Based on Appendix C -Air Quality Impact Analysis, Table J specifies the proposed land uses for Building 1 through Building 10 and the land use category for Building 4 and Building 6 are identified in CalEEMod as general heavy industrial. However, the future uses for these buildings are not specified in the Draft EIR and it is not clear if any of the buildings will use equipment for which South Coast AQMD air permits will be required. For example, if implementation of the

B-2-17

[14] State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf

[15] South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

[16] United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation

Proposed Project would require the use of new stationery and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., South Coast AQMD air permits will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project including but not limited to Rule 201 – Permit to Construct,[17] Rule 203 – Permit to Operate,[18] Rule 401 – Visible Emissions,[19] Rule 402 – Nuisance,[20] Rule 403 – Fugitive Dust,[21] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[22] Rule 1166 – VOC Contaminated Soil Excavation,[23] Regulation XIII – New Source Review,[24] Rule 1401 – Air Toxics,[25] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[26] and Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines.[27] It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. B-2-18 B-2-19

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the Draft EIR is inadequate to be relied upon for this purpose. B-2-20

[17] South Coast AQMD Rule 201 – Permit to Construct. Available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf.

[18] South Coast AQMD Rule 203 – Permit to Operate. Available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf.

[19] South Coast AQMD Rule 401 – Visible Emissions. Available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf.

[20] South Coast AQMD Rule 402 – Nuisance. Available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf.

[21] South Coast AQMD Rule 403 – Fugitive Dust. Available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.

[22] South Coast AQMD Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines. Available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf.

[23] South Coast AQMD Rule 1166 – VOC Contaminated Soil Excavation. Available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf.

[25] South Coast AQMD Regulation XIII – New Source Review. Available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii

[26] South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants. Available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf.

[27] South Coast AQMD Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines. Available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf.

For these reasons, the Draft EIR should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at http://www.aqmd.gov/home/permits. B-2-21

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. B-2-22 B-2-23

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,
Sam Wang
*Sam Wang*
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

BR:SW:SG
RVC231221-01
Control Number

## Response to Letter B-2

South Coast Air Quality Management District
Sam Wang, Program Supervisor
January 30, 2024

### Response to Comment B-2-1

The commenter provides introductory statements. The City recognizes receipt of SCAQMD's comments on the Draft EIR. This comment is introductory, does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

### Response to Comment B-2-1-A

The commenter provides a general summary of the Development Project as presented in the Draft EIR. The commenter correctly restates the location of the nearest sensitive receptor as being 50 feet from the project site. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

### Response to Comment B-2-1-B

The commenter states the Air Quality Impact Analysis (Draft EIR, Appendix C-2) omits CalEEMod output files for a portion of operational emissions, and specifically that the construction and operational emissions reports for each project phase for Annual, Summer (daily), Winter (daily), and their mitigated emissions are not in Appendix C and that said output files should be included in Appendix C-1. On January 9, 2024, the commenter requested (see Attachment A to this response for the request email) electronic live modeling and emission calculation files that were used to quantify the air quality impacts from construction and operation of the Development Project. This information (see Attachment B to this response for a list of files provided) was provided electronically to the commenter on January 12, 16, and 17, 2024. The commenter confirmed receipt of this data on January 23, 2024. It appears these CalEEMod results were inadvertently omitted from Appendix C-2 during the assembly of the Draft EIR. These files however were included in the transmittal of the electronic files to the commenter. The originally omitted CalEEMod output files[14] for construction, as a part of the complete set of CalEEMod files, are included for reference in the Final EIR.

The Air Quality Impact Analysis and the discussion of Air Quality impacts provided in Section 4.3 of the Draft EIR accurately and fully reflect the results of the all the CalEEMod outputs modeled for the Development Project. The inadvertently omitted output files do not constitute "new information" under CEQA Guidelines Section 15088.5(a). Guidelines section 15088.5(a) specifies that new information which may require recirculation can include additional data. However, Guidelines section 15088.5(b) makes clear that recirculation is not required for changes or additions that merely clarify or amplify information already contained in an adequate EIR, and case law applying this provision makes clear that this type of data does not merit recirculation. *See, e.g., High Sierra Rural Alliance v. County of Plumas* (2018) (addition of maps to general plan EIR provided clarifying information and did not require recirculation); *Beverly Hills Unified Sch. Dist. V. Los Angeles Metro. Transp. Auth.* (2015)

[14] Three CalEEMod output files for construction – annual, summer, and winter.

241 Cal.App.4th 627, 663 (new fault and tunneling studies confirmed conclusion in Draft EIR); *Mt. Shasta Bioregional Ecology Ctr. V. County of Siskiyou* (2012) 210 Cal.App.4th 184, 221 (addition to Final EIR of reports that had been summarized in Draft EIR was not significant new information). Accordingly, recirculation of the Draft EIR is not required. No further response is necessary.

**Response to Comment B-2-2**

The commenter states CalEEMod output files for construction emissions were not presented in the Air Quality Impact Analysis in Appendix C. The CalEEMod output files documenting the construction analysis include the annual, summer, and winter output files, and were inadvertently omitted from the Draft EIR Appendix C. However, the all model output, including the missing files, were sent to the commenter in January. The omitted CalEEMod output files are included in the Final EIR. See the response to Comment B-2-1-B. No further response is required.

**Response to Comment B-2-3**

The commenter states the regional and localized emissions in the Air Quality Impact Analysis in the Draft EIR Appendix C do not match the emissions shown in the CalEEMod output files (provided as Draft EIR, Appendix C-1), and provided an example that Appendix C shows total NOx construction emissions in 2024 as 42 lbs/day but that the CalEEMod output tables show 139.7 lbs/day. The commenter is incorrect. The commenter states that 139.7 lbs/day appears on page 71 of the CalEEMod output files. However, upon review this number does not appear in the Draft EIR Appendix C, or in the inadvertently omitted CalEEMod output files sent to the commenter in January as set forth in Response B-2-1-B. Accordingly, no further response is possible.

Construction emissions are shown in Table L of the Air Quality Impact Analysis included in Appendix C of the Draft EIR. The emissions from Table L are consistent with the Table 4.3.H included in Section 4.3 of the Draft EIR. The reported emissions are consistent with the model output files sent to the commenter.

As previously stated in response B-2-1-B, the omitted output files will be included in the Final EIR. These output files indicate that the peak Summer daily NOx emissions for 2024 of 286.8 lbs/day and 41.1 lbs/day unmitigated and mitigated, respectively. Peak Winter daily NOx emissions for 2024 would be 287.0 lbs/day and 42.4 lbs/day unmitigated and mitigated, respectively as reported in Table 4.3.H of the Draft EIR. Additionally, the Air Quality Impact Analysis correctly conveys the same peak construction day NOx emission data, matching the data provided in the referenced CalEEMod outputs. Accordingly, no difference exists between what was calculated using CalEEMod and what was presented in Appendix C, and no revision to the Draft EIR is necessary. No further response is required.

**Response to Comment B-2-4**

The commenter states the small diesel engines used to provide power to TRUs at the proposed cold-storage uses generate large amounts of diesel exhaust emissions while operating, and that on-site TRU emissions from on-site cold storage buildings were not included in the CalEEMod output files, causing pollutant emissions to be underestimated. See the responses to Comments A-3-14, A-3-16, and A-3-18 which are incorporated by reference. See also *Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment*

(LSA July 2024) Final EIR Appendix C-4 and *Sunset Crossroads Supplemental Air Quality Assessment* memo (Urban Crossroads, July 11, 2024), Final EIR Appendix C-5. No further response is required.

**Response to Comment B-2-5**

The commenter notes that the main truck route from the Development Project Site to the I-10 on- and off-ramps passes through residential neighborhoods, and states that the HRA modeling files do not include modeling for emissions levels for off-ramps, only on-ramps, and that the HRA has underestimated the potential cancer risk resulting from Project truck traffic. As suggested by the commenter, the HRA has been revised to include the two eastbound off-ramps closest to the project site, the eastbound I-10 exit at Sunset Avenue and the eastbound I-10 exit at Highland Springs Avenue and the westbound I-10 exit at Sunset Avenue, as well as TRU emissions, and to match the revised project plans that would relocate the portion of Sunset Avenue between Westward Avenue and Lincoln Street, 42 feet to the west. See the responses to Comments A-3-14, A-3-16, and A-3-18 (details regarding off ramp modeling) which are incorporated by this reference. See also *Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment* (LSA July 2024) Final EIR Appendix C-4 and *Sunset Crossroads Supplemental Air Quality Assessment* memo (Urban Crossroads, July 11, 2024), Final EIR Appendix C-5. See also Final EIR Section 4.3 and Appendix C-5. No further response is required.

**Response to Comment B-2-6**

The commenter states that the receptor spacing in the AERMOD modeling file is set at 25 meters near the Development Project's site but changed to 100 meters near offsite mobile sources, and that this discrepancy could result in underestimation of cancer risk especially near the truck route toward the I-10 ramp. While the receptor grid close to the project site boundary has receptors spaced 25 meters from each other, the row of receptors adjacent to the project site are all placed on the nearest row of homes. As specified in Section 4.7 of the Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Risk Assessment Guidelines* (May 2015)[15] which is the SCAQMD recommended guidance document, the HRA modeling included receptors located in a fine grid of 25 meter spacing all around the Project site to ensure that any impacts to sensitive receptors close to the Project site would be identified. Receptors further from the project site were located at a coarser grid to ensure that any impacts would still be identified, with the purpose that if the results showed an impact in any area with more widely dispersed receptors, the modeling would be revised to have more receptors in that area. Figure 4-2 in the Draft EIR Appendix C-2 HRA, graphs the cancer health risk levels surrounding the Development Site. As shown, due to prevailing winds and general atmospheric dispersion, the cancer risk would only reach above 1 in one million in a small band along the northeast and east sides of the Development Site. Everywhere else the cancer risk would be less than 1 in one million. Therefore, additional modeling with 25 meter spacing was not necessary. No further response is required.

[15] Office of Environmental Health Hazard Assessment (OEHHA) 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines*. May. Website: oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf (accessed April 2024).

**Response to Comment B-2-7**

The commenter states the Draft EIR does not include electrical charging ports on-site for refrigerated trucks as a project feature or mitigation measure, and that the HRA improperly assumed that these trucks would use electric charging ports 100 percent of the time. The commenter is incorrect. Mitigation Measure AIR-2 as revised specifically provides:

> All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric.

Please also refer to the responses to Comments B-2-5, A-3-14, and A-3-16. These responses describe the conservative nature of the TRU modeling assumptions (i.e., that all TRU engines are diesel and would be used for the life of the project) and that per regulatory requirements all diesel TRUs will be phased out by 2030. The Project has plug in capability to handle hybrid and ZE TRUs that will actually service the project. No further response is required.

**Response to Comment B-2-8**

The commenter states the HRA underestimated cancer risk impact because of the potential lack of on-site plug-in capability for some TRUs, and therefore diesel particulate emissions (DPMs) from TRUs should be analyzed. As discussed under response to Comment B-2-4, diesel TRUs will be phased-out through regulations in the coming years, with California fleets being required to transition to the use of electric TRUs completely by 2030. Hence, mitigation measure AIR-2 as revised provides: "All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric." There is no lack of onsite plug-in capability for TRUs. Please see also responses to Comments B-2-7, B-2-4, A-3-14, and A-3-16 which describe regulatory requirements phasing out TRU diesel engines effective in 2030, mitigation requiring on-site plug-in capability for TRUs, and the response to Comment A-3-18 that describes the outcome of the revised Health Risk Assessment (HRA) conservative modeling which assumes four hours of on-site diesel engine TRU use (for the entire project) while awaiting plug-in at the dock bays, off-site TRU use while traveling to and from the project site, resulting in the slight increase of emissions evaluated in the revised HRA. See also *Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment* (LSA July 2024) Final EIR Appendix C-4 and *Sunset Crossroads Supplemental Air Quality Assessment* memo (Urban Crossroads, July 11, 2024), Final EIR Appendix C-5. See also Final EIR Section 4.3 and Appendix C-5. The HRA is extremely conservative by assuming diesel TRUs operate at the project site throughout the life of the project and modeling that exposure risk over the 30-year exposure risk assessment period included in the HRA. This is an overestimate of potential emissions from the project, and results in HRA providing conservative results. Even under this conservative analysis, although emissions and HRA impacts would slightly increase from the previous modeling, the revised modeling would not result in a substantive increase in emissions, exceed the threshold of significance, or create impacts that would cause a new significant impact that was not previously disclosed in the Draft EIR. Accordingly, this modeling does not require recirculation of the Draft EIR. Under CEQA Guidelines Section 158088.5(b),

recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The revised modeling and the results show a minimal increase as a result of adding TRU emissions. Therefore, the additional modeling and updated totals do not change the significance determinations, and do not meet the criteria of "new information" warranting recirculation of the Draft EIR. No further response is required. No further response is required.

**Response to Comment B-2-9**

The commenter states that the Project is located adjacent to and north of an existing railroad, and states that the Draft EIR should be revised to explain if rail transportation will be utilized during the construction and operation of the Project. The commenter states that such use must be included in the HRA and Draft EIR air quality analysis. The Project will not use the adjacent railroad for any aspect of project construction or operation; therefore, railroad operations are not addressed in the Draft EIR. No further response is required.

**Response to Comment B-2-10**

The commenter states that the trip generation rates in the Project vehicle miles traveled (VMT) in the Draft EIR VMT analysis tables and in Table 4.8 of the HRA are inconsistent and provides an example of Building 1 VMT analysis showing a trip generation rate of 538 trips per day while the HRA modeling file shows 481 trips per day.

The analysis requirements for VMT under SB 743 use a different methodology for calculating VMT than CalEEMod calculation methodology for air quality purposes and should not be compared. To determine the Project VMT impact, the VMT analysis uses model- based trips based on the Riverside County Transportation Model (RIVCOM) consistent with the City's Traffic Impact Analysis Guidelines for Local Transportation Analysis and Vehicle Miles Traveled Analysis (October 2021) (City Guidelines).

The HRA does not contain a Table 4.8, so it is unclear what the commenter is referring to. However, Appendix A to the HRA contains a traffic data table which shows 539 truck trips per day for Building 1. Likewise, Appendix J-2, Traffic Analysis, page 56 contains Table 4-2, Traffic Trip Generation Study which also shows 538 truck trips per day for Building 1, as does Appendix J-3, Supplemental Traffic Assessment, Attachment A, page 1 which also shows 538 daily truck trips for Building 1. Accounting for rounding differences, the total truck volume detailed in the HRA is consistent with the 538 trips for Building 1 provided in the Traffic Analysis. Hence, there is no meaningful discrepancy. No further response to this comment is required.

**Response to Comment B-2-11**

The commenter states that Appendix C of the Air Quality analysis assumed a truck trip length of 40 miles but the CalEEMod output files show 59 percent of truck trips at 40 miles and the remaining 41 percent at 6.9 miles. Please refer to the response to Comment A-3-6 regarding the truck trip length averages and A-3-7 regarding the percentage of truck trips allocated to each trip length average used in the Air Quality Impact Analysis and Supplemental Air Quality Assessment, both of which are incorporated by reference. The updated air quality assessment increases truck trip lengths based on WAIRE Rule Implementation Guidelines. The resulting analysis results in minor increases in emissions

and no change in significance findings. See *Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment* (LSA July 2024) Final EIR Appendix C-4 and *Sunset Crossroads Supplemental Air Quality Assessment* memo (Urban Crossroads, July 11, 2024), Final EIR Appendix C-5. No further response is required.

**Response to Comment B-2-12**

The commenter states the CalEEMod calculations underestimate truck emissions based on inconsistencies between Draft EIR and CalEEMod output files for truck trip length averages and allocation of percentage of truck trip lengths, and requests these inconsistencies be addressed, and emissions for air quality analysis and HRA be recalculated and included in the Final EIR. Please refer to the responses to Comments B-2-11, A-3-6, and A-3-7 which are incorporated by reference. No further response is required.

**Response to Comment B-2-13**

The commenter states generally its concern about potential public health impacts of siting sensitive populations proximate to existing sources of air pollution such as freeways and railroads, and requests for future development projects presented to the City for approval, that the City consider impacts of air pollutants on people who will live in the new projects and impose effective mitigation described in the guidance contained in two specified resources. The suggestion is noted. This comment pertains to future residential projects (or potential for future projects located near existing sources of air pollution that will be occupied by sensitive receptors) and does not apply to the Project. "Future" residential projects are not included in the CEQA baseline, as such the inclusion of such projects would be speculative. Per CEQA (Section 15125(a)(3)). "…An existing conditions baseline shall not include hypothetical condition, such as those that might be allowed, but have never actually occurred, under existing permits, as the baseline." Other planned and approved residential projects in the City have been appropriately considered in the cumulative air quality discussion (see Draft EIR, Section 6.5.3.) As for impacts from this Project, the Air Quality Impact Analysis (included as Appendix C-1 of the Draft EIR) shows that the Project does not result in significant levels of localized emissions during either construction or operational phases (Draft EIR Tables 4.3.O and 4.3.P). The HRA (included as Appendix C-2 of the Draft EIR and as revised in Appendix C-4 of the Final EIR) determined that potential health risks to nearby residents, students, and workers from Project-related toxic air contaminants would be below the SCAQMD's thresholds (see Draft EIR Table 4.3.Q and revised HRA in Appendix C-4 of the Final EIR). See the responses to Comments B-2-4, A-3-14, A-3-16, and A-3-18 which are incorporated by reference. The additional modeling and updated emission totals discussed in these responses do not change the significance determinations, and do not meet the criteria of "new information" warranting recirculation of the Draft EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment B-2-14**

The commenter identifies strategies available to residential receptors to reduce exposure to particulate matter, including minimum efficiency reporting value (MERV) filtration equipped HVAC systems. The commenter cites the merits of various MERV systems, and requests impacts from the operation and maintenance of these systems be evaluated in the Draft EIR. The Project does not

include the construction of any residential units on-site. Pursuant to CEQA Guidelines Section 15041, a Lead Agency has the authority to require feasible changes in activities involved in the project or mitigation measures to substantially lessen or avoid significant effects on environment. The health risk impacts associated with the construction and operation of the Project do not exceed established thresholds and are not significant. The Project specific analysis (Appendix C-2 to the Draft EIR), and Section 4.3.6.3 of the Draft EIR and Appendix C-4 of the Final EIR), shows that the Project does not result in significant levels of localized emissions during either construction or operational phases of the project (Draft EIR Tables 4.3.O and 4.3.P), and the health risks to nearby residents, students, and workers from Project-related toxic air contaminants would be below the SCAQMD's thresholds (see Draft EIR Table 4.3.Q (see Final EIR Appendix C-4 and Final EIR, revised Table 4.3.Q). Therefore, no filtration system mitigation, or any other mitigation, is required for off-site uses. In addition, while enhanced filtration systems are capable of reducing exposure to particulate matter, the commenter admits the limitations of these systems, including inability to filter VOC emissions.

Even if added as a mitigation measure, the effectiveness of MERV systems to mitigate Project impacts is speculative. First, existing residences cannot be required to install these systems. Second, as the commenter acknowledges, the filters have no effect unless the HVAC system is running, and the times when residents are not using their HVAC systems containing filtration and instead have their doors and windows open or are outdoors cannot be accurately quantified. Further, the effectiveness of filtration systems is dependent on the maintenance regimen undertaken by individual homeowners. There is no feasible method to mandate how or when the filtration systems are operated or maintained. As there is no feasible way to consistently determine how, where, or when filtration systems are operated or maintained, the commenter's requested assessment would be highly speculative. Considering the determination the Project has a less than significant effect on local health, the additional mitigation, and proposed further analysis is not required.

**Response to Comment B-2-15**

The commenter states that CEQA requires all feasible mitigation measures that go beyond what is required by law be required to minimize or eliminate significant air quality impacts and recommended a list of measures and design features to incorporate into the Final EIR. CEQA Guidelines Section 15126.4(c) states in part:

> Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.

The commenter does not cite to authority to support its statement that compliance with regulations and laws cannot be used exclusively to mitigate project impacts. Notwithstanding, the Draft EIR includes a variety of features and actions that do not exclusively rely on compliance with laws and regulations including those suggested by the commenter, and each will be discussed below in connection with the commenter's suggested mitigation measures.

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr) if and when feasible.

Please refer to the responses to Comments A-3-24, A-3-25, and A-3-26 which provide detail on regulations including CARB's Advance Clean Fleets Rule, the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project, and SCAQMD's WAIRE rule that facilitate or mandate the transition to ZE and hybrid heavy duty trucks. These responses also identify the infeasibility of requiring the Project to utilize only ZE or hybrid trucks at the present time. No further response is necessary.

- Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

See the responses to Comments A-3-24, A-3-25, and A-3-26.

- At a minimum, require the use of a 2010 model year that meets CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. All heavy-duty haul trucks should meet CARB's lowest optional low-NOx standard starting in 2022. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document. Include the requirements in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. Regular inspections should be conducted by the Lead Agency to the maximum extent feasible to ensure compliance.

Mitigation Measure AIR-2 requires:

> All facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site shall meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on site demonstrating compliance with this requirement and shall make records available for inspection by the City of Banning, SCAQMD, and State upon request.

See also response to Comment A-3-49 (regarding additional mitigation for potential use of non-diesel equipment and tools and maintenance of records), A-3-61, and Draft EIR Chapter 4.6.

No further response is required.

An EIR must describe feasible measures that could minimize the project's significant adverse impacts. 14 Cal Code Regs §15126.4(a)(1). An EIR may decline to propose a mitigation measure that would not effectively address a significant impact. An EIR also need not identify and discuss mitigation measures that are infeasible. Nor must an EIR analyze in detail mitigation measures it concludes are infeasible. The EIR (as revised) includes an appropriate range of feasible and technologically available mitigation to reduce the emission of pollutants to the extent feasible. No further response is required.

- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

The commenter incorrectly assumes that implementation of the proposed Project will require subsequent environmental analysis and EIR, and that the City should restrict the amount of daily truck traffic to and from the Project to be analyzed in the subsequent project-level analysis. The EIR is a project level EIR (see Draft EIR, Section 3.1) and as supplemented, analyzed Project level truck trip numbers and truck trip lengths according to CEQA compliant methodology including compliance with SCAQMD's WAIRE Rule Implementation Guidelines. See the responses to Comments A-3-6 through A-3-9. See also Draft EIR Appendix J-2, Final EIR Appendix C-5.

The recommendation to impose and enforce a truck trip cap is not feasible or practical nor required by CEQA, nor would it be reasonable or feasible for the City to monitor and enforce such a requirement. CEQA requires that an EIR evaluate the Development Project based on reasonable assumptions and foreseeable actions. As stated in the Draft EIR (Appendix J-1, pg 51), the traffic characteristics of the Development Project were developed based on trip-generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition, 2017) and the TUMF High-Cube Warehouse Trip Generation Study (WSP, January 29, 2019), the recommendations from which are based on a reasonable type of building occupant that would be permitted by the site's zoning. See Draft EIR, Appendices J-1 and J-3. The revised analysis for truck trip length is based on SCAQMD data that examined truck trip lengths of heavy and medium duty trucks in SCAQMD jurisdiction. There is no substantive information presented by this comment or by any of the information in the Development Project's administrative record that contradicts the reasonable assumptions made in the Draft EIR about the expected number of truck trips or truck trip lengths as revised. Therefore, it is unnecessary to impose and enforce a numerical cap on the number of trucks that access the Development Site on a daily basis.

- Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

This is already provided in Mitigation Measure AIR-2 (as revised):

- At buildout of the industrial land uses a minimum of 50 ~~Level 3 AC~~ Class 8 electric vehicle (EV) truck chargers shall be installed at the tractor trailer parking spaces in logical locations to facilitate electric truck charging. <u>These charges shall have the power rating sufficient to charge a Class 8 truck battery.</u>

- For the warehouse/industrial portions of the Development Project, the buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for installation of electric charging systems for electric trucks and power transport refrigeration units (TRUs). Conduit shall be installed from the electrical room to all

tractor trailer parking spaces in logical locations on site to facilitate future electric truck charging.

- At buildout, the Development Project shall include the higher value of either:
  - At least 350 Level 2 AC EV chargers; or
  - A percentage of total parking spaces with Level 2 AC EV chargers to comply with the minimum requirements of CCR, Title 24, Part 11: California Green Building Standards Code.
  - The provision of EV chargers in each parking lot shall occur prior to occupancy of uses for said lots.
- All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric.
- For the warehouse/industrial portions of the Development Project, the buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for installation of electric charging systems for electric trucks and power transport refrigeration units (TRUs). Conduit shall be installed from the electrical room to all tractor trailer parking spaces in logical locations on site to facilitate future electric truck charging.

The Project provides abundant EV charging capacity to satisfy CALGreen requirements and to facilitate the electrification of future truck fleets which has been further enhanced by the minor additions noted. These additions further support the conclusions in the Draft EIR and are not evidence of a new or greater impact not previously disclosed. No further response is required.

- Maximize the use of solar energy by installing solar energy arrays.

The Project includes a Project Design Feature (PDF) that requires all roofs are solar ready and will comply with all CALGreen Building Code requirements for solar roofs on commercial and industrial buildings. The City of Banning utilizes electricity purchases from industrial and commercial projects like the Development Project to secure affordable long term renewable energy contracts through Banning Electric which is purchasing utility scale solar. Please see the response to Comment A-3-64. No further response is required.

- Use light-colored paving and roofing materials.

Mitigation Measure GHG-3 (see Draft EIR, pg 4.8-28) includes the provision to use roofing material for commercial buildings that is rated CRRC Rated 0.15 aged solar reflectance or greater and 0.75 thermal emittance, satisfying the 'cool roofs' requirement. There is no indication that utilizing light-colored

paving will provide quantifiable reductions in emissions or energy savings, and its use is not required in the Project. No further response is required.

- Utilize only Energy Star heating, cooling, and lighting devices and appliances.

The Development Project requires the design of buildings exceeding Title 24 energy efficiency standards and the use of only Energy Star appliances in all commercial and industrial land uses. See Mitigation Measures GHG-3 and GHG-4 (Draft EIR, pg 4.8-28). As this suggested mitigation has already been incorporated into the Development Project, no further response is required.

- Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).

As stated in the Specific Plan (Draft EIR, Appendix B, pg 4-18) vehicular direction signs would clearly direct to destination anchors within Development Site such as on-site parking areas, and service routes. Mitigation Measure AIR-2 (Draft EIR, pg 4.3-36) requires the placement of signs at every truck exit driveway providing directional information to the truck route. The Development Project utilizes major arterials and secondary highways for primary access to the Development Site and an additional PDF in the Specific Plan will require a Truck Route Management Plan approved by the City to discourage truck travel along Sun Lakes Boulevard west of the Development Site (See Final EIR PDF T-4, Truck Route Management Plan). As previously stated in the responses to Comments A-3-14, A-3-15, and B-2-5, the HRA included in the Draft EIR (see Appendix C-2) and the revised HRA included in the Final EIR (see Appendix C-4) determined that the project as proposed would not increase the health risk to nearby sensitive receptors to levels exceeding current SCAQMD significance thresholds; therefore, no further response is required.

- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.

Please see the responses to A-3-14, A-3-15, and B-2-5 regarding the impacts to sensitive receptors in the vicinity of the Development Site. Furthermore, the Specific Plan includes design guidelines requiring the installation of walls and fences around loading and dock areas, trailer parking areas, and parking lots to screen on-site uses from public roads. As these areas are appropriately screened from sensitive uses and the health risk impact to sensitive receptors do not exceed established significance thresholds, no further response is required.

- Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.

Connections to private driveways and drive aisles within the Development Site will be designed and provided pursuant to access requirements and queueing restrictions established by the City. As stated in Section 4.3.11 of the Specific Plan (see Draft EIR, Appendix B), site-plan design would ensure, "…interior driveways and drive aisles to provide adequate stacking and prevent queuing of vehicles on public streets." Also, adequate areas for on-site parking, on-site queuing, and truck check-in point will be provided (Appendix B, pg 3-35). As the Project provides appropriate features to prevent on-site queuing, no further response is required.

- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.

Specific Plan development standards state the building façades that orient inward to truck courts or service areas or that are not clearly visible from abutting public roads, or are not abutting publicly accessible. (Draft EIR, Appendix B, pg 4-46.) Please see the responses to A-3-14, A-3-15, and B-2-5 regarding the impacts to sensitive receptors in the vicinity of the Development Site. As the health risk impact to sensitive receptors do not exceed established significance thresholds, no further response is required.

- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Banning Municipal Code Section 10.16.020 already includes restrictions on the parking of commercial vehicles on City streets. No further response is required.

**Response to Comment B-2-16**

The commenter suggests the City review *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* (State of California, Department of Justice); specific appendices from the 2022 SCAQMD Air Quality Management Plan (IV-a Stationary and Mobile Source Control Measures, IV-B CARB's strategy for South Coast, and IV-C Regional Transportation Strategy and Control Measures), and *Mobile Source Pollution – Environmental Justice and Transportation* (United States Environmental Protection Agency). The commenter suggests, as applicable, that measures from these sources to be considered for inclusion in the Draft EIR as applicable. Of note, while the commenter does not provide any specificity or substantiation as to which measures referenced in these sources would be applicable to the Development Project. A discussion of the sources and applicability of measures is provided below:

- State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality

Many of these mitigation measures are duplicative to those suggested in this comment letter and other Comment Letters (e.g., Comment Letters D-3 and D-6). The measures related to air quality and greenhouse gas impact from construction operations have been considered and are discussed in detail in the responses to Comments D-3-56 through D-3-67. Measures suggested to mitigate air quality and greenhouse gas impacts from operation of the Development Project are addressed in detail in the responses to Comments D-3-68 through D-3-93. Furthermore, many of these measures are regional in nature or directed to regional planning efforts or policy formation by government bodies, or the daily business operation practices of private enterprises that are outside the scope of the proposed Project. CEQA does not require adoption of every imaginable mitigation measure. CEQA's requirement applies only to feasible mitigation that will "substantially lessen" a project's significant effects. (Public Resources Code, § 21002.) As explained by one court: A lead agency's "duty to condition project approval on incorporation of feasible mitigation measures only exists when such measures would [avoid or] 'substantially lessen' a significant environmental effect." (San Franciscans for Reasonable Growth v. City and County of San Francisco (1989) 209 Cal.App.3d 1502, 1519.) "Thus,

the agency need not, under CEQA, adopt every … mitigation scheme brought to its attention or proposed in the project EIR." (Ibid.) Rather, an EIR should focus on mitigation measures that are feasible, practical, and effective. (Napa Citizens for Honest Government v. Napa County Board of Supervisors (2001) 91 Cal.App.4th 342, 365.)

As the stated responses address the suggested mitigation, no further response is required.

- South Coast AQMD 2022 Air Quality Management Plan, specifically:
    - Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures
    - Appendix IV-B – CARB's Strategy for South Coast
    - Appendix IV-C – SCAG's Regional Transportation Strategy and Control

The AQMP is a regional blueprint for achieving air quality standards and healthful air by providing the strategy and the underlying technical analysis for how the region will meet federal standards by the required dates and continue progress to achieve the state standards. Approximately every 3 years, the SCAQMD prepares a new AQMP, updating the previous plan and the 20-year horizon. The Final 2022 Air Quality Management Plan is the currently adopted AQMP. The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 8-hour ozone NAAQS – 70 parts per billion (ppb) as expeditiously as practicable, but no later than the statutory attainment deadline of August 3, 2038 for South Coast Air Basin and August 3, 2033 for the Riverside County portion of the Salton Sea Air Basin (referred as Coachella Valley Planning Area or Coachella Valley). These referenced sources have been reviewed, and they do not include project specific mitigation measures, but rather propose highly programmatic goals, strategies, and measures to reduce air quality emissions. Further, the commenter does not specify which mitigation measures it is recommending in these documents. The majority of the proposed measures are being developed over the next several years and implemented prior to 2037.

As discussed in Section 4.3, of the Draft EIR (see pgs 4.3-32 through -34), the Project would be inconsistent with AQMP Criterion No. 1 and 2, resulting in a potentially significant impact. Mitigation Measures AIR-1 and AIR-2 would reduce the Development Project's construction source and operational source air pollutant emissions. Additionally, incorporation of contemporary energy-efficient technologies and operational programs would reduce air pollutant emissions and contribute to the meeting of SCAQMD emission reduction goals. The implementation of feasible mitigation measures, the Project's emission reducing design features, and operational programs are consistent with and support overarching AQMP air pollution reduction strategies.

- United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation

The source provides a summary of future plans and policies by the U.S. EPA related to environmental justice and transportation, including new criteria standards for medium and heavy-duty trucks, partnerships with state and local agencies on reducing mobile source air pollution, partnerships with federal agencies on truck electrification, etc. Without further specifics about which mitigation measures the commenter would like the City to consider that could be applied to the Development Project, no further response is required. The Project would be required to comply with all applicable

federal, state, regional, and local regulations in place at the time of construction and operation. Additionally, environmental justice is not a topic that is required to be evaluated or considered pursuant to CEQA Guidelines Sections 15120-15132 (Contents of Environmental Impact Reports). Accordingly, no additional mitigation measures are required.

**Response to Comment B-2-17**

The commenter states that Table J, Appendix C of the Draft EIR Air Quality Analysis does not indicate specific future uses for industrial buildings 4 and 6 which are only identified as general heavy industrial, and it is not clear of any of the buildings will use equipment requiring SCAQMD air permits. The Draft EIR (see Section 3.0, Project Description) provides a description of the type and maximum square footage of potential on-site uses, but because future tenants are unknown, it is not possible to anticipate with any certainty the exact type of use for the proposed buildings, the type of equipment necessary, or the corresponding SCAQMD permits that may be required. Table 3-1 of the Sunset Crossroads Specific Plan (see Draft EIR, Appendix B) provides a detailed list of permitted, conditionally permitted, ancillary, and prohibited uses within the Specific Plan area. Conditionally permitted uses automatically trigger consideration of whether additional CEQA compliance may be required. However, "permitted" uses only means allowed under the Specific Plan, not that no further permits from other agencies may be required. Whether the installation of specialized equipment to support permitted and conditionally permitted uses may require SCAQMD permits, and whether such permits may require additional CEQA analysis can only be known when a specific future tenant proposes a specific use. The Specific Plan Section 3.2 at page 3-5 anticipates this situation as follows:

> The City, in considering an application for a specific permitted use, shall determine whether there are significant environmental impacts resulting from such proposed use not addressed in the EIR or any then prepared subsequent environmental documentation. If the environmental impacts exceed the impacts disclosed in the EIR or subsequent environmental documentation approved by the City, the City shall undertake additional environmental review in compliance with CEQA prior to approving any such use.

See also Specific Plan Section 5.2.6, Environmental Review, which discusses a more detailed application of this approach. It would be speculative to anticipate specific uses and specific SCAQMD permits they might require. An EIR is only required to evaluate potential impacts in light of what is reasonably feasible and is not required to evaluate an impact that is too speculative for evaluation. CEQA Guidelines Sections 15151 and 15145. The Draft EIR analyzes anticipated environmental effects associated with the Development Project as established in the Project Description provided in Section 3.0 of the Draft EIR as required by CEQA. As stated in in Draft EIR, Section 3.8.1, actions required by other agencies may include approval by the SCAQMD for "authority to construct." (see the Response to B-2-18.) Because it cannot be known at this time if any industrial buildings will use equipment for which SCAQMD air permits will be required, no further analysis is required, and no further response is required.

**Response to Comment B-2-18**

The commenter states the EIR should include a discussion about a list of SCAQMD rules that are potentially applicable to the Project. Under State law and SCAQMD rules, every piece of equipment which emits, or controls air pollution must have a permit to operate. Per the SCAQMD, common types

of applications filed at SCAQMD are for Permit to Construct (PC) or Permit to Operate (PO). Prior to installation of new or relocated equipment, or prior to modification of an existing equipment, the operator of the equipment is required to obtain a PC. Once a piece of equipment is installed, modified and/or operated, SCAQMD would process the application for a PO. SCAQMD may further require permits where/when changes occur in the equipment, conditions, or operator occur. Permit applications are evaluated for compliance with applicable rules, criteria, and regulations and must meet appropriate public noticing requirements. Based on these SCAQMD requirements, equipment cannot be constructed or operated unless it is demonstrated that all applicable rules and regulations have been satisfied. SCAQMD permit requirements can be enforced through actions for civil penalties, local prosecutorial action, and/or injunctive orders or abatement.[16]

The referenced SCAQMD Rules regulate a variety of actions, some of which are already cited in the Draft EIR (e.g., Rules 402 and 403 in Section 4.4.4.3). Other referenced rules pertain to specific actions that would not apply to the Project (e.g., Rules 1403 and 1466 related to activities on soils contaminated with VOCs or TACs, respectively). As adherence to the SCAQMD permit process is required District-wide, if any of the operators of any Project buildings want to install any equipment that requires a SCAQMD air permit, it is reasonable to conclude the permit conditions would be appropriately followed. See the response to B-2-17. CEQA does not require discussion of speculative uses or permits required for them. See the response to Comment B-2-17. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment B-2-19**

The commenter states that when SCAQMD air permits are required, SCAQMD's role would change from a Commenting to a Responsible Agency, which would trigger the City's requirement to consult with the SCAQMD per CEQA Guidelines Section 15086. This section states a Lead Agency shall, "…consult with and request comment" from a variety of Responsible and Trustee and other local, State, and federal agencies. The Notice of Availability (NOA) requesting review and comment of the Draft EIR was provided to these agencies on December 15, 2023. As evidenced by SCAQMD's comment letter itself, and the City's responses contained herein, the City has engaged in an appropriate level of consultation as required under CEQA for the uses analyzed in the Draft EIR. The comments provided and the City's substantiated responses will be included in the Final EIR and provided as required to the commenting parties at least 10 days action related to the certification of the Final EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment B-2-20**

The commenter cites CEQA Guidelines Section 15086 for provisions governing procedures for responsible agencies including making a decision regarding the adequacy of the Draft EIR for discretionary approvals to be issued by the Responsible Agency. The commenter further states its concern that the Project Description and Draft EIR analysis is inadequate for SCAQMD to rely on in its role as a responsible agency. SCAQMD assumes that it is a responsible agency based on unspecified industrial uses that may require issuance of various air permits in the future, but its potential status

16 See https://www.aqmd.gov/nav/about/authority.

as a responsible agency is unknown at this time. As stated in the responses to Comments B-2-17 and B-2-18, it is uncertain and cannot be known at this time whether any future uses may entail specialized equipment that may require an air quality permit, and any analysis would be speculative. The Specific Plan provides a permitting process for future tenants which requires assessment of this EIR and analysis of all impacts for proposed uses to determine whether additional analysis (and additional permits) will be required. Therefore, it is reasonable to anticipate individual operators will comply with the applicable permit conditions as established and enforced by the SCAQMD. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment B-2-21**

The commenter states that the Draft EIR should be revised to include a discussion of impacts for all new stationary and portable equipment requiring air permits and identify SCAQMD as a Responsible Agency for the Project. Please refer to the responses to Comments B-2-17 through B-2-20. The Draft EIR is adequate for identified Project uses and those Project uses that are feasible to anticipate and analyze at this time. No further analysis is required, and no further response is required.

**Response to Comment B-2-22**

The commenter cites California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), regarding lead agency obligations to prepare written responses to comments 10 days before certifying the Final EIR, and requests that SCAQMD be provided with the written responses at least 10 days prior to the certification of the Final EIR. The comment is noted. Comments on the Draft EIR and the City's responses will be included in the Final EIR and provided as required to the commenting parties at least 10 days prior to certification of the Final EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment B-2-23**

Citing the CEQA Guidelines Section 15088(c), the comment requests that detailed reasons supported by substantial evidence in the record be provided to explain why its specific comments and suggestions are not accepted where the City's position is at variance with recommendations provided in SCAQMD's comment letter. The comment is noted. In compliance with CEQA Guidelines Section 15088(c), the City considered, evaluated, and provided substantiated responses to SCAQMD's comments on the Draft EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

# ATTACHMENT A

# SCAQMD REQUEST FOR FILES

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## Technical Data Request for the Sunset Crossroads Project

Sahar Ghadimi <sghadimi@aqmd.gov>
Tue 1/2/2024 11:34 AM
To: Adam Rush <arush@banningca.gov>
Cc: Sam Wang <swang1@aqmd.gov>

Dear Adam Rush,

South Coast AQMD staff received the Notice of Availability of a Draft Environmental Impact Report (EIR) for the Sunset Crossroads Project (South Coast AQMD Control Number: RVC231221-01). Staff is currently in the process of reviewing the Draft EIR.

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod, Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources (i.e. truck operations).

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff ASAP. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.

Thank you.

Sincerely,

*Sahar Ghadimi*
Air Quality Specialist, CEQA IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
(909)396-2392
sghadimi@aqmd.gov

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# ATTACHMENT B

# LIST OF FILES PROVIDED TO SCAQMD

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# FILES PROVIDED TO SCAQMD

**CalEEMod Input Files:**

CalEEMod Construction Tier 4 data-Rev (30 g-L).xls
CalEEMod Construction Tier 4 data-Rev.xls
CalEEMod Ops-PF Phase 1 HDVeh data-Rev.xls
CalEEMod Ops-PF Phase 1 LDVeh data-Rev.xls
CalEEMod Ops-PF Phases 1-2 HDVeh data-Rev.xls
CalEEMod Ops-PF Phases 1-2 LDVeh data-Rev.xls
CalEEMod Ops-PF Phases 1-3 HDVeh data-Rev.xls
CalEEMod Ops-PF Phases 1-3 LDVeh data-Rev.xls
CalEEMod Ops-PF All Phases LDVeh data-Rev.xls
CalEEMod Ops-PF All Phases HDVeh data-Rev.xls

**CalEEMod Output Files (all included in the DEIR except as noted):**

CalEEMod Mitigated Construction Annual-Rev (30 g-L).xlsx (not included in the DEIR)
CalEEMod Mitigated Construction Summer-Rev (30 g-L).xlsx (not included in the DEIR)
CalEEMod Mitigated Construction Winter-Rev (30 g-L).xlsx (not included in the DEIR)
CalEEMod Ops-PF Phase 1 HDVeh Annual-Rev.xlsx
CalEEMod Ops-PF Phase 1 HDVeh Summer-Rev.xlsx
CalEEMod Ops-PF Phase 1 HDVeh Winter-Rev.xlsx
CalEEMod Ops-PF Phase 1 LDVeh Annual-Rev.xlsx
CalEEMod Ops-PF Phase 1 LDVeh Summer-Rev.xlsx
CalEEMod Ops-PF Phase 1 LDVeh Winter-Rev.xlsx
CalEEMod Ops-PF Phases 1-2 HDVeh Annual-Rev.xlsx
CalEEMod Ops-PF Phases 1-2 HDVeh Summer-Rev.xlsx
CalEEMod Ops-PF Phases 1-2 HDVeh Winter-Rev.xlsx
CalEEMod Ops-PF Phases 1-2 LDVeh Annual-Rev.xlsx
CalEEMod Ops-PF Phases 1-2 LDVeh Summer-Rev.xlsx
CalEEMod Ops-PF Phases 1-2 LDVeh Winter-Rev.xlsx
CalEEMod Ops-PF Phases 1-3 HDVeh Annual-Rev.xlsx
CalEEMod Ops-PF Phases 1-3 HDVeh Summer-Rev.xlsx
CalEEMod Ops-PF Phases 1-3 HDVeh Winter-Rev.xlsx
CalEEMod Ops-PF Phases 1-3 LDVeh Annual-Rev.xlsx
CalEEMod Ops-PF Phases 1-3 LDVeh Summer-Rev.xlsx
CalEEMod Ops-PF Phases 1-3 LDVeh Winter-Rev.xlsx
CalEEMod Ops-PF All Phases HDVeh Annual-Rev.xlsx
CalEEMod Ops-PF All Phases HDVeh Summer-Rev.xlsx
CalEEMod Ops-PF All Phases HDVeh Winter-Rev.xlsx
CalEEMod Ops-PF All Phases LDVeh Annual-Rev.xlsx
CalEEMod Ops-PF All Phases LDVeh Summer-Rev.xlsx
CalEEMod Ops-PF All Phases LDVeh Winter-Rev.xlsx

**Analysis Information Files:**

Architectural Coating Area Calc.xlsx
Worker & Vendor Trip Rate Calc.xlsx
Overall Construction Schedule.csv

**LST Analysis Files:**

LST Analysis-Construction.xlsx (Worksheet to tabulate construction LST results)
LST Analysis-Operations.xlsx (Worksheet to tabulate operational LST results)
LST-Construction-AERMOD-Gas.zip (537 AERMOD input, output, and data files)
LST-Construction-AERMOD-PM10.zip (535 AERMOD input, output, and data files)
LST-Operations-AERMOD-Gas.zip (3,793 AERMOD input, output, and data files)
LST-Operations-AERMOD-PM10.zip (3,800 AERMOD input, output, and data files)
PL_RiversideSC_2027_Annual_20220609110704.csv (EMFAC datafile)

**EMFAC & OFFROAD data files:**

EMFAC2021-EI-2007Class-Riverside(SC)-2027-Annual-20220628161002.csv
EMFAC2021-EI-2007Class-Riverside(SC)-2027-Annual-20220628161317.csv
EMFAC2021-ER-2007Class-Riverside(SC)-2027-Annual-20220628160507.csv
OFFROAD2021-Equipment Types-Riverside(SC)2024-Exhaust Emissions-20220628160400.csv
PL_RiversideSC_2027_Annual_20220628155611.csv (EMFAC datafile)

**HRA Files:**

NPD2001 HRA Coords & EmRates.xlsx (Workbook to develop HARP emissions file)
NPD2001 HARP.zip (66 HARP modeling files)
SC-AERMOD-final.zip (4,099 AERMOD modeling files)

## C. LOCAL AGENCIES

C-1: Riverside County Flood Control and Water Conservation District, Amy McNeill, Engineering Project Manager (January 10, 2024)

C-2: Riverside County Airport Land Use Commission, Jackie Vega, Urban Regional Planner II (December 19, 2023)

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JASON E. UHLEY
General Manager-Chief Engineer

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RIVERSIDE, CA 92501
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951.788.9965 FAX
www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

254409

January 10, 2024

City of Banning
99 East Ramsey Street
Banning, CA 92220-0998

Attention: Adam Rush

Re: Sunset Crossroads Project
APNs 537-110-003, 537-110-004, 537-110-005, 537-110-011, 537-110-012, 537-110-013, 537-110-014, 537-120-013, 537-120-025, 537-120-028, 537-120-029, 537-120-030, 537-120-031, 537-120-032, 537-120-033, 537-120-034, 537-120-035 and 537-120-036

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided. C-1-1

The District's review is based on the above-referenced project transmittal, received December 18, 2023. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue: C-1-2

☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.

☐ This project involves District proposed Master Drainage Plan facilities, namely, _____. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

☒ If this project proposes channels, storm drains larger than 36 inches in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall C-1-3

enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety. C-1-3 Cont

☐ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, _____. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266.

☐ The District's previous comments are still valid.

**GENERAL INFORMATION**

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt. C-1-4

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy. C-1-5

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document (i.e., Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report) and/or Mitigation Monitoring and Reporting Program, if a CEQA document was prepared for the project. The project proponent shall also bear the responsibility for complying with all other federal, state, and local environmental rules and regulations that may apply. C-1-6

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit. C-1-7

Very truly yours,

Amy McNeill

AMY MCNEILL
Engineering Project Manager

EM:blm

# City of Banning

## Community Development Department

**NOTICE OF AVAILABILITY OF A**
**DRAFT ENVIRONMENTAL IMPACT REPORT**

RECEIVED
DEC 18 2023
RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

**Date:** December 15, 2023

**SCH:** 2021020011

**Project Name:** Sunset Crossroads Project

**Project Description:** The Sunset Crossroads Project (Development Project or Project) envisions the development of industrial and commercial uses on a 533.8-acre site through adoption of the Sunset Crossroads Specific Plan, including up to 268,400 square feet of medical office, professional office, education, recreation, and commercial uses, a travel center with refueling uses, and a 125-room hotel on 47.9-acres; and up to 5,545,000 square feet of industrial uses (including up 330,000 square feet of cold storage uses) on 392.0 acres. The Specific Plan text identifies the permitted land uses; development standards, design guidelines; and implementation provisions. The Development Project includes a General Plan Amendment and Zone Changes amending the land use designations on-site to General Commercial (GC), Industrial (I), Open Space – Parks (OS-P), and Open Space – Resources (OS-R). Approximately 65.6 acres of the Project site would be retained as Open Space - Resources (OS-R) and/or Open Space – Parks (OS-P) use, including a five-acre passive park. Approximately 253.7 acres of the site are located outside the current City boundary within the City's sphere of influence (SOI); therefore, the Project envisions annexation of this area into the city.

The Project would result in the reduction of the City's residential capacity by a maximum of 1,146 units on the site; therefore, the City's requirement to identify and rezone other land in the city to ensure no net loss of residential capacity is also evaluated as part of the Project. The City has identified an approximately 49.2-acre site located east of Sunset Avenue and south of Westward Avenue (the MSJC Site) owned by the Mt. San Jacinto Community College District (MSJCCD) to accept the transfer of residential capacity from the Development Project site. The City has initiated a General Plan Amendment and rezoning of the MSJC Site to VHDR (Very High Density Residential) (MSJC Entitlements) allowing a maximum capacity of not less than 1,146 residential units. No residential development is envisioned on the MSJC Site at this time.

**Project Location:** The Development Project site is located 533.8 acres directly south of I-10 and the Union Pacific Railroad, and west of Sunset Avenue. The northerly 280.1 acres of the site is located in the city, while the southerly 253.7 acres is located within the city's SOI in unincorporated Riverside County (see Figure 1: Project Location). The Development Project site encompasses the following Assessor's Parcel Numbers (APNs): 537-110-003 through -005, 537-110-011 through -014, 537-120-013, 537-120-025, and 537-120-028 through -036. The MSJC Site is located in the city on 49.2 acres located at the southeast corner of Westward and Sunset Avenues, encompassing APNs: 537-140-004, 537-140-006 through -012, 537-150-001, 537-150-003 and -004, 537-150-008, and 537-140-001 through -003.

**Public Review Period:** The 45-day public review for the Draft Environmental Impact Report (EIR) will begin on December 15, 2023, and end on January 30, 2024.

Written comments regarding this Draft EIR should be addressed to:

Adam Rush, M.A., AICP
Community Development Director
99 E. Ramsey Street Banning, CA 92220
(951) 922-3131
arush@banningca.gov

**Public Hearing:** A public hearing(s) with the Planning Commission and City Council will be conducted at a future date(s). Public hearing notices will be issued at least ten (10) days in advance of any hearing (s).

**Project Impacts**: The Draft EIR evaluates the proposed project's potential individual-and cumulative-level environmental impacts on the following resource areas: aesthetics, agricultural and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise and vibration, population and housing, recreation, public services, transportation, tribal cultural resources, utilities and services systems, and wildfire. A Project-level analysis of these issues is provided in Sections 4.1 through 4.20 of the Draft EIR. A programmatic level analysis of potential environmental impacts pertaining to the MSJC Entitlements and cumulative analysis is provided in Chapters 5.0 and 6.0 of the Draft EIR, respectively.

As discussed in Section 4.0 of the Draft EIR, the Project would result in significant adverse environmental effects that cannot be mitigated to below levels of significance after the implementation of feasible mitigation measures. The unavoidable significant impacts are identified below.

**Air Quality**

**Greenhouse Gas Emissions**

**Noise**

**Vehicle Miles Traveled (VMT)**

**Availability of the Draft Environmental Impact Report:** The Draft EIR and its technical appendices are available for review online at: https://banningca.gov/Archive.aspx?AMID=60&Type=&ADID=

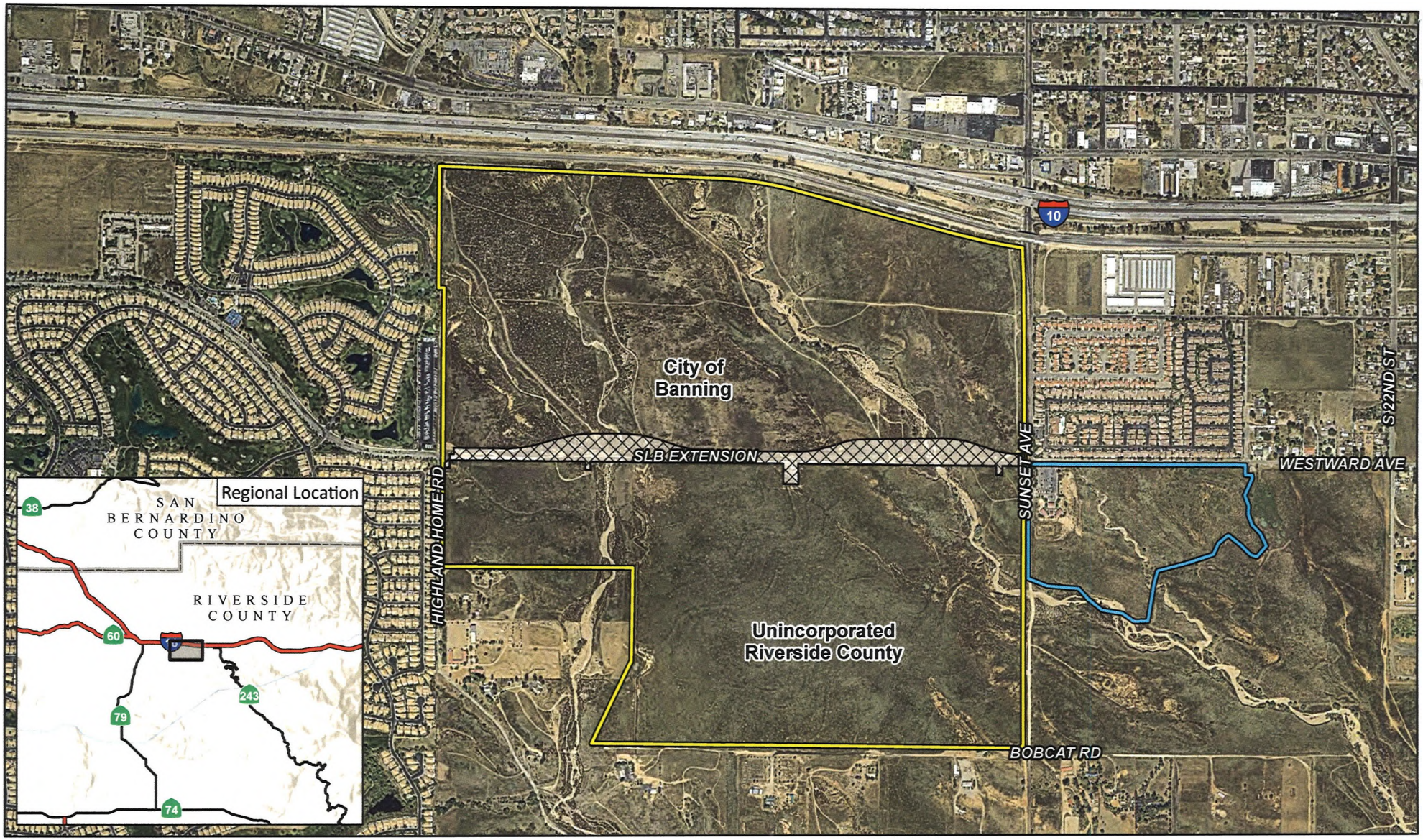


FIGURE 1

LEGEND

- Development Site
- MSJC Site
- Future Sun Lakes Blvd Extension (Not a Part)

N

0 625 1250
FEET

SOURCE: Nearmap Imagery (10/12/2020)

I:\NPD2001\GIS\Pro\Sunset Crossroads\Sunset Crossroads.aprx (12/6/2023)

*Sunset Crossroads*

Project Location

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## Response to Letter C-1

Riverside County Flood Control and Water Conservation District
Amy McNeill, Engineering Project Manager
January 10, 2024

### Response to Comment C-1-1

The Riverside County Flood Control and Water Conservation District (RCFCWCD) states it does not typically recommend conditions for land use divisions in incorporated cities, does not plan check city land use cases, or provide required Division of Real Estate letters or flood hazard reports for such cases. The RCFCWCD's comments for such cases are limited to items of their specific interest including master drainage plan facilities, regional flood control and drainage facilities, and drainage plan fees. This comment is noted and does not raise any specific issues related to the adequacy of the Draft EIR; therefore, no further response is required.

### Response to Comment C-1-2

The commenter states that they have not reviewed the plan in detail and that the comments provided do not constitute the RCFCWCD's endorsement or approval of the Project with respect to flood hazard, public safety, or any other issues. This comment is noted and does not raise any specific issues related to the adequacy of the Draft EIR; therefore, no further response is required.

### Response to Comment C-1-3

On written City request, the commenter states that RCFCWCD would consider accepting ownership of any storm drains larger than 36" in diameter or other facilities that could be considered regional in nature and/or a logical extension of RCFCWCD facilities. The commenter further states a cooperative agreement with the RCFCWCD would be required to establish the terms/conditions related to the operation/maintenance of any such facility; that any facilities would be constructed to RCFCWCD standards; that required fees be paid; that all terms/conditions of required regulatory permits be approved prior RCFCWCD approval of facility plans; and that there shall be no unreasonable constraint upon the RCFCWCD's ability to maintain facilities to protect the public health and safety. This comment is noted and does not raise any specific issues related to the adequacy of the Draft EIR; therefore, no further response is required.

### Response to Comment C-1-4

The commenter states the Project may require a National Pollutant Discharge Elimination System (NPDES) permit and that grading, recordation, or final approval by the City should not occur until the required permit has been granted or the project is shown to be exempt from permit requirements. The Draft EIR (page 4.10-36) already identifies Regulatory Compliance Measure (RCM) WQ-1 which requires that the Project obtain coverage under the NPDES. This comment is noted and does not raise any specific issues related to the adequacy of the Draft EIR; therefore, no further response is required.

### Response to Comment C-1-5

The commenter states, if applicable, that the City should require studies, maps, plans, calculations, and other information to meet Federal Emergency Management Agency (FEMA) requirements,

including obtaining a Conditional Letter of Map (CLOMR) Revision prior to grading and a Letter of Map Revision (LOMR) prior to occupancy of the Development Project. As stated in the Draft EIR (page 4.10-45), while Smith and Pershing Creeks are located in Flood Hazard Zone A[17], the Development Project does not include the construction or occupation of buildings within these areas; therefore, implementation of the Development Project would not result in a hazard within a FEMA-identified flood zone and preparation of a CLOMR and/or LOMR is not required. This comment is noted and does not raise any specific issues related to the adequacy of the Draft EIR; therefore, no further response is required.

**Response to Comment C-1-6**

The commenter states the Project would be required to comply with the mitigation measures identified in the Draft EIR, and all other federal, States, and local environmental rules and regulations that may apply. Pursuant to CEQA Guidelines Section 150967, a Mitigation Monitoring and Reporting Program (MMRP) will be in included in the Final EIR. The MMRP will identify the mitigation, method and timing of verification of compliance, and the parties responsible for compliance. This comment is noted and does not raise any specific issues related to the adequacy of the Draft EIR; therefore, no further response is required.

**Response to Comment C-1-7**

The commenter states that if a natural watercourse or mapped floodplain is impacted by the Project, the City should require the applicable permits from the California Department of Fish and Wildlife (CDFW), the U.S. Army Corps of Engineers, and/or the California Regional Water Quality Control Board or confirmation the Project is exempt from the permit requirements of these agencies.

With respect to flood plains impacted by the Development Project, see the response to Comment C-1-5. With respect to impacts to other riparian/riverine areas on the Development Site, see Section 4 (Biological Resources) of the EIR. As indicated in the Draft EIR, the Development Project may be subject to regulatory permits from the listed federal and state agencies which would specify permit conditions as required by law. Implementation of the Development Project would require satisfaction of the permit requirements identified by the relevant permitting authorities. No further response is required.

[17] Flood Hazard Zone A areas are subject to inundation by the 1-percent-annual-chance flood event. The remaining portions of the Development Site are not located within a floodplain.

C-2

## Sunset Crossroads

Vega, Jaqueline <JaVega@RIVCO.ORG>
Tue 12/19/2023 11:20 AM
To:Adam Rush <arush@banningca.gov>

Hello Adam,

Thank you for transmitting the above referenced project to ALUC. Please note that the proposed project is located outside the airport influence area, and therefore ALUC review is not required. C-2-1

Should you have any questions, please contact me.

Jackie Vega
Urban Regional Planner II

Riverside County Airport Land Use Commission
4080 Lemon Street, 14th Floor
Riverside, Ca 92501
(951) 955-0982
Javega@RIVCO.ORG
www.rcaluc.org

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County of Riverside California

## Response to Letter C-2

Riverside County Airport Land Use Commission
Jackie Vega, Urban Regional Planner II
December 19, 2023

### Response to Comment C-2-1

The Riverside County Airport Land Use Commission (RCALUC) notes the Project is located outside the Airport Influence Area (AIA) (established for Banning Municipal Airport) and states that review by the RCALUC is not required. No further response is required.

## D. ORGANIZATIONS

D-1: Sierra Club, George Hague (December 22, 2023)

D-2: Sierra Club, George Hague (December 22, 2023)

D-3: Golden State Environmental Justice Alliance, Represented by Blum, Collins & Ho LLP, Matt Hagemann and Paul Rosenfeld (January 29, 2024)

D-4: Golden State Environmental Justice Alliance, Adam Salcido (January 29, 2024)

D-5: Sierra Club, Represented by Law Office of Abigail Smith, Abigail Smith (January 30, 2024)

D-6: Sierra Club, Represented by Law Office of Abigail Smith, Abigail Smith (January 30, 2024)

D-7: Western States Regional Council of Carpenters, Represented by Mitchell Tsai Law Firm, Matt Hagemann and Paul Rosenfeld (January 30, 2024)

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D-1

## NOP comments on Sunset Crossroads Project?

George Hague <gbhague@gmail.com>

Fri 12/22/2023 5:37 PM

To:Adam Rush <arush@banningca.gov>

Good morning Mr Rush,

How can I obtain all the Notice of Preparation (NOP) comments submitted on the Sunset Crossroads Project? I would appreciate any help you can provide in making that possible. D-1-1

Thank you,

George Hague

## Response to Letter D-1

Sierra Club
George Hague
December 22, 2023

### Response to Comment D-1-1

The commenter requests to be provided with the comments the City received during the public review period for the Project's Notice of Preparation (NOP). The Notice of Availability (NOA) of the Draft EIR was distributed on December 15, 2023. The NOA provided a link to the City's website which included in its entirety the Draft EIR, supporting project information, and project-specific technical studies. The NOP comment letters are included as Draft EIR Appendix A-2 and are accessible at the Sunset Crossroads Project link https://www.banningca.gov/762/Sunset-Crossroads-Specific-Plan. The City also provided this information to the commenter on January 10, 2024. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

**D-2**

## Notice of Preparation (NOP) comments submitted on the Sunset Crossroads Project?

George Hague <gbhague@gmail.com>

Fri 12/22/2023 5:59 PM

To:Community Development Email Group <CD@banningca.gov>
Cc:cityclerks <cityclerks@banningca.gov>;Doug Schulze <dschulze@banningca.gov>;Adam Rush <arush@banningca.gov>

Good morning,

Since Mr Rush is out of the office until Wednesday Jan 3rd, can you or someone please begin fulfilling my request found below before then? **D-2-1**

Thank you,

George Hague

Good morning Mr Rush,

How can I obtain all the Notice of Preparation (NOP) comments submitted on the Sunset Crossroads Project? I would appreciate any help you can provide in making that possible.

Thank you,

George Hague

## Response to Letter D-2

Sierra Club
George Hague
December 22, 2023

### Response to Comment D-2-1

The commenter repeats the request to the City for comments on the Project's Notice of Preparation (NOP). Please refer to the response to Comment D-1-1. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

BLUM, COLLINS & HO LLP
ATTORNEYS AT LAW
AON CENTER
707 WILSHIRE BOULEVARD
SUITE 4880
LOS ANGELES, CALIFORNIA 90017 (213) 572-0400

January 29, 2024

Adam Rush, M.A., AICP
Community Development Director
99 E. Ramsey Street
Banning, CA 92220

*VIA EMAIL TO:*
arush@banningca.gov

***SUBJECT: COMMENTS ON SUNSET CROSSROADS PROJECT EIR (SCH NO. 2021020011)***

Dear Mr. Rush,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Sunset Crossroads Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. D-3-1

**1.0 Summary**

The project proposes industrial and commercial uses on a 533.8-acre site through City adoption of the Sunset Crossroads Specific Plan, including up to 268,400 square feet of medical office, professional office, education, recreation, and commercial uses, a travel center with refueling uses, and a 125-room hotel on 47.9-acres; and up to 5,545,000 square feet of industrial uses (including up 330,000 square feet of cold storage uses) on 392.0 acres. Approximately 253.7 acres of the site are located outside the City boundary and lie within the City's sphere of influence (SOI) within unincorporated Riverside County. The areas outside the existing City boundary are proposed to be annexed by the City. D-3-2

The following discretionary actions are required to implement the proposed project:

1. General Plan Amendment and Zone Change to change the land use designations for the Development Site from High Density Residential, General Commercial, Medium Density Residential, Open Space – Resources, and Open Space – Parks to the following: 392.0 acres of Industrial (LI), 47.9 acres of General Commercial, 53.0 acres of Open Space – Resources (OS-R), and 12.6 acres of Open Space – Parks (OS-P).
2. Annexation: Approximately 253.7 acres of the Development Site are currently located outside the current City boundary within the City's SOI. As part of the Project, an application to LAFCO would be submitted for annexation of the Southern Portion of the Development Site into the City.

D-3-2 Cont

**4.3 Air Quality, 4.6 Energy, and 4.8 Greenhouse Gas Emissions**

Please refer to attachments from SWAPE for a complete technical commentary and analysis.

D-3-3

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0[1], CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project site spans two census tracts (6065043812 and 6065043813). The proposed project's census tracts and surrounding community, including residences to the east, west, and Mt. San Jacinto College Banning Campus that also houses the Beaumont Middle College High School program, bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicators measured by CalEnviroScreen.

D-3-4

For example, the census tracts rank in the 98th percentile (6065043812) and 97th percentile (6065043813) for ozone burden and the 81st percentile (6065043812) and 84th percentile (6065043813) for traffic burdens. Both of these environmental factors are typically attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[2]. Exhaust fumes contain toxic chemicals that can damage DNA, cause cancer, make breathing difficult, and cause low weight and premature births[3]. Children who live or go to schools near busy roads have higher rates of asthma and other lung diseases than children in areas farther from roads[4].

D-3-4-A

[1] CalEnviroScreen 4.0 https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[2] OEHHA Ozone https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[3] OEHHA Traffic Density https://oehha.ca.gov/calenviroscreen/indicator/traffic-density
[4] Ibid.

D-3

The census tracts also experience high rates of contaminated drinking water (6065043812: 59th percentile and 6065043813: 78th percentile). Poor communities and people in rural areas are exposed to contaminants in their drinking water more often than people in other parts of the state[5]. D-3-4-A Cont

Census tract 6065043812 ranks in the 68th percentile and census tract 6065043813 ranks in the 87th percentile for hazardous waste facility impacts. Hazardous waste generators and facilities contribute to the contamination of air, water and soil near waste generators and facilities can harm the environment as well as people[6]. The census tracts also rank in the 95th percentile (6065043812) and 77th percentile (6065043813) for solid waste impacts. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilites are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations[7]. D-3-4-B

Further, the project area census tracts are diverse communities, whom are especially vulnerable to the impacts of pollution (6065043812: 12% Hispanic, 2% African-American and 4% Asian-American residents; 6065043813: 36% Hispanic, 19% Native-American and 2% Asian-American residents). The project area has a high rate of low educational attainment, meaning a portion of the census tract residents over age 25 have not attained a high school diploma (6065043812: 20% and 6065043813: 73%). D-3-4-C

The project area census tracts also have high rates of poverty, meaning a majority of the households in the census tract have a total income before taxes that is less than the poverty level (6065043812: 30% and 6065043813: 86%). Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care[8]. Poor communities are often located in areas with high levels of pollution[9]. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution[10]. D-3-4-D

Living in poverty and low educational attainment are indications that the project are census tract residents lack health insurance or access to medical care. Medical care is vital for the project area census tracts as they experience high rates of cardiovascular disease (6065043812: 93% and

[5] OEHHA Contaminated Drinking Water https://oehha.ca.gov/calenviroscreen/drinking-water
[6] OEHHA Hazardous Waste Generators and Facilities https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities
[7] OEHHA Solid Waste Facilities https://oehha.ca.gov/calenviroscreen/indicator/solid-waste-sites-and-facilities
[8] OEHHA Poverty https://oehha.ca.gov/calenviroscreen/indicator/poverty
[9] Ibid.
[10] Ibid.

6065043813: 99%). They also experience high rates of asthma (6065043812: 82% and 6065043813: 93%). D-3-4-D Cont

Additionally, a project census tract (6065043813) is identified as a SB 535 Disadvantaged Community[11]. This indicates that cumulative impacts of development and environmental impacts in the area are disproportionately impacting these communities. The negative environmental, health, and quality of life impacts resulting form a saturation of the industrial, warehousing, and logistics industry in the City have become distinctly inequitable. The severity of significant and unavoidable impacts particularly on this Disadvantaged Community must be included for analysis as part of a revised EIR. Each section of the revised EIR must include the specific analysis of each environmental impact on the Disadvantaged Community, including cumulative analysis and irreversible environmental effects. D-3-5

The State of California lists three approved compliance modeling softwares[12] for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. D-3-6 Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software. D-3-7

Further, Table 4.8.N: Project Consistency with the 2020 RTP/SCS provides a misleading and erroneous consistency analysis with SCAG's 2020-2045 Connect SoCal RTP/SCS. Due to errors in modeling, modeling without supporting evidence (as noted throughout this comment letter and attachments), and the EIR's conclusion the project will result in significant and unavoidable cumulatively considerable impacts to Air Quality, Greenhouse Gas Emissions, Noise, and Transportation (VMT), the proposed project is directly inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. The EIR must be revised to include a finding of significance due to these direct inconsistencies with SCAG's 2020-2045 Connect SoCal RTP/SCS. D-3-8

[11] OEHHA SB 535 Census Tracts https://oehha.ca.gov/calenviroscreen/sb535
[12] California Energy Commission 2022 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1

**4.11 Land Use**

The project faces significant inconsistencies with statutory requirements of the Housing Crisis Act (HCA) of 2019/Senate Bill (SB) 330[13]/SB 8[14]. The HCA/SB 330/SB 8 require replacement housing sites when land designated for housing development is changed to a non-housing use to ensure no net loss of housing capacity. Government Code Section 66300(b)(1)(A) requires that agencies shall not "change the general plan land use designation, specific plan land use designation, or zoning to a less intensive use below what was allowed under the land use designation and zoning ordinances in effect at the time of the proposed change." Under Government Code Section 66300(b)(1)(A), a "less intensive use" includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, or new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce residential development capacity. Pursuant to SB 330, replacement capacity for any displaced residential units must be provided **concurrently** at the **time of project approval**. D-3-9

Government Code Section 66300 (h)(i)(1) states that, "this section does not prohibit an affected county or an affected city, including the local electorate acting through the initiative process, from changing a land use designation or zoning ordinance to a less intensive use, or reducing the intensity of land use, if the city or county concurrently changes the development standards, policies, and conditions applicable to other parcels within the jurisdiction to ensure that there is no net loss in residential capacity." The EIR is misleading in describing the proposed Mt. San Jacinto College (MSJC) replacement sites as a "rezoning." The proposal at the MSJC sites is a Specific Plan Zoning Overlay (SPZO) ("Overlay"), which allows the site to retain its base land use/zoning designation of PF–S (Public Facilities-Schools) and continue to be developed with exclusively educational uses should the current or future property owner choose. Additionally, the EIR states that, "To ensure that the college facilities and any future residential development are compatible, and to provide for the clustering allowed by the City's Municipal Code, the City will establish a Specific Plan Zoning Overlay (SPZO) ("Overlay") coterminous with the MSJC Site boundary." It does not appear that such an Overlay (or any overlay designations) exist on the City's Zoning Map[15] currently and a new designation must be created. The EIR has not provided any information or specifics regarding the newly proposed SPZO or the timing of its adoption by the City. Further, the EIR states that, "The Overlay would require preparation of a Specific Plan, pursuant to Chapter D-3-10

[13] Housing Crisis Act of 2019/SB 330
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330
[14] SB 8 https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB8
[15] http://banning.ca.us/DocumentCenter/View/5462/Banning_GeneralPlan-and-Zoning-2021?bidId=

17.96 of the BMC prior to development of residential uses on the MSJC Site." All of the above factors are in conflict with SB 8 that expanded the provisions of the HCA to include Government Code Section 66300 (h)(i)(1) requiring concurrent approval of replacement sites to ensure no net loss in residential capacity, and Section 66300 (h)(2)(A) defining "concurrently" to mean the action is approved at the same meeting of the legislative body. The MSJC replacement sites program within the EIR does not comply with these requirements as a loss in residential capacity exists until (1) the City establishes a Specific Plan Zoning Overlay, (2) applies it on the MSJC replacement sites, and (3) adopts a Specific Plan on the MSJC replacement sites (and all associated CEQA review) that permits development of 1,146 residential units. The loss in residential capacity must be included as a finding of significance as part of a revised EIR. The EIR does not act in conformance with the HCA/SB 330/SB 8 and the lost zoning capacity of any dwelling units is a significant environmental impact in violation of the HCA/SB 330/SB 8. The EIR must be revised to include a finding of significance due to this inconsistency.

D-3-10 Cont

D-3-11

Additionally, deferring the environmental analysis of construction and operation of the MSJC replacement sites to a later date is project piecemealing in violation of CEQA. The EIR does not accurately or adequately describe the project, meaning "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment" (CEQA § 15378). The whole of the action must statutorily and legally include (1) City establishment of a Specific Plan Zoning Overlay (SPZO), (2) adoption of the SPZO on the MSJC replacement sites, and (3) adoption of a Specific Plan on the MSJC sites that permits development of at least 1,146 residential units.

D-3-12

Further, the EIR omits discussion and analysis regarding the project's inconsistency with other land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. For example, the project will have a significant and unavoidable cumulatively considerable impact to Air Quality because it will exceed the assumptions in the AQMP and generate operational-source emissions (VOC, NOX, CO, PM10, and PM2.5) that exceed SCAQMD thresholds. The project will also have a significant and unavoidable cumulatively considerable impact to Greenhouse Gas Emissions because the operational emissions will exceed the City's threshold of 3,000 MT CO2e per year and will impede long-term GHG reduction goals of various plans (e.g., for 2030 and 2050) adopted for the purpose of reducing GHG emissions. The Land Use and Planning analysis omits any discussion regarding inconsistencies with the AQMP and California's statewide GHG reduction goals for 2030 and 2050. The EIR must be revised to include these significant and unavoidable cumulatively considerable impacts for analysis and include a finding of significance.

D-3-13

Table 4.11.A: Development Project Consistency Analysis with the City of Banning General Plan provides a misleading and erroneous consistency analysis with the General Plan. The EIR concludes that the proposed project is consistent with every Goal and Policy of the General Plan without considering the EIR's conclusion that the project will result in significant and unavoidable cumulatively considerable impacts to Air Quality, Greenhouse Gas Emissions, Noise, and Transportation (VMT). The EIR is inadequate as an informational document and a revised EIR must be prepared with a consistency analysis that considers the project's significant and unavoidable impacts in its analysis, particularly in reference to the following General Plan items: D-3-14

1. Land Use Element Industrial Goal A: balanced mix of non-polluting industrial land uses which provide local jobs for the City's residents.
2. Circulation Element Policy 6: The City shall maintain peak hour Level of Service C or better on all local intersections, except those on Ramsey Street and at I-10 interchanges, where Level of Service D or better shall be maintained

Appendix J-2 concludes the following intersections require improvements to address the peak hour deficiencies per the City's thresholds under opening year (2027) cumulative conditions:

1. Highland Home Rd. & Ramsey St. (#7) – LOS E PM peak hour only
2. Sunset Av. & I-10 WB Ramps (#29) – LOS E PM peak hour only
3. Sunset Av. & I-10 EB Ramps (#30) – LOS F AM and PM peak hours
4. Sunset Av. & Lincoln St. (#32) – LOS F PM peak hour only
5. Sunset Av. & Westward Av. (#33) – LOS F PM peak hour only

D-3-15

Appendix J-2 concludes the following intersections require improvements to address the peak hour deficiencies per the City's thresholds under horizon year (2045) cumulative conditions with the addition of project traffic:

1. Sunset Av. & Lincoln St. (#32) – LOS E AM peak hour; LOS F PM peak hour
2. Sunset Av. & Bobcat Rd. (#37) – LOS F PM peak hour only

Appendix J provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersections to less than significant levels (Table 1-3: Summary of Off-Site Improvements by Analysis Scenario). It must be noted that the impacts to intersection #2 is also under jurisdiction of Beaumont; intersections #29 and #30 are Caltrans facilities; and intersections #33 and #34 are under jurisdiction of the County of Riverside. Any improvements planned/constructed or in-lieu fees/fair share fees paid for Beaumont, County of Riverside, or Caltrans facilities are beyond the control/scope of the lead agency. An assessment

of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date, whether by the City of Banning, Beaumont, Caltrans, or County of Riverside. Any improvements recommended or fees paid to mitigate impacts for Beaumont, Caltrans, or County of Riverside facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Beaumont, Caltrans, or County of Riverside has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold A and Land Use and Planning Impact Threshold B because it is not consistent with the following General Plan Policy: D-3-15 Cont

1. Policy 6: The City shall maintain peak hour Level of Service C or better on all local intersections, except those on Ramsey Street and at I-10 interchanges, where Level of Service D or better shall be maintained.

The EIR does not include any information regarding the buildout conditions of the City's General Plan in order to provide an adequate and accurate environmental analysis. The EIR must be revised to provide the horizon year of the City's current adopted General Plan, the total developable building floor area analyzed within the Industrial land use designation, and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Plan EIR's analysis, particularly since the EIR tiers from the General Plan EIR. For example, Table III-3 Commercial and Industrial Buildout Statistical Summary of the General Plan indicates that the entirety of the Industrial land use designation will accommodate 4,582,512 square feet of building area. The proposed project's 5,545,000 square feet of industrial building area will exceed the entirety of the planned industrial growth for the entire incorporated City area, and this was not accounted for by the General Plan or its EIR as the project requires a GPA/ZC/Annexation to proceed. The growth generated by the proposed project was not anticipated by the City's General Plan, RTP/SCS, or AQMP. A revised EIR must be prepared with a finding of significance. D-3-16 D-3-17

**4.14 Population and Housing**

The EIR utilizes uncertain and misleading language in stating that, "it is *expected* that local and *regional* construction workers would be available to serve the construction needs of the site,"which D-3-18

does not provide any meaningful analysis or calculation of the project's population and employment (construction) generation. The EIR states that, "Construction workers would not be *expected* to relocate their households 'places of residence as a consequence of working on the Development Project," and relies upon the City and County's overall unemployment rates to fill the project's jobs without providing information on whether the unemployed workforce is interested in or qualified for work in the construction and/or industrial sectors.

D-3-18 Cont

Additionally, relying on the entire labor force within all of Riverside County to fill the project's construction and operational jobs will increase VMT and emissions during all phases of construction and operations and a revised EIR must be prepared to account for longer worker trip distances. In order to comply with CEQA's requirements for meaningful disclosure and adequate informational documents, a revised EIR must be prepared to provide an accurate estimate of employees generated by all uses of the proposed project, including construction. It must also provide demographic and geographic information on the location of qualified workers to fill these positions.

D-3-19

The planned growth for the City is developed by the Southern California Association of Governments (SCAG). SCAG's Connect SoCal Demographics and Growth Forecast[16] states that the City will add 4,100 jobs between 2016 - 2045. Utilizing EIR's calculation of 5,993 employees, the project exceeds the City's growth forecast for the 29 year period by 46%. A single project accounting 146% of the employment growth within the City (particularly on a site that requires a GPA/ZC/Annexation to proceed) over 29 years represents a significant amount of growth. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since General Plan adoption, 2016 (SCAG forecast), and projects "in the pipeline" to determine if the project will exceed the General Plan or SCAG's employment and/or population growth forecast. For example, another recent project, Sun Lakes North Specific Plan Amendment 5 (1,758 employees) combined with the proposed project will cumulatively generate 7,751 employees, which is 189% of the City's employment growth forecast over 29 years accounted for by only two recent projects. This number increases exponentially when the City's other industrial and commercial development activity is added to the calculation. A revised EIR must be prepared to include an accurate cumulative analysis on this topic and include a finding of significance.

D-3-20

D-3-21

[16] SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

**4.17 Transportation and Traffic**

Appendix J-2 concludes he following intersections require improvements to address the peak hour deficiencies per the City's thresholds under opening year (2027) cumulative conditions:

1. Highland Home Rd. & Ramsey St. (#7) – LOS E PM peak hour only
2. Sunset Av. & I-10 WB Ramps (#29) – LOS E PM peak hour only
3. Sunset Av. & I-10 EB Ramps (#30) – LOS F AM and PM peak hours
4. Sunset Av. & Lincoln St. (#32) – LOS F PM peak hour only
5. Sunset Av. & Westward Av. (#33) – LOS F PM peak hour only

Appendix J-2 concludes the following intersections require improvements to address the peak hour deficiencies per the City's thresholds under horizon year (2045) cumulative conditions with the addition of project traffic:

1. Sunset Av. & Lincoln St. (#32) – LOS E AM peak hour; LOS F PM peak hour
2. Sunset Av. & Bobcat Rd. (#37) – LOS F PM peak hour only

Appendix J provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersections to less than significant levels (Table 1-3: Summary of Off-Site Improvements by Analysis Scenario). It must be noted that the impacts to intersection #2 is also under jurisdiction of Beaumont; intersections #29 and #30 are Caltrans facilities; and intersections #33 and #34 are under jurisdiction of the County of Riverside. Any improvements planned/constructed or in-lieu fees/fair share fees paid for Beaumont, County of Riverside, or Caltrans facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date, whether by the City of Banning, Beaumont, Caltrans, or County of Riverside. Any improvements recommended or fees paid to mitigate impacts for Beaumont, Caltrans, or County of Riverside facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Beaumont, Caltrans, or County of Riverside has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold A and Land Use and Planning Impact Threshold B because it is not consistent with the following General Plan Policy:

D-3-22

1. Policy 6: The City shall maintain peak hour Level of Service C or better on all local intersections, except those on Ramsey Street and at I-10 interchanges, where Level of Service D or better shall be maintained.

D-3-22 Cont

Further, the EIR has underreported the quantity VMT generated by the proposed project operations. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed project, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as a fulfillment center, which will drastically increase project-generated VMT. The project's truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. The project's total operational VMT generated is not consistent with the significance threshold and legislative intent of SB 743 to reduce greenhouse gas emissions by reducing VMT. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity.

D-3-23

D-3-24

The EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. There are no exhibits adequately depicting the available maneuvering and queueing space for trucks/trailers at the intersection of the project driveways and the adjacent streets. There are also no exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the site. The EIR also states that, "Improvements to the existing roadway network and new internal roadways would be constructed to meet City standards. The proposed driveways and intersections would be designed so as to not introduce hazards due to geometric design feature (e.g., sharp curves or dangerous intersections)." The EIR makes a similar statement regarding emergency access, stating that "Unimpeded access throughout the Development Site would be maintained by ensuring that vehicles would not be parked or placed in a manner that would impede access for emergency response vehicles. Internal access roads would be constructed throughout the Development Site for construction staff/inspectors, construction equipment and materials delivery/removal, and emergency response vehicles," without providing any meaningful evidence to support this claim. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared to include the City determination/review of the

D-3-25

D-3-26

D-3-27

D-3

project and the Site Plan for review, analysis, and comment by the public and decision makers in order to provide an adequate and accurate environmental analysis. D-3-27 Cont

Additionally, the EIR has not provided any analysis of the available horizontal and vertical sight distance at the intersection of the project driveways and adjacent streets. Sight distance is the continuous length of street ahead visible to the driver. At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. A revised EIR must be prepared with this analysis based on the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance requirements. D-3-28

**6.0 Cumulative Impacts and 7.2 Other CEQA Considerations: Growth Inducing Impacts**

A revised EIR must be prepared to include an accurate cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting. The EIR does not include any information regarding the buildout conditions of the City's General Plan in order to provide an adequate and accurate cumulative analysis. D-3-29 The revised EIR must provide the horizon year of the City's current adopted General Plan, the total developable building floor area analyzed within the Industrial land use designation, and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Plan EIR's analysis, particularly since the EIR tiers from the General Plan EIR. For example, Table III-3 Commercial and Industrial Buildout Statistical Summary of the General Plan indicates that the entirety of the Industrial land use designation will accommodate 4,582,512 square feet of building area. The proposed project's 5,545,000 square feet of industrial building area will exceed the entirety of the planned industrial growth for the entire incorporated City area, and this was not accounted for by the General Plan or its EIR as the project requires a GPA/ZC/Annexation to proceed. The growth generated by the proposed project was not anticipated by the City's General Plan, RTP/SCS, or AQMP. A revised EIR must be prepared with a finding of significance. D-3-30

The EIR does not discuss its own conclusion that implementation of the proposed project and required GPA/ZC/Annexation will result in significant and unavoidable cumulatively considerable Air Quality, Greenhouse Gas Emissions, Noise, and Transportation (VMT) impacts. The EIR must be revised to include a finding of significance due to the project's significant and unavoidable Greenhouse Gas Emissions (cumulatively considerable), Noise, and Transportation/VMT (cumulatively considerable ) impacts and direct contribution to climate change. D-3-31

The EIR does not adequately discuss or and analyze the commitment of resources is not consistent with regional and local growth forecasts and does not address the EIR's own conclusion that the D-3-32

project will result in impacts (Air Quality, GHG) that exceed with the forecasts of the applicable plans (AQMP, 2030/2050 GHG reduction goals). As noted throughout this comment letter, the project represents a significant amount of growth in the City and exceeds the developable Industrial building area anticipated by General Plan buildout and exceeds the City's employment growth forecast for a 29 year period. This is especially notable as the project requires a GPA/ZC/Annexation to proceed, indicating the proposed project was not anticipated in any General Plan buildout projection or SCAG growth forecast. The EIR has not provided an adequate or accurate cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting. For example, another recent project, Sun Lakes North Specific Plan Amendment 5 (1,758 employees) combined with the proposed project will cumulatively generate 7,751 employees, which is 189% of the City's employment growth forecast over 29 years accounted for by only two recent projects. This number increases exponentially when the City's other industrial and commercial development activity is added to the calculation. A revised EIR must be prepared to include an accurate cumulative analysis on this topic and include a finding of significance.

D-3-32 Cont

D-3-33

The EIR does not meaningfully discuss or analyze the project's required land use designation changes (General Plan Amendment, Annexation, Zone Change) from residential/commercial to industrial/commercial and the annexation of 253.7 acres from unincorporated Riverside County to the City. This increases the developable nonresidential area of the City without providing any information or analysis on the buildout conditions of the General Plan. The growth generated by the proposed project was not anticipated by the General Plan, RTP/SCS, or AQMP. For example, Table III-3 Commercial and Industrial Buildout Statistical Summary of the General Plan indicates that the entirety of the Industrial land use designation will accommodate 4,582,512 square feet of building area. The proposed project's 5,545,000 square feet of industrial building area will exceed the entirety of the planned industrial growth for the entire incorporated City area, and this was not accounted for by the General Plan or its EIR as the project requires a GPA/ZC/Annexation to proceed. A revised EIR must be prepared with a finding of significance.

D-3-34

**8.0 Alternatives**

The EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the project (CEQA § 15126.6.) The alternatives chosen for analysis include the CEQA required "No Project" alternative and only three others - No Project/Existing General Plan and Zoning/Residential and Commercial Development, Reduced Commercial Alternative, and Reduced Industrial Alternative. The EIR does not evaluate a reasonable range of alternatives as only three alternatives beyond the required No Project alternative are analyzed. The EIR does not include an alternative that meets the project objectives and also eliminates all of the project's significant and unavoidable impacts. The EIR

D-3-35

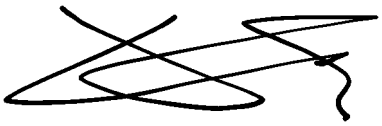
D-3-36

must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This could include alternatives such as development of the site with a project that reduces all of the proposed project's significant and unavoidable impacts to less than significant level, and/or a mixed-use project that provides affordable housing and exclusively local-serving commercial uses that may reduce VMT, GHG emissions, and improve Air Quality. D-3-37

**Conclusion**

For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. D-3-38

Sincerely,



Gary Ho
Blum, Collins & Ho LLP

Attachment: SWAPE Analysis

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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January 26, 2024

Gary Ho
Blum, Collins & Ho LLP
707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

**Subject: Comments on the Sunset Crossroads Project (SCH No. 2021020011)**

Dear Mr. Ho,

We have reviewed the December 2023 Draft Environmental Impact Report("DEIR") for the Sunset Crossroads ("Project") located in the City of Banning ("City"). The Project proposes to construct 5,903,400-square-feet ("SF") of industrial space, including a 90,000-SF hotel, and a 65 megawatt-hours Battery Energy Storage Systems facility on the 47.9-acre site. D-3-39

Our review concludes that the DEIR fails to adequately evaluate the Project's air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A revised Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the project may have on the environment.

## Air Quality

### Failure to Implement All Feasible Mitigation to Reduce Emissions

The DEIR concludes that the Project's operational air quality emissions would be significant-and-unavoidable. Specifically, the Air Quality Impact Analysis ("AQIA") estimates that the Project's construction VOC emissions would exceed the applicable South Coast Air Quality Management District ("SCAQMD") thresholds (see excerpts below) (p. 45, Table N). D-3-40

## Table N: Short-Term Regional Construction Emissions With Mitigation

| Construction Year | Maximum Daily Regional Pollutant Emissions (lbs/day) | | | | | |
|---|---|---|---|---|---|---|
| | VOCs | $NO_x$ | CO | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
| 2023 | 9 | 35 | 185 | <1 | 39 | 16 |
| 2024 | 874 | 42 | 277 | <1 | 39 | 17 |
| 2025 | 751 | 30 | 219 | <1 | 34 | 16 |
| 2026 | 710 | 21 | 143 | <1 | 20 | 9 |
| 2027 | 334 | 7 | 48 | <1 | 9 | 4 |
| SCAQMD Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Exceeds Threshold? | Yes | No | No | No | No | No |

Source: Compiled by LSA Associates, Inc. (September 2023).
CO = carbon monoxide
lbs/day = pounds per day
$NO_x$ = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
$PM_{10}$ = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
$SO_x$ = sulfur oxides
VOCs = volatile organic compounds

The AQIA continues:

> "Table N shows the mitigated construction emissions and indicates that with implementation of Mitigation Measure AIR-1, other than for VOCs, maximum daily construction emissions would be less than the SCAQMD thresholds. VOC emissions associated with construction of the project would result from the application of architectural coatings. The VOC content of architectural coatings is regulated by the SCAQMD under Rule 1113. The project applicant and any construction contractors would be required to use coatings that are consistent with the VOC limits specified in AIR-1 for the Development Project. There are no additional feasible measures or mitigation to further reduce VOC emissions" (p. 44).

D-3-40 Cont

As discussed, the DEIR concludes that even with the implementation of mitigation, the Project's construction air quality impacts would be significant-and-unavoidable. However, while we agree that the Project would result in significant air quality impacts, the DEIR's assertion that this impact is significant-and-unavoidable is unreliable. According to CEQA Guidelines § 15096(g)(2):

> "When an updated EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."[1]

The DEIR is required under CEQA to implement all feasible mitigation to reduce impacts. While the DEIR implements Mitigation Measure ("MM") AIR-1 through MM-AIR-2, along with RCM AQ-1 through RCM AQ-4, the DEIR fails to implement *all* feasible mitigation (p. 54). To reduce the Project's air quality

D-3-41

[1] "Cal. Code Regs. tit. 14 § 15096." California Legislature, *available at:* https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-7-eir-process/section-15096-process-for-a-responsible-agency.

impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions." The Project should not be approved until a revised EIR is prepared, incorporating all feasible mitigation to reduce emissions the maximum extent possible. D-3-41 Cont

## Disproportionate Health Risk Impacts of Warehouses on Surrounding Communities

Upon review of the DEIR, we have determined that the development of the proposed Project may contribute to disproportionate health risk impacts on community members living, working, and going to school within the immediate area of the Project site. According to the SCAQMD: D-3-42

> "Those living within a half mile of warehouses are more likely to include communities of color, have health impacts such as higher rates of asthma and heart attacks, and a greater environmental burden."[2]

In particular, the SCAQMD found that more than 2.4 million people live within a half mile radius of at least one warehouse, and that those areas not only experience increased rates of asthma and heart attacks, but are also disproportionately Black and Latino communities below the poverty line.[3] Another study similarly indicates that "neighborhoods with lower household income levels and higher percentages of minorities are expected to have higher probabilities of containing warehousing facilities."[4] Additionally, a report authored by the Inland Empire-based People's Collective for Environmental Justice and University of Redlands states: D-3-43

> "As the warehouse and logistics industry continues to grow and net exponential profits at record rates, more warehouse projects are being approved and constructed in low-income communities of color and serving as a massive source of pollution by attracting thousands of polluting truck trips daily. Diesel trucks emit dangerous levels of nitrogen oxide and particulate matter that cause devastating health impacts including asthma, chronic obstructive pulmonary disease (COPD), cancer, and premature death. As a result, physicians consider these pollution-burdened areas "diesel death zones."[5]

It is evident that the continued development of industrial warehouses within these communities poses a significant environmental justice challenge. However, the acceleration of warehouse development is D-3-44

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[2] "South Coast AQMD Governing Board Adopts Warehouse Indirect Source Rule." SCAQMD, May 2021, *available at:* http://www.aqmd.gov/docs/default-source/news-archive/2021/board-adopts-waisr-may7-2021.pdf?sfvrsn=9.

[3] "Southern California warehouse boom a huge source of pollution. Regulators are fighting back." Los Angeles Times, May 2021, *available at:* https://www.latimes.com/california/story/2021-05-05/air-quality-officials-target-warehouses-bid-to-curb-health-damaging-truck-pollution.

[4] "Location of warehouses and environmental justice: Evidence from four metros in California." Metro Freight Center of Excellence, January 2018, *available at:* https://www.metrans.org/assets/research/MF%201.1g_Location%20of%20warehouses%20and%20environmental%20justice_Final%20Report_021618.pdf, p. 21.

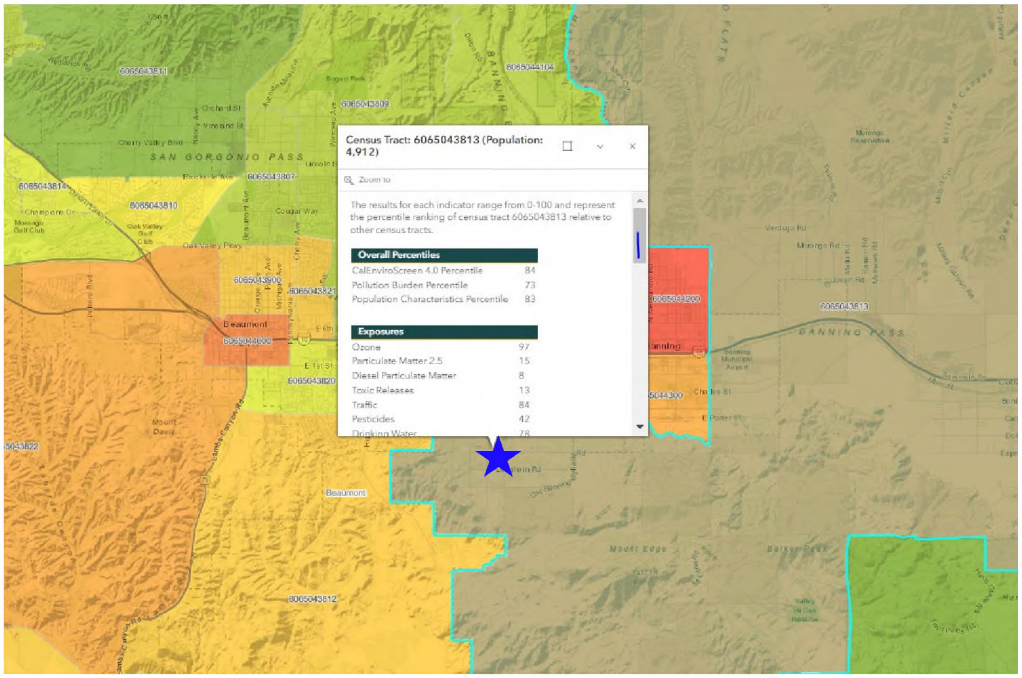
[5] "Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry's impacts on environmental justice communities across Southern California." People's Collective for Environmental Justice, April 2021, *available at:* https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf, p. 4.

only increasing despite the consequences on public health. The Inland Empire alone is adding 10 to 25 million SF of new industrial space each year.[6]

D-3-44 Cont

San Bernardino County, the setting of the proposed Project, has long borne a disproportionately high pollution burden compared to the rest of California. When using CalEnviroScreen 4.0, CalEPA's screening tool that ranks each census tract in the State for pollution and socioeconomic vulnerability, we found that the Project's census tract is in the 84th percentile of most polluted census tracts in the State (see excerpt below).[7]

D-3-44-A




In April 2022, the American Lung Association ranked San Bernadino County as the worst for ozone pollution in the nation.[8] The Los Angeles Times also reported that San Bernardino County had 130 bad air days for ozone pollution in 2020, violating federal health standards on nearly every summer day.[9] Downtown Los Angeles, by comparison, had 22 ozone violation days in 2020. This year, the County continues to face the worst ozone pollution, as it has seen the highest recorded Air Quality Index ("AQI") values for ground-level ozone in California.[10] The U.S. Environmental Protection Agency ("EPA")

D-3-44-B

[6] "2020 North America Industrial Big Box Review & Outlook." CBRE, 2020, *available at:* https://www.cbre.com/-/media/project/cbre/shared-site/insights/local-responses/industrial-big-box-report-inland-empire/local-response-2020-ibb-inland-empire-overview.pdf, p. 2.

[7] "CalEnviroScreen 4.0." California Office of Environmental Health Hazard Assessment (OEHHA), October 2021, *available at:* https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40, census tract #6071002204.

[8] "State of the Air 2022." American Lung Association, April 2022, *available at:* https://www.lung.org/research/sota/key-findings/most-polluted-places.

[9] "Southern California warehouse boom a huge source of pollution. Regulators are fighting back." Los Angeles Times, May 2021, *available at:* https://www.latimes.com/california/story/2021-05-05/air-quality-officials-target-warehouses-bid-to-curb-health-damaging-truck-pollution.

[10] "High Ozone Days." American Lung Association, 2022, *available at:* https://www.lung.org/research/sota/city-rankings/states/california.

indicates that ozone, the main ingredient in "smog," can cause several health problems, which includes aggravating lung diseases and increasing the frequency of asthma attacks. The U.S. EPA states: D-3-44-B Cont

> "Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure. Children are also more likely than adults to have asthma."[11]

Furthermore, regarding the increased sensitivity of early-life exposures to inhaled pollutants, the CARB states:

> "Children are often at greater risk from inhaled pollutants, due to the following reasons:
>
> - Children have unique activity patterns and behavior. For example, they crawl and play on the ground, amidst dirt and dust that may carry a wide variety of toxicants. They often put their hands, toys, and other items into their mouths, ingesting harmful substances. Compared to adults, children typically spend more time outdoors and are more physically active. Time outdoors coupled with faster breathing during exercise increases children's relative exposure to air pollution. D-3-45
>
> - Children are physiologically unique. Relative to body size, children eat, breathe, and drink more than adults, and their natural biological defenses are less developed. The protective barrier surrounding the brain is not fully developed, and children's nasal passages aren't as effective at filtering out pollutants. Developing lungs, immune, and metabolic systems are also at risk.
>
> - Children are particularly susceptible during development. Environmental exposures during fetal development, the first few years of life, and puberty have the greatest potential to influence later growth and development."[12]

A Stanford-led study also reveals that children exposed to high levels of air pollution are more susceptible to respiratory and cardiovascular diseases in adulthood.[13] Given that children are more susceptible to the negative health impacts of air pollutants, and that warehouses release more smog-forming pollution than any other sector, it is necessary to evaluate the specific health risk that warehouses pose to children in the nearby community.

A revised EIR should be prepared to evaluate the contribution to the disproportionate impacts that warehouses on the community adjacent to the Project, including an analysis of the impact on children and people of color who live in the surrounding area. Finally, in order to evaluate the cumulative air D-3-46

[11] "Health Effects of Ozone Pollution." U.S. EPA, May 2021, *available at:* https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution.
[12] "Children and Air Pollution." California Air Resources Board (CARB), *available at:* https://ww2.arb.ca.gov/resources/documents/children-and-air-pollution.
[13] "Air pollution puts children at higher risk of disease in adulthood, according to Stanford researchers and others." Stanford, February 2021, *available at:* https://news.stanford.edu/2021/02/22/air-pollution-impacts-childrens-health/.

quality impact, the analysis should prepare a revised cumulative HRA to quantify the adverse health outcome from the effects of exposure to multiple warehouses in the immediate area in conjunction with the poor ambient air quality in the Project's census tract. This recommendation is consistent with guidance provided by the California Department of Justice ("DOJ").[14]

D-3-46 Cont

## Diesel Particulate Matter Emissions Inadequately Evaluated

The DEIR conducts a health risk assessment ("HRA") evaluating the impacts from exposure to toxic air contaminant ("TAC") emissions from passenger cars and trucks during Project operation. Specifically, the DEIR estimates that the maximum cancer risk posed to nearby, existing residential sensitive receptors as a result of Project operation would be 3.3 in one million, which would not exceed the SCAQMD significance threshold of 10 in one million (see excerpt below) (p. 4-9, Table 4.C).

**Table 4.C: Health Risk Levels for Nearby Residents and Students**

| Location | Maximum Cancer Risk | Maximum Noncancer Chronic Risk (Hazard Index) | Maximum Noncancer Acute Risk (Hazard Index) |
|---|---|---|---|
| Residential & Student MEI Risks | 3.3 in 1 million | 0.0008 | 0.0005 |
| Worker MEI Risks | 0.02 in 1 million | 0.0001 | 0.0001 |
| SCAQMD Significance Threshold | 10 in 1 million | 1.0 | 1.0 |
| Significant? | No | No | No |

Source: Compiled by LSA Associates, Inc. (2022).
MEI = maximum exposed individual
SCAQMD = South Coast Air Quality Management District

However, the DEIR fails to mention or evaluate the Project's health risk impacts associated with Project construction. As such, the DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is unreliable for four reasons.

D-3-47

First, the DEIR fails to mention the exposure assumptions for the operational HRA, such as age sensitivity factors ("ASF") or fraction of time at home ("FAH") values whatsoever. Until the DEIR substantiates the use of correct exposure assumptions, the HRA may underestimate the cancer risk posed to nearby, existing sensitive receptors because of Project operation. Furthermore, according to the *Risk Assessment Guidelines* provided by the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California, the DEIR's model should have used the following equation:[15]

D-3-48

D-3-49

[14] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 6.

[15] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-7 Equation 8.2.4.

A. **Equation 8.2.4 A:** $RISK_{inh\text{-}res} = DOSE_{air} \times CPF \times ASF \times ED/AT \times FAH$

7. $RISK_{inh\text{-}res}$ = Residential inhalation cancer risk
8. $DOSE_{air}$ = Daily inhalation dose (mg/kg-day)
9. CPF = Inhalation cancer potency factor (mg/kg-day$^{-1}$)
10. ASF = Age sensitivity factor for a specified age group (unitless)
11. ED = Exposure duration (in years) for a specified age group
12. AT = Averaging time for lifetime cancer risk (years)
13. FAH = Fraction of time spent at home (unitless)

However, the DEIR and associated documents fail to include a dose and risk equation to calculate the Project's operational cancer risks. As such, we cannot verify that the DEIR's operational HRA is accurate, and the Project's cancer risks may be underestimated. **D-3-49 Cont**

Second, by failing to prepare a quantified construction HRA, the DEIR is inconsistent with CEQA's requirement to correlate the increase in emissions that the Project would generate to the adverse impacts on human health caused by those emissions. This is incorrect, as construction of the proposed Project will produce DPM emissions through the exhaust stacks of construction equipment over a total construction duration of 51 months (Appendix C-1, p. i). However, the DEIR fails to evaluate the potential Project-generated TACs or indicate the concentrations at which such pollutants would trigger adverse health effects. Without making a reasonable effort to connect the Project's construction-related TAC emissions to the potential health risks posed to nearby receptors, the DEIR is inconsistent with CEQA's requirement to correlate the increase in emissions generated by the Project with the potential adverse impacts on human health. **D-3-50**

Third, the State of California Department of Justice recommends that warehouse projects prepare a quantitative HRA pursuant to the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California, as well as local air district guidelines.[16] OEHHA released its most recent *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments* in February 2015. This guidance document describes the types of projects that warrant the preparation of an HRA. Specifically, OEHHA recommends that all short-term projects lasting at least 2 months assess cancer risks.[17] Furthermore, according to OEHHA: **D-3-51**

[16] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, *available at*: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf, p. 6.
[17] "Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-18.

> "Exposure from projects lasting more than 6 months should be evaluated for the duration of the project. In all cases, for assessing risk to residential receptors, the exposure should be assumed to start in the third trimester to allow for the use of the ASFs (OEHHA, 2009)."[18]

D-3-51 Cont

As the Project's anticipated construction duration exceeds the 2-month and 6-month requirements set forth by OEHHA, construction of the Project meets the threshold warranting a quantified HRA under OEHHA guidance and should be evaluated for the entire 51-month construction period. These recommendations reflect the most recent state health risk policies, and a revised EIR should be prepared to include an analysis of health risk impacts posed to nearby sensitive receptors from Project-generated DPM emissions.

Fourth, while the DEIR includes a HRA evaluating the health risk impacts to nearby, existing receptors as a result of Project operation, the HRA fails to evaluate the combined lifetime cancer risk to nearby, existing receptors as a result of Project construction and operation together. According to OEHHA guidance "the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location."[19] However, the Project's HRA fails to sum each age bin to evaluate the total cancer risk over the course of the Project's total construction and operation. This is incorrect and an updated analysis should quantify the entirety of the Project's construction and operational health risks together and sum them to compare to the SCAQMD threshold of 10 in one million, as referenced by the DEIR (Appendix C-1 p. 44).

D-3-52

## Greenhouse Gas

### Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR estimates that the Project would result in net annual greenhouse gas ("GHG") emissions of 18,379-metric tons of carbon dioxide equivalents per year ("MT $CO_2e$/year") (see excerpt below) (p. 4.8-30, Table 4.8-J).

D-3-53

[18] "Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-18.
[19] "Guidance Manual for preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf p. 8-4

**Table 4.8.J: Mitigated Long-Term Greenhouse Gas Emissions at Buildout**

| Source | GHG Emissions (MT/year) | |
|---|---|---|
| | Mitigated 2027 | Estimated Mitigated 2040 |
| Construction Emissions Amortized over 30 Years | 487.49 | 487.49 |
| Operational Emissions | | |
| On-Site Commercial Emissions | 2,639.75 | 1,235.14 |
| Off-Site Commercial Mobile Emissions | 5,594.92 | 2,617.86 |
| On-Site Industrial Emissions | 9,737.48 | 4,556.17 |
| Off-Site Industrial Emissions | 20,266.59 | 9,482.74 |
| Total On-Site Emissions | 12,377.24 | 5,791.31 |
| Total Off-Site Mobile Emissions | 25,861.52 | 12,100.60 |
| **Total Project Emissions** | **38,726.25** | **18,379.40** |

Source: Table G, *Greenhouse Gas Analysis, Sunset Crossroads Project, Banning, California* (Michael Hendrix Consulting 2023).
GHG = greenhouse gas
MT $CO_2e$/year = metric tons carbon dioxide equivalent per year

The DEIR concludes that the Project would result in a significant-and-unavoidable GHG impact, stating:

> "As shown in Table 4.8.J, even with all feasible mitigation, emissions would exceed the City's threshold of 3,000 MT CO2e at Development Project Buildout. No additional feasible mitigation measures are available that can reduce impacts to less than significant" (p. 4.8.30).

D-3-53 Cont

As discussed, the DEIR concludes that the Project would result in a significant-and-unavoidable GHG impact due to its compliance with the service population threshold and implementation of mitigation measures According to CEQA guidelines, an impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. As stated above in section of this letter titled "Failure to Implement All Feasible Mitigation to Reduce Emissions," the DEIR implements AIR-2, GHG-1, GHG-2, GHG-4, GHG-5, and GHG-6 (DEIR, p 4.8-31). However, the DEIR fails to implement *all* feasible mitigation. To reduce the Project's GHG impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions." The Project should not be approved until a revised EIR is prepared, incorporating all feasible mitigation to reduce emissions to maximum extent possible.

D-3-54

# Mitigation

## Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project would result in potentially significant air quality, health risk, and GHG impacts that should be mitigated further. In an effort to reduce emissions, the Project should consider the implementation of the following mitigation measures found in the California Department of Justice Warehouse Project Best Practices document.[20]

D-3-55

- Requiring off-road construction equipment to be hybrid electric-diesel or zero emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier

D-3-56

[20] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.

IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.

- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day. D-3-57
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power. D-3-58
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge. D-3-59
- Limiting the amount of daily grading disturbance area. D-3-60
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area. D-3-61
- Forbidding idling of heavy equipment for more than three minutes. D-3-62
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications. D-3-63
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts. D-3-64
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L. D-3-65
- Providing information on transit and ridesharing programs and services to construction employees. D-3-66
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees. D-3-67
- Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030. D-3-68
- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided. D-3-69
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations. D-3-70
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use. D-3-71
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager. D-3-72
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers. D-3-73
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible. D-3-74

- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project. D-3-75
- Running conduit to designated locations for future electric truck charging stations. D-3-76
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks. D-3-77
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability. D-3-78
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance) D-3-79
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations. D-3-80
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project. D-3-81
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air. D-3-82
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel. D-3-83
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. D-3-84
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking. D-3-85
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. D-3-86
- Designing to LEED green building certification standards. D-3-87
- Providing meal options onsite or shuttles between the facility and nearby meal destinations. D-3-88
- Posting signs at every truck exit driveway providing directional information to the truck route. D-3-89
- Improving and maintaining vegetation and tree canopy for residents in and around the project area. D-3-90
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also D-3-91

require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request. D-3-91 Cont

- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers. D-3-92
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets. D-3-93

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation. D-3-94

As it is policy of the State that eligible renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045, we emphasize that the energy mix that will charge the batteries and power electrical equipment must be 100% renewable energy resources. Until the feasibility of charging the batteries with renewable energy resources only is evaluated, the Project should not be approved. D-3-95

A revised EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality, health risk, and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible. D-3-96

## Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties. D-3-97

Sincerely,

Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

Attachment A: Matt Hagemann CV
Attachment B: Paul Rosenfeld CV

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## Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

**Geologic and Hydrogeologic Characterization**
**Investigation and Remediation Strategies**
**Litigation Support and Testifying Expert**
**Industrial Stormwater Compliance**
**CEQA Review**

**Education:**

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

**Professional Certifications:**

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

**Professional Experience:**

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

**Senior Regulatory and Litigation Support Analyst:**

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

**Executive Director:**

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

**Hydrogeology:**

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

**Policy:**

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

**Geology:**

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

**Teaching:**

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

**Invited Testimony, Reports, Papers and Presentations:**

**Hagemann, M.F**., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

**Hagemann, M.F**., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

**Hagemann, M.F.,** 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

**Hagemann, M.F.,** 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

**Hagemann, M.F.**, 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

**Hagemann, M.F**., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

**Hagemann, M.F**., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

**Hagemann, M.F**., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

**Hagemann, M.F**., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

**Hagemann, M.F**., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

**Hagemann, M.F**., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F**., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F**., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

**Hagemann, M.F**., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F**., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

**Hagemann, M.F.**, 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

**Hagemann, M.F.**, and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

**Hagemann, M.F.**, 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

**Hagemann, M.F.**, 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

**Hagemann, M.F.**, and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

**Hagemann, M.F.**, Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

**Hagemann, M. F.**, Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

**Hagemann, M.F.**, 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

**Hagemann, M.**F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

**Hagemann, M.F.**, 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

**Hagemann, M.F**., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

**Other Experience:**

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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2656 29th Street, Suite 201
Santa Monica, California 90405
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# *Paul Rosenfeld, Ph.D.*

**Chemical Fate and Transport & Air Dispersion Modeling**

*Principal Environmental Chemist*

**Risk Assessment & Remediation Specialist**

## Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

## Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

## Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex $H_2O$ Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

## Publications:

**Rosenfeld P. E.,** Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

**Rosenfeld, P.E**. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

**Rosenfeld, P.E.,** J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

**Rosenfeld, P. E.,** M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

**Rosenfeld, P.E.,** and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

**Rosenfeld P. E.,** J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

**Rosenfeld, P.E.,** and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

**Rosenfeld, P.E.,** and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49( 9), 171-178.

**Rosenfeld, P. E**., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

**Rosenfeld, P.E.,** Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

**Rosenfeld, P.E**., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

**Rosenfeld, P.E.,** and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

**Rosenfeld, P.E.,** C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

**Rosenfeld, P.E.,** and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

**Rosenfeld, P.E.,** and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

**Rosenfeld, P. E.** (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

**Rosenfeld, P. E.** (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

**Rosenfeld, P. E. (**1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

**Rosenfeld, P. E.** (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

**Rosenfeld, P. E. (**1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

## Presentations:

**Rosenfeld, P.E**., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

**Rosenfeld, P.E.,** Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

**Rosenfeld, P.E**. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

**Rosenfeld, P.E.** (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

**Rosenfeld, P. E.** (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld P. E.** (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

**Rosenfeld P. E.** (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

**Paul Rosenfeld Ph.D**. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

**Paul Rosenfeld Ph.D**. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

**Paul Rosenfeld Ph.D**. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

**Paul Rosenfeld Ph.D**. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

**Paul Rosenfeld Ph.D**. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

**Paul Rosenfeld Ph.D**. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld Ph.D**. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

**Paul Rosenfeld, Ph.D.** (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

**Paul Rosenfeld, Ph.D.** (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

**Rosenfeld, P. E.**, Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

**Paul Rosenfeld, Ph.D.** (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

**Paul Rosenfeld, Ph.D**. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E**. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E**. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

**Rosenfeld, P.E**. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

**Rosenfeld. P.E.** (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

**Rosenfeld. P.E. (**October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

**Rosenfeld, P.E. (**2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E**., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.**, and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

**Rosenfeld, P.E.**, C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

**Rosenfeld, P.E.**, C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

**Rosenfeld, P.E,** C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.**, C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

## Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

## Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

## Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

## Response to Letter D-3

Golden State Environmental Justice Alliance
Represented by Blum, Collins & Ho LLP
Matt Hagemann and Paul Rosenfeld
January 29, 2024

### Response to Comment D-3-1

The commenter requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for the project. The City acknowledges this statement of interest and will include Golden State Environmental Justice Alliance (GSEJA) on the mailing list for future CEQA notices for the Project. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

### Response to Comment D-3-2

This commenter provides a summary of the Project as set forth in the Draft EIR that is generally accurate. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

### Response to Comment D-3-3

The commenter refers to the attachment provided with this comment letter from Soil/Water/Air Protection Enterprise (SWAPE) which provides technical comments. The responses to the environmental issues raised in the SWAPE letter are provided in responses to Comments D-3-39 through D-3-97. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

### Response to Comment D-3-4

The commenter states the Draft EIR does not adequately analyze environmental justice issues, including cumulative impacts from the proposed project. The commenter further states that data obtained from the California Environmental Protection Agency (CalEnviroScreen 4.0) indicates two census tracts (6065043812 and 6065043813), including the proposed project site as well as the surrounding community, which contains residences to the east, west, and Mt. San Jacinto College (MSJC) Banning Campus (at which the Beaumont Middle College High School program is located), are impacted by multiple sources of pollution and are more polluted than average on several pollution indicators measured by CalEnviroScreen 4.0.

Environmental justice is not a topic that is required to be evaluated or considered pursuant to CEQA Guidelines Sections 15120-15132 (Contents of Environmental Impact Reports). Please see the response to Comment A-3-4. Specifically, for evaluation of health impacts, only the geographic area in the immediate vicinity of the project site is required to be assessed because impacts dissipate as the distance from the project site increases. The air quality analysis presented in the Draft EIR demonstrates that the Development Project would not expose any sensitive receptor, which includes receptors located in disadvantaged communities, to substantial concentrations of localized criteria

pollutants or sources of diesel particulate matter. A localized significance analysis was conducted for both construction and operational phases of the Project. The localized significance thresholds for the Development Project were calculated using air dispersion modeling with ambient pollutant concentrations and project emissions. As borne out by the localized emission analysis, the Development Project would not expose sensitive receptors to substantial pollutant concentrations during either the construction or operational phases and impacts would be less than significant (refer to Pages 4.3-52 to 4.3-56 of the Draft EIR). See also *Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment* (Final EIR Appendix C-4).

The health risk assessment used a toxic air contaminant (TAC) emission dispersion model to address all on-site emission sources and vehicle emissions. TAC concentrations were translated into long-term carcinogenic and chronic- and short-term acute health levels following SCAQMD risk assessment guidelines. As presented in Table 4.3.Q of the Draft EIR and revised Table 4.3.Q of the Final EIR, the cancer and non-cancer (chronic and acute) risk to the nearest sensitive receptors do not exceed established SCAQMD thresholds. No further response is required.

**Response to Comment D-3-4-A**

The commenter describes the CalEnviroScreen 4.0 evaluation for various pollutants in the census tracts in which the Project site is located. Please see the response to Comment A-3-4.

This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment D-3-4-B**

The commenter describes the CalEnviroScreen 4.0 data for hazardous and solid waste facilities in the census tracts in which the Project site is located. See the response to Comment A-3-4. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment D-3-4-C**

The commenter states the census tracts in which the Project is located are diverse communities which are vulnerable to pollution impacts. See the response to Comment A-3-4. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary/required.

**Response to Comment D-3-4-D**

The commenter describes the CalEnviroScreen 4.0 data regarding poverty and overall health impacts for the census tracts in which the Project site is located. See the response to Comment A-3-4. This comment does not raise any issue or impacts requiring analysis by CEQA. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment D-3-5**

The commenter states a Project site census tract (6065043813) is identified as a SB 535 Disadvantaged Community and that the Draft EIR does not adequately analyze cumulative impacts, which disproportionately impact Disadvantaged Communities, and that the Draft EIR must be revised to include specific analyses of each environmental impact on the Disadvantaged Community. The southern portion of the Development Site and the MSJC Site are located within census tract 6065043813, although no residential units are located within the limits of either of these sites. Environmental justice is not a topic that is required to be evaluated or considered pursuant to CEQA Guidelines Sections 15120-15132 (Contents of Environmental Impact Reports). Please see the response to Comment A-3-4. The Draft EIR includes analysis of the Project on the surrounding environment including air quality and potential health impacts on nearby sensitive receptors, as appropriate, including cumulative impacts. CEQA does not require that air quality impacts be assessed based on a census tract level. The air quality analysis contained in the Draft EIR demonstrates that the Project would not expose any sensitive receptor, which includes receptors located in any disadvantaged communities located within this census tract, to substantial concentrations of localized criteria pollutants or diesel particulate matter source emissions. To the contrary, the nearest sensitive receptor within census tract 6065043813 would not be exposed to emissions in concentrations exceeding established significance thresholds established by the SCAQMD (see Draft EIR, pages 4.3-52 to 4.3-56). In response to public comment, the emissions totals for the Development Project were updated based on the WAIRE Implementation Guidelines for truck trip lengths and the addition of calculations for TRU emissions (see Final EIR Appendix C-4). See also *Sunset Crossroads Supplemental Air Quality Assessment* (Final EIR Appendix C-5). The results of the updated emissions for the Development Project are summarized in revised Tables 4.3.M and 4.3.N of the Final EIR (also see Tables 5 and 6 in Appendix C-5). Please see the response to Comment D-3-4.

The HRA and LST analysis address potential impacts based on the distance separating the sensitive receptor and the emitting source, while regional impacts are based on impacts to the Basin as a whole. There currently is no methodology to model the cumulative areawide or localized air quality health risks within a census tract. The Project could cumulatively contribute to an increase in health effects in the SCAB associated with VOC, NOx, CO, PM10, and PM2.5 because these air quality impacts exceed the regional significance thresholds. See Final EIR Tables 4.3.M and Table 4.3.N. Although SCAQMD has some of the most sophisticated air quality modeling and health impact evaluation capability of the State's air districts, it has not provided methodology, and modeling does not currently exist, to assess the specific correlation between mass emissions generated, cumulative increases from individual projects, and the effect on health from exceeding regional thresholds. At best, it would be speculative to assess whether or the extent to which the Project would contribute to adverse health effects from the air quality emissions that exceed SCAQMD thresholds either in the SCAB or in local census tracts. Therefore, no further analysis is required. See CEQA Guidelines Section 15145.

The SCAQMD's recommended thresholds of significance apply to individual development projects. In developing thresholds of significance for individual projects, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. The City relies on the SCAQMD's recommended methodology to evaluate cumulative impacts, which is to conclude that an impact considered to be significant on a project-specific basis would also cause a significant cumulative impact. No further response is required.

**Response to Comment D-3-6**

The commenter incorrectly states that the use of CalEEMod to estimate the project's energy demand was inappropriate because it does not comply with the 2022 Building Energy Efficiency Standards, and that energy impacts and fuel consumption were underreported as a result. The commenter further states that one of the three State-approved software types should have been used instead. The compliance modeling software, CBECC-Com, EnergyPro, and IES VE, referenced by the commenter are used to confirm the final design of a development project at the time of building construction so that the buildings as constructed comply with applicable energy efficiency regulations based on detailed information included in construction drawings. Project final design and construction drawings are not available at this time and are not prepared until well after project approval. The project will be required to demonstrate compliance with Title 24 using one of these models based on detailed building plans. However, the Draft EIR correctly used CalEEMod to estimate Project energy demand. As described in the CalEEMod User's Guide, CalEEMod utilizes widely accepted methodologies for estimating emissions combined with default data that can be used when site-specific information is not available. Because the occupants of the Project buildings are unknown at this time, it is appropriate to rely on the CalEEMod default assumptions. Sources of these methodologies and default data include, but are not limited to, the US EPA AP-42 emission factors, CARB vehicle emission models, and studies commissioned by California agencies such as the CEC and CalRecycle.

The User's Guide states that the emissions inventory modules also contain default values for estimating utility consumption (e.g., water, electricity, natural gas) that may be useful for preparing hydrology and energy analyses in other sections of a CEQA document. Additionally, it should also be noted that the energy use factors included in the CalEEMod model, which was used to estimate energy for the project, are based on the CEC-sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies, which provide a more conservative assumption based on actual use surveys and are the best available information for purposes of this assessment. As such, CalEEMod is appropriate for use in energy analyses. Further, as discussed in Section 3.5.3.10 of the Draft EIR, the Development Project incorporates the energy efficiency and sustainability specifically cited in the Specific Plan (see Draft EIR, Appendix B, Section 3.6) and 2022 Title 24 Standards. Therefore, reliance on CalEEMod default assumptions, which were derived by CAPCOA based on survey data, is appropriate. No recirculation of the Draft EIR is needed and no further response is required.

**Response to Comment D-3-7**

The commenter incorrectly states that because energy impacts were not adequately or accurately modeled, a finding of significance must be made and a revised EIR must be prepared and recirculated. Please see the response to Comment D-3-6. No further response is required.

**Response to Comment D-3-8**

The commenter incorrectly states that the consistency analysis with SCAG's Connect SoCal 2020-2045 (RTP/SCS) is flawed due to modeling errors, modeling without supporting evidence, and the fact that the Draft EIR determined that there are significant air quality and GHG emissions, and Noise and VMT impacts makes the project inconsistent with Goals 5, 6 and 7 of the RTP/SCS. The comment states the project is inconsistent with Goal 5 of the RTP/SCS which is the reduction of GHG emissions and

improvement of air quality. SCAG's Program EIR for the 2020-2045 RTP/SCS determined significant and unavoidable air quality and GHG emissions impacts under CEQA. Therefore, a significant impact under CEQA does not constitute an inconsistency with the RTP/SCS. In addition, the city is located in a priority growth area for job centers in the region under the Connect SoCal Plan. Concentrating business growth in Job Centers reduces the length of vehicle trips which reduces GHG emissions and improves air quality consistent with Goal 5. As indicated in Section 4.8 of the Draft EIR (Table 4.8.K, page 4.8-32- County of Riverside Climate Action Plan (CAP) Screening Tables), the Project is consistent with the Riverside County CAP's requirement to achieve at least 100 points indicating that its GHG impacts are not considered cumulatively considerable. In fact, the Project implements 586+ points. The actions required by CAP points will be implemented as part of the Development Project through the PDFs and Mitigation Measures AIR-2, and GHG-1 through GHG-7. The following measure has been added to the Final EIR:

**MM GHG-7** Prior to issuance of building permits, the Project shall provide documentation to the City as part of the plan check process, demonstrating that the Project will implement the measures specified in Table 4.8.K which were obtained from the Riverside County Greenhouse Gas Emissions Screening Tables. The Project may also achieve equivalent emission reductions from other measures approved by the City. Implementing these mitigation measures shall be verified by the City prior to the issuance of final Certificate of Occupancy.

The new mitigation provides only a mechanism for ensuring the actions detailed in Table 4.8.K of the Draft EIR are implemented and does not constitute new information. It merely clarifies, amplifies, or makes a minor modification in an otherwise adequate EIR. Therefore, it does not constitute new information and no recirculation is required. See CEQA Guidelines §15088.5(b).

The PDFs and mitigation measures include, without limitation, installation of a minimum of 50 class 8 electric truck chargers; sufficiently sizing buildings' electrical rooms to hold additional panels needed to supply power for electrical charging systems for trucks; installing conduit from buildings' electrical rooms to all tractor trailer parking spaces to facilitate future electric truck charging; providing the greater of 350 Level 2 AC EV charges or the number of chargers required to comply with minimum California Green Building Standard Code requirements; the electrification of all truck/dock bays that serve cold storage facilities to allow plug-in capabilities and support use of stand-by and/or hybrid electric TRUs; including contractual language in lease agreements restricting trucks and support equipment from non-essential idling longer than 3 minutes on-site (a decrease from previous 5 minute maximum idling time); and requiring all on-site cargo-handling equipment be electric with necessary plug-in charging included in the design of the Development Project electrical system, buildings, and equipment storage and parking areas. The Development Project also requires the design of buildings consistent with or exceeding Title 24 energy efficiency standards; use of only Energy Star appliances in all commercial and industrial land uses; and use of only electric landscaping equipment within the Development Project, which would be implemented through adherence to Mitigation Measures AIR-2, and GHG-1 through GHG-7. These will reduce Air Quality impacts and reduce GHG emissions to the maximum extent feasible.

The commenter states that the project is inconsistent with Goal 6. Goal 6 of the RTP/SCS was not analyzed since the focus of Goal 6 was on the development of healthy and equitable communities which is a land use goal for local agencies, not specific projects. The project does not include residential components that are the basis for healthy and equitable communities, and industrial, commercial and other job-based developments are not inconsistent with the RTP/SCS which includes increasing employment opportunities within a designated Job Center identified in the RTP/SCS.

The commenter states that the project is inconsistent with Goal 7 of the RTP/SCS which includes adaptation to climate change as the comment noted, but also includes supporting an integrated regional development pattern and transportation network (which was not noted in the comment). The Project Site, located in a Job Center, facilitates this Goal of supporting a regional development pattern to reduce GHG and air quality emissions and VMT. The Project is the development of industrial and commercial buildings that would add diversity to the City's economy and bring employment opportunities closer to the local workforce in a housing rich area. Locating jobs near housing helps improve the current the jobs to housing imbalance within the City and reduces GHG and Air Quality emissions caused by long commutes and contributes to integrated development patterns. The Project Site is located near I-10 thereby reducing travel distances for movement of goods. Development of the Project in western Riverside County, also shortens the distance that goods need to travel between a logistics facility to their final destinations ("last mile" transit times). Therefore, the Draft EIR properly concluded the project is consistent with the RTP/SCS. No further response is required.

**Response to Comment D-3-9**

This comment indicates that the Project faces significant inconsistencies with statutory requirements of the Housing Crisis Act (HCA) of 2019/Senate Bill (SB) 330/SB 8 and details certain provisions of that statute, including clause (b)(1)(A) of Government Code Section 66300 regarding the prohibition on changing the land use of a site to a less intensive use. As the commenter notes in its next comment (D-3-10, addressed below), this Section expressly provides an exception pursuant to Government Code Section 66300(h)(1). The commenter also identifies the statutory requirement for concurrent replacement of allowable capacity. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment D-3-10**

The commenter states that the EIR is misleading in describing the proposed MSJC re-entitlement as a rezoning because the Specific Plan Overlay would allow the site to retain its base land use/zoning designation of Public Facilities-Schools. The commenter mischaracterizes the City's re-entitlement effort and its General Plan and zoning code requirements. As stated in Section 3.6.2 of the Draft EIR, the MSJC Site will not remain zoned for public facilities:

> "The City has initiated a General Plan Land Use Amendment (GPA) and a change to the Official Zoning Map (ZC), respectively, on the MSJC Site which will change the land use designation and zoning from PF–S (Public Facilities-Schools) to VHDR (Very High Density Residential), with a density range of 18–24 dwelling units per acre (18–24 DU/AC). The City's VHDR land use district allows condominiums and townhomes, as well as apartments with the provision of common area amenities and open space. The clustering of condominiums and townhomes is appropriate with the provision of common area amenities and open space. To ensure that the

> college facilities and any future residential development are compatible, and to provide for the clustering allowed by the City's Municipal Code, the City will establish a Specific Plan Zoning Overlay (SPZO) ("Overlay") coterminous with the MSJC Site boundary. The Overlay would require preparation of a Specific Plan, pursuant to Chapter 17.96 of the [Banning Municipal Code] prior to development of residential uses on the MSJC Site."

The commenter expresses a variety of concerns about whether the statutory concurrency requirement will be met. First, the commenter notes that concurrency requires action approved at the same meeting of the legislative body. As discussed in Draft EIR Section 5.1, adoption of the MSJC Entitlements is proposed to occur concurrently with the Development Project entitlements for the express purpose of and as required for compliance with Government Code requirements related to replacement capacity. ["To avoid a net loss to the City's residential capacity that would result if the Development Project, as described in Chapter 3.0 of this EIR, is approved, the City has initiated an application to concurrently amend the general plan land use designation, change the zoning classification, and establish a Specific Plan Zoning Overlay (SPZO) ("Overlay") for the MSJC Site with the MSJC Entitlements. . . "]

Additionally, the commenter suggests that the concurrency requirement could not be met because the Specific Plan overlay does not exist on the City's zoning map and would need to be created in the future, and therefore any rezoning would not be concurrent. However, the requirement to prepare a Specific Plan (whether or not pursuant to an overlay) is an existing requirement of the City's General Plan and no new zoning is required. The General Plan provides as follows:

> "The Specific Plan is an important tool in the coordinated development of larger parcels, or of projects which propose a variety of land uses. They shall include design standards and guidelines, infrastructure plans and implementation measures to ensure the coordinated, orderly development of a project.... In Banning, Specific Plans have previously been considered a land use designation. With adoption of this General Plan, this is no longer the case. **Existing approved Specific Plans are shown on the land use map with their approved land use plan, and the Specific Plan overlay. With adoption of this General Plan, Specific Plans are required for projects which propose more than one type of residential land use, commercial land uses and/or industrial land uses, or a combination of these, within one project site. Specific Plans are also required when a project is proposed within an area previously undeveloped, where infrastructure master planning will be required (water, sewer, flood control or roadways), and when the project will be phased.** Once a new Specific Plan is approved by the City Council, the Land Use Map will be amended to place the Specific Plan overlay on that area." (emphasis added).[18]

In light of the General Plan requirements, the use of the term "overlay" in this context is in recognition of this General Plan requirement, making clear that preparation of a specific plan for the MSJC Site will be required for General Plan consistency. The City zoning code also expressly provides for the creation of Specific Plans and Section 17.9.6080 states: "Notwithstanding the express references to the Specific Plan(s) below, nothing in this section is intended to affect the enforceability of any other City Council adopted Specific Plan that is not specifically referenced below."

[18] Banning General Plan (Community Development III-8, Pgs. 9/10 of 175): Specific Plans.

Finally, the commenter states that for a replacement sites program to comply with the legal requirements of HCA/SB 330/SB 8, in addition to adoption of the residential land use designation/zone, the City must adopt a Specific Plan for the MSJC Site with all associated CEQA review concurrently with its adoption of the entitlements for the Development Site. The adoption by the City of the MSJC Entitlements (General Plan and zoning with requirement for a specific plan to be prepared) would provide the same potential for development of residential uses on the MSJC Site as currently exist on the Development Site. This is because, among other reasons, development of residential uses for the Development Site under the existing General Plan and zoning designations would also require a Specific Plan which has not been prepared. The statute requires that there be no net loss in residential capacity, it does not require more. In the absence of a specific project for development, analysis of a detailed development plan would be speculative. The City therefore elected to evaluate GPA 22-2502 and ZC 22-3502 at a programmatic level. Section 5.0 of the Draft EIR includes a programmatic discussion of the MSJC Entitlements. For the foregoing reasons, the Project is not inconsistent with the provisions of the referenced statutes. This comment does not raise any issues about or relating to the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment D-3-11**

The commenter states that a loss of residential capacity must be included as a finding of significance as part of a revised EIR, that non-conformance with the HCA/SB 330/SB 8 statute should be characterized in the EIR as a significant environmental impact in violation of those laws and that the EIR must be revised to include a finding of significance due to this inconsistency. As demonstrated by the EIR, there will be no loss of residential capacity in the city with adoption of the Development Project and MSJC Entitlements. Therefore, the Project complies with SB 330 and the suggested finding in not appropriate. Even if the Project resulted in such loss, neither CEQA nor the HCA identify a statutorily created loss of residential capacity from rezoning as an environmental impact to be analyzed under CEQA. No revision to the Draft EIR is required.

**Response to Comment D-3-12**

The commenter states that deferral of environmental analysis of construction and operation of the MSJC Site to a later date is "project piecemealing" in violation of CEQA. However, in the absence of a specific project for development, analysis of a detailed development plan would be speculative and such analysis is not required by CEQA. CEQA Guidelines Section 15168 provides for a programmatic level analysis for rezoning where the details of the project are not specified. A program EIR is distinct from a project level EIR which is prepared for a specific project the details for which are known, and which must examine site specific impacts in detail[19]. Since no specific development plans are pending for the MSJC Site, a programmatic analysis is appropriate. SB 330 only requires that approval of zoning for replacement housing units occur concurrently with the project that eliminates that housing to ensure no loss of residential capacity but does not require the residential replacement project to proceed concurrently. Specifically, Section 5.0 of the Draft EIR provides a programmatic evaluation of the potential impacts that may result from the future construction and operation of high-density residential units to the extent that such impacts can be ascertained at this time. Consistent with CEQA Guidelines Sections 15152 and 15168(c), prior to future activities at the MSJC Site, including adoption

[19] In *re Bay Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1169.

of a future specific plan, the City will evaluate the proposed project to determine whether project-level environmental documentation is required and if environmental analysis can be tiered off of the programmatic analysis contained in the Draft EIR. Therefore, no piecemealing has occurred. No further response is necessary.

**Response to Comment D-3-13**

The commenter states the Draft EIR's Land Use and Planning analysis omits any discussion regarding consistencies with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact, and gave the examples of exceeding AQMP assumptions, exceeding SCAQMD thresholds of significance for five air quality pollutants, exceeding the City's GHG threshold of 3,000 MT CO2e per year, and impeding the State's 2030 and 2050 GHG reduction goals. This analysis is more appropriately provided in Sections 4.3 (Air Quality) and 4.8 (Greenhouse Gas) of the Draft EIR. The Development Project's effect relative to the AQMP is clearly detailed in Section 4.3.6.1 of Draft EIR which identifies the Project's inconsistency with the AQMP and finds impacts are significant and unavoidable. A discussion of the Development Project's consistency with State, regional, and local goals related to the reduction of greenhouse gases is provided in Section 4.8 of the Draft EIR (see Tables 4.8.K through 4.8.O). This discussion finds that the Development Project would not conflict with any of the local, regional, and Statewide plans, policies, programs, and regulations discussed above that are adopted for the purposes of reducing GHG emissions. In addition, Project compliance with the Riverside County CAP also shows that it will not impede 2030 and 2050 goals for GHG emissions reductions. [20] [21];. Project consistency with the plans referenced in the comment concerning cumulative air quality and GHG emissions are discussed in Section 6.3 (Air Quality) and 6.8 (Greenhouse Gas Emissions) of the Draft EIR.-The Draft EIR identifies the cumulatively considerable impacts associated with Project air quality emissions and identifies these impacts as significant and unavoidable. Per CEQA Guidelines Section 15064.4, greenhouse gas emissions are cumulative by definition. Regarding General Plan land use consistency, please see responses to Comments D-6-19 and D-6-20. No revision of the Draft EIR is required and no further response is necessary.

**Response to Comment D-3-14**

The commenter states that the General Plan consistency analysis in Table 4.11.A of the Draft EIR is inaccurate in concluding that the project is consistent with the listed goals and policies of the City's General Plan because project impacts are significant and unavoidable and cumulatively considerable for Air Quality, GHG, Noise, and Transportation (VMT), and that a revised EIR must be prepared. Under CEQA, project consistency with a General Plan is not an environmental consideration[22]. Please see the

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[20] Riverside County CAP, Table 3-5 Adjusted BAU Forecast Emissions by Source and 3-6 State-Aligned Emissions Reduction Targets by Year, pgs. 3-5 and 3-7. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-2019-CAP-Update-Full.pdf.

[21] See, e.g., *Mission Bay Alliance v. Office of Commun. Inv. and Infrastructure* (2016) 6 CalApp.5th 160, 198, 202-203.

[22] See, e.g., North Coast Rivers Alliance et al. v. Marin Municipal Water District (2013) 216 Cal.App.4th 614, 633.

responses to Comments D-6-19, D-6-20, D-6-23 through 25, D-6-28, and D-6-29. No further response is necessary.

**Response to Comment D-3-15**

The commenter states that that the Draft EIR is inadequate as an informational document and that a revised EIR must be prepared with a consistency analysis that considers the project's significant and unavoidable impacts in its analysis particularly with reference to the following General Plan items:

- Land Use Element Industrial Goal A: balanced mix of non-polluting industrial land uses which provide local jobs for the City's residents.

- Circulation Element Policy 6 regarding maintenance of Level of Service (LOS) C or better at all local intersections except those on Ramsey Street and at I-10 interchanges where Level of Service D or better shall be maintained.[23]

It should be noted the commenter refers to the City's LOS standard provided in the 2006 General Plan and not the revised Policy 6 as provided in the 2013 Circulation Element which states that "The City shall maintain peak hour Level of Service D or better on all local roadways and intersections." This information has been updated in the Final EIR.

While the Traffic Analysis prepared for the Development Project (see Draft EIR, Appendix J-2, Section 2.5.2) cites the correct LOS standard, the Draft EIR misstated this information. As such, the Final EIR includes a revision to Section 4.11 and Table 4.11.A as follows:

| | |
|---|---|
| **Policy 6:** ~~The City shall maintain peak hour Level of Service C or better on all local intersections, except those on Ramsey Street and at I-10 interchanges, where Level of Service D or better shall be maintained.~~ The City shall maintain peak hour Level of Service D or better on all local roadways and intersections. | **Consistent:** With the implementation of Conditions of Approval (COAs), the Development Project is consistent with the General Plan Street System and would not significantly affect circulation within or adjacent to the Development Site. |

This revision identifies an overall less stringent LOS standard. and does not constitute new information. It merely clarifies, amplifies, or makes a minor modification in an otherwise adequate EIR. Therefore, it does not constitute new information and no recirculation is required. See CEQA Guidelines §15088.5(b).

The General Plan specifically notes as an overarching goal of Commercial and Industrial Land Use, that "industrial development has been an important source of jobs in the City, and the City continues to attract industrial land uses, primarily due to the limited industrial lands available in the Pass region." For this reason, Policy 7 states: "The land use map shall include sufficient industrial lands for manufacturing, warehousing and distribution, while carefully considering compatibility with adjacent lands." The project is consistent with the City's goals to facilitate additional industrial uses including manufacturing, warehousing and distribution. It is well established that a project does not need to conform perfectly with each and every General Plan policy to be consistent with the General Plan. It

[23] The commenter refers to Policy 6 from the 2006 Circulation Element and not the updated 2013 Circulation Element.

is sufficient that the project be compatible overall with the General Plan's objectives and policies, general land uses, and programs specified[24]. Please see the response to Comment D-6-20. Accordingly, the project is consistent with the General Plan provisions regarding industrial uses and no revision to the draft EIR is required.

Regarding Level of Service conditions, the commenter identifies various intersections in the traffic study (Draft EIR, Appendix J-2) where a level of service below the stated level is identified before taking into account impact fee programs or conditions of approval and lists various intersections identified in the traffic study as under control of the City and other jurisdictions. The commenter also describes Table 1-3 in the Draft EIR, Attachment J-2 (which identifies improvements proposed at certain intersections identified in the traffic study) as, ". . .allegedly mitigat[ing] significant and unavoidable impacts to the [listed] intersections to less than significant levels", but states that there is no evidence that mitigation at those intersections will occur. The commenter indicates that in the absence of such evidence, a revised EIR must be prepared to include the LOS analysis as a cumulatively considerable impact as they otherwise render the project inconsistent with General Plan Policy C and in conflict with two unidentified thresholds.

CEQA does not require an analysis of level of service impacts at the project or cumulative level. CEQA only requires an EIR to address whether the Project would conflict with the General Plan in such a way that it would result in an environmental effect. See CEQA Guidelines, Appendix G, XI. (b). Project consistency with a general plan is not an environmental consideration and does not need to be addressed or mitigated for in a CEQA document. See, e.g., *North Coast Rivers Alliance et al. v. Marin Municipal Water District* (2013) 216 Cal.App.4th 614, 633. Where, as here, CEQA expressly provides that LOS is not a measure of an environmental impact, any potential inconsistency with a General Plan LOS provision does not raise a CEQA issue. Effective July 1, 2020, LOS and similar metrics measuring automobile delay no longer can be used to determine whether a land use project's impacts on transportation constitute a significant environmental effect under CEQA. Lead agencies in California are required to use VMT to evaluate project-related transportation impacts. CEQA Guidelines Section 15064.3(a) provides that "a project's effect on automobile delay (or LOS) shall not constitute a significant environmental impact." [25] Consistent with this change in CEQA, the traffic study is provided in the Draft EIR for the purpose of providing raw traffic data to support the trip generation and mobile source assumptions used for the air quality analysis and other impact areas that use trip inputs, and for no other purpose.

In addition, under the terms of the Specific Plan and with payment of mandatory City Development Impact Fee (DIF)[26] and Transportation Uniform Mitigation Fee (TUMF)[27] fees, the Project will either

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[24] *Families Unafraid to Uphold Rural etc. v. Board of Supervisors (1998) 62 Cal.App.4th 1332, 1336, 1341; see also California Native Plant Soc'y v. City of Rancho Cordova (2009) 172 Cal. App. 4th 603, 637-638.*

[25] CEQA Guidelines Section 15064.3(a).

[26] See Banning Municipal Code, Section 15.68.

[27] The TUMF an obligation that must be met on all new development in Western Riverside County. Where the local agency has determined that TUMF is due, a developer will need to pay their TUMF fees. These fees vary based on the land use type of the proposed development and its size. These factors influence how traffic will be increased due to development. The TUMF fee goes toward providing improvements to improve local traffic.

construct (in the case of Sunset Avenue) or contribute to an established program for improvement for the intersections identified in Table I-3, with the exception of Intersection 2 for which a non-construction modification to the existing signal to extend the existing signal cycle length would be required in 2045, an activity under City control. It is well established that a project does not need to conform perfectly with each and every General Plan policy to be consistent with the General Plan. It is sufficient that the project be compatible overall with the General Plan's objectives and policies, general land uses, and programs specified[28]. The commenter seeks analysis of traffic impacts in the EIR that are in conflict with current legal requirements and, further, does not provide any evidence that the Project would result in an adverse environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA regarding the adequacy of the environmental analysis contained in the Draft EIR. Therefore, no revision to the Draft EIR is required and no further response is necessary.

**Response to Comment D-3-16**

The commenter states that the Draft EIR does not include build out conditions for the General Plan and that the Draft EIR must be revised to provide the horizon year for the current General Plan, the total floor area analyzed in the General Plan industrial area, and cumulative development since adoption of the General Plan to ensure the project is within the General Plan EIR's analysis. The commenter's statements that the project must conform to General Plan square footage limitations for industrial buildout conditions is incorrect. The General Plan Land Use Element including background information and citywide goals provide that commercial and industrial development are tied to the appropriate and sufficient supply of land for these developments and require the City to annually monitor the remaining capacity of all General Plan land use categories and recommend changes to the City Council as needed. See General Plan Land Use Element Program 1.A, which states, "The city shall annually monitor the remaining capacity of all General Plan land use categories and recommend changes to the City Council as needed." Land Use Commercial and Industrial Policy 7 requires the land use map to include sufficient industrial lands for manufacturing, warehouse, and distribution uses. Government Code section 65358 provides that General Plans may be amended. The Project includes General Plan Amendments that will amend the land use map to provide for the additional industrial square footage proposed for the Development Site[29] and to allow for the future development of very-high density residential uses on the MSJC Site[30], respectively. Government Code section 65358 provides that general plans may be amended in between revisions to elements of the General Plan. The Draft EIR analyzed cumulative impacts from the Project. No further response is required.

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28 *Families Unafraid to Uphold Rural etc. v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1336, 1341; see also *California Native Plant Soc'y v. City of Rancho Cordova* (2009) 172 Cal. App. 4th 603, 637-638.

29 As stated in Section 3.4.5.1 of the Draft EIR, General Plan Amendment proposes amending the land use designation for the Development Site from High Density Residential, General Commercial, Medium Density Residential, Open Space – Resources, and Open Space – Parks to Industrial, General Commercial, Open Space – Resources, and Open Space – Parks uses (GPA 20-2504).

30 As stated in Section 3.6.2 of the Draft EIR, the City has initiated a General Plan Land Use Amendment (GPA) for the on the MSJC Site which will change the land use designation from PF–S (Public Facilities-Schools) to VHDR (Very High Density Residential) (GPA 22-2502).

**Response to Comment D-3-17**

The commenter states the growth generated by the Project was not anticipated by the City's General Plan, RTP/SCS, or AQMP and that a revised EIR with a finding of significance must be prepared. No revisions to the Draft EIR regarding project consistency with the General Plan, RTP/SCS, or the AQMD are required. Contrary to the comment, the Project does not generate population or economic growth beyond what was contemplated in SCAG's 2020-2045 RTP/SCS, or SCAQMD's 2022 AQMP. he Development Project will provide jobs in a designated Job Center identified in SCAG's 2020-2045 RTP/SCS. While the Development is anticipated to create jobs, it would not directly increase the population within the local and regional area as the Project proposes commercial and industrial uses (and not residential uses). The Development Project is located within an area that is primarily residential and which currently experiences a housing/jobs imbalance requiring longer work commutes for city residents.

The growth assumptions of the SCS include focusing employment in designated Job Centers to reduce VMT by providing jobs closer to home; which additionally improves the current housing/jobs imbalance. The SCAQMD uses SCAG's RTP/SCS overall growth assumptions (including a focus of employment opportunities within designated Job Centers) in the development of the population and jobs growth inputs used to develop its AQMP. As such, the increase in jobs resulting from implementation of the Development Project was included as a portion of the jobs anticipated in the Development Project Area in the SCAG RTP/SCS, and SCAQMD's Air Quality Management Plan. A revised EIR is not warranted and an increase in jobs anticipated by these plans is not a significant impact under CEQA[31].

The growth assumptions of the SCS including focusing employment in designated Job Centers designed to reduce VMT by providing a better jobs to housing balance. The project site is within a designated Job Center for the region identified in SCAG's RTP/SCS. SCAQMD's AQMP uses much of the SCAG RTP/SCS overall growth assumptions including a focus of employment opportunities within designated Job Centers such as the project site. The SCAQMD CEQA Air Quality Handbook [32] describes the methods used in assessing consistency with the AQMP. Chapter 12.2 of the CEQA Air Quality Handbook states that "Consistency with the AQMP…means that a project is consistent with the goals, objectives, and assumptions…" in the AQMD. This includes growth projections, and the general location of population should be compared to the growth the project will generate. The Project does not generate population growth. However, it does generate jobs growth in a designated Jobs Center as defined in SCAG's RTP/SCS.

As stated in Section 4.3 of the Draft EIR (page 4.3-36), the proposed Development Project would result in the emission of pollutants at levels that would exceed SCAQMD thresholds; therefore, the Project would conflict with/obstruct implementation of the AQMP. Despite this, being in a designated Job Center location, the Development Project better balances the jobs to housing ratio in the City, which

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31 SCAQMD does not have rules that specify or require an overall consistency. CEQA Guidelines Appendix G has a Threshold question "Does the Project conflict with the Air Quality Management Plan," which was used in the Draft EIR (see Section 4.3.6.1, page 4.3-32).

32 See https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.

will reduce VMT associated with worker commutes and is consistent with the overall goals and policies of the RTP/SCS. Accordingly, no revisions to the EIR or changes to findings of significance are required.

**Response to Comment D-3-18**

The commenter states the Draft EIR utilized uncertain and misleading language related to the estimate of the number of workers required during Project construction, does not estimate the number of construction jobs created, and relies on Banning and County of Riverside unemployment rates to conclude local and regional workers are available to fill construction-related jobs. It is anticipated that the employees would come from within Banning or the surrounding region because there is an imbalance of jobs and housing in Western Riverside County and the jobs that an industrial and commercial project would likely provide would be consistent with the job skills of residents in the area. From 2021 to 2022, employment in the city grew at a rate of 2.04 percent, from 10,300 to 10,500 employees. The most common employment sectors for those who live in the city are Health Care & Social Assistance (1,945 people), Retail Trade (1,427 people), and Construction (1,029 people).[33] According to the Bureau of Labor Statistics (BLS), in February 2024, the Riverside-San Bernardino-Ontario region's civilian labor force exceeded 2,184,128 persons with more than 2,063,5980 people employed and an unemployment rate of 5.56 percent (or 120,530 persons)[34]. Within the City and the County of Riverside, the unemployment rate is 6.6 and 4.6 percent, respectively.[35] Approximately 86.1 percent of Banning residents commute outside of the city for work.[36] The Riverside-San Bernardino-Ontario region contains an ample supply of potential employees under existing conditions and the City has a higher unemployment rate than the Riverside County overall; therefore, the Project's labor demand is expected to draw from the City and immediate area, and is not expected to draw a substantial number of new, unplanned residents to the area.

As stated in Section 4.14.3.3 (page 4.14-4) of the Draft EIR, the SCAG Connect SoCal Environmental Justice technical report indicates that Riverside County has a jobs-to-housing ratio of 0.88, indicating that the region is "housing rich, but jobs poor." While neither the City nor SCAG maintain formal statistics regarding Banning's jobs-housing ratio, previous evaluations indicated that the City of Banning followed similar trends as the County as a whole, with more housing available than employment opportunities within the City. Based on the number of jobs (10,500) and housing stock (12,156 units), the City's jobs/housing ratio would be calculated at approximately 0.86, slightly lower than Riverside County as a whole. The City follows the general trend of having more housing available than employment opportunities within the city. It is therefore anticipated that local employees will seek jobs at the Development Site and that the Development Project would provide additional employment opportunities, while not displacing or reducing housing opportunities. The Project would provide job opportunities close to home for existing and future Banning residents, which would

33 https://datausa.io/profile/geo/banning-ca#:~:text=Employment%20by%20Industries&text=%C2%B1%2010.8%25-,From%202021%20to%202022%2C%20employment%20in%20Banning%2C%20CA%20grew%20at,and%20Construction%20(1%2C029%20people), site accessed June 6, 2024.

34 Bureau of Labor Statistics, Civilian labor force and unemployment by state and metropolitan area, https://www.bls.gov/news.release/metro.t01.htm, site accessed April 19, 2024.

35 Monthly Labor Force Data for Cities and Census Designated Places (CDP) April 2024 - Preliminary, California Economic Development Department.

36 Page 21, *Pre-certified Local Housing Data for the City of Banning*, Southern California Association of Governments, updated April 2021.

subsequently help achieve a better job-to-housing balance within the city. The employment generated from the Development Project would not induce substantial growth in the area because the Project would result in service-oriented and industrial-oriented jobs, which are jobs that are anticipated to be filled by residents of the city and surrounding area. No further response is required.

**Response to Comment D-3-19**

The commenter states that relying on the entire labor force located within Riverside County to fill construction and operational jobs will increase VMT and emissions during all phases of construction and during Project operation. The commenter requests preparation of a revised EIR to provide an accurate estimate of employees from all stages of the Project demographic and geographic information on the location of qualified workers. As indicated in response to Comment D-3-18, there is an ample supply of available workers within the City and the surrounding area.

The VMT analysis (Appendix J-1 to the Draft EIR) relies on the Riverside County Transportation Model (RIVCOM) consistent with the City's Traffic Impact Analysis Guidelines for Local Transportation Analysis and Vehicle Miles Traveled Analysis (October 2021) (City Guidelines). RIVCOM is a complex system that analyzes road networks, socio-economic data, driver behavior, and goods movement to predict where traffic flow will occur as the population grows and changes. While the RIVCOM model covers the entire SCAG region, Riverside County is the focus of analysis, and the model data is more disaggregated within the County as opposed to other areas of the region[37]. The City's required VMT metric of VMT per service population uses origin-destination methodology for all trips by all trip purposes, not only commute trips by employees only. The Project VMT analysis was prepared by traffic engineering experts consistent with the City Guidelines. Employment factors reflected in the VMT analysis were obtained from the Riverside County General Plan, Appendix E, and derived from data presented in the ITE Trip Generation Manual (10th Edition), which is an accepted industry standard used by traffic engineering professionals in the development of traffic and VMT analyses. With respect to effect on VMT of local hiring, see the response to Comment D-6-36-A.

As the construction of the Development Project is phased, the number and nature of construction workers required on-site will fluctuate. Relative to operation of the Development Project, construction activities are of limited duration; therefore, reliance on the general employment trends cited in the Draft EIR is appropriate.

As stated in the response to Comment D-3-18, the City currently has a jobs/housing imbalance, meaning there is more housing in the City than available jobs. See the response to Comment D-3-18 regarding the City's location in a SCAG-identified job center. No further response is required.

**Response to Comment D-3-20**

The commenter states the Project will account for 146 percent of the city's overall employment growth which represents a significant amount of growth. The commenter incorrectly states that the projected employment growth from the Project represents a significant amount of growth based on SCAG's projections from 2016-2045.

[37] https://wrcog.us/320/Transportation-Modeling-Services.

The key question in determining whether a project would result in a significant impact to population and housing is whether the project would induce substantial unplanned population growth in the area. As stated in Connect SoCal's *Demographics and Growth Forecast*, "… The region's history of relatively dense, yet single-family growth has posed challenges for where to accommodate growth while also promoting subregional balance between population and employment— one ingredient for ensuring reasonable commutes and decreased congestion."[38] SCAG further identifies the need for increased jobs in inland regions, "…comparing the median commute distance and overall job-to-worker ratio between coastal counties and inland counties, counties with lower job-to-worker ratio generate more long-distance commuters. This indicates the need for more job growth in inland counties, while coastal counties need more housing growth."[39]

CEQA Guidelines Section 15126.2(e) states in part, "…. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. Based on the number of jobs (10,500) and housing stock (12,156 units), the City's jobs/housing ratio would be approximately 0.86, slightly lower than Riverside County as a whole. See the response to Comment D-3-18. Consistent with SCAG's overall objectives, the employment opportunities provided by the Project will contribute to and improve the current and future jobs/housing imbalance in the City and Riverside County and does not itself represent a significant impact or require further discussion in the Final EIR. No revision of the Draft EIR or further response is necessary.

**Response to Comment D-3-21**

The commenter states a revised EIR must be prepared to provide a cumulative discussion of projects approved since General Plan adoption and projects "in the pipeline" to determine if the Project will exceed SCAG's employment and/or population forecast. The commenter further states an accurate cumulative analysis on this issue and a finding of significance must be prepared**.** The commenter incorrectly states that the Draft EIR needs to be revised to include cumulative development analysis of projects approved since 2006 and projects "in the pipeline" to determine if the proposed project exceeds the General Plan growth estimates and/or SCAG's growth forecasts. Please refer to the responses to Comments D-3-18 and D-3-22 regarding job growth. Furthermore, CEQA Guidelines Section 15130(b) establishes the manner in which cumulative impacts may be addressed, either by, 1) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or 2) a summary of projections contained in an adopted local, regional or statewide plan or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

As detailed in Section 6.0 of the Draft EIR, the Project's cumulative analysis includes a list of related projects that were prepared through consultation with the City. The City's General Plan growth projection, as analyzed in the City's General Plan EIR, assumes buildout of all vacant land within the City and its SOI, which provides a cumulative analysis of the Project in addition to potential projects that will be built in the future. To maintain a diversified urban economy, General Plan policies require

[38] Page 19, *Connect SoCal Demographics and Growth Forecast Technical Report*, Southern California Association of Governments, Adopted September 3, 2020.

[39] Page 48, *Connect SoCal Environmental Justice Technical Report*, Southern California Association of Governments, Adopted September 3, 2020.

that individual project applications be reviewed and analyzed to ensure a long-term balance between employment and housing in the City. Therefore, the Project would not result in cumulative impacts related to population and housing. As the cumulative discussion appropriately conforms to CEQA requirements, no revisions to the Draft EIR are required and no further response is necessary.

**Response to Comment D-3-22**

The commenter identifies substantially the same issues as were raised in Comment D-3-15. Please see the response to Comment D-3-15 above. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment D-3-23**

The commenter states that the EIR has underreported the VMT that would be generated by the Project as a result of truck/trailer/delivery van traffic traveling from large import hubs to regional distribution centers/smaller industrial parks and final delivery destinations. The commenter also states that the exclusion of the Project's truck/trailer and delivery van activity is misleading as these users cannot use public transit or active transportation.

Further, the Draft EIR VMT analysis has been prepared consistent with City of Banning *Traffic Impact Analysis Guidelines for Local Transportation Analysis and Vehicle Miles Traveled Analysis* (October 2021) (City Guidelines). In turn, the City Guidelines reflect and are consistent with VMT analysis direction articulated at *CEQA Guidelines* Section 15064.3. As stated at *CEQA Guidelines* Section 15064.3 (a): "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of ***automobile travel*** [emphasis added] attributable to a project." As a result, the *CEQA Guidelines* VMT criteria and thresholds for employment-generating uses (such as the Project considered here) do not apply to commercial vehicles. This includes commercial vehicles such as truck/trailer/delivery van traffic cited by the commenter. Nonetheless, the Draft EIR discloses likely maximum truck traffic VMT that would be generated by the Project. See EIR Appendix J-3: *Supplemental Traffic Assessment*. In this respect, the Draft EIR VMT analysis establishes a comprehensive estimate of all Project VMT and provides the decision-makers with information which enables them to make a decision that intelligently takes account of the Project's environmental consequences, including the Project's VMT impacts. The Draft EIR technical appendix (see Draft EIR, Appendix J-1) accurately and fully discloses the Development Project's VMT impacts. Section 4.17.6.3 of the Draft EIR has been revised to more fully disclose the findings and analysis provided in Appendix J-1. These revisions are provided as follows:

> "The Development Project would exceed the City's adopted thresholds of 25.9 VMT per employee for the industrial and hotel uses. This would result in a potentially significant impact. To achieve a less than significant finding for non-retail VMT per employee, VMT would need to be reduced by 15.9 percent or 26,377 HBW VMT. The following project design features (PDFs) described in Appendix J-1 have the potential to reduce HBW VMT. These design features are based on coordination with the City staff and the recommendations contained within the City's Traffic Impact Analysis Guidelines and the Western Riverside Council of governments (WRCOG) TDM Strategies Evaluation Memo.

**PDF T-1:** Design Feature 1: Commute Trip Reduction Marketing

The Development Project will include a marketing strategy to promote the project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. The following features (or similar alternatives) of the marketing strategy are essential for effectiveness.

1. Onsite or online commuter information services.
2. Employee transportation coordinators.
3. Onsite or online transit pass sales.

The Development Project will provide tenant's employees material and online resources as a means to promote the commute trip reduction program. With proper implementation and 100 percent of the employees eligible, this design feature is expected to reduce VMT by 4 percent.

**PDF T-2:** Ridesharing Program

The Development Project will provide a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips and VMT. Ridesharing must be promoted through a multifaceted approach. Examples include the following:

- Designating a certain percentage of desirable parking spaces for ridesharing vehicles.
- Designating adequate passenger loading and unloading and waiting areas or ridesharing vehicles.
- Providing an app or website for coordinating rides.

The Development Project as designed, will provide carpool/vanpool/EV parking designated spaces in locations of easy and convenient accessibility to the Project building. As calculated for the Project, with proper implementation and 100 percent employees eligible, the Project is expected to reduce VMT by four percent.

**PDF T-3:** End-of-Trip Bicycle Facilities

The Development Project will install and maintain end-of-trip facilities for employee use. In this case End-of-trip facilities will only include bike parking. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT. End-of-trip facilities should be installed at a size proportional to the number of commuting bicyclists and regularly maintained.

The Development Project will include building elements for bicycle trip end facilities (i.e., parking) for commuters that choose to bicycle as a mode of travel. This will promote an alternative mode choice of commuting for employees. As calculated, the Project will reduce VMT by 0.06 percent.

These project design features will be incorporated into the Transportation Demand Strategy Report required under Mitigation Measure TRA-1. As detailed in Appendix J-1, the inclusion of PDFs T-1 through T-3 would result in a reduction in HBW VMT of 8.4 percent. As noted previously, the Project would need to reduce HBW VMT by 15.9 percent to a achieve a less than significant finding; therefore, the Project's impact to non-retail VMT per employee is significant.~~nd unavoidable. With implementation of the measures identified in **MM TRA-1,** a project can realize a maximum reduction of 45 percent in commute VMT. The Development Project would require a minimum reduction of 18.9 percent to achieve a less than significant impact.~~

**Level of Significance Prior to Mitigation:** Potentially Significant Impact.

**Project Design Features~~Regulatory Compliance Measures~~ and Mitigation Measures:** The following mitigation measure would require the preparation of a Transportation Demand Management (TDM) strategy report to reduce employee VMT that incorporates PDF T-1, PDF T-2, and PDF T-3. ~~The TDM measures included in **MM TRA-1** below were derived from the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality Since future tenants on the Development Site are unknown at this time,~~While the inclusion of PDFs T-1 through T-3 reduce HBW VMT by 8.4 percent, Project generated VMT per employee still exceeds the City's adopted VMT impact threshold; implementation of the feasible TDM measures identified in ~~**MM TRA-1** cannot be guaranteed to reduce the industrial and service component's VMT per employee to a level of less than significant.~~ Therefore, even with the implementation of **MM TRA-1**, Impact 4.17.2 would remain ***significant and unavoidable***.

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

**Level of Significance After Mitigation:** Significant and Unavoidable Impact."

As discussed in the Draft EIR, VMT impacts are disclosed as significant and unavoidable (Draft EIR, pages 4.17-13 through –15) and the analysis and findings are supported by substantial evidence. While implementation of Mitigation Measure TRA-1 could result in a VMT reduction of up to 8.4 percent in HBW VMT and is consistent with VMT reductions outlined in the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality (California Air Pollution Control Officers Association [CAPCOA] 2021), implementation of MM TRA-1 (which incorporate PDFs T-1 through T-3) cannot reduce the HBW VMT impact to a less than significant level. Should the City elect to approve the Project and certify the EIR, Findings and a Statement of Overriding Consideration(s) would be required. The stated revisions to the Draft EIR clarify data previously provided during public review in Appendix J-1 and do not identify new information not previously provided during public review, nor does it identify a new impact that was not previously identified in the Draft EIR. Therefore, it does not constitute new information and no recirculation is required. See CEQA Guidelines §15088.5(b). The findings and conclusions stated in the Draft EIR are not affected; therefore, no further response is necessary.

**Response to Comment D-3-24**

The commenter states the Project's total operational VMT generated is not consistent with the significance threshold stated in the Draft EIR or to the legislative intent of SB 743 to reduce greenhouse gas emissions by reducing VMT. However, it is unclear how (per the commenter's statement) the "Project's total operational VMT generated is not consistent with the significance threshold." The Draft EIR discloses the Project's VMT impacts in the context of the VMT thresholds adopted by the City. Even with application of all feasible mitigation, Project VMT impacts would exceed applicable VMT thresholds. The commenter also states a revised EIR must be prepared to quantify all truck/trailer/delivery van activity. See the response to Comment D-3-23. The Draft EIR therefore appropriately concludes that Project VMT impacts would be significant and unavoidable. See Draft EIR (pp. 4.17-13 through 4.17-15) and Section 4.17.6.3 of the Final EIR. If the City decides to approve the Project and certify the EIR, Findings and a Statement of Overriding Consideration(s) would be required.

The stated intent of SB 743 is to "[m]ore appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions." VMT impact reductions achieved through implementation of MM TRA-1 above would, as a corollary, reduce Project vehicular-source GHG emissions. This is consistent with the intent and purpose of SB 743.

Moreover, the Project uses, location, and orientation act to reduce VMT impacts generally, and thereby minimize vehicular-source GHG emissions. Specifically, the Project is located within an urbanized area, proximate to prospective employees and patrons. Uses proposed by the Project would increase and diversify the City's economy and would provide new and varied employment and commercial opportunities closer to the local workforce and customers – this site is within an area considered to be generally housing rich and jobs poor. In this latter regard, the Project uses at this location promote a balanced jobs/housing condition, reducing commuter trip lengths and VMT. This is consistent with the SB 743 legislative intent.

Additionally, the Project is located adjacent to the interstate freeway system. Interstate 10 (I-10) borders the Project site to the north; the Highland Springs Avenue/I-10 interchange is located approximately one mile west of the Development Site; and Sunset Avenue interchanges with I-10 immediately northeast of the Development Site. This Development Site's location provides direct access to the Project via the interstate freeway system, minimizing trip lengths and VMT for all patrons and employees and reducing travel distances for movement of goods. This is also consistent with the SB 743 legislative intent. As summarized above, VMT impacts have been evaluated consistent with City and CEQA requirements. Further, the Project conforms to and supports SB 743 legislative intent. No revisions to the Draft EIR are required and no further response is necessary.

The Development Project is consistent with the legislative intent of SB 743 in that it will develop industrial and commercial buildings that would add job diversity to the City's economy and bring employment opportunities closer to the local workforce as well as develop commercial retail and wellness uses in a city which is lacking in such development. (Please refer to responses to Comments D-3-8 and D-3-18). Locating jobs near housing helps correct the existing jobs/housing imbalance within the City and reduces VMT associated with commute trips.

**Response to Comment D-3-25**

The commenter states the Draft EIR does not adequately address the Development Project's potential to increase roadway hazards, stating an absence of exhibits ensuring appropriate on-site turning, queuing, and other potential roadway hazards.

CEQA Guidelines Section 15126.4(c) states in part:

> Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.

The City maintains standards documents (see http://banning.ca.us/21/Engineering) on its website that provide design requirements for roadway access and street improvements. The City's Engineering Division coordinates and reviews private development projects and related construction in the public rights-of-way and ensures compliance with City codes and standards of work. Connections to private driveways and drive aisles within the Development Site will be designed and provided pursuant to access requirements and queueing restrictions established by the City. As stated in Section 4.3.11 of the Specific Plan (see Draft EIR, Appendix B), site-plan design would ensure, "…interior driveways and drive aisles to provide adequate stacking and prevent queuing of vehicles on public streets." Specific Plan Section 4.4.9 additionally identifies parking and vehicular circulation guidelines to minimize vehicular conflict and ensure appropriate emergency access. Generally, the question of what design standards to use is a policy question that will be determined by the City . Adopted building codes and standards can be assumed to minimize environmental impacts and need not be included as mitigation measures[40]. Reliance on the City's existing standards and stated review process reasonably assures that any roadway and access improvements would not result in significant geometric design or emergency access impacts. Per CEQA Guidelines Section 15151, "An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." As it is reasonable that installation of any roadway or access improvement required during implementation of the Development Project would conform to the design standards established by the City. The inclusion of the design detail suggested by the commenter in the Draft EIR is not necessary. No revision to the Draft EIR is required.

**Response to Comment D-3-26**

The commenter states the Draft EIR does not provide meaningful evidence to support the claim that the Development Project would not impede emergency access. Please refer to the response to Comment D-3-25. No further response is required.

**Response to Comment D-3-27**

The commenter claims the discussion of potential roadway design and emergency access is deferred in the Draft EIR and does not provide meaningful disclosure. Please refer to the response to Comment D-3-25. No further response is required.

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[40] See *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884.

**Response to Comment D-3-28**

The commenter states the Draft EIR does not provide an analysis of available horizontal and vertical sight distance at the planned intersections and driveways. As stated in Section 2.2.1 of the Sunset Crossroads Specific Plan (Draft EIR, Appendix B), "Sight distances shall be reviewed by the City Engineer in conjunction with the preparation of grading, landscaping, and street improvement plans. This review shall ensure that setbacks allow for clear unobstructed sight distances at intersections." Please refer to the response to Comment A-3-25. No further response is required.

**Response to Comment D-3-29**

The commenter states that a revised EIR must be prepared to include an accurate cumulative analysis and that the Draft EIR does not include buildout conditions of the General Plan. While the General Plan as a whole was last updated in 2006, there have been periodic amendments including regular updates to the housing element, and circulation element for example. Taking these into account allows for accurate estimates of impacts at General Plan build out. Please refer to the response to Comment D-3-21 regarding the cumulative analysis provided in the Draft EIR. The Draft identifies and analyzes the significant and cumulatively considerable impacts with respect to air quality (see Draft EIR Section 6.5.3), greenhouse gas (Section 6.5.8), and VMT (Section 6.5.17) and off-site operational noise (Section 6.5.13). The Draft EIR (see Section 6.5.3.2) fully addresses the cumulative effect of concurrent construction and operation on air quality and other environmental impact areas. As the Draft EIR appropriately discloses the cumulative effects related to implementation of the Project, no revision of the Draft EIR is necessary and no further response is required.

**Response to Comment D-3-30**

The commenter states the EIR must include information related to buildout of the General Plan as the Project greatly exceeds the anticipated General Plan buildout condition and the growth was not anticipated by the General Plan, AQMP, or RTP/SCS. Please refer to the responses to D-3-15 and D-3-17, regarding General Plan, AQMP, and RTP/SCS plan consistency, and D-3-21 regarding the manner of cumulative analysis provided in the Draft EIR. Per the City's General Plan Vision Statement, the City seeks to promote a well-balanced community, where revenue generating uses provide a diversified economy and a wide range of jobs that allow people to live and work while minimizing vehicle trips to the extent feasible. As needed due to changed circumstances or shifts in City policy/priorities, the City has periodically amended its General Plan. These amendments have led to changes to specific portions of the General Plan such as the land use designation for a particular area or revisions to modify housing objectives. The proposed land use entitlements are consistent with the City's vision and the Project's objectives (see Draft EIR, Section 3.7). No revision of the Draft EIR is necessary and no further response is required.

**Response to Comment D-3-31**

The commenter states the Draft EIR does not discuss its own conclusion that Project will result in significant and unavoidably cumulatively considerable air quality, greenhouse, noise, and VMT impacts, and states the Draft EIR must be revised to include a finding of significant, unavoidable, and cumulatively considerable air quality, greenhouse gas, noise and VMT impacts. The commenter is incorrect as Section 6.0 of the Draft EIR identifies the Project's significant cumulatively considerable

air quality, greenhouse gas emissions, noise, and VMT impacts. See Draft Section 6.5.3 (air quality), 6.5.3 (greenhouse gas), Section 6.5.17 (VMT), and Section 6.5.13 (noise).

As described in response to Comment D-6-29, the significant and unavoidable operational noise impacts disclosed in the Draft EIR have been eliminated by changes to the Development Project's design (see Final EIR, PDF N-1) and accordingly, cumulative impacts associated with noise have also been eliminated with these changes since traffic noise impacts for existing (2021), opening year (2027) and horizon year (2045) were derived from the traffic analysis for the Project, which incorporates future circulation network and traffic from the cumulative projects. See Draft EIR page 6-10. The Development Project would have a less than significant impact on off-site noise-sensitive land uses because the Horizon Year (2045) with project traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL.

In addition, on-site project operations were revised to relocate cold storage equipment from the rooftop to the ground floor and implemented 10-foot-high "wing walls" on the south end of warehouse Buildings 1 and 2, and 6-foot-high walls that surround the automobile parking lots south of warehouse Buildings 1 and 2 as a PDF (Final EIR, PDF NO-2). Based on the PDFs described above, noise generated from on-site operations would be reduced such that nighttime ambient noise levels would not increase by 3 dBA. Therefore, noise levels generated from on-site project operations would be less than significant. Overall, revisions to the project will eliminate significant traffic and on-site stationary noise impacts and will reduce noise levels to a less than significant level.

As the cumulative impacts referenced by the commenter have already been accurately identified in the Draft EIR or been eliminated through project revisions, no revisions to the Draft EIR related to this specific comment are required and no further response is necessary.

**Response to Comment D-3-32**

The commenter states the Draft EIR does not discuss or analyze the commitment of resources, is not consistent with regional and local growth forecasts, and does not address that the identified significant air quality and greenhouse gas impacts that exceed applicable plans (e.g., the AQMP and 2030/2050 GHG reduction goal). Please refer to the responses to Comments D-3-17 and D-3-30 regarding growth forecasts and consistency with applicable plans and D-3-21 and D-3-29 regarding the cumulative analysis provided in the Draft EIR. The County of Riverside Climate Action (CAP) determined a baseline GHG emissions inventory, and calculated percentage reductions needed to meet 2020, 2030, and 2050 reduction goals. See Draft EIR, Sections 4.3 and 4.8. Consistency with the CAP is demonstrated as the Development Project greatly exceeds the 100-points (+586 points) needed to show consistency with the CAP. See Draft EIR Table 4.8.K. Through the incorporation of project design features (PDFs) and Mitigation Measures AIR-2, and GHG-1 through GHG-7 (including the addition of GHG-7 expressly verifying implementation of the total number of CAP points – see the response to Comment D-3-8) the Development Project implements actions required for consistency with the CAP (and therefore 2030/2050 GHG reductions). See also response to Comment D-3-13.

The commenter incorrectly states the Draft EIR does not address or analyze the commitment of resources. Section 7.1 of the Draft EIR provides appropriate analysis regarding the use of resources for and by the proposed Project including commitment of the Development Site to urban uses, the

use of energy resources, and impacts related to agricultural land conversion, mineral resources, and biological resources. In the absence of any specific or contrary information, the analysis contained in the Draft EIR provides sufficient disclosure of the Project's commitment of resources. No further response is required.

**Response to Comment D-3-33**

The commenter states the Project represents a significant amount of growth in the City and exceeds anticipated General Plan buildout and SCAG growth forecast and does not provide an adequate or accurate cumulative analysis. Please refer to the responses to Comments D-3-17 and D-3-18 regarding growth forecasts, and Comments D-3-21 and D-3-29 regarding the cumulative analysis provided in Section 6.0 of the Draft EIR. No further response is required.

**Response to Comment D-3-34**

The commenter states the Draft EIR does not meaningfully discuss the Project's required land use designation changes and states the growth generated by the Project was not anticipated by the General Plan, RTP/SCS or AQMP. The commenter essentially states that because the General Plan designations do not match the proposed Project uses, the Project is inconsistent with the City's General Plan and a finding of significance is required. Please see the responses to Comments D-6-19 and D-6-20. Please also refer to the responses to Comments D-3-17 and D-3-18 regarding growth forecasts and consistency with the RTP/SCS and AQMP, and D-3-21 and D-3-29 related to the cumulative analysis included in the Draft EIR. Impacts from the Project's proposed changes in land use designations (General Plan Amendment, Annexation, Zone Change) for the Development Site and the General Plan Amendment and Zone Change for the MSJC Site are analyzed throughout the Draft EIR (including, but not limited to, Sections 3.5.1, 3.5.2, 3.5.4, and 3.6, Section 4.11.3, Section 5.3.3, and Section 6.5). The portion of the Project site located in Riverside County is within the City's sphere of influence, was anticipated to be developed once annexed into the City, and the land was included in the City's 2020 UWMP and as far back as the City's 2005 UWMP for anticipated water demand to serve the area within the sphere of influence so the City has contemplated more intensive development on this site for nearly 20 years. No revision of the Draft EIR or further response is required.

**Response to Comment D-3-35**

The commenter states the EIR does not evaluate a reasonable range of alternatives because it only evaluated three alternatives in addition to the no project alternative. CEQA Guidelines 15126.6(a) provides that an EIR does not need to consider every conceivable alternative to a project, but only needs to consider a reasonable range of potentially feasible alternatives that would attain most of the basic project objectives but would avoid or substantially lessen any of the project's significant impacts. No set number of alternatives is required to constitute a legally adequate range of alternatives. *Tracy First v. City of Tracy* (2009) 177 Cal.App.4$^{th}$ 912 (three alternatives, in addition to the no project alternative, to large supermarket project upheld as reasonable range); *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4$^{th}$ 477 (three project alternatives in addition to no project alternative constituted a reasonable range of alternatives). Potential alternatives may be eliminated from detailed consideration in an EIR if they do not meet most of the basic project objectives and/or do not avoid or substantially lessen significant environment impacts. Section 8.2 of the Draft EIR

considered six potential alternatives (including an off-site alternative) determined as infeasible because they would exceed or not substantially lessen the Project's significant, are duplicative of other alternatives or, based on City input, would not meet most of the basic objectives for the Project The Draft EIR analyzed four alternatives in detail (see Draft EIR Section 8.0, Alternatives). Alternatives considered in the Draft EIR include:

- **Alternative 1:** No Project/No Build;
- **Alternative 2:** No Project/Existing General Plan and Zoning/Residential and Commercial Development;
- **Alternative 3:** Reduced Commercial Alternative; and
- **Alternative 4:** Reduced Industrial Alternative.

See Draft EIR Sections 8.3 through 8.6. In the absence of specific reasons why the commenter believes the range of alternatives is not reasonable, no further response is required.

**Response to Comment D-3-36**

The commenter states that the Draft EIR does not include an alternative that eliminates all the significant and unavoidable impacts resulting from the Project and also meets the stated Project objectives. CEQA does not require inclusion of an alternative that would eliminate all significant impacts, and "it is practically impossible to imagine an alternative that would provide substantial environmental advantages in all respects." *Sierra Club v. City of Orange* (2008) 163 Cal.App.4$^{th}$ 523, 546. CEQA does not require consideration of alternatives that are infeasible (CEQA Guidelines 15126.6). As detailed in Table 8.Q of the Draft EIR (Final EIR, revised Table 8.Q), the alternatives assessed result (in varying degrees) in a reduction of the Project's emissions of air pollutants and greenhouse gases, the number of daily trips, the amount of vehicle miles traveled, and the total energy consumed. In addition, as identified in response to Comment D-6-29, changes to the Development Project in the Final EIR have resulted in the elimination of the significant onsite and offsite operational noise impacts disclosed in the Draft EIR. Therefore, analysis of alternatives to lessen these noise impacts to a less than significant level is no longer necessary. The Draft EIR's range of alternatives meet most of the primary project objectives for the site, including:

- Establish a functional and balanced pattern of land use that maximizes economic opportunity and provides needed public improvements for City residents.
- Establish land uses for properties in the City's sphere of influence that will create positive fiscal impact to the City and provide sufficient fiscal benefit to permit annexation of the property upon which the project is proposed into the City.
- Promote job creating uses that reduce the need for City residents to commute outside of the City for employment, thereby improving the City's jobs to housing ratio.
- Address a need in the City for commercial and industrial land uses that accommodate a variety of modern industrial, business, hospitality and commercial activities.

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

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

The alternatives addressed in the Draft EIR provide a reasonable range of alternatives to the Development Project. No further response is required.

**Response to Comment D-3-37**

The commenter states the EIR must be revised to include a reasonable range of project alternatives that foster informed decision-making and suggests including alternatives that would reduce all significant impacts to less than significant or provides mixed-uses, affordable housing, and exclusively local-serving commercial uses that may reduce the significant Project-related impacts. See the response to Comment D-3-36. Alternative 2 consists of mixed use residential and commercial uses. CEQA does not require consideration of variations on alternative analyzed in the Draft EIR. *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4$^{th}$ 477, 491. No further response is required.

**Response to Comment D-3-38**

The commenter states that for the reasons set forth in its letter, the Draft EIR is flawed based on its comments that analyses in the Draft EIR must be significantly revised and additional mitigation added, and that a revised EIR must be prepared and recirculated. The commenter also requests that it be added to any public interest list regarding subsequent environmental documents, public notices, public hearings, and notices of determination on the Project. As requested, the commenter will be added to the City's distribution list for public notification of future actions related to the Project. Regarding its statement that the Draft EIR is flawed, please see the responses to Comments D-3-1 through D-3-38. The Draft EIR is not flawed as the commenter stated and recirculation is not required on that basis. Pursuant to CEQA Guidelines Section 15088.5(a):

> A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:
>
> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded

In addition, where, as here, modifications in the Final EIR and the supplemental CEQA memoranda expand the scope of mitigation in the Draft EIR and clarify, amplify, or make other modifications to analyses in an otherwise adequate Draft EIR and do not result in adverse environmental impacts or identify mitigations measures the applicant declines to adopt, such modifications do not constitute new information, recirculation of the Draft EIR is not required, and no further response is required.

**The commenter attached the following comments from SWAPE regarding the Draft EIR's analysis of health risk impacts air quality emissions, and greenhouse gas emissions, and the identification of feasible mitigation. These comments are addressed below.**

**Response to Comment D-3-39**

The commenter provides an introductory statement, summarizes the project description, and incorrectly claims that the Draft EIR's health risk, air quality and greenhouse gas impacts are underestimated, and under-mitigated and requests that a revised EIR be prepared. The specific comments and corresponding responses are detailed in responses to Comments D-3-40 through D-3-54, below. The commenter correctly summarizes the Draft EIR's discussion regarding emission of volatile organic compounds (VOCs) during construction activities. No further response is necessary.

**Response to Comment D-3-40**

The commenter states without substantiation that even with mitigation, the Draft EIR's conclusion that construction air quality impacts would be significant and unavoidable is unsubstantiated and unreliable. The commenter additionally relies on CEQA Guidelines Section 15096 which applies to responsible agencies and is inapplicable here. See the responses to Comments A-3-4 and D-3-5 for the results of the air quality and HRA modeling prepared in response to public comments. Concerning additional mitigation measures the commenter subsequently suggests, please see the responses to Comments D-3-56 through D-3-93. No further response is necessary.

**Response to Comment D-3-41**

The commenter states that the Draft EIR is required to implement all feasible mitigation to reduce impacts, that additional feasible mitigation measures such as those it recommends in Comments D-3-56 through D-3-93 should be incorporated, and that the Draft EIR should be revised to incorporate all feasible mitigation to reduce emissions to the maximum extent feasible. Refer to responses to Comments D-3-56 to D-3-93 for a detailed discussion on the suggested mitigation measures. No further response is necessary.

**Response to Comment D-3-42**

The commenter states the Project may contribute to disproportionate health risk impacts on community members living, working, and attending school in the immediate area of the Project, and that in general, people living near warehouses are disproportionately Black and Latino communities below the poverty line. Please refer to the responses to Comments A-3-3 and A-3-4 (regarding disadvantaged communities) and response to Comment A-3-2 regarding Project impacts on health of surrounding residences and school. Environmental justice is not a topic required to be evaluated or considered under CEQA. See CEQA Guidelines Sections 15120-15132 (Contents of Environmental Impact Reports). The comment mistakenly refers to the County in which the Project is located as San Bernardino. Regardless, air quality impacts are not required to be assessed based on census tract locations. The commenter does not raise any issues concerning or relating to the adequacy of the analysis in the Draft EIR, and no further response is necessary.

**Response to Comment D-3-43**

The commenter states that disadvantaged communities may be disproportionally suffer health risks from warehouse operations. Environmental justice is not a topic required to be evaluated or considered under CEQA. See CEQA Guidelines Sections 15120-15132 (Contents of Environmental Impact Reports). Additionally, air quality impacts are not required to be assessed based on census tract locations. See the responses to Comments A-3-3, A-3-4, and D-3-42. This comment does not raise any issues related to the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment D-3-44**

The commenter states that development of warehouses in low-income communities of color poses an environmental justice challenge. Environmental justice is not a topic required to be evaluated or considered under CEQA. See CEQA Guidelines Sections 15120-15132 (Contents of Environmental Impact Reports). In addition, air quality impacts are not required to be assessed based on census tract locations. See also responses to Comments A-3-3 and A-3-4 (regarding environmental justice). This comment does not raise any issues related to the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment D-3-44-A**

The commenter misstates the Development Site's location as San Bernardino County but appears to show the correct census tracts based on the CalEnviroScreen 4.0 website. Environmental justice is not a topic required to be evaluated or considered under CEQA. See CEQA Guidelines Sections 15120-15132 (Contents of Environmental Impact Reports). In addition, air quality impacts are not required to be assessed based on census tract locations. See also responses to Comments A-3-3 and A-3-4 regarding an accurate summary of the pollution burdens in these census tracts depicted by CalEPA's CalEnviroScreen 4.0. No further response is required.

**Response to Comment D-3-44-B**

The commenter misstates the Development Site's location, citing ozone pollution data for San Bernardino County from various agencies and potential health impacts of ozone. See the response to

Comment D-3-44. This comment does not raise any issues related to the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment D-3-45**

The comment summarizes information from various agencies and an educational institution regarding potential health risks to, and risk susceptibility of children from exposure to inhaled pollutants. The comment then extrapolates without substantiation that since warehouses release more smog forming pollution than other industries, it is necessary to evaluate the specific health risks posed to children from warehouses. See the responses to Comments A-3-22 and D-3-42. This comment does not raise any issues related to the adequacy of the environmental analysis contained in the Draft EIR, and no additional response is necessary.

**Response to Comment D-3-46**

The commenter states the Draft EIR should be revised to evaluate the disproportional impacts that the proposed uses would have on the community adjacent to the Development Site, including an analysis on the impact to children and people of color in the surrounding area and should include a cumulative health risk assessment (HRA) to quantify the health outcomes from the effects of multiple warehouses in the immediate area. The HRA included in the Draft EIR and the revised HRA provided in the Final EIR (see Final EIR, Appendix C-4) that analyzes the impacts that Development Project warehouses would have on the adjacent sensitive receptors including the impact on children and all adults, without distinguishing ethnicity, disadvantage level, or poverty level as such environmental justice evaluations are not required by CEQA. Please refer to the responses to Comments A-3-3 and A-3-4, and A-3-33 regarding cumulative HRA, and Comments A-3-14 and A-3-16 regarding the revised HRA. No additional analysis in the Draft EIR is required and no further response is necessary.

**Response to Comment D-3-47**

The commenter states the Draft EIR failed to mention or evaluate the Project's construction-related health risk impacts and that the Draft EIR's conclusion that Project's health risk impacts are less than significant is unreliable for four reasons discussed subsequently. The HRA did not include construction emissions overlapping with partial project operational emissions because the total emissions of toxic air contaminants (TAC), is limited to diesel particulate matter (DPM) or PM10 for this Project. Please see the response to Comment A-3-22. Regarding conclusions for Project health risk impacts, see also responses to Comments A-3-14 and A-3-16, and Final EIR, Appendices C-4 and C-5. No further response is required.

**Response to Comment D-3-48**

The commenter states the Draft EIR did not mention exposure assumptions for the HRA such as age sensitivity factors (ASF) or fraction of time at home (FAH) and that until these assumptions are substantiated, the HRA may underestimate the cancer risk posed by Project operations to nearby sensitive receptors. A screening-level multi-pathway assessment has been conducted. This technique was chosen as recommended in the Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxic Hot Spots Program Risk Assessment Guidelines* (2015) as prescribed in the SCAQMD *AB 2588 and Rule 1402 Supplemental Guidelines (*see Draft EIR, page 4.3-20). All HRA modeling parameters were documented in the last five pages of Appendix B of the HRA, which was included in Appendix C-

2 of the Draft EIR, providing appropriate substantiation for the outcomes presented in the HRA and summarized in Section 4.3 of the Draft EIR, as such: "The HRA followed the modeling approach recommended by the South Coast AQMD. South Coast AQMD recommends using Office Of Environmental Health Hazard Assessment (OEHHA) guidance. The HRA followed South Coast AQMD-approved and OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments (February 2015)." See also the responses to Comments A-3-22 and A-3-42 regarding the HRA modeling.

The commenter does not raise any specific questions regarding the modeling parameters or the modeling output. Please see the response to Comment D-3-47. As the information requested by the commenter was already presented in the HRA, no further response is necessary.

**Response to Comment D-3-49**

The commenter identifies a specific equation from the OEHHA Risk Assessment Guidelines that should be used in the modeling of health risk impacts. The equation specified by the commenter is built into the HARP model provided by OEHHA. As stated previously (see the response to Comment D-3-4), the equation parameters used followed SCAQMD and OEHHA recommendation and were documented in the last five pages of Appendix B of the HRA, which was included in Appendix C-2 of the Draft EIR. Because the HRA already utilized the specified equation in the modeling of health risks, this comment is incorrect, and no further response is required.

**Response to Comment D-3-50**

The commenter states that because construction emissions were not analyzed in the HRA, the HRA did not fully evaluate adverse health risks from DPM and TACs and is inconsistent with CEQA's requirement to correlate the increase in emissions with potential adverse health impacts on human health. Please refer to the responses to Comments D-3-47, D-3-48, and D-3-49. The TAC emissions for this Project are limited to DPM or PM10. The HRA utilized total emissions from the full project operations alone which exceed emissions from construction alone or overlapping with partial operations. Thus, by analyzing the highest rate of PM10 emissions over the 9-year and 30-year exposure periods for residents, which is during full operations after construction is completed, the HRA is fully consistent with CEQA requirements. No further response is required.

**Response to Comment D-3-51**

The commenter states that the DOJ recommends that warehouse projects prepare a quantitative analysis pursuant to OEHHA and local air district guidelines. As described on pages 1-1 and 1-2 of the HRA (see Appendix C-2 of the Draft EIR), the HRA follows OEHHA guidance, as well as guidance from SCAQMD, CAPCOA, and CARB. The HRA cited in the Draft EIR is a site-specific quantified analysis that addressed the latest OEHHA guidelines, incorporated the latest CARB regulations, and used the latest modeling software available. See also the responses to Comments D-3-48 and D-3-49. No further response is required.

**Response to Comment D-3-52**

The commenter states the HRA fails to evaluate the combined lifetime health risk impacts at nearby receptors from the Project's combined construction and operation emissions. It cites to OEHHA

guidance for accessing lifetime cancer risk to calculate excess cancer risk separately by age group and then summed to derive the cancer risk at the receptor location. The commenter requests the analysis be updated to quantify the entirety of the Project's impacts. Please refer to the response to Comment D-3-47 regarding the assessment of construction activities in the HRA and the response to Comment D-3-51 regarding the OEHHA technique followed during the preparation of the HRA. The HRA follows OEHHA guidance that includes how to sum each age bin. The HARP model, provided by OEHHA for conducting HRAs and used in this HRA, has the correct age bin handling process built in (see Draft EIR, Appendix C-2 pg. 281 [*Appendix B, AERMOD Output and HARP Results*]). As the HRA provides sufficient substantiation to support its conclusions, no revision to the Draft EIR is required. No further response is necessary.

**Response to Comment D-3-53**

The commenter states the Project's net annual GHG emissions as 18,379 MT CO2e/year. The Draft EIR estimates this will be the net GHG emissions in 2040 but calculates the annual mitigated GHG emissions at 38,726.25 MT CO2e/year at Project buildout in 2027. The commenter further summarizes the Draft EIR's conclusion that GHG emissions exceed the City's threshold of significance, and no additional feasible mitigation exists to reduce impacts to less than significant.

It must be noted, in response to public comments, the GHG emissions totals for the Development Project were updated based on the updated CalEEMod run for truck trip lengths and the updated calculations for TRU emissions. See *Sunset Crossroads Supplemental Greenhouse Gas Emissions Assessment* (Final EIR Appendix C-6). The update identified an increase in the volume of unmitigated (62,844.96 MTCO2e/yr) GHG emissions (see Final EIR, revised Tables 4.8.F and 4.8.J). Section 3.6 of the Specific Plan has been revised to state that building roofs shall be solar ready in compliance with Solar Requirements with of the California Building Code, Title 24 standards (see revision in Final EIR, Section 3.5.3.10). With the Mitigation Measures identified in the EIR and additional quantified reductions[41], emissions of GHGs would total 45,067 MTCO2e/yr, a net increase of 5,942 MTCO2e/yr from that identified in the Draft EIR. The emission of GHGs was previously identified as a significant and unavoidable impact. While the revisions to the GHG analysis to address public comments identified an increase in the volume of GHG emitted, this change did not change the overall level of significance and does not constitute new significant information requiring recirculation of the Draft EIR.

The commenter does not raise any issues related to the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment D-3-54**

The commenter states the EIR fails to implement all feasible mitigation to reduce the significant and unavoidable impact related to the emission of greenhouse gases and suggests a revised EIR be

[41] The Specific Plan, as updated, includes a project design feature requiring compliance with California Building Code Title 24, Part 6 solar requirements. Previously, for non-residential development, only solar ready roofs were required, Current Title 24, Part 6 requirements which keep the Development Project compliant with Title 24, Part 6 requirements, and is the basis for the GHG analysis in the supplement GHG memorandum (Final EIR, Appendix C-6).

prepared to incorporate all feasible mitigation to reduce emissions to the extent possible and provides a list of potential mitigation measures. See the responses to Comments D-3-56 through D-3-93 below for specific responses. However, the commenter does not provide quantification of greenhouse gas reduction associated with any of the suggested measures, and it, therefore is not possible to determine whether or the extent to which these suggestions would reduce GHG impacts to a less than significant level. No further response is required.

**Response to Comment D-3-55**

The commenter states the City should consider the implementation of the mitigation measures found in the "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." See the response to Comment D-3-54 the substance of which applies to GHG, air quality and health risk impacts. No further response is required.

**Response to Comment D-3-56**

The commenter suggests that the Project require off-road construction to be hybrid electric-diesel or zero emission where available and that diesel-fueled off-road equipment to be equipped with CARB Tier IV-compliant or better. Mitigation Measure AIR-1 already requires all off-road diesel-powered equipment to be powered with CARB certified Tier 4 engines or equivalent. Pursuant to the commenter's request Mitigation Measure AIR-1 (Draft EIR, pg. 4.3-34) has been revised to read as follows:

- Plans submitted for grading permit issuance and building permit issuance shall specify a designated area of the construction site where electric or non-diesel vehicles, equipment, and tools can be fueled or charged. The provision of temporary electric infrastructure for such purpose shall be approved by the utility provider, Banning Electric Utility (BEU). If BEU does not approve the installation of temporary power for this purpose, the establishment of a temporary electric charging area will not be required. If electric equipment will not be used on the construction site because the construction contractor(s) does not have such equipment in its fleet (as specified in this Mitigation Measure below), the establishment of a temporary electric charging area also will not be required. If the contractor(s) equipment fleet includes this equipment and BEU approval is secured, the temporary charging location shall be established upon issuance of grading permits and building permits.

- If electric or non-diesel off-road trucks and construction support equipment, including but not limited to hand tools, forklifts, aerial lifts, materials lifts, hoists, pressure washers, plate compactors, and air compressors are available in the construction contractor's equipment fleet and can fulfill the construction requirements during the building, construction, paving, and architectural coating phases of Project construction, such equipment shall be used during on-site construction. This requirement shall be noted on plans submitted for building permit issuance.

- If electric or non-diesel off-road truck and construction support equipment are not available, then during construction of the proposed Development Project, the Project contractor shall ensure all 50 horsepower or more off-road diesel-powered construction equipment is powered with California Air Resources Board (CARB) certified Tier 4 Final engines or the equivalent.

- Construction contractors shall maintain records of all off-road diesel construction equipment associated with on-site construction to document that each off-road diesel construction equipment used meets required emission standards. Records shall be kept on-site for the duration of construction activities and shall be made available for periodic inspection by City staff or their designee.

- During construction activities, the City shall conduct periodic inspections to verify compliance with construction-related mitigation measures pursuant to the Mitigation Monitoring and Reporting Program.

- During construction of the proposed Development Project, the Project contractor shall only use interior paints with low volatile organic compound (VOC) content with a maximum concentration of 30 grams per liter (g/L) for residential building architectural coating to reduce VOC emissions. All building and site plans shall note use of paints with a low VOC content with a maximum concentration of 30 g/L verified.

- The City of Banning shall verify these requirements have ~~his two-part measure has~~ been incorporated into construction plans prior to issuance of any construction permits and during architectural coating activities.

See further the responses to Comments A-3-48 and A-3-49. Mitigation Measure AIR-1, as revised, further supports the conclusions in the Draft EIR and is not evidence of a new or greater impact not previously disclosed. Therefore, no recirculation is required. See CEQA Guidelines §15088.5(b). No further response is required.

**Response to Comment D-3-57**

The commenter requests that off-road diesel-powered equipment be prohibited from being in the "on" position for more than 10 hours per day. Mitigation Measure MM AIR-1 in the Draft EIR requires that all 50-horsepower or greater diesel-powered equipment comply with Tier 4 offroad emissions standards or equivalent. Tier 4 compliant engines significantly reduce emissions of particulate matter (PM) and oxides of nitrogen (NOX) to near zero levels. Typically, construction workers take time off for lunch and breaks. All construction exhaust emissions are assumed to take place over the 8-hour period between 8:00 a.m. to 4:00 p.m., (see Draft EIR, Appendix C-1, Table I). This is reflected in the conservative assumptions of hours of construction equipment operation in Table 4.3.G. Thus, the City determines that this additional mitigation is not necessary. No further response is required.

**Response to Comment D-3-58**

The commenter requests a mitigation measure that would require use of electric-powered hand tools and equipment and providing electric hook-up to the power grid rather than using diesel-fueled generators to supply power. See the responses to Comments D-3-56, A-3-48, and A-3-49. No further response is required.

**Response to Comment D-3-59**

The commenter requests a mitigation measure designating an area on the construction site where electric-powered construction vehicles and equipment can charge. See the responses to Comments D-3-56, D-3-58, A-3-48, and A-3-49. No further response is required.

**Response to Comment D-3-60**

The commenter requests a mitigation measure limiting the amount of daily grading disturbance but does not suggest an exact quantity that should not be exceeded. The construction analysis included extremely conservative assumptions on the number of acres that could be actively graded per day resulting in a worst-case analysis of air quality impacts. Limiting the amount of grading per day will not change the total amount of grading required for the Project, which would result in the same impact. The Draft EIR made reasonable assumptions based on equipment and schedule and disclosed the maximum emissions per day. The Development Project will comply with applicable SCAQMD regulations and requirements to support regional attainment of AQ standards (including Rule 403 and 402 as included as RCMs AQ-1 and -4 in the Draft EIR). Compliance with these Rules and Mitigation Measure AIR-1 will reduce air pollutant emissions during construction operations to the extent feasible. Therefore, no further mitigation is required.

**Response to Comment D-3-61**

The commenter requests a mitigation measure prohibiting grading when an Air Quality Index forecast of greater than 100 for particulates or ozone is issued. Table 4.3.O of the Draft EIR identifies the localized impacts in the vicinity of the Development Project. As demonstrated through the Localized Significance Threshold (LST) analysis, conducted per SCAQMD requirements, construction emissions would not exceed the applicable SCAQMD threshold (LST) for CO, NOx, $PM_{10}$, or $PM_{2.5}$ at the maximally impacted receptor location. All other modeled locations in the study area would experience a lesser concentration and consequently a lesser impact. Accordingly, construction of the Development Project would not result in the exposure of any sensitive receptors to substantial pollutant concentrations, as analyzed per SCAQMD regulations and policy guidance.

Please refer to the responses to Comments D-3-47, D-3-48, and D-3-49. As stated in the Draft EIR (see Draft EIR, pages 4.3-52 to 4.3-57, and Appendix C-2) the HRAs utilized total emissions from the full project operations alone which exceed emissions from construction alone or overlapping with partial operations.

As discussed in the Draft EIR (see Draft DEIR, page 4.3-26) the Development Project is required to implement stringent fugitive dust control measures to reduce emissions of particulate matter during construction, as required to comply with SCAQMD Rule 403. Additionally, through the implementation of Mitigation Measure AIR-1, the Development Project is required to further utilize

construction equipment with Tier 4 Final certified engines, which would further reduce the emission of particulate matter and NOx emissions associated with construction activities. With respect to limitations of activity when the Air Quality Index (AQI) exceeds 100, pursuant to EPA documentation[42], an AQI of over 100 is generally correlated when the ambient air quality standards are exceeded. AQI is monitored at a regional level and not necessarily representative of local atmospheric conditions that may occur on or adjacent to the Development Site, which is the appropriate condition to consider when determining local construction impacts. As established by modeling conducted for the LST and HRA analysis, the Development Project would not result in a significant health risk to sensitive receptors during construction; therefore, there is no need to limit grading activities and the requested mitigation is not required.

**Response to Comment D-3-62**

The commenter requests a mitigation measure forbidding idling of heavy equipment for more three minutes. CARB's Guide to Off-Road Vehicle and Equipment Regulations states, "…Fleet owners must limit their unnecessary idling to five minutes; there are exceptions for vehicles that need to idle to perform work (such as a crane providing hydraulic power to the boom), vehicles being serviced, or in a queue waiting for work." (see https://ww2.arb.ca.gov/sites/default/files/offroadzone/pdfs/offroad_booklet.pdf). While it is not feasible to totally eliminate all idling of diesel-powered construction equipment, the Development Project during construction will comply with CARB's 2007 In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation) limiting the idling of all construction diesel vehicles to no more than 5 consecutive minutes. In response to this and similar comments, Mitigation Measure AIR-2 (Draft EIR, pg. 4.3-35) has been revised for Development Project operations as follows:

> Tenant lease agreements for the Development Project shall include contractual language restricting trucks and support equipment from nonessential idling longer than ~~5~~ 3 minutes while on site. The idling restriction will be presented on signs at the entrance to the industrial portions of the Development Project as well as at loading docks and truck parking areas.

This revision further supports the conclusions in the Draft EIR and is not evidence of a new or greater impact not previously disclosed. Therefore, it does not constitute new information and no recirculation is required. See CEQA Guidelines §15088.5(b). No further response is required.

**Response to Comment D-3-63**

The commenter requests a mitigation measure to keep onsite and provide to Lead Agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications. This requirement has been added to MM AIR-1. Please see the response to Comment D-3-56. Compliance with the mitigation measures identified in the Draft EIR will be achieved through the Mitigation Monitoring and Reporting Program (MMRP) that will be in included in the Final EIR. The MMRP will identify the mitigation, method and timing of verification of compliance, the parties responsible for compliance, and sanctions to be imposed in instances of non-compliance. No further response is required.

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42 https://www.airnow.gov/sites/default/files/2020-05/aqi-technical-assistance-document-sept2018.pdf.

**Response to Comment D-3-64**

The commenter requests a mitigation measure of conducting on-site inspections to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts. The on-site inspection of equipment has been incorporated into revised Mitigation Measure AIR-1. Please see the response to Comment D-3-56. In response to this and other comments, Mitigation Measure AIR-1, as revised, further supports the conclusions in the Draft EIR and is not evidence of a new or greater impact not previously disclosed. As the commenter does not clarify what "other opportunities" are, it is not possible to sufficiently identify or quantify any supposed reductions. No further response is necessary.

**Response to Comment D-3-65**

The commenter requests a mitigation measure to use paints, architectural coating, and industrial maintenance coatings that have VOC compound levels of less than 10 grams/liter (g/l). Architectural coatings that have a VOC content of 50 g/l or less are typically compliant with SCAQMD Compliant Rule 1113 (see RCM AIR-1). For the Development Project, Mitigation Measure AIR-1 states, ". . . All building and site plans shall note use of paints with a low VOC content with a maximum concentration of 30 g/L verified." As the architectural coatings used during construction would be compliant with SCAQMD Rule 1113, no additional mitigation is required, and no further response is necessary.

**Response to Comment D-3-66**

The commenter requests a mitigation measure providing information on transit and ridesharing programs and services to construction employees. As detailed in Section 4.3 of the Draft EIR (Tables 4.3.H and 4.3.I) during construction, regional emissions of VOC and NOx would exceed the SCAQMD significance threshold without mitigation. With the implementation of Mitigation Measure AIR-1, requiring use of CARB certified Tier 4 construction equipment, only emissions of VOCs would exceed the SCAQMD significance threshold. During the concurrent operation of the Project and ongoing construction (after Opening Year and beyond), due to the addition of project traffic, emissions of all air pollutants would exceed SCAQMD significance thresholds. Mitigation Measure AIR-2 requires development of a Transportation Demand Management (TDM) Program for operators employing 200 or more employees. It is not possible to quantify the reduction in air pollutants achieved through the implementation of the TDM, and the same holds true for a potential TDM during construction. See CEQA Guidelines Section 15041.

**Response to Comment D-3-67**

The commenter requests a mitigation measure to provide meal options on-site or shuttles between the facility and nearby meal destinations for construction employees. Due to the overall limited duration of construction and or number of construction workers who may be present on-site at any given point in time, the provision of the requested mitigation is not feasible. Furthermore, the frequency of how or when such a measure would be utilized is unknown (e.g., would most on-site workers bring meals from home); therefore, it is not possible to quantify the reduction in air emissions this measure would achieve. No further response is necessary.

**Response to Comment D-3-68**

The commenter requests a mitigation measure requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030. See the responses to Comments A-3-25, A-3-26, and A-3-27. Regulations governing truck emissions and use of zero emission trucks for warehouse operations will be changing over the lifetime of the Development Project with tenants being required to comply. The Development Project includes the infrastructure necessary to support zero-emission trucks vehicles as they are added to tenant fleets pursuant to these regulations (see Mitigation Measures AIR-2. Draft EIR, pgs. 4.3-34 36). These include, without limitation, installation of a minimum of 50 class 8 electric vehicle chargers; sufficiently sizing buildings' electrical rooms to hold additional panels needed to supply power for electrical charging systems for trucks; installing conduit from buildings' electrical rooms to all tractor trailer parking spaces to facilitate future electric truck charging; providing 350 Level 2 AC EV charges or the number of chargers to comply with minimum California Green Building Standard Code requirements whichever is greater; and the electrification of all truck/dock bays that serve cold storage facilities to allow plug-in capabilities and support use of stand-by and/or hybrid electric TRUs. These provisions will facilitate the use of zero emission trucks in tandem with CARB requirements to transition to clean zero-emission fleets, and compliance with provisions of the WAIRE program. However, the current commercially availability of electric trucks is limited, and insufficient to serve the needs of the Development Project when it is fully operational in 2027. It would be speculative to assume that sufficient electric trucks would be available to fully serve the Project by 2030 as requested. See, e.g., response to Comment A-3-25. Thus, requiring exclusive use of zero emission trucks by 2030 is economically and technologically infeasible, and CEQA does not require imposition of mitigation that is infeasible. No further response is necessary.

**Response to Comment D-3-69**

The commenter requests a mitigation measure requiring all motorized operational equipment to be zero-emission by 2030. Mitigation Measure AIR-2 already requires that on-site cargo handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts), and other on-site equipment shall be electric with the necessary electrical plug-in charging included in the design of the Development Project electrical system, buildings, and equipment storage and parking areas. Since this recommendation is already included in the Draft EIR, no additional mitigation is required, and no further response is necessary.

**Response to Comment D-3-70**

The commenter requests a mitigation measure requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations. See the response to Comment D-3-68 regarding the feasibility of requiring the use of zero-emission vehicles. Depending on the end tenant, the use of EVs may not be suitable for business operations. As required by Mitigation Measure AIR-2, tenants will be provided with information on incentive programs, such as the Carl Moyer Program and the (Hybrid) Incentive Voucher Program to upgrade fleets. Mitigation Measure AIR-2 already requires the Development Project to install electric vehicle (EV) charging stations for heavy duty trucks, and clean air/vanpool parking stalls at the Project site, which would contribute to and support the use of more EVs (see Draft EIR, pgs. 4.3-34 36). Additionally, conduit will be installed from the electrical room to tractor trailer parking spaces in logical location(s) on the site for the purpose of accommodating the

future installation of EV truck charging stations, for the future time that this technology becomes commercially and technologically available to future tenants, and the buildings will be being served by TRU trucks with electric-powered engines (see Mitigation Measure AIR-2). Thus, no further mitigation or response is required.

**Response to Comment D-3-71**

The commenter requests a mitigation measure forbidding trucks from idling for more than three minutes. The CARB's Airborne Toxic Control Measure requires, that drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds, including buses and sleeper berth equipped trucks, not idle the vehicle's primary diesel engine longer than five minutes at any location (see: https://ww2.arb.ca.gov/capp-resource-center/heavy-duty-diesel-vehicle-idling-information). Please see the response to Comment D-3-56. Nevertheless, in response to this and other comments, Mitigation Measure AIR-1, is revised reducing maximum idling times to 3 minutes. This revision further supports the conclusions in the Draft EIR and is not evidence of a new or greater impact not previously disclosed. No further response is required.

**Response to Comment D-3-72**

The commenter requests a mitigation measure requiring the posting of interior- and exterior-facing signs identifying idling restrictions. Mitigation Measure AIR-2 already includes this measure. No further response is required.

**Response to Comment D-3-73**

The commenter requests a mitigation measure requiring installation of photovoltaic systems on the project site to ensure electrical generation is equal to or greater than the buildings' projected energy needs, including electrical vehicle chargers. Please see the response to Comment A-3-64. No further response is required.

**Response to Comment D-3-74**

The commenter requests a mitigation measure designing building roofs to accommodate the maximum future coverage of solar panels and install the maximum solar power generation capacity feasible. In compliance with Title 24, Project buildings will be designed and constructed to include solar-ready roofs. See also response to Comment A-3-64. No further response is necessary/required.

**Response to Comment D-3-75**

The commenter requests a mitigation measure to construct zero-emission charging/fueling stations proportional to the number of dock doors at the project. Mitigation Measure AIR-2 includes the requirement to provide a minimum of 50 truck chargers sufficiently sized to charge heavy duty trucks. As the intent of this recommended measure is already effectively satisfied by Mitigation Measure AIR-2, no further response is required.

**Response to Comment D-3-76**

The commenter requests a mitigation measure to run conduit to designated locations for future electric truck charging stations. Mitigation Measure AIR-2 requires buildings within the warehouse/

industrial portions of the Development Project to be sufficiently sized to hold additional panels that may be needed to supply power for installation of electric charging systems for electric trucks and power transport refrigeration units (TRUs). Conduit is required to be installed from the electrical room to all tractor trailer parking spaces in logical locations on site to facilitate future electric truck charging. As the intent of this recommended measure is effectively satisfied by Mitigation Measure AIR-2, no further mitigation or response is required.

**Response to Comment D-3-77**

The commenter requests a mitigation measure ensuring refrigerated warehouse space provides electric plugs for transport refrigeration units (TRUs) and requiring truck operators to use plugs when docked. Mitigation Measure AIR-2 already requires all truck/dock bays that serve cold storage facilities to be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs. As this recommended measure is satisfied by Mitigation Measure AIR-2, no further mitigation or response is required.

**Response to Comment D-3-78**

The commenter requests a mitigation measure oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future electric vehicle charging capability. Mitigation Measure AIR-2 requires buildings within the warehouse/industrial portions of the Development Project to be sufficiently sized to hold additional panels that may be needed to supply power for installation of electric charging systems for electric trucks and power transport refrigeration units (TRUs). As the intent of this recommended measure is already effectively satisfied by Mitigation Measure AIR-2, no further mitigation or response is required.

**Response to Comment D-3-79**

The commenter requests a mitigation measure to construct and maintain electric light-duty vehicle charging stations proportional to the number of employee parking spaces – at least 10 percent to be equipped with at least level 2 chargers. Mitigation Measure AIR-2 requires the provision of either the higher value of at least 350 Level 2 AC EV chargers; or a percentage of total parking spaces with Level 2 AC EV chargers to comply with the minimum requirements of CCR, Title 24, Part 11: California Green Building Standards Code, whichever is greater. As the intent of this recommended measure is already satisfied by Mitigation Measure AIR-2, no further mitigation or response is required.

**Response to Comment D-3-80**

The commenter requests a mitigation measure requiring the installation of additional conduit to future employee parking spaces to accommodate future increases in the number of electric light-duty charging stations. Please refer to the responses to Comments D-3-78 and D-3-79. As the intent of this recommended measure is already satisficed by Mitigation Measure AIR-2, no further mitigation or response is necessary.

**Response to Comment D-3-81**

The commenter requests a mitigation measure installing and maintaining at the manufacturer's recommended maintenance intervals, air filtration systems at nearby sensitive receptors. Because the

HRA (Draft EIR Appendix C-2; Final EIR Appendix C-5) has not identified a significant localized air quality impact or a health risk impact at the nearest sensitive receptors, no mitigation is required (see also the response to Comment B-2-5). See CEQA Guidelines Section 15041. Please also refer to the response to Comment B-2-14 regarding the limited effectiveness of filtration systems at nearby sensitive receptors. No further response is necessary.

**Response to Comment D-3-82**

The commenter requests a mitigation measure to install and maintain an air quality monitoring system near sensitive receptors for the life of the Project. As the commenter acknowledges, this measure would not mitigate any air quality or greenhouse gas impacts associated with the Development Project, and therefore is not required mitigation. No further discussion is necessary.

**Response to Comment D-3-83**

The commenter requests a mitigation measure requiring all stand-by emergency generators to be powered by a non-diesel fuel. By definition, emergency generators would only be used on a limited basis in the case of emergency power failure or for routine testing and maintenance. Such intermittent use would not cause a substantial amount of emissions, since the use would be short-term, intermittent, and infrequent. Requiring emergency generators to be powered by non-diesel fuel would not result in a significant reduction in air quality emission impacts. No further mitigation or response is necessary.

**Response to Comment D-3-84**

The commenter requests a mitigation measure require training to ensure efficient scheduling and load management to prevent necessary queuing and truck idling. Mitigation Measure AIR-2 already includes this measure. No further response is required.

**Response to Comment D-3-85**

The commenter requests a mitigation measure establishing and promoting rideshare and other programs that discourage single-occupancy vehicle trips and encourages alternate modes of transportation. Mitigation Measure TRA-1 requires development of Transportation Demand Management (TDM) strategies that incorporate features into project design that reduce vehicle trips by increasing and providing financial incentives for alternate modes of transportation, including carpooling/vanpools, public transit, and biking. These measures are included as project features in Appendix J-1 at pp. 6-8. No further response is necessary.

**Response to Comment D-3-86**

The commenter requests a mitigation measure meeting CALGreen Tier 2 Green Building standards including provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. Tier 2 green building standards are voluntary. The City elected to utilize the Riverside County CAP point system in reducing GHG emissions, which includes designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. Under the CAP, the Project achieves 586 points, far greater than the 100-point minimum needed to meet CAP requirements. Under the CAP, the Project has a less than significant impact. Project buildings would meet CALGreen Tier 1 green building

standards. Per the Draft EIR (page 4.3-18), the Development Project provides bicycle storage as a sustainable design strategy consistent with CALGreen. The Project also is required to provide 350 Level 2 AC EV chargers or a number of charges to comply with requirements of the California Green Building Standards, whichever is greater. The Development Project is also providing 50 Class 8 truck chargers, and electrical conduits for future EV truck charging stations (see Mitigation Measure AIR-2). The Development Project includes other project design features (PDFs) including but not limited to: providing parking spaces to accommodate vans used for ride-sharing programs, a car/vanpool program with preferred parking; bike lockers and secure racks; and reserved preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles (Draft EIR, Table 4.8.K, page 4.8-32). Also, a requirement to provide commute trip reduction, a rideshare program, and end-of-trip bicycle facilities is identified in Appendix J-1 of the Draft EIR, and Section 4.17.6.3 (as revised) of the Final EIR. Therefore, the Project adequately provides designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. Thus, no additional mitigation or further response is required.

**Response to Comment D-3-87**

The commenter requests a mitigation measure designing to LEED green building certification standards. The Project would be constructed to Title 24 Part 6 and CALGreen Building Code Tier 1 standards, which approximates basic LEED certification (see Draft EIR, Section 3.5.3.10, page 3-98). No additional mitigation or further response is necessary.

**Response to Comment D-3-88**

The commenter requests a mitigation measure providing meal options on-site or shuttles between the facility and nearby meal destinations. Within the planned commercial area, the Development Project includes venues for a variety of dining options including sit-down restaurants, a food hall, areas for use by potential on-site vendors/concessionaires, and fast food outlets (see Draft EIR Section 3.3.5.1, page 3-25); therefore, no additional mitigation is necessary.

**Response to Comment D-3-89**

The commenter requests a mitigation measure posting signs at every truck exit driveway providing directional information to the truck route. Mitigation Measure AIR-2 already includes this measure. No further response is required,

**Response to Comment D-3-90**

The commenter requests a mitigation measure improving and maintaining vegetation and tree canopy for residents in and around the project area. The reduction achieved by the requested measure is not quantifiable and there is no reasonable assurance it would reduce Development Project-related impacts, nor are there any Project impacts related to residents around the Project area that this would address. Therefore, this measure is not required by CEQA. See CEQA Guidelines Section 15041. Moreover, the Specific Plan (see Draft EIR, Appendix B) includes a robust landscape plan that serves the dual purpose of adding year-round visual appeal while being sensitive to the environment, and the Southern California climate, by using drought-tolerant materials. Streetscape landscaping presents a combination of evergreen and deciduous trees, low shrubs, and masses of groundcovers to create a visually pleasing experience for pedestrians and passing motorists.

Development per the guidelines detailed in the Specific Plan will ensure appropriate landscaping throughout the Development Site. No further response is required.

**Response to Comment D-3-91**

The commenter requests a mitigation measure requiring (1) every tenant to train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses; and (2) facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and State upon request. Mitigation Measure AIR-2 already includes these measures. No additional mitigation or further response is required.

**Response to Comment D-3-92**

The commenter requests a mitigation measure requiring tenants to enroll in the US EPA's SmartWay Program. Mitigation Measure AIR-2 already includes this measure. No further response is required.

**Response to Comment D-3-93**

The commenter requests a mitigation measure to provide tenants with information on incentive programs, such as the Carl Moyer Program and the (Hybrid) Incentive Voucher Program to upgrade fleets. Mitigation Measure AIR-2 already includes this measure. No further response is required.

**Response to Comment D-3-94**

The commenter states, without substantiation, that the measures in comments provided offer a cost-effective, feasible way to incorporate lower-emitting design features into the Development Project and to reduce emissions during the construction and operation of the Development Project. Please see the responses to Comments D-3-56 through D-3-93. The Draft EIR contains appropriate design features and mitigation to reduce emissions to the extent feasible (see, e.g., Mitigation Measures AIR-1 and AIR-2, and GHG-1 through GHG-7). The commenter's suggestions are noted and will be considered by City decision makers prior to any future action on the Project. No further response is required.

**Response to Comment D-3-95**

The commenter references the State's goal that renewable and zero-carbon resources supply 100 percent of retail electricity sales by December 31, 2045. As stated in the Draft EIR, the Project site is within the service territory of the Banning Electric Utility (BEU) which, as the retailer supplying the Project with electricity, is required to comply with SB 100's statutory mandate. No further response is required.

**Response to Comment D-3-96**

The commenter states a revised EIR should be prepared to include all feasible mitigation measures with revised air quality, health risk, and greenhouse gas analyses to ensure necessary mitigation measures are implemented to reduce emissions to below thresholds. Please refer to the responses to Comments D-3-56 through D-3-93 for a detailed discussion of the suggested mitigation measures. Please note that CEQA only requires imposition of mitigation that is feasible and reduces but does not

necessarily eliminate significant impacts to below the threshold of significance. See Pub. Resources Code section 21002; CEQA Guidelines sections 15021(a), 15043(a). Pursuant to various public comments, Mitigation Measures AIR-1 and AIR-2 (Draft EIR, pages 4.3-35) have been revised. Please see the responses to Comments D-3-56 and D-3-62. These revisions do not constitute evidence of a new or greater impact not previously disclosed. Even with the incorporation of the additional mitigation measures, the specified impacts to air quality and GHG would remain significant and unavoidable, and the health impacts are less than significant. The Draft EIR as supplemented by the Final EIR contains an appropriate level of analysis and mitigation to reduce emissions to the extent feasible. No additional response is required.

**Response to Comment D-3-97**

The commenter provides concluding statements that do not raise any issues regarding the adequacy of the analysis in the Draft EIR. No further response to this comment is required.

**From:** Adam Rush
**To:** Sandra Calderon;
**Cc:**
**Subject:** Fwd: Sunset Crossroads Project
**Date:** Monday, January 29, 2024 1:46:57 PM

---

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line: 951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

---

**From:** Adam Salcido <asalcido@goldenstateeja.com>
**Sent:** Monday, January 29, 2024 1:37:21 PM
**To:** Adam Rush <arush@banningca.gov>
**Cc:** Executive Director <executivedirector@goldenstateeja.com>; Assistant Executive Director <assistantexecutivedirector@goldenstateeja.com>; Steven Piepkorn <spiepkorn@goldenstateeja.com>; Ramon Amaya <ramaya@goldenstateeja.com>; Pete Sheehan <psheehan@goldenstateeja.com>; Stanley Saltzman <ssaltzman@goldenstateeja.com>
**Subject:** Sunset Crossroads Project

Good Afternoon Mr. Rush,

Please provide any updates to the above mentioned project.

I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project.

executivedirector@goldenstateeja.com

assistantexecutivedirector@goldenstateeja.com

jbourgeois@goldenstateeja.com

D-4-1

asalcido@goldenstateeja.com

spiepkorn@goldenstateeja.com

ramaya@goldenstateeja.com

psheehan@goldenstateeja.com

ssaltzman@goldenstateeja.com

D-4-1
Cont

Mailing Address:

P.O. Box 79222

Corona, CA 92877

Please confirm receipt of this email.

Thank You,

Adam Salcido

## Response to Letter D-4

Golden State Environmental Justice Alliance
Adam Salcido
January 29, 2024

### Response to Comment D-4-1

The commenter provides a number of email contacts and a mailing address and requests these individuals be added to the notification list regarding any subsequent environmental documents, public notices, public hearings, and notices and determinations for the Project. Pursuant to Public Resource Code Section 21092.2, the City has added these contacts to its distribution/notification list for the Project. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

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**From:** Adam Rush
**To:** "Abigail A. Smith"
**Subject:** RE: Sunset Crossings DEIR - attachment to comment letter
**Attachments:** TN228787-46_20190619T092238_NACFE - Amping Up - Charging Infrastructure for Electric Trucks 2019.pd.pdf

Ms. Smith,
No additional comment letters were received by the City within the specified comment period. Your attachment "Amping Up" was the only document received.

Sincerely,
Adam B. Rush, AICP
*Community Development Director*

**Community Development**
City of Banning

Direct Line: (951) 922-3131
Cell: (760) 219-2791
E: arush@banningca.gov

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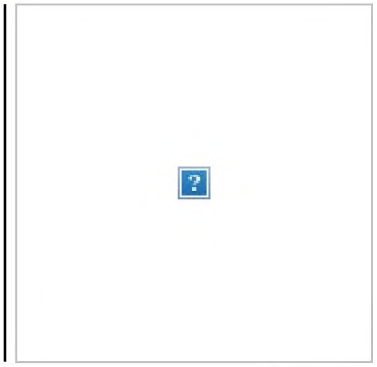

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**From:** Abigail A. Smith <abby@socalceqa.com>
**Sent:** Tuesday, January 30, 2024 1:48 PM
**To:** Adam Rush <arush@banningca.gov>
**Subject:** Sunset Crossings DEIR - attachment to comment letter

Dear City of Banning:

Please find attached one attachment to Sierra Club's comment letter regarding the **Sunset Crossings Specific Plan DEIR** sent via email moments ago. Thank you again.

D-5-1

Abigail A. Smith, Esq.
Law Office of Abigail Smith, A Professional Corporation
2305 Historic Decatur Road, Suite 100

San Diego, CA. 92106
951-808-8595
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# AMPING UP: CHARGING INFRASTRUCTURE FOR ELECTRIC TRUCKS

Widespread innovation and technological advances are producing technologies and practices that could affect decisive, revolutionary, and potentially disruptive opportunities across the transportation industry. As novel concepts, new applications, and original modes of behavior reach the market, fleets and manufacturers need information on the benefits, challenges, and risks so that everyone can profit in this evolving landscape. The North American Council for Freight Efficiency (NACFE) hopes that by fleet managers, manufacturers, and others using its Guidance Reports in the months and years leading to launch, the first generation of production technologies will perform much better and offer higher return on investments.

This report focuses on charging infrastructure considerations for North American commercial battery electric vehicles (CBEVs). In its previous Guidance Reports, *Electric Trucks—Where They Make Sense* and *Medium Duty Electric Trucks—Cost of Ownership*, NACFE found that while the benefits of electric vehicles can be huge, so are the power requirements for charging them. In fact, the previous reports identified charging infrastructure as one of the largest unknowns and sources of anxiety for fleets considering near-term adoption of this technology. NACFE created this Guidance Report to provide unbiased information detailing the multiple factors to consider in infrastructure planning for charging CBEVs. While there

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is no “one size fits all” solution to charging, there are common steps and considerations that any fleet considering deployment of electric trucks should undertake in order to ensure they have a complementary and cost-effective charging strategy in place.

This is the third in a series of NACFE guidance reports on electric trucks. It will be followed by Guidance Reports on Class 7 and 8 day cabs and Class 8 long-haul electric vehicles. The goals of this guidance report are to: a) give an overview of electric vehicle supply equipment (EVSE); b) provide information on procuring charging stations and the required electricity; and c) provide common steps and considerations to ensure a complementary and cost-effective charging strategy.

## METHODOLOGIES

NACFE’s research for this report included interviewing key people with first-hand knowledge of electric vehicle charging infrastructure at fleets, manufacturers, suppliers, utilities, and industry groups. The report includes an extensive list of references to assist readers interested in pursuing more detail. Interviewees were specifically asked what they would want to see in this report and NACFE has taken care to include these wants in the final report. This report builds off the NACFE Guidance Reports: *Electric Trucks—Where They Make Sense*, published in May 2108, and *Medium Duty Electric Trucks—Cost of Ownership*, published October 2018.

## SCOPE OF THIS REPORT

The report covers charging considerations for CBEVs currently in production for freight delivery. Because most CBEVs are currently being deployed in the goods movement sector in the medium-duty urban delivery and drayage sectors, much of the best practices and lessons learned come from these applications. And while we touch on considerations for long-haul CBEVs, much of this information is speculative at this point in time as electric trucks have yet to be deployed for this application in any meaningful way.

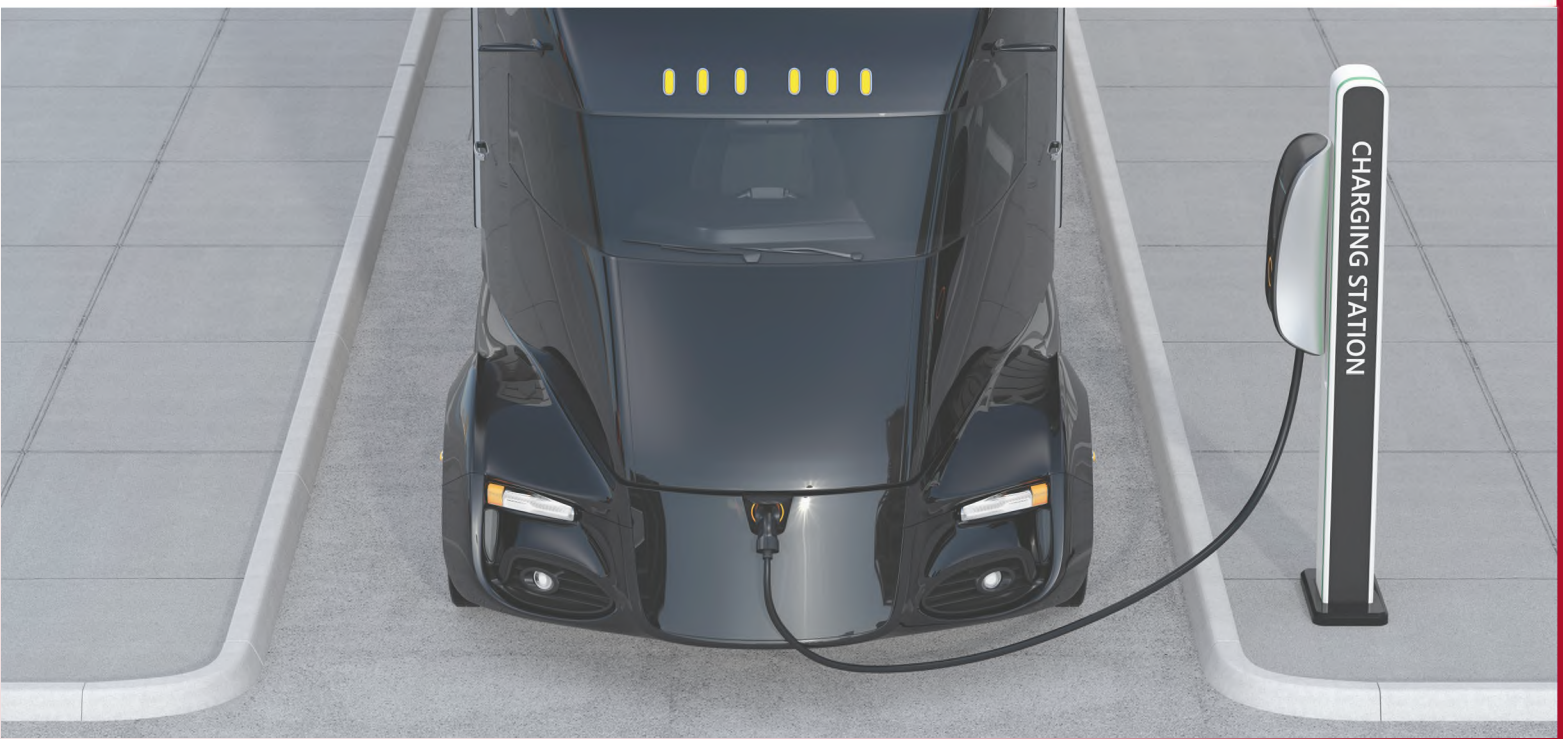
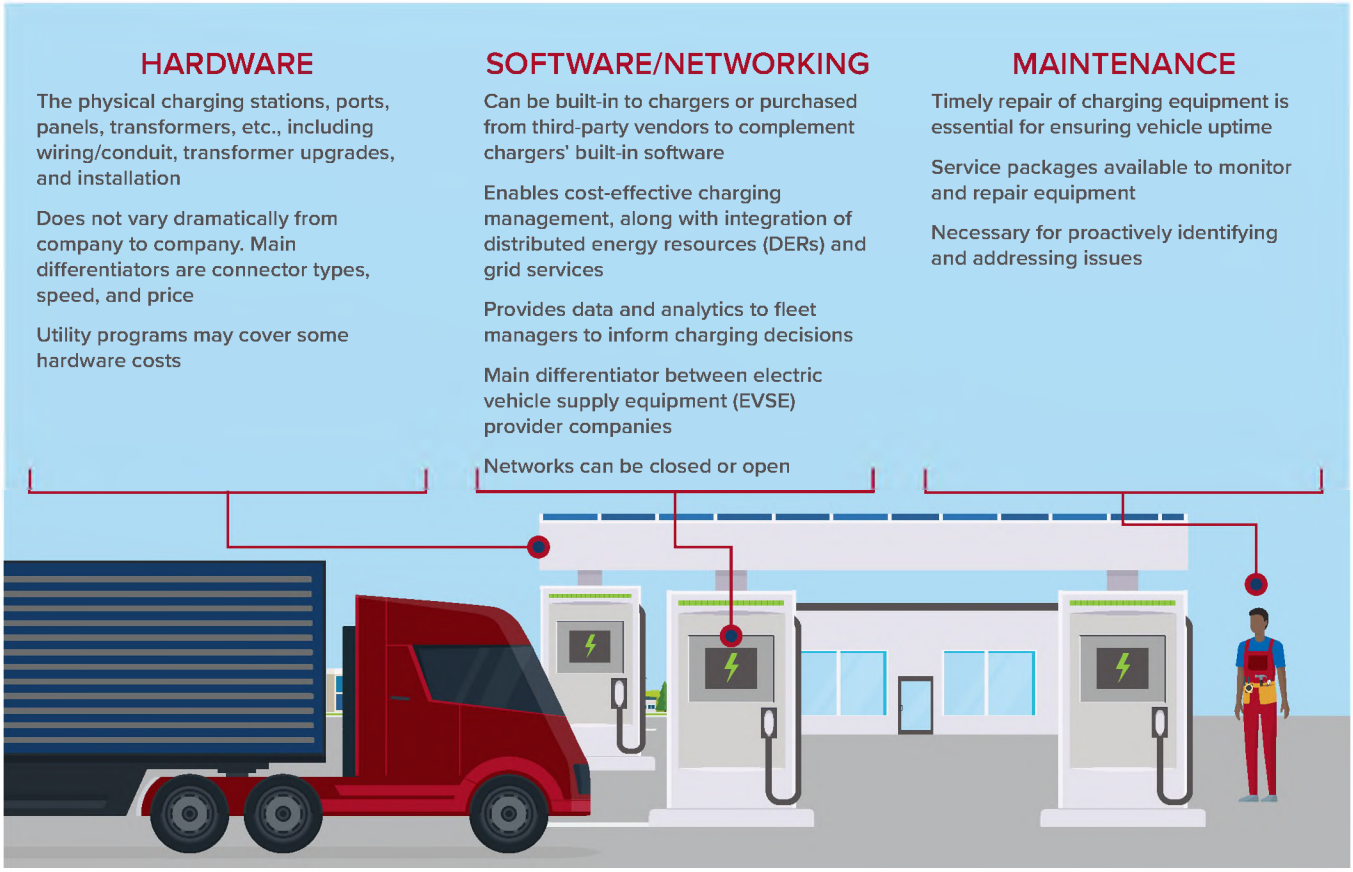


**FIGURE ES1**
ELECTRIC TRUCK CHARGING INFRASTRUCTURE COMPONENTS




## INFRASTRUCTURE BASICS

### ELECTRIC VEHICLE SUPPLY EQUIPMENT

When planning for charging infrastructure, fleets must plan for three separate but related components: hardware, software/networking, and maintenance.

The hardware consists of the electric vehicle supply equipment (EVSE), also known as a charging station, which charges the batteries of electric vehicles. The most common type of EVSE is a plug-in charging station, which plugs into a port on the truck to recharge it. Unfortunately, charging station connecters are not yet standardized, and there are a number of competing charging station connector types throughout the world (e.g., SAE J1772, CCS, CHAdeMO, Tesla, etc.).

It is important to pair electric trucks with the appropriate type of connector. However, standardizing connectors may eventually occur for regional marketplaces as one configuration wins significant market share advantage over others. In the near term, commercial vehicles may be developed with several adapters to deal with various charging station constraints or forced to use proprietary connections and be limited to proprietary charging stations. Similarly, some charging stations offer multiple connector types to ensure usability across different vehicles. The connector choice may not be an issue for fleets with only one CBEV model and with dedicated A-B-A type routes where the vehicle only charges from its home base. However, if a fleet is using competing CBEV models from different manufacturers but wanting to use the same charging system, there may be need for adapters. Thus, for fleets that choose their vehicles first, they will need to know what type of port the truck has in order to plan which charger type(s) to purchase.

An alternative to charging through wires and plugs is termed wireless power transfer (WPT). Wireless charging protocols are in use with automobiles and some buses. Applicability of wireless charging to trucks is being investigated both in static situations where the vehicle is not moving, and in on-road methods were the vehicle is moving. Although static charging presents the least technical challenge for wireless, currently wireless charging technology appears too expensive for the trucking market, with a few exceptions for niche markets. For example, wireless charging may be an opportunity for heavy-duty trucks to charge while they're waiting to pick up loads from ports. It is also being considered as a solution in port applications where union contracts may prevent workers from physically plugging in charging cables. However, some see a bigger opportunity for wireless charging in the trucking sector.

Other charging options include overhead or in-ground conductive charging systems and battery swapping—rapidly charging vehicles by simply replacing the battery packs.

## CHARGING SPEEDS

In regard to charging speed, there are three types of EVSEs: Level 1—a 120 Volt home wall outlet, typically only used for light-duty passenger vehicles; Level 2—a 240 Volt charger; and Level 3—DC Fast Chargers (DCFC).

Since a Level 1 charger is not appropriate for charging commercial fleets, fleets will need to decide between Level 2 or DCFC (or a mix of both) in order to keep their vehicles charged. Level 2 chargers can range from $2,000 to $7,000 and offer upwards of 7.2 kW of power, with some now offering over 19 kW. Depending on duty cycle, many fleets that employ "return to base" or "depot" charging find Level 2 EVSEs adequate for charging overnight or during their "dwell time" between shifts.

However, trucks with larger battery packs and/or shorter dwell times may need to consider DCFCs, which are much faster and also much more expensive. Not including installation or any grid/facility upgrades that may be required, current DCFC stations can cost upwards of $15,000 and as much as $90,000. Deciding which level of charging is right for your fleet depends on how many trucks need to be charged, the size of their batteries, and how long they each have to charge.

**FIGURE ES2**
TYPES OF EVSE (NACFE)

| Type of EVSE | Voltage | Power (kW) | Price | Installation Requirements |
|---|---|---|---|---|
| **Level 1** | 120 V | 1.9 kW | Usually included with vehicle purchase (for passenger EVs) | Most plug-in electric light-duty vehicles come with a cord set capable of plugging into a standard home wall outlet, so no additional charging equipment is required |
| **Level 2** | 208 - 240 V | 7.2 - 19.2 kW | A few thousand dollars per charger | Requires installation of charging equipment and a dedicated circuit of 20 to 100 amps |
| **DC Fast Charge** (sometimes called Level 3) | Typically 480 V AC input | 72 kW–1 MW (in discussion) | $15,000–$90,000 per charger | Requires installation of charging equipment and dedicated circuit |

**FIGURE ES3**
POTENTIAL REAL-WORLD CHARGING SCENARIOS

| Truck | Battery Size | Range | Charge Time with Level 2* ** | | Charging Time with DCFC* *** | |
|---|---|---|---|---|---|---|
| | | | To 80% | To 100% | To 80% | To 100% |
| Chang[illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] |
| Freightliner [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] |

* Assuming 20% state of charge
** Assuming 19.2 kW
*** Assuming 120 kW from charger and that vehicle capable of receiving 120 kW

For example, as shown in Figure ES3, an electric delivery van may be able to recharge its batteries in 4–6 hours using a Level 2 charger, whereas an electric Class 8 tractor may require the same amount of time to recharge using a DCFC.

Note: The estimates in Figure ES3 assume a 20% starting state of charge for the batteries, that the Level 2 charger delivers 19.2 kW, and that the DCFC delivers 120 kW. It also assumes that both vehicles are capable of receiving 120 kW.

*"Fast charging is not really an issue for most medium-duty trucks in the US. Most are one-shift operations with lots of time to charge."*



–Don Francis, Clean Cities Georgia

## CHARGER COMMUNICATION

In order to ensure proper charging, the charger must know how much power to provide and when. This is accomplished via the EVSE protocol, which, on a basic level, is a two-way communication between the charger and the vehicle. It detects the battery's state of charge (SOC) and sets the correct charging current based on the maximum current the charger can provide as well as the maximum current the vehicle can receive. There's also a safety feature that will prevent current from flowing when the charger is not connected to the vehicle or when there is not proper grounding. EVSE is also capable of detecting hardware faults and disconnecting the power in order to prevent battery damage, electrical shorts, or fire.

The EVSE protocol's ability to understand battery SOC also creates opportunities for smart charging systems to prioritize the order of charging vehicles based on where power is most needed to optimize charging from the fleet's perspective rather than by individual truck. For example, a truck with batteries that are 80% depleted will need more power and therefore more charging time than a truck with batteries that are only depleted 30%. Smartly managing these trade-offs and interactions requires appropriate software.



Image courtesy of Wikipedia Commons

## CHARGER SOFTWARE AND NETWORKING

Charging software is key for easily and cost-effectively managing fleet charging operations and is now the main differentiator between EVSE provider companies. For example, software is what allows multiple chargers on-site to be able to communicate with one another to optimize sequencing, load management, and variable time of day electricity rates and what ensures that a fleet is charging smartly.

Sometimes, software comes built-in to chargers. Software can also be purchased from third-party vendors to complement the chargers' built-in software. In addition to real-time charging optimization, software is also capable of collecting data and providing analytics to help fleet managers make informed charging decisions.

Most software requires that a charger be connected to a network in order to achieve full functionality. Generally speaking, there are three types of charging station networks: non-networked—typically used in residential applications; closed—which communicate between the charging station and the network server; and open—which allow charging stations to connect to multiple open networks. Particularly when fleets are first dipping their toe into electrification and piloting charging solutions, they may want to opt for open, standards-based networks in case they want to test multiple chargers but manage them all together on one network or in case they want to switch or mix and match chargers in the future.

## CHARGER MAINTENANCE

Similar to networking, charging companies may offer very different maintenance packages. These may include services such as proactive monitoring and repair of equipment if needed. Monitoring is important in order to spot and address issues before they snowball into crises. And timely repair of charging equipment is essential for ensuring mission-critical vehicle uptime. Therefore, maintenance packages should be carefully reviewed to ensure they meet fleet needs.

## CHARGING LOCATIONS

Charging will roll out in stages, first at a fleets' home depot. Later, fleets may share charging, where a truck goes from its home depot to someone else's home depot, both equipped with chargers. Eventually, remote public charging is expected to emerge on high density freight corridors where distances demand a mid-trip boost or recharge. Charging will evolve as demand grows.

Similar to the personal vehicle market, most commercial vehicles currently charge at "home," or at private, "depot," or "return-to-base" charging stations. Due to the unpredictable "hub and spoke" nature of commercial trucking operations, most fleets currently adopting electric truck technology will want to place chargers at a central home base such as a warehouse, distribution center, or headquarters where trucks start from and return to each day. This type of "return-to-base charging" also makes sense because fleets have full control over site access, charger type, placement, and timing. This may mean redesigning the site, as the vehicles must be co-located with the chargers for some extended period of time to allow charging.

However, charging vehicles at the fleet's base during dwell times between shifts may not be sufficient for vehicles with larger battery packs and/or longer routes. One potential solution, at least for dedicated regional routes, might be to install charging stations not only at the fleet depot, but also at the customer's site(s). This could allow vehicles with relatively long A-B-A routes to charge at point B while unloading, giving them enough of a charge to make it back to their home base for further charging between shifts.

In addition to depot charging, fleets may also consider "opportunity charging" on the road. For example, vehicles may take advantage of the quickly developing public charging network if needed for range extension or in emergencies. However, because of the costs of using public chargers and the uncertainty of availability, vehicles will likely only want to rely on public charging in case of emergency. But knowing that this option exists should relieve some of the "range anxiety" that fleet managers and drivers may feel about potentially running out of power while away from their home base. Regardless of where charging takes place, fleets that invest in charging infrastructure will want to ensure that station utilization is maximized in order to justify the significant expense.

## GRID INTEGRATION AND UTILITY BUSINESS MODELS

What is clear, as far as the overall charging system, is that electric trucks will increase demand on electricity. Because of this, grid capacity will need to be improved. New generation may need to be added if increased efficiency in other sectors (buildings, industry, etc.) is not enough to counterbalance the new load from the quickly electrifying transportation sector. Utilities may also need to develop new demand management and/or storage solutions to help balance timing concerns with electricity supply and demand. Similarly, new tariff structures may be necessary in order to encourage smart charging when electricity supply is available, clean, and economical.

Given constraints of the current grid, utilities would prefer that electric vehicles not charge during "peak" times when electricity demand is highest, typically in the late afternoon or early evening when people return home from work and begin doing energy-intensive chores. Rather, utilities are interested in encouraging charging (and other energy-intensive tasks) during "off-peak" hours when the grid has more excess capacity.

The growing demand for electric vehicles combined with state-level greenhouse gas reduction goals and mandates, are causing some utilities to rethink their tariff structures and even to design new tariffs specifically to support EV charging for commercial and industrial customers. This includes implementing time-of-use rates, in which utilities charge a different rate for on-peak versus off-peak times, or demand charges, which allow utilities to charge customers based on their individual peak demand or highest use in a given timeframe. Because of this dynamic, fleets with flexible operations or operations that allow for trucks to be charged at night will likely find charging to be more economical than fleets that may need to charge during the day or all at once to support mission critical operations. However, this dynamic will vary by region and by utility.

Because many utilities earn a profit based on a "cost-of-service" business model that guarantees a "rate of return" on the company's assets or "rate base," utilities are incentivized to build the necessary infrastructure to support transportation electrification, a trend which will likely require them to invest in new assets and therefore earn more profits. With this information in mind, fleets should not be shy in demanding reasonable support and accommodations from utilities to support vehicle charging.



## PROCURING CHARGING INFRASTRUCTURE AND ELECTRICITY

There are two main business models for procuring charging stations and associated infrastructure. The most common is by buying the stations outright, often through a request for proposal process. In this scenario, fleets may hire a consultant to help make these decisions and set up the infrastructure (and potentially also help manage the relationship with the utility), but in the end, the fleet owns and manages the chargers, which are then considered a capital expense.

The other way is through leasing in which the supplier owns the stations and the fleet simply pays a fee for using them. This model allows the fleet to pay for the stations out of their operational expense budget. In both the lease and own options, fleets often pay charging suppliers not just for the physical stations but also for access to their fleet management networks, which again, are a recurring operational expense.

Other innovative business arrangements may be possible, including third parties that step in with capital to create turnkey systems, with various usage rates that could remove the site owner from the complexity of managing part or all of the charging system. Those third parties, similar to an energy service provider in the buildings sector, may specialize not just in infrastructure procurement and installation, but also in optimizing charging, which can have large financial implications. Especially for fleets with little experience or interest in optimizing charging, this sort of "charging-as-a-service" model can be a good option since these third-party companies specialize in this area and therefore may be better able to maximize efficiency and avoid load spikes and demand charges.

### ELECTRICITY BUSINESS MODELS

Just as there are various ways to procure the charging infrastructure, there are also various ways to procure the electricity. Most fleets procure electricity the traditional way—through the local utility's electric grid. Depending on whether the region is a regulated or deregulated electricity market, fleets may have options with respect to which company they buy their energy from. In thinking through electricity pricing, fleets must be aware of their utility's rates and if and how demand charges are integrated into those rates.

Fleets can also get their electricity from on-site "behind the meter" solutions such as microgrids and renewables like solar PV. However, integrating systems like these into electric fleet charging systems is a very new concept and no data is yet available as far as best practices.

### FINANCIAL ASSISTANCE

Fortunately for fleets, depending on the location and project, there are a myriad of financial assistance programs available to help make vehicle electrification more economically feasible. While some of these funding mechanisms are focused more on the vehicles themselves, some can also help cover the cost of charging infrastructure.

Utilities are typically aware of any financial incentives offered within their service territory, so speaking with a utility representative is usually a good place to start. There are also directories available online that allow fleets to search for funding support by location.

## IMPLEMENTATION STEPS AND CONSIDERATIONS

Fleets planning for vehicle electrification must consider many variables for implementation. And while each project by necessity involves some bespoke engineering (since each site and project is different), there are some common factors to consider. A suggested chronological roadmap, including key considerations is outlined in Figure ES3.

The roadmap will have the same general steps regardless of number or size of trucks; however, as fleets scale the number of electric vehicles at each site, the charging procurement process will become exponentially more complex and time-consuming.

**FIGURE ES4**
CHARGING PROCUREMENT ROADMAP

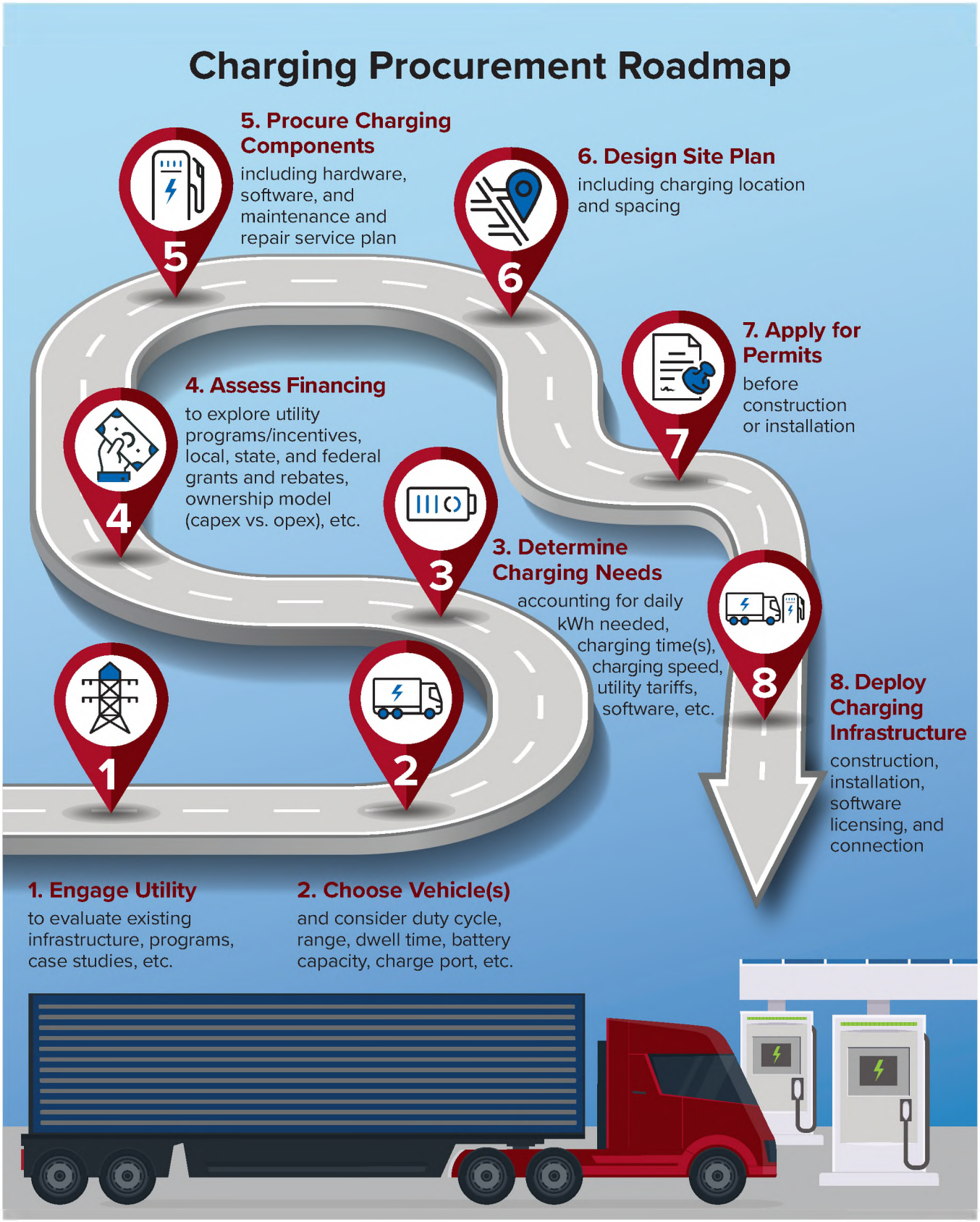
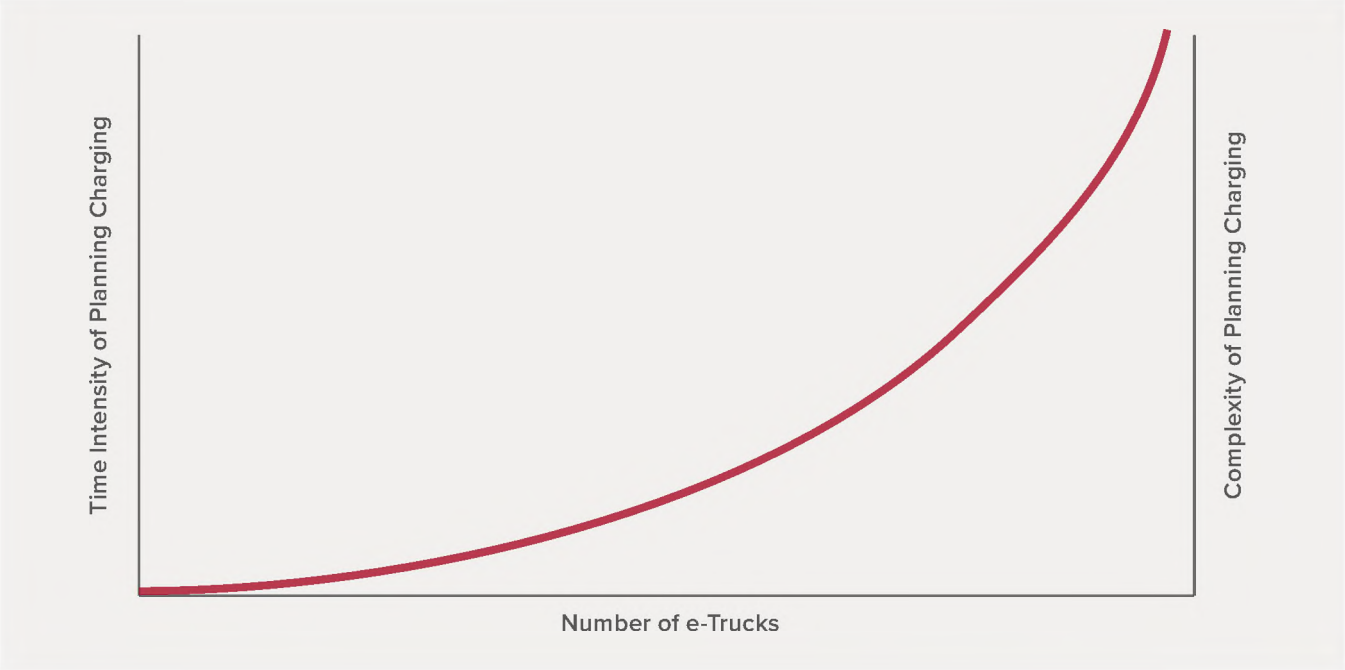


**FIGURE ES5**
CHARGING IMPLEMENTATION COMPLEXITY




This implementation process may be lengthy, but as more fleets and utilities gain more and more experience, this process will become more streamlined as a common "cookbook" approach evolves.

## ADDITIONAL CONSIDERATIONS

In addition to the opportunities and challenges mentioned above, other considerations to take into account when planning for charging infrastructure include employee safety, fueling schedules and operator time requirements, scaling, grid services, integrating renewables, workforce dynamics, ratepayer benefits, and utility business model reform.

*"Every charging installation faces a variety of variables—number of trucks to charge, local utility rate tariffs and power delivery structure, existing site and local grid details. There are no rules of thumb."*



–Chris Nelder, RMI




Image courtesy of National Renewable Energy Laboratory

## CONCLUSION AND RECOMMENDATIONS

NACFE's research into charging infrastructure for commercial battery electric vehicles to date has revealed the following:

- The focus for the foreseeable future of electric truck charging will be on private, "depot," or "return-to-base charging."
- Planning and permitting for charging infrastructure can be a time-intensive process, so fleets should appreciate lead times and start early.
- Fleets planning to electrify some or all of their vehicles should work closely with their local utility, regulators, cities, neighbors, OEMs, and charging system providers.
- Fleets should focus on differentiating products and companies based on their software, network, and maintenance offerings, and should ensure that they are comparing apples to apples during the procurement process.
- Fleets must develop a fairly sophisticated understanding of the existing electric infrastructure and demand, their electricity rates, and the types, number, duty cycles, and time available for charging of their vehicles—or contract a third party to do so for them.
- Fleets should plan on a site-by-site basis since charging infrastructure is not one size fits all.
- Fleet electrification will happen most where special programs are implemented to help mitigate hardware, installation, and electricity costs, at least in the initial stages of technology adoption.
- Fleets should consider investing in smart, networked charging software and services, particularly for deployments of multiple vehicles and/or vehicles with large battery capacities.
- Fleets should demand improvements from technology providers and utilities and inform them quickly of all dissatisfactions.
- As all new technologies go through learning curves, fleets should not make rash conclusions in the first months or year of operation, but realize that solutions will be iterative as experience amasses.

Fleets as well as utilities, regulators, and technology providers are constantly learning and developing in this rapidly evolving space. And innovative utility programs and rate structures are allowing commercial battery electric vehicles to charge successfully and economically in growing areas of the country. However, much broader and faster design and approval of these sorts of programs by utilities and regulators is needed in order to scale electric vehicle adoption across the nation. As much as possible, EV-friendly programs and rate structures should be standardized so that fleets with operations that span multiple utility service territories can scale their electrification efforts without having to reinvent the wheel in each new territory. It's important to remember that utilities are relatively new to the EV charging space, and that although it will require a significant departure from their historical rate structures and business models, it is in their financial interest to support the build-out of charging infrastructure because it offers additional rate-basing investments and load growth opportunities in an otherwise plateauing market.

It is also imperative that utilities understand the important differences between passenger EVs and commercial EVs. Not only is the charging capacity much higher for CBEVs, but they have unique needs and constraints due to their mission-focused operations, which are much less flexible than personal vehicle usage and charging times. As such, CBEVs need to be looked at as a distinct market rather than an extension of the passenger EV market.

*"In order for electric trucks to scale, we need both the truck and the ability to charge it. The three keys to infrastructure deployment are standardization, collaboration for construction, and teaming with utility companies for the efficient delivery of electricity."*



–Gary Horvat, VP of eMobility, Navistar, Inc.

While the charger itself is the most visible piece of the charging infrastructure ecosystem, fleets must focus more on the big picture than on simply comparing EVSEs. We expect more and more innovative networking and maintenance options to arise. Software will be invaluable as smart charging will be key to minimizing costs while also ensuring mission critical uptime of vehicles. Many business models exist to help manage charging, and fleets will need to decide what trade-offs they're comfortable making between risk management and price volatility. Fleets that develop expertise in smart charging will have a leg up on their peers, though innovative partnerships will allow even fleets new to the electrification space to be successful.

Smart charging and vehicle-to-grid capabilities may also enable new grid services that, if compensated for appropriately, may be a win-win-win for utilities, fleets, and ratepayers. That said, it is imperative that these services are piloted in the real world for further refinement, as they are mostly hypothetical today.

Last but certainly not least, charging infrastructure, though no doubt not sufficient today, should not be considered an insurmountable problem. Thomas Edison's first patent for the light bulb was filed in 1879 well before there was a North American power grid. Light bulb and electric motor technology ignited national development of new infrastructure to adapt society to the new technology rather than forcing the technology to fit poorly into the existing infrastructure. The power grid infrastructure was demand driven based on success of the electric devices that needed it. This lag between product introduction and infrastructure investment has been repeated many times, and there's no reason to think it won't be repeated for CBEV charging infrastructure as well.

## THE FULL REPORT

The full report is available at www.nacfe.org and includes 160 references; a robust, current, relevant bibliography of charging infrastructure works; appendices that list charging infrastructure suppliers and utilities with electric truck charging programs; and 91 figures. See the Table of Contents below for more information on the full report:

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## NACFE

The North American Council for Freight Efficiency (NACFE) is a nonprofit organization dedicated to doubling the freight efficiency of North American goods movement. For the past 10 years, NACFE has operated as a nonprofit in order to provide an independent, unbiased research organization for the transformation of the transportation industry. Data is critical and NACFE is proving to help the industry with real-world information that fleets can use to take action. In 2014, NACFE collaborated with Carbon War Room, founded by Sir Richard Branson and now a part of Rocky Mountain Institute (RMI), to deliver tools and reports to improve trucking efficiency. These reports include a series of Confidence Reports that detail the solutions that exist, highlight the benefits and consequences of each, and deliver decision-making tools for fleets, manufacturers, and others. As of early 2019, NACFE and RMI have completed 18 such reports covering nearly all the 85 technologies available.

**www.nacfe.org**

## ROCKY MOUNTAIN INSTITUTE

Rocky Mountain Institute (RMI)—an independent nonprofit founded in 1982—transforms global energy use to create a clean, prosperous, and secure low-carbon future. It engages businesses, communities, institutions, and entrepreneurs to accelerate the adoption of market-based solutions that cost-effectively shift from fossil fuels to efficiency and renewables. RMI has offices in Basalt and Boulder, Colorado; New York City; Washington, D.C.; and Beijing.

**www.rmi.org**

## GET INVOLVED

Trucking Efficiency is an exciting opportunity for fleets, manufacturers, and other trucking industry stakeholders.

**Learn more at:** www.nacfe.org

**Or contact:** Mike Roeth at mike.roeth@nacfe.org



## Response to Letter D-5

Sierra Club
Represented by Law Office of Abigail Smith
Abigail Smith
January 30, 2024

### Response to Comment D-5-1

In a separate email to the City, the commenter provides an attachment to the Sierra Club's previously submitted comment letter regarding the Sunset Crossroads Draft EIR (Comment Letter D-6). This attachment (*Amping Up: Charging Infrastructure for Electric Truck,* North American Council for Freight Efficiency, 2019) provides information on the charging infrastructure for commercial electric vehicles. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

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***VIA E-MAIL ONLY***

January 30, 2024

Adam B. Rush, Director
City of Banning, Community Development Dept.
99 E. Ramsey Street
Banning, CA 92220
arush@banningca.gov

**Re: Public Comments – Sunset Crossroads Specific Plan Project Draft Environmental Impact Report**

Dear Mr. Rush and City of Banning:

Please accept this letter on behalf of the Sierra Club regarding the Sunset Crossroads Specific Plan Project ("the Project") including the Draft Environmental Impact Report ("Draft EIR or EIR"). The Project is a request for a General Plan Amendment, Rezone, Specific Plan, and Annexation for purposes of developing a 533.8-acre site with approximately 5,800,000 of total development space (439 acres) consisting of commercial and industrial land uses, including 5,545,000 square feet (392 acres) of warehousing/logistics space over nine buildings.

The Project site is in the City's San Gorgonio Pass area at the southeast corner of Sunset Avenue and Westward Avenue. The northern part of the Project site is located within the City boundaries. The southern part of the site is in the City's Sphere of Influence, in unincorporated Riverside County. Because the Project will result in a loss of land zoned for residential units (approximately 1,100 units), the Project additionally includes a request to rezone approximately 49 acres of land to residential, creating capacity for approximately 1,100 units. This land is owned by the Mount San Jacinto College District ("MSJC Site"). No residential units will be constructed in connection with the Project.

D-6-1

The Project site is located adjacent to existing residential communities to the west, east and south. Notably, the "Sun Lakes Community" is located to the west of the site on Highland Home Road, with the closest homes being **50 feet** from the Project site. (See Air Quality Study p. 46.) The Serrano del Vista neighborhood is located to the east of the site on Sunset Avenue. To the south, the closest homes are located **150 feet** from the Project boundary. Land uses adjacent to the nearby "MSJC Site" include single-family neighborhoods. The Project site is currently zoned for a mix of uses, but it is predominately zoned for residential development. The Project proposes to

replace the site's existing zoning with specific plan zoning to permit industrial uses interspersed with "open space" areas (among the industrial buildings) as well as commercial uses on a 47.9-acre area in the northeast corner of the site. D-6-1 Cont

As designed, *warehouse/distribution buildings will be located on the western, eastern and southern edges of the Project site.* By build-out, the Project is anticipated to generate **a total of 32,174 daily of total vehicle trips** including **8,394 daily big-rig truck trips** (Traffic Assessment p. 1.1-39). This astounding number of vehicle trips will use Sunset Avenue for access to the Project site: the "truck distribution models" show **80- 100% of big rig trucks using Sunset Avenue, a local roadway, for access to the Project site**. While the "truck distribution model" shows no trucks on Highland Home Avenue, there is apparently nothing to restrict trucks from using that roadway. These vehicle trips contribute to the Project's significant air quality impacts – in fact, the Project will generate 350 lbs per day of NOx (with mitigation) at full buildout. (Air Quality Study p. 54). D-6-1-A

The Project entails substantial on- and off-site infrastructure work including the construction of new roadways, bridges, utility, and electrical facilities. Construction will include a massive amount of grading of natural areas. Construction is expected to take place in four phases for a duration of "approximately 51 months" or 4+ years. Phase 1, consisting of the largest portion of industrial warehousing, will be constructed first. D-6-1-B

The Draft EIR identifies six significant environmental impacts that cannot be mitigated according to the EIR including: air quality, greenhouse gas emissions, noise impacts and vehicle miles traveled ("VMT"). As discussed below, in accordance with the California Environmental Quality Act ("CEQA"), the EIR must be revised with further analysis, and it must identify additional mitigation for significant impacts.

**Air Quality Impacts**

According to the California Air Resources Board ("CARB")[1], individuals most likely to be affected by air pollution include children under age 14, athletes, or other persons who exercise outdoors. Land uses considered sensitive receptors include *residences*, schools, and playgrounds. According to CARB's 2022 Scoping Plan p. 184, "[c]ommunities adjacent to congested roadways, including ports and distribution centers, are exposed to the highest concentration of toxic pollutants from vehicles and equipment consuming fossil fuels, leading to a number of demonstrated health impacts such as respiratory illnesses, higher likelihood of cancer development, and premature death." Changes to the Project's site design to avoid placement of industrial buildings near sensitive receptors, or appropriate buffering to increase the distance between Project operations by shrinking or eliminating building space must be incorporated into the Project's site design to minimize the Project's adverse impacts to sensitive receptors. As intentionally designed, the Project places warehouse development next to existing homes, whereas a design utilizing buffering could provide environmental and public health benefits. **Revisions to the site design must be considered feasible mitigation for the significant impacts identified in the EIR, including, but not limited to, air quality impacts**. D-6-2

[1] www.arb.ca.gov/ch/handbook.pdf

**This hyperlink and its contents, and all hyperlinks and their contents cited in this letter, are fully incorporated by reference. Information contained at this link and all other hyperlinks is summarized in the body of this letter.**

The EIR's construction air quality analysis is based on assumptions about construction phasing. If any phases overlap, or if the construction schedule or equipment operation occurs differently than the assumptions, the Project's construction air quality impacts could be much more severe. Therefore, the Project must be conditioned to require a construction schedule consistent with the EIR's analysis. D-6-3

The Draft EIR concludes the Project will exceed significance thresholds for several criteria pollutants and conflict with the applicable Air Quality Management Plan ("AQMP"). The majority of the Project's air quality emissions are caused by mobile emissions. The EIR's operational air quality analysis is based on the implementation of mitigation measures but mitigation is illusory. MM Air 1 credits the Project for utilizing elective vehicle chargers, but the EV chargers will be installed "at buildout" according to MM Air 1, meaning there is no requirement that each phase of development (particularly Phase 1 with the largest portion of industrial uses) construct and utilize these chargers at occupancy or perhaps ever, since full buildout of the site is not guaranteed. Title 24/Cal Green does not currently require the installation of electric vehicle (EV) charging units for cars or trucks; the Building Code requires electrical conduit for vehicle charging stations *but not charging units*. Thus, the Project must be conditioned to require the installation of EV and electric truck charging units *at the time of occupancy* of *each* phase of the development. D-6-4 D-6-5

Furthermore, with respect to MM Air 1's requirement of "50 Level 3 AC Class 8 electric vehicle (EV) truck chargers," it is unclear what type of charger this refers to. It is not clear there are "Level 3 *AC* Class 8" EV chargers available in the commercial market. (*See* [2] [Level 3 stations provide direct current or DC].) Also, the amount of power (power level or power rating) needed to charge the battery of a Class 8 (heavy duty/big rig) truck, coupled with the battery range needed to ensure these trucks could meet a "two shift" or even a "one shift" schedule, will require charging units with large battery storage capability, and a realistic charging timeframe to ensure, on a practical basis, the utilization of the units. (*See* [3].) To ensure the effectiveness of the measure, MM Air 1 must specify that Level 3/DC Fast (or Quick) Chargers (DCFC) are required; and it must be assured these chargers have the power rating sufficient to charge a Class 8 truck battery. (*See* **Exhibit A** hereto [big rig truck with battery size of 550kw and range of 250 miles would take approximately 24 hours to charge with a Level 2 charger].) This comment also applies to "medium duty" vehicles such as delivery vans. *See* [4] [FedEx vans charge in hours with DC quick charger/Level 3].) In short, MM Air 1 must be revised to ensure the enforceability and effectiveness of the measure including with respect to the timing of implementation. D-6-6 D-6-7

An EIR's central purpose is to identify a project's significant environmental effects and then evaluate ways of avoiding or minimizing them. (Cal. Public Resources Code, §§ 21002.1(a), 21061.) The City must adopt *any* feasible mitigation measure that can substantially lessen the project's significant air quality environmental impacts. (Cal. Pub. Res. C. § 21002; State CEQA Guidelines, § 15002(a)(3).) Accordingly, the Project should adopt further sustainability measures to reduce air quality impacts, including: D-6-8

[2] https://blog.evbox.com/level-3-charging-speed
[3] https://www.sdge.com/sites/default/files/documents/SDGE%20-%20EV%20Guidebook%20-%20Final%20-%20Web.pdf
[4] https://www.carscoops.com/2018/11/fedex-adds-1000-china-built-chanje-f8100-electric-vans-fleet/

- Constructing building roofs with "light colored roofing materials." Cool roofs retain less heat and reflect more sunlight, thus lowering energy demand and reducing the "heat island" effect of a building. The Project must be conditioned to use roofing materials with a solar reflectance index ("SRI") of 78 for at least 75% of the roof surface (portions not covered in solar), consistent with USGBC standards. To provide measurable environmental benefit, the roofing material must be at the highest possible rating. *See* [5]
- Obtaining LEED certification to the most current USGBC[6] rating system for all industrial buildings, where such certification would require the applicant to implement sustainability measures that provide environmental benefits and off-set impacts.
- Installing concrete, preferably white concrete, in all parking areas. Light- colored concrete is more reflective of sunlight, thus employing concrete in all parking areas will reduce the "heat island" effect of the Project. [7] [8] Among other benefits, cooler surfaces and air reduce the need for air conditioning in vehicles.
- Providing landscaping in parking areas to provide 50% shade coverage within 10 years of operations. This can also reduce "heat island" effects and reduce the need for air conditioning.
- Installing and utilizing solar power for 100% of the facility's total electricity demand including electric vehicle parking in parking areas and automation within buildings. Solar power is entirely feasible and is particularly appropriate for a Project of this size, scale, and location. The fact that the Project will receive electricity from a utility that generates power from renewables does not eliminate the need for the Project to adopt all feasible mitigation which must include a commitment to on-site renewables.
- Establishing a homeowner fund for installation of air filtration units and dual-paned windows (for significant noise impacts) for homes adjacent to and near the Project site. *See* https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf
- Including within buildings a "truck operator" lounge of a reasonable size which is available to truck operators with seating, restrooms, vending machines, and showers if size allows. The purpose of this lounge is to reduce the need for operators to wait in their cabs running either their diesel truck engine or diesel "APUs" either on- or off-site. Signage shall also be provided notifying truck operators that a lounge(s) is available for their use.

D-6-8 Cont

The EIR finds that NOx (diesel-related) impacts are significant (approximately seven times the threshold of significance). In the aggregate, the southern-California "goods movement network" is a "major source of emissions that contribute to the region's air pollution," and the southern California area "continues to have the worse air quality in the nation." (https://www.ca-ilg.org/sites/main/files/file-attachments/f2012rtpscs.pdf?1383110821) A "key component of air pollution is nitrogen oxides (NOx). NOx is emitted whenever fuel is combusted and reacts in the air to form ozone (smog) and fine particulates." (*Id.*) Despite "aggressive strategies" in the South Coast Air Basin, "it is estimated that NOx emissions will need to be reduced by approximately two-thirds in 2023 and three-quarters in 2030." (*Id.*) Addressing NOx impacts associated with mobile sources is key to mitigating the Project's significant air quality impacts. According to the

D-6-9

[5] https://www.energy.gov/sites/prod/files/2013/10/f3/coolroofguide.pdf
[6] https://www.usgbc.org/leed
[7] https://coolcalifornia.arb.ca.gov/cool-pave-how
[8] https://heatisland.lbl.gov/coolscience/cool-pavements

SCAQMD's Blueprint for Clean Air (2016)[9], the southern California air basin will require approximately a 65 percent reduction in NOx emissions, *above and beyond existing measures*, to meet air quality standards. D-6-9 Cont

The Project should establish fleet efficiency requirements for vehicle fleets. This should include, at a minimum, requirements that industrial tenants shall use exclusively zero emission light and medium-duty delivery trucks and vans; shall use only zero emission service equipment such as forklifts and yard trucks (electric only/no natural gas); and shall use near-zero and zero-emission technologies in heavy-duty applications such as "last mile delivery."[10] As the State moves toward its goal of zero emission goods movement, the City must ensure that the Project is in line with this important objective by also requiring the *phase-in* of zero emission or clean technology for *heavy duty* trucks. According to CARB, actions to deploy both zero emission and cleaner combustion technologies will be essential to meet air quality goals in California particularly with respect to goods movement. [11] Additional, feasible mitigation for operational air quality impacts includes the phase-in of electric, hybrid electric, hydrogen electric, or battery operated (*i.e.*, non-diesel) trucks. The Project should be conditioned to adopt a "Diesel Minimization Plan" whereby zero emission trucks are phased in, *e.g.*, 25% of truck fleets shall use zero emission technology by 2030, and increase that percentage by 10% per year, until 100% of trucks operating on sites are zero emission. This approach to mitigation is consistent with California regulations regarding phase-in of electric vehicles.[12] [13] (California requiring manufacturers to produce zero emission trucks beginning in 2024); *see also* (discussing CARB's Advanced Clean Truck Rule)[14].) A mitigation measure is feasible if it can be achieved in a reasonable period of time. (Guidelines, § 15364.) The California Attorney General has recommended the adoption of zero emission truck mitigation. (*See* https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf ["requir[e] all heavy duty vehicles entering or operated on the project site to be zero-emission beginning in 2030".]) D-6-10 D-6-11 D-6-12 D-6-13

**Greenhouse Gas Emissions**

The State of California has committed to aggressive goals for the reduction of the emissions causing global climate change. Executive Order S-3-05 establishes a 2030 target of a 40 percent GHG reduction below 1990 levels; Executive Order S-3-05 establishes a GHG emission reduction target of 80% below 1990 levels by 2050; and Executive Order B-16-2012 establishes a target for the reduction of GHG emissions from the transportation sector of 80% below 1990 levels by 2050. Roughly a billion square feet of the Inland Empire is devoted to warehouses.[15] The Project serves to increase cumulative GHG emissions by building even more warehousing, but it fails to adopt all feasible mitigation for the cumulatively significant impact. D-6-13-A

[9] https://www.aqmd.gov/docs/default-source/Agendas/aqmp/white-paper-working-groups/wp-blueprint-revdf.pdf?sfvrsn=2
[10] https://www.nbcnews.com/tech/tech-news/treated-sacrifices-families-breathe-toxic-fumes-california-s- warehouse-hub-n1265420
[11] https://ww3.arb.ca.gov/planning/sip/2016sip/2016mobsrc.pdf
[12] https://ww2.arb.ca.gov/news/california-moves-accelerate-100-new-zero-emission-vehicle-sales-2035
[13] https://www.cnbc.com/2023/03/31/california-requires-half-of-heavy-trucks-sales-to-be-electric-by-2035.html#:~:text=The%20state%27s%20rule%20requires%20manufacturers,on%20the%20road%20by%202035.
[14] https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet
[15] https://calmatters.org/commentary/2023/09/inland-empire-warehouse-boom-rejections/

The Project will result in total GHG emissions of 38,726.25 MTCO2e/year (mitigated) (56,902.96 MTCO2e/year unmitigated). This vastly exceeds the adopted threshold of significance of 3,000 MTCO2e/year. The Draft EIR asserts there are no feasible mitigation measures, beyond those proposed by the Draft EIR, to further reduce emissions. The Draft EIR asserts that the majority of GHG emissions are generated by mobile sources which are outside the control of the City of Banning. The measures identified in the air quality section above should be considered appropriate mitigation for significant GHG emissions particularly the transportation measures, as the transportation sector currently accounts for the largest portion (50%) of total statewide GHG emissions according to the CARB. D-6-14

The City should also consider additional measures aimed at reducing VMT including: providing carpool incentives to employees, such as free parking, preferred parking or implementing a reward program for carpooling; providing free, low-cost monthly transit passes to employees; and creating an online ridesharing program that matches potential carpoolers through e-mail. D-6-15

**Energy Impacts**

State CEQA Guidelines Appendix F provides that "[t]he goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: (1) decreasing overall per capita energy consumption; (2) *decreasing* reliance on fossil fuels such as coal, natural gas and oil, and (3) *increasing* reliance on renewable energy sources." (emphasis added) Appendix F puts "particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." The EIR's finding of less-than- significant with respect to energy resources is not supported. D-6-16

The Draft EIR concludes that impacts are less than significant because it states the Project will comply with existing regulations and requirements for energy efficiency. The Project creates a massive demand for electricity, but does not, for instance, "increase reliance on renewable energy sources." (*See* CEQA Guidelines Appendix F.) This Project must mitigate its energy impacts. The installation and utilization of a solar energy system for even half of the facility's energy demand could vastly reduce the Project's energy impacts consistent with Guidelines Appendix F. The City must impose measures on the Project to ensure compliance with Guidelines, Appendix F and to advance the policies and goals of Senate Bill 100 which commits to 100% clean energy in California by 2045. D-6-17 D-6-18

**Land Use Impacts**

Contrary to the conclusion of the Draft EIR, the Project results in significant land use impacts, including, but not limited to, conflicts between the Project and City of Banning General Plan policies. The EIR must be revised, and further analysis and mitigation is required at least with respect to the following. D-6-19

The General Plan's Land Use Element Goal 1, Policy 2 states that "projects adjacent to residential neighborhoods shall be carefully reviewed to assure that neighborhood character is protected." This Project proposes millions of square feet of industrial development within 100 feet of existing neighborhoods and proposes to funnel thousands of vehicle trips per day onto local, neighborhood-serving roadways. The Project is antithetical to the notion of protecting community character. D-6-20

Despite proposing millions of square feet of development, the Project does not include bike lanes and therefore it does not provide access to a safe means of alternative transportation. (*See* City of Banning General Plan Parks and Recreation Element, Policies 6 and 8). The Project is not required to use recycled water for irrigation (*See* City of Banning General Plan Water Resources Element Policy 3; *see also* Riverside County General Plan Policies LU-4.1, LU 18.5, and OS 1.4) The Project does not "assure [sic] that sensitive receptors are separated from polluting point sources" to the extent that warehouses are sited near existing homes and trucks traveling to and from the Project site will pass by residences in route to the Project site. (*See* City of General Plan Air Quality Element Policy 3.) The Project is not "required to mitigate any [air quality] impacts" consistent with AQ Policy 4. In fact, the Project results in significant air quality impacts and it fails to propose all feasible mitigation for the impact. The Project does not "promote the use of clean and/or renewable energy sources for transportation, heating and cooling" in accordance with AQ Element Policy 5. Among other things, the Project does not propose the use of solar (renewable) energy to power the Project buildings; and it does not propose any measures relative to cleaner vehicles such as electric cars and trucks. Again the Project does not propose any "bicycle paths" and therefore cannot be consistent with AQ Element Policy 6. It is not clear whether the Project will provide public transit stops or other means to access public transit such as employee shuttles. The Project is woefully inadequate in terms of Energy Element Policies 1 and 2 as it fails to propose feasible measures to promote energy conservation particularly "alternative energy systems." The Project is inconsistent with Noise Element Policy 1 in that it results in significant noise impacts. Project traffic will share roadways with local traffic; the Project does not "mitigate" the "relationship between land use designations" in terms of "changes in the circulation pattern" that will negatively impact residents. The Project is therefore inconsistent with Noise Element Policies 2 and 4.

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The Project is also inconsistent with Riverside County General Plan Policies, including LU 7.7 in that "buffers" are not required between intense industrial uses and watercourse areas including their habitat. The Project does not "encourage conservation of productive agricultural lands" consistent with Riverside County GP Policy LU 20.4. The Project does not provide transportation options and bikeways consistent with Policies C 1.2 and C 1.7. Policy C 3.8 states that heavy duty truck "through-traffic" shall be restricted in residential areas. The Project is designed so that a residential street is a primary access point for Project vehicles including heavy duty trucks. In terms of biological impacts, the EIR does not demonstrate that the Project is consistent with Policy OS 4.9 which "discourage[s] development within watercourses and areas within 100 feet of the outside boundary of riparian vegetation." The record does not demonstrate the Project is consistent with Policy OS 5.5 to "preserve and enhance existing native riparian habitat." The Project is patently inconsistent with Policies OS 11.1, 11.,2, 11.3 and 16.9 regarding solar energy systems.

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In sum, the EIR must be revised in terms of conflicts with General Plan policies applicable to the Project. Additional mitigation must be imposed to ensure consistency between the Project and adopted land use plans.

D-6-35-A

Furthermore, the Project increases VMT and is therefore patently inconsistent with land use plans - local, regional, and State – that aim to reduce VMT. For instance, according to the 2022

D-6-36

CARB Scoping Plan[16],

> [c]ontrary to popular belief, zero-emission vehicles (ZEV) alone are not enough to solve the climate crisis. The 2022 Scoping Plan illustrates that despite cleaner vehicles and low- carbon fuels, the path to carbon neutrality by 2045 also depends on reducing per capita VMT (the total passenger vehicle miles driven by an average person in California on any given day). To meet the carbon neutrality goal, the Scoping Plan proposes reducing VMT from 24.6 miles per day in 2019 to 18.4 miles by 2030 (a 25 percent reduction) and to 17.2 miles per day by 2045 (a 30 percent reduction).

D-6-36 Cont

Hence, to reduce VMT, the Project should consider an alternate development scenario involving mixed-use development with a balance of housing, employment and commercial uses. The Project should consider committing to local hiring to reduce VMT. The Project should incorporate safe and accessible bike lanes as well as access to public transit. Before adopting a statement of overriding considerations for the Project's significant VMT impact, the City should also explore *programmatic VMT mitigation options*. Other jurisdictions like the City of Escondido are evaluating "VMT Exchange Programs" for instance[17]. *See also* [18] [19].

D-6-36-A

**Noise**

The Draft EIR indicates that the Project's operational activities will exceed the standards of the City's Noise Ordinance (55 dBA residential at nighttime) with respect to many of the measured residential receivers. (Table 4.13.V.)

D-6-36-B

The City must adopt all feasible mitigation measures for this significant impact. This includes site design measures, such as increasing the distance between noise generating sources and nearby sensitive receptors. Reducing the size or number of buildings, or relocating buildings, to allow for more buffering between facilities and Receivers 1 through 6, for instance, is one feasible means of reducing this impact. (*See* Attorney General *Warehouse Best Practices* "Warehouse Siting and Design Considerations.")[20] This is particularly important where the truck distribution models show 80-100% of Project trucks using Sunset Avenue for access to the Project site. This amounts to *thousands* of trucks per day traveling past homes on a 24-hour basis.

D-6-37

Limiting the hours of operation/deliveries/loading dock activities to daytime hours is another feasible and reasonable means to reduce significant nighttime noise impacts (*see, id.* p. 9).

D-6-38

Proposed Mitigation Measure NOI-2 is ineffective. A "minimum 6-foot barrier" could be increased to up to 14 feet to allow for increased noise mitigation. Additional barriers can be installed such as a "wing wall" to further shield residences from sound-producing activities at the Project site. In addition, it is not shown the Project with MM NOI-2 will meet the standards of the Noise Ordinance which states that noise shall not exceed *55 dbA* at residential uses during nighttime

D-6-39

D-6-40

[16] https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-e-sustainable-and-equitable-communities.pdf

[17] https://www.escondido.org/Data/Sites/1/media/Planning/VMT/EscondidoFeeProgramDocumentation_PublicReviewDraft10212022_clean.pdf

[18] https://www.law.berkeley.edu/wp-content/uploads/2018/09/Implementing-SB-743.pdf

[19] https://scag.ca.gov/sites/main/files/file-attachments/ladot-vmt-mitigation-program-factsheet.pdf?1643075436

[20] https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

hours. MM NOI-2 claims noise will be reduced to the General Plan noise standard of 65 dBA CNEL, which is an average noise level. D-6-40 Cont

The DEIR proposes only *one* noise mitigation measure for significant, long-term noise impacts due to intense industrial operations including significant truck traffic on local roadways. D-6-40-A Sierra Club submits that numerous measures are available to reduce noise at the Project site due to Project operations including, for instance, paving roads with low noise asphalt (*see. id.*, p. 9; *see also*[21], [22]). D-6-41 Due to the porous nature of asphalt, this material can reduce roadway noise by 3 dBA to 5 dBA.[23] Also for instance, loading docks can be designed with noise attenuating features such as a foam seal and enhanced bumpers on the deck leveler to reduce "dock mating noise." Ensuring a tight connection between the truck and the building will ensure that all unloading is done directly in the building. Again for instance, a completely roofed loading dock and roll up doors that are closed during trailer unloading would reduce nighttime noise if loading activities are permitted at nighttime. D-6-42 If loading docks are not fully covered, trailer unloading should not be allowed during nighttime hours. D-6-43 In terms of traffic noise near sensitive receptors, trucks should be limited at nighttime to the route that is least sensitive in terms of impacts to sensitive receptors. D-6-44 Gates should be installed to disallow trucks from using entrances that adversely impact residences. D-6-45 In terms of on-site equipment, all cargo moving equipment shall be installed with self-adjusting "back up" beepers that adapt to the noise environment.[24] [25] The EIR erroneously assumes that "walls" are the only available noise mitigation measures (DEIR p. 4.13-48). D-6-46 It is the City's obligation to investigate mitigation measures in good faith, and it must impose all feasible mitigation for significant Project impacts *before* a statement of overriding considerations can be legally adopted.

**Project Alternatives**

CEQA requires that an EIR describe "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project." (Guidelines, § 15126.6 (a).) D-6-47 The Draft EIR should evaluate a development alternative with a greater mix of uses, such as business park or professional park uses, to reduce VMT and noise (due to heavy duty truck traffic). Specific plan zoning is an opportunity to create a comprehensive zoning plan for a particular area; and because the Project proposes to entirely redesignate and rezone the properties it is not a foregone conclusion that only industrial uses (with some limited commercial) must be developed. D-6-48 The City should explore a development that truly balances uses to create the type of "infill" or "transit oriented" development that reduces VMT.

To ensure that alternatives are properly assessed and considered, CEQA "contains a `substantive mandate' requiring public agencies to refrain from approving projects with significant environmental effects if 'there are feasible alternatives or mitigation measures' that can substantially lessen or avoid those effects'." (*County of San Diego v. Grossmont-Cuyamaca* D-6-49

[21] https://www.petronaftco.com/asphalt-reduces-noise/
[22] https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/quieter-pavement-a11y.pdf
[23] https://www.sunlandasphalt.com/can-we-reduce-road-noise-by-selecting-a-certain-pavement-type/
[24] https://www.cpwrconstructionsolutions.org/heavy_equipment/solution/792/self-adjusting-and-directional-backup-alarms.html#:~:text=Self%2Dadjusting%20and%20directional%20backup%20alarms%20are%20an%20engineering%20control,the%20vicinity%20of%20the%20vehicle.
[25] https://www.forkliftamerica.com/forklift-backup-alarms/

*Community College Dist.* (2006) 141 Cal.App.4th 86, 98; Pub. Res. Code § 21002.) A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. (Public Resources Code §§ 21081 (a), 21081.5; Guidelines, §§ 15091 (a)(3), 15092.) Rejected alternatives must be "truly infeasible." (*County of Marina v. Bd of Trustees of Calif. State Univ.* (2006) 39 Cal.4th 341, 369.) Absent findings of infeasibility supported by substantial evidence, the City here must adopt the environmentally superior alternative. D-6-49 Cont

**Growth Inducement**

Based on the Project's development pattern and expansion of infrastructure, including roadways and utilities, and given the site's proximity to undeveloped rural residential lands, the Project presents the potential for growth inducing impacts contrary to the EIR's findings. (Guidelines, § 15126 (d).) D-6-50

**Conclusion**

For the reasons above, the Draft EIR should be revised and additional mitigation proposed. Thank you for the opportunity to comment on this Project. D-6-51

Sincerely,

Abigail Smith

Abigail Smith

Enclosure D-6-52

## Response to Letter D-6

Sierra Club
Represented by Law Office of Abigail Smith
Abigail Smith
January 30, 2024

### Response to Comment D-6-1

The commenter provides generally accurate summaries of the project description[43], states that the Development Site is located adjacent to residential communities to the west, east and south and identifies the distance of the nearest sensitive receptors to the Development Site boundary, as identified in the Air Quality Impact Analysis (see Draft EIR Appendix C-1, page 8) and the Draft EIR (see page 4.3-7). The commenter also notes that the warehouse/distribution buildings will be located on the western, eastern and southern edges of the Development Site. While that statement is generally accurate, industrial uses are interspersed throughout the Development Site. Residential uses located west of the Development Site are buffered from industrial uses by open space in Planning Area 12 (12.5 acres), open space and passive park uses Planning Area 11 (12.6 acres) or open space in the undeveloped portion of Planning Area 7. This comment does not raise any question regarding the analysis contained in the Draft EIR, and no further response is required.

### Response to Comment D-6-1-A

The commenter incorrectly states that the Development Project generates a total of 32,174 daily total vehicle trips and 8,394 daily "big-rig trucks", citing Table 1 in Appendix J-2, which shows the total passenger car equivalent (PCE)[44] daily trips rather than the actual number of trips and thus overstating truck trips by more than 2.5 times. The reference to a table showing PCE daily trips is incorrect as is the reference to a table in Appendix J-2. The correct data is found in Table 2 of the Supplemental Traffic Analysis in the Draft EIR (Appendix J-3) which supersedes the traffic analysis in Appendix J-2 of the Draft EIR,[45] and which shows the actual number of total weekday daily vehicle trips from the Development Project as 20,496 trips of which 3,330 are truck trips. This data, as stated in Table W of the Air Quality Impact Analysis (see Draft EIR, Appendix C-1) was used to assess the Project's potential air quality impacts. The commenter does not raise any issues regarding the adequacy of the

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43 Section 3.4 of the Draft EIR provides an overview of the Development Project. The commenter approximates, 1) the total square footage of the Development Project (5.8 million square feet) versus the 5.8134 million square feet provided in Table 3.D of the Draft EIR, and 2) the 1,100 residential unit capacity to be transferred to the MSJC versus the 1,146 units cited in the Draft EIR.

44 Passenger Car Equivalent (PCE) is the number of passenger cars that will result in the same operational conditions as a single heavy vehicle. PCE factors are used to convert counts of heavy vehicles into counts of passenger cars such that a mixed flow of heavy and light vehicles is converted to an equivalent traffic stream consisting entirely of passenger cars. As emissions are calculated based on the actual number of vehicles, PCE is not based in air quality modeling.

45 As stated in the Supplemental Traffic Assessment for the Sunset Crossroads (Project) dated August 31, 2023 attached to the DEIR at Appendix J-3 ("Supplemental Traffic Analysis"), the Supplement Traffic Analysis is a supplemental traffic assessment to the Sunset Crossroads Traffic Analysis (prepared by Urban Crossroads, Inc., dated August 9, 2023), attached to the DEIR as Appendix J-2. Table 2 in Appendix J-3 shows the net total daily trips for the Project and supersedes the prior analysis in Appendix J-2.

environmental analysis contained in the Draft EIR with respect to these matters, and no further response is necessary.

The commenter also identifies Sunset Avenue as a "local road" that 80-100% of the project's truck trips will use. While the commenter is correct that the intent is that all trucks would use this route to the I-10 freeway, Sunset Avenue is designated as a Major or Arterial Highway and/or Secondary Highway in the City's General Plan Circulation Element and is not a "local road". Arterial Highways typically are 4-lane divided roadways that may provide on-street parking. These roadways typically direct traffic through major development areas and serve to move larger volumes of inter-city traffic. Secondary Highways are 4-lane roadways that may include a painted median. Sunset Avenue provides direct access from the Development Site to the I-10 freeway east/west interchanges and does not result in through-traffic in residential developments. Sun Lakes Boulevard east (existing) and through the Development Site (future extension) is also designated a Major or Arterial Highway in the City's General Plan[46].

Project Design Feature PDF T-4, an additional PDF in the Specific Plan (see revised Specific Plan, Section 3.4 and revised Section 4.17.6.4 of the Final EIR), requires that the Development Project applicant prepare a Truck Route Management Plan, to be approved by the City Community Development Director, prior to issuance of the first occupancy permits for each industrial site, that includes the following components:

- Posting of signage clearly showing the designated entry for trucks from the public streets to the designated on-site truck check-in and truck parking areas.
- Posting of signage indicating that all parking and maintenance of trucks must be conducted within the designated onsite areas and not within the surrounding community or on public streets.
- Posting of signage for exiting traffic (other than exempt vehicles) showing the designated exits and restricting westward travel on Sun Lakes Boulevard west of Highland Home Road.
- Lease provisions clearly identifying the required truck routes, including requiring trucks to use Sunset Avenue to access the I-10 Freeway interchange and prohibiting trucks (other than exempt vehicles) on Sun Lakes Boulevard west of Highland Home Road.
- Consider and include, where feasible, driveway aprons providing egress to SLB Extension that physically direct trucks east on Sun Lakes Boulevard Extension in a manner that does not affect exempt vehicles.
- Truck route maps provided to all drivers and posted in breakrooms and throughout the Project.
- Designation of a Traffic Coordinator contact for the City to notify in the event of traffic issues.

For the Truck Route Management Plan, exempt vehicles include emergency and public safety vehicles, buses, limos and passenger vehicles, vehicles owned by a public utility or public agency and delivery

[46] City of Banning Circulation Element, Figure III-5, 2013.

vans serving local routes or using designated detour routes. Based on the site design, the adjacency of the Development Project to Sunset Avenue and its direct access to the I-10 freeway and with implementation of PDF T-4,Truck Route Management Plan, the Development Project will direct truck travel from the Development Project to the I-10 freeway along Sunset Avenue. See the response to Comment B-2-15.

The commenter incorrectly states that no trips are shown on Highland Home Road. As indicated above, primary Development Project access will be via Sunset Avenue to/from the full interchange at the I-10. The distribution of traffic and volume of traffic was analyzed pursuant to the Traffic Analysis and Supplemental Traffic Analysis approved by the City and consistent with the parameters of the Development Project (Draft EIR, Appendices J-2 and J-3). As planned, Highland Home Road north of the proposed Sun Lakes Boulevard extension is identified as a Secondary Highway terminating in a cul-de-sac. This roadway will provide emergency/secondary access via a 24-foot wide connection. South of the SLB Extension, Highland Home Road forms a portion of the Specific Plan's western boundary and is designated a Collector Street. See Draft EIR Project Description pg. 3-45. Primary access to Planning Area 7 will be from Lincoln Street to Sunset Avenue. No other buildings take access off Highland Home Road; therefore, the assignment of the distribution of traffic presented in the Draft EIR accurately reflects the intended pattern of traffic. The Draft EIR correctly shows this distribution of trips on Highland Home Road would occur only in Phase 4 with development of Building 9 and is anticipated to be minimal. See Draft EIR, Appendix J-3, Exhibit 4-9 (Phase 4-Warehouse Truck Trip Distribution) and Exhibit 4-10 (Phase 4-Warehouse Passenger Car Trip Distribution) showing this travel.

The commenter correctly cites the amount of NOx emitted by the Development Project after the implementation of mitigation and project design features. Despite the implementation of measures to reduce emissions, the Draft EIR identified a significant and unavoidable air quality impact for NOx emissions. The commenter correctly cites the NOx emissions resulting from Project-related traffic after mitigation; however, and as with the remainder of this comment, the commenter does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR. No further response is necessary.

**Response to Comment D-6-1-B**

The commenter generally describes the construction required for the Project, the approximate duration over the span of 51 months, and that the largest portion of industrial warehouse buildings will be constructed in Phase 1. The commenter also states that six environmental impacts cannot be mitigated to less than significant, but only identifies four: air quality, greenhouse gas, noise, and vehicle miles traveled (VMT) impacts. The commenter concludes by stating that the Draft EIR must be revised with further analysis including the identification of additional mitigation for the significant impacts and indicates that the specifics will be discussed below. The commenter's suggestion that additional analysis and mitigation is required is noted. The responses below specifically address each contention regarding the sufficiency of analysis and mitigation, and where updates to both are being provided. As the comment does not raise specific issues regarding the adequacy of the environmental analysis contained in the Draft EIR, no further response is necessary.

**Response to Comment D-6-2**

The commenter cites the California Air Resources Board (CARB) handbook and 2022 Scoping Plan that sensitive receptors such as residences located adjacent to congested roadways, including ports and distribution centers, are exposed to the highest concentrations of toxic pollutants from vehicles and equipment using fossil fuels, leading to a number of demonstrated health impacts including respiratory illness, and higher likelihood of cancer. The commenter recommends changing the Project's site design to avoid placing industrial buildings near sensitive receptors or buffering to increase the distance between Project buildings and site buffering to increase the distance between Project buildings and sensitive receptors to minimize impacts to sensitive receptors.

While the Project does result in significant and unavoidable regional air quality impacts (as established in Section 4.3 of the Draft EIR), the Health Risk Assessment (HRA) analyzed potential health impacts to nearby sensitive receptors including residences and the nearby school and found no significant health risks to any sensitive receptors. The response to Comment A-3-2 provides a detailed account of the localized significance threshold (LTS) analysis and Health Risk Assessment (HRA) prepared for the Project. The HRA was supplemented to address public comments (see *Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment for the Proposed Sunset Crossroads Specific Plan Project* which is included in the Final EIR as Appendix C-4). See also the responses to Comments A-3-4 and B-2-5. While residential uses abut the western boundary of the Development Site, Planning Areas 11 and 12 and the western portion of Planning Area 7 have been intentionally retained as open space, providing substantial buffers between residential uses and industrial uses. Other residential areas to the east and south are separated from industrial uses by improved roadways and landscaped buffers and/or infiltration basins. See Draft EIR, Appendix B which includes cross-sections[47] of proposed buffering in Figures 4-16 through 4-21. The commenter does not acknowledge existing buffers in the current design of the Development Project. While no significant health impacts results from the Development Project and, therefore, no mitigation is required, the commenter does not suggest specific changes that could provide the additional mitigation and health benefits requested. Moreover, pursuant to CEQA Guidelines Section 15041, a Lead Agency has the authority to require feasible changes in activities involved in the project to substantially lessen or avoid **significant** effects on environment. The health risk impacts associated with the construction and operation of the Project do not exceed established thresholds and are not significant. The Project specific analysis (see Appendix C-2 to the Draft EIR and Appendix C-4 to the Final EIR) and Section 4.3.6.3 of the Draft EIR show that the Development Project does not result in significant levels of localized emissions during either construction or operational phases of the project (Draft EIR Tables 4.3.O and 4.3.P), and the health risks to nearby residents, students, and workers from Project-related toxic air contaminants would be below the SCAQMD's thresholds (see Draft EIR Table 4.3.Q and revised Table 4.3.Q). Therefore, no mitigation or site redesign is required, and no further response is required.

[47] Revised project plans would realign a portion of Sunset Avenue between Westward Avenue and Lincoln Street, 42 feet to the west, which results in the new centerline of Sunset Avenue being 72 ft from the nearest residential property line and 115 feet from the MSJC campus uses.

**Response to Comment D-6-3**

The commenter states that the air quality analysis was based on assumptions about construction phasing, that if the construction schedule or equipment differs from those assumptions, Project construction air quality emissions could be more severe, and therefore the Project must be conditioned to require that construction adhere to the schedule consistent with the Draft EIR. The construction schedule, including the potential for concurrent active grading, construction, and operation of the proposed uses, represents a worst-case estimate of potential air quality that could result from the overlapping of construction phases. Based on past construction scheduling experience, deviation from this worst-case schedule would result in a more extended construction schedule. Extending construction operations over a longer duration would result in lower daily emissions. As all SCAQMD thresholds are based on the peak daily emissions for each pollutant, the worst-case schedule presented in the Draft EIR represents the he worst-case daily pollutant emission levels. As such, conditioning the project to adhere to the construction schedule is not necessary. The Draft EIR mitigates the significant impacts resulting from construction of the Development Project to the extent feasible. No further response is necessary.

**Response to Comment D-6-4**

The commenter correctly notes that the Project will exceed significance thresholds for several criteria pollutants, conflicts with the applicable AQMP, and that the majority of air quality emissions are caused by mobile emissions. However, the commenter confuses applicable air quality mitigation when it states that MM AIR-1 credits the Project for using electric vehicle chargers. MM AIR-1 pertains to mitigation measures for construction. MM AIR-2 contains numerous measures to reduce air quality operational impacts through providing, among other things, electric vehicle charging stations for passenger vehicles, trucks, and TRU trucks. The commenter mistakenly concludes that MM AIR-2 provision that "At buildout of the industrial land uses a minimum of 50 Level 3 AC Class 8 electric vehicle (EV) truck chargers shall be installed at the tractor trailer parking spaces in logical locations to facilitate electric truck charging" means that there is no requirement that chargers will be installed at each phase of development. Electrical truck chargers will be installed proportional to the square footage of each building; i.e. one charger for every 109,000 SF. The project will install fifty (50) chargers total as required by this mitigation measure even if fewer buildings are constructed. Accordingly, each building in each phase will include the installation of electrical chargers In parking spaces in logical locations on site to facilitate future electric truck charging. Please see the responses to Comments A-3-54, A-3-62, and B-2-15. In response to public comments, Mitigation Measure AIR-2 has been revised as follows.

**MM AIR-2** The following multi-part mitigation measure shall be implemented during Project operation:

- Implement Mitigation Measures GHG-4, GHG-5, and GHG-~~6~~7.
- All facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site shall meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on site demonstrating compliance with

this requirement and shall make records available for inspection by the City of Banning, SCAQMD, and State upon request.

- All on-site cargo handling equipment including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment shall be electric with the necessary electrical plug-in charging included in the design of the Development Project electrical system, buildings, and equipment storage and parking areas.

- Tenant lease agreements for the Development Project shall include contractual language restricting trucks and support equipment from nonessential idling longer than ~~5~~3 minutes while on site. The idling restriction will be presented on signs at the entrance to the industrial portions of the Development Project as well as at loading docks and truck parking areas.

- All facility operators shall train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

- Interior- and exterior-facing signs, including signs directed at all dock and delivery areas, shall be provided identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.

- At buildout of the industrial land uses a minimum of 50 ~~Level 3 AC~~ Class 8 electric vehicle (EV) truck chargers shall be installed at the tractor trailer parking spaces in logical locations to facilitate electric truck charging. These charges shall have the power rating sufficient to charge a Class 8 truck battery.

- For the warehouse/industrial portions of the Development Project, the buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for installation of electric charging systems for electric trucks and power transport refrigeration units (TRUs). Conduit shall be installed from the electrical room to all tractor trailer parking spaces in logical locations on site to facilitate future electric truck charging.

- ~~At buildout, t~~The Development Project shall include the higher value of either:

  - At least 350 Level 2 AC EV chargers; or

  - A percentage of total parking spaces with Level 2 AC EV chargers to comply with the minimum requirements of CCR, Title 24, Part 11: California Green Building Standards Code.

  - The provision of EV chargers in each parking lot shall occur prior to occupancy of uses for said lots.

- All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric

standby and/or hybrid electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric.

- Prior to issuance of occupancy permits for the industrial/warehouse area, the Development Project operators employing 200 or more employees shall be required to establish and promote a rideshare program and prepare and submit a Transportation Demand Management Program detailing strategies that discourage single-occupancy vehicle trips by employees by increasing and providing financial incentives for alternate modes of transportation, including carpooling/vanpools, public transit, and biking.

- Signs at every truck exit driveway shall be provided showing directional information to the truck route.

- Every tenant shall be required to train staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Facility operators shall also be required to maintain records on site demonstrating compliance and make records available for inspection by the City of Banning, SCAQMD, and State upon request.

- Tenants shall be required to enroll in the United States Environmental Protection Agency's SmartWay program, and tenants shall be required to use carriers that are SmartWay carriers.

- Industrial and commercial buildings within the Development Project shall be all electric unless the land use requires natural gas (i.e., restaurants, bakeries, dental and medical laboratories).

- Tenants shall be provided with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

Because the California Green Building Code requires a percentage of the total parking spaces to be provided with electric chargers for passenger vehicles, these chargers will be installed proportionally to comply with the code for each phase. The Development Project has been designed to further accommodate current and near future commercial capacity of electric truck fleets. As detailed above, Mitigation Measure AIR-2 requires:

- For the warehouse/industrial portions of the Development Project, the buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for installation of electric charging systems for electric trucks and power transport refrigeration units (TRUs). Conduit shall be installed from the electrical room to all tractor trailer parking spaces in logical locations on site to facilitate future electric truck charging.

- All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid

electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric.

Additional electric capacity is included to increase the number of electric truck chargers in order to accommodate a 100 percent electric truck fleet once that becomes commercially feasible. The installation of electric charging capability at buildings, combined with State and regional requirements and programs (e.g., CARB's Advanced Clean Fleets Rule and SCAQMD's WAIRE program) will facilitate the use of zero-emission vehicles to the extent feasible. The revisions to Mitigation Measure AIR-2 provide additional measures to reduce the emission of pollutants. Under applicable provisions of CEQA Guidelines Sections 15088.5(a)(1) and (3), the modest change in this mitigation measure merely clarifies, or makes a modification in an otherwise adequate EIR and does not result in adverse environmental impacts or do not constitute new information; therefore, no recirculation of the Draft EIR is required. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment D-6-5**

The commenter states that the Title 24 CALGreen Building Code does not require installation of EV chargers for cars or truck, but only requires electrical conduit for electrical charging stations, and requests the project be conditioned to require the installation of EV and electric truck charging units at the time of occupancy of each phase of development. The commenter is not correct regarding charging unit mandates. CALGreen Building Code requires EV chargers for passenger vehicles based on a percentage of the parking spaces. Accordingly, the Development Project will install the greater of 350 Level 2 AC EV chargers or a percentage of total parking spaces with Level 2 AC EV chargers to comply with the minimum requirements of the California Code of Regulations (CCR), Title 24, Part 11: California Green Building Standards Code, whichever number is higher. Accordingly, Level 2 AC EV chargers will be installed in each parking lot at the time of occupancy in compliance with CCR Title 24 Part 11 requirements. Although the CALGreen Code does not require installation of truck EV chargers, the Development Project will install a minimum of 50 Class 8 electric vehicle (EV) truck chargers. To clarify the installation requirement, Mitigation Measure AIR-2 has been revised. Please see the responses to Comments A-3-54, B-2-15, and D-6-4.

This revision merely clarifies the timing of EV charger installation. Under applicable provisions of CEQA Guidelines Sections 15088.5(a)(1) and (3), the modest change in this mitigation measure merely clarifies, or makes a modification in an otherwise adequate EIR and does not result in adverse environmental impacts or identify mitigations measures the applicant declines to adopt; therefore, the modifications do not constitute new information, and no recirculation is required. Please see the response to Comment D-6-4 regarding the timing of installation of truck EV chargers. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response required.

**Response to Comment D-6-6**

The commenter is unclear regarding the type of Level 3 AC Class 8 EV truck chargers identified in MM AIR-2 (mistakenly referred to as AIR-1), and whether these chargers are available in the commercial market and points out Level 3 chargers provide direct current (DC) charging. Because tenants have not yet been identified for the Development Project, and the precise charging technology for EV trucks

that might service the Development Site is unknown, Mitigation Measure AIR-2 has been revised. Please see the responses to A-3-54 and D-6-4.

As revised, this mitigation measure provides an equivalent amount of EV capability and would result in the same reductions of significant impact. This measure as revised will not cause any significant impact on the environment because Class 3 DC chargers would utilize the same amount of electricity to charge Class 8 trucks, though the charging time 5545000 is reduced[48]. Please see the responses to Comments D-6-4 and D-6-5. Therefore, no recirculation of the Draft EIR is required. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment D-6-7**

The commenter states that charging times and battery ranges needed for Class 8 one or two shift schedules require that the type of EV truck chargers specified in Mitigation Measure AIR-2 (mistakenly referred to as AIR-1), provide sufficient power rating and charging timeframes to adequately charge Class 8 vehicles, and must be Level 3/DC fast chargers. Please refer to the response to Comment D-64-6. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment D-6-8**

The commenter states that the City must adopt any feasible measures that can substantially lessen the Project's significant air quality impacts and lists additional "sustainability measures" it recommends be adopted. The City recognizes that CEQA requires the incorporation of all feasible mitigation measures where a Project EIR identifies significant and unavoidable impacts. However, CEQA does not require that the lead agency adopt every imaginable mitigation measure, or adopt every mitigation measure brought to its attention, including those suggested by commenters. This requirement applies only to feasible mitigation that will "substantially lessen" a project's significant effects and is practical as well as effective. Public Resources Code, § 21002; *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 365. In addition, the City need not adopt measures that will not provide additional mitigation beyond the measures already included in the Draft EIR. See the responses below to the commenter's suggested mitigation measures:

- The commenter suggests building roofs with "light colored roofing materials" with a solar reflectance index (SRI)[49] of 78 for at least 75% of the roof not covered by solar. Mitigation Measure

[48] https://betterenergy.org/blog/charging-medium-and-heavy-duty-electric-vehicles-plugging-into-the-future-part-ii/. An electric truck with a 600-kWh battery would need 80-100 hours to fully charge using a Level 2 charger. The fastest DC fast chargers can fill a light-duty EV battery up to 80 percent in about 10 minutes. A 600-kWh electric truck would require six hours to charge using a 100 kW DC fast charger.

[49] **Solar reflectivity** or reflectance is the ability of a material to reflect solar energy from its surface back into the atmosphere. The SR value is a number from 0 to 1.0. A Value of 0 indicates that the material absorbs all solar energy and a value of 1.0 indicates total reflectance. To meet LEED requirements a roofing material must have an SRI of 29 or higher for steep slope (>2:12) roofing and an SRI value of 78 or higher for low slope roofing (see https://www.deansteelbuildings.com/products/panels/sr-sri-by-color, site accessed April 26, 2024).

GHG-3 requires, "All roofing material for commercial buildings shall be Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance or greater and 0.75 thermal emittance." As this suggestion is already included in Mitigation Measures GHG-3, no additional mitigation or further response is necessary.

- The commenter suggests LEED certification for all industrial buildings, requiring the applicant to implement sustainability measures that provide environmental benefits. The Development Project would be constructed to Title 24 Part 6 and CALGreen Building Code Tier 1 standards, which approximates basic LEED certification (see Draft EIR, Section 3.5.3.10, page 3-98). No additional mitigation or further response is required.

- The commenter suggests the installation of concrete, preferably white concrete, in parking areas to reduce the heat island effect of the project. The reduction achieved by the requested measure is not quantifiable and there is no reasonable assurance it would reduce Development Project-related impacts. Therefore, this measure is not required by CEQA. See CEQA Guidelines Section 15041. In addition, the solar reflectance of pavement can change over time due to local weather conditions and vehicle wear. Generally, newly constructed asphalt pavement absorbs approximately 95 percent of sunlight, but vehicle wear and oxidation over time may reduce solar absorption to 80 percent after seven years. Conversely, newly installed concrete pavement absorbs approximately 65 percent of sunlight; but as it gets darker due to vehicle traffic and soiling, its solar absorption increases to 75 percent[50]. The Development Project will experience traffic from heavy-duty trucks, delivery vehicles, and passenger vehicles. The type of pavement used, as well as the extent and location of said pavement, will be dictated by the type and manner of traffic. Generally, truck driveways, truck/trailer storage/staging areas, building aprons, and loading docks will be paved with concrete, while passenger car parking areas will be paved with asphalt. As shown in Figure 3.7 of the Draft EIR, substantial portions of the Development Site are dedicated to the areas where truck operations occur; therefore, these areas are likely to be paved with concrete. Thus, a substantial amount of concrete will already be installed within the Development Site to sufficiently support truck operations. The installation of concrete pavement throughout the entirety of the Development Sites is not required. No additional mitigation or further response is necessary.

- The commenter suggests the provision of landscaping to provide 50 percent shade cover within ten years. Please refer to the response to Comment D-3-90. No additional mitigation or further response is necessary.

- The commenter suggests the installation and use of 100 percent solar power to meet energy demand, including that required for electric vehicle charging. Please refer to the response to Comment A-3-64. No additional mitigation or further response is necessary.

- The commenter suggests establishing a homeowner fund for the installation of air filtration units and dual pane windows for homes adjacent to and near the Development Site. Please see the responses to Comment B-2-14 regarding home filtration units and D-6-29 regarding the

[50] https://coolcalifornia.arb.ca.gov/cool-pave-how, site accessed May 10, 2024.

elimination of significant noise impacts (based on project revisions). No additional mitigation or further response is necessary.

- The commenter suggests including truck operator "lounges" within buildings to reduce truck idling and use of auxiliary power units (APUs). The commenter does not provide any specificity as to the "reasonable size" of the buildings requiring lounges or the mitigation effect of providing them. Generally, buildings such as those proposed for the Development Site, provide break area for employees and/or visitors. In-building amenities for truck operators may be provided in buildings based on the needs of each tenant and subject to terms of individual leases. Furthermore, the increasing availability and efficiency of battery-powered APUs, the progressing electrification of truck fleets, and the provision of plug-in capabilities at loading docks/truck bays, will limit the use of emissions-producing APU. Mitigation Measure AIR-2 (as revised) already includes a limit on nonessential idling of trucks and support equipment to no longer than three minutes. No additional mitigation or further response is necessary.

The requirements detailed in Mitigation Measures GHG-3 and AIR-2, as well as project design features provide a reasonable range of feasible measures to reduce energy usage and corresponding air quality and GHG emissions. Revisions to Mitigation Measures AIR-1 and AIR-2 (see the responses to Comments A-3-49, A-3-62, and B-2-15) would further reduce air quality and GHG emissions; therefore, no additional mitigation measures are required. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

**Response to Comment D-6-9**

The commenter states the Draft EIR's finding that the NOx emissions exceed SCAQMD thresholds, cites the 2012 RTP for the proposition that NOx emissions continue to contribute to the "region's air pollution", and that addressing NOx impacts associated with mobile sources is the key to mitigating significant air quality impacts. The RTP has been superseded twice and the most current 2020 RTP shows NOx emissions declining by the target date of 2045 over baseline. Similarly, the 2022 AQMP which supersedes the 2016 *Blueprint for Clean Air* cited by the commenter states the, "…2022 AQMP estimates show lower emissions of NOx and VOCs in 2018 than projected levels from the 2016 AQMP… [and] [f]or 2037, emissions are significantly lower than base-year 2018 emissions" due to existing federal and state regulatory requirements for heavy duty trucks. As further stated in the 2022 AQMP, "Despite growth in vehicular activities, emissions from on-road mobile sources are expected to decrease [and] NOx and VOC emissions in 2037 are 76 and 56 percent lower than in 2018, respectively." This estimated decrease does not include the additional anticipated beneficial impacts of the 2021 SCAQMD implemented Rule 2305 (the Warehouse Indirect Source Rule, WAIRE rule), a regulatory program to reduce air pollution from warehouse-related activities, which is focused on emissions from vehicles that service large warehouses.

As referenced by the commenter, the condition of air quality is a regional issue, and the Project must address significant NOx impacts. Mitigation Measures AIR-1 and AIR-2 (as originally drafted and as revised) along with additional project design features, imposed mitigation, and operational requirements will reduce NOx emissions from construction and operations to the extent feasible. This

comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

**Response to Comment D-6-10**

The comment states the Project should establish fleet efficiency requirements for vehicle fleets and that industrial tenants be mandated to exclusively use zero emission light-and medium-duty delivery trucks and vans, only zero emission yard equipment e.g. forklifts and yard trucks, and near-zero and zero-emission technologies for last mile heavy duty truck deliveries. Measure AIR-2 already requires exclusive use of electric yard equipment. Also required is installation of 50 Class 8 heavy-duty electric truck charging stations, installation of stand-by plug-in capability at all dock bays for charging TRUs, and sufficient sizing of electrical rooms to hold additional panels to accommodate charging for additional electric trucks charging stations in the future. However, tenants have not yet been identified for the Project, and the precise fleet mix they may require is uncertain. In addition, the vehicles specified by the commenter are not available on a large enough scale to be relied upon to serve the Project, and CEQA does not require imposition of infeasible mitigation in an EIR. Refer to responses to Comments A-3-25 and A-3-27 regarding the infeasibility of requiring EV trucks and delivery vehicles for the Project at this time; and D-3-70 regarding light- and medium-duty EV vehicle usage. In addition, operators of warehouses would be subject to provisions of the WAIRE program (See Draft EIR, page 4.3-27 and 4.8-13 and -14.) WAIRE points are earned by implementing options from a menu of actions which include purchase/leasing of zero- or near-zero emission trucks and delivery vehicles, design of a custom WAIRE plan subject to SCAQMD approval, or payment of mitigation fees that assist in the funding of pollutant reduction measures in the South Coast Air Bain (Basin). Since the proposed Project will not be operated by the current owner, it is not feasible to commit to specific provisions of Rule 2305 and quantify emissions reductions, but future tenants will be obligated to comply with its provisions. Complying with Rule 2305 would reduce air quality impacts throughout the SCAB from the warehouse industry, including the Project. No further response is required.

**Response to Comment D-6-11**

The commenter states the City must ensure the Project is consistent with the State's goal of zero-emission transport of goods and require the phase in of zero emission or clean technology for heavy duty trucks utilized by the Project. Please see the responses to Comments A-3-25 and A-3-27. No further response is necessary.

**Response to Comment D-6-12**

The commenter states CARB has indicated that deployment of zero emission and cleaner technologies for goods movement will be necessary to meet air quality goals, and states that additional mitigation for operational air quality impacts includes phase in of non-diesel trucks. Please refer to the responses to Comments D-6-4 and D-6-10 above as well as A-3-25 and A-3-27, which discuss electrification features provided by the Project, CARB's Advanced Clean Fleets Rule, SCAQMD's WAIRE program, and the infeasibility of specifying a phase in schedule for non-diesel trucks at this time. No further response is necessary.

**Response to Comment D-6-13**

The commenter requests imposition of a mitigation measure requiring the project to implement phase-in of percentages of zero emission trucks by specified dates and cites various state regulations and rules to support its conclusion that such a mitigation measure falls under CEQA's definition of feasible in CEQA Guidelines section 15364. The California Air Resources Board's (CARB)'s Advanced Clean Truck Rule provides a "holistic approach" to accelerate the transition to the use of zero emission medium- and heavy-duty vehicles[51]. The regulation has two components including, 1) a manufacturer sales requirement and, 2) a reporting requirement. CARB does not currently mandate a phased in use of zero emission trucks and allows for continued use of existing diesel trucks for a specified period. The statement that the Attorney General recommends all trucks be zero emission by 2030 is incorrect as that recommendation only pertained to drayage (short haul) trucks, not all trucks utilized in for warehouse uses. Because tenants have not yet been identified for the Development Site, it is unknown whether and which CARB regulation provisions would apply to Project tenants. This Rule also does not mean that a phase in plan for ZE trucks is feasible for a project of this size, and the same feasibility issue also applies to requiring all ZE drayage trucks by 2030. While heavy-duty trucks are commercially available, these vehicles are not available on a large enough scale to totally support Project operations; therefore, requiring exclusive zero-emission vehicles is currently economically and technologically infeasible[52]. Imposing requirements related to emerging technology, when the various types of technological advancements and their timeframes for common availability are not known with certainty, is not a feasible mitigation measure. See also the response to Comment A-3-25. Nevertheless, the Project provides 50 Class 8 plug in chargers, plug in capability for TRUs, along with other features to support future use of ZE trucks (see the response to Comment D-6-4 and revised MM AIR-2), and all tenants of industrial buildings will be required to comply with SCAQMD's WAIRE program which provides a suite of options, including deploying ZE or other clean technology trucks to lessen air quality emissions. Complying with the WAIRE rule allows future tenants to phase in use of ZE trucks as they are commercially available for this Project.

In addition, the Project appropriately incorporates measures recommended by the California Attorney General[53]. See the responses to Comments D-3-56 through D-3-93. The commenter's citations are

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51 The regulation has two components including, 1) a manufacturer sales requirement where manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales; and 2) a reporting requirement in which large employers including retailers, manufacturers, brokers and others are required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, are required to report about their existing fleet operations. This information will help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs. See: https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet, site accessed May 14, 2024.

52 https://theicct.org/sites/default/files/publications/Zero-emission-freight-trucks_ICCT-white-paper_26092017_vF.pdf.

53 https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf.

noted and will be considered by the City prior to future action on the Project; however, the City is not required to incorporate all suggested mitigation measures. No further response is necessary.

**Response to Comment D-6-13-A**

The commenter cites the State's greenhouse gas (GHG) emission reduction targets, the square footage of warehouses in the Inland empire, and states the Project will increase cumulative greenhouse gas (GHG) impacts but fails to adopt all feasible mitigation for the cumulatively significant impact. The comment is noted. Please see the responses to Comments D-6-4 and D-3-8 regarding the Project's GHG mitigation (see Mitigation Measures GHG-1 through GHG-6, Draft EIR, Section 4.8), the Development Project implements actions required by the Riverside County Climate Action Plan (CAP) through the incorporation of project design features (PDFs) to reduce GHG emissions to the extent feasible. The following measure has been added to the Final EIR (revised Section 4.8.5.1):

**MM GHG-7** Prior to issuance of building permits, the Project shall provide documentation to the City as part of the plan check process, demonstrating that the Project will implement the measures specified in Table 4.8.K which were obtained from the Riverside County Greenhouse Gas Emissions Screening Tables. The Project may also achieve equivalent emission reductions from other measures approved by the City. Implementing these mitigation measures shall be verified by the City prior to the issuance of final Certificate of Occupancy.

Please see the responses to Comments A-3-28 and D-3-8 regarding the infeasibility of other GHG reduction measures. The new mitigation provides only a mechanism for ensuring the actions detailed in Draft EIR Table 4.8 are implemented and do not constitute new information requiring recirculation of the Draft EIR. Per CEQA Guidelines section 15064.4, GHG emissions that exceed an adopted threshold of significance are considered cumulatively considerable regardless of other greenhouse gas emissions from nearby projects. Greenhouse gas emission impacts are cumulative by nature. The Project would generate the same level of GHG emissions regardless of where it was located; therefore, the project's location in the Inland empire where other warehouse projects are located is not pertinent to the Project's GHG impacts. No further response is necessary.

**Response to Comment D-6-14**

The commenter accurately summarizes the Project's mitigated and unmitigated GHG emissions, exceed the City's threshold of 3,000 MTCO2e/yr (56,902.96 MTCO2e/yr unmitigated/38,726.25 MTCO2e/yr mitigated), and the Draft EIR's conclusion that there are no other feasible mitigation measures beyond those in the Draft EIR (see Draft EIR Tables 4.8.F and 4.8.J). The commenter did not note that even without implementing WAIRE rule requirements, the estimated further reduction in the Project GHG emissions from regulatory requirements by 2040 would be half of the mitigated emissions at Project buildout. See Draft EIR p. 4.8-30, Table 4.8-J. The commenter requests that the mitigation measures it previously identified for air quality mitigation should be considered for the reduction of GHG, especially those originating from transportation sources. Please refer to the responses to Comments D-6-8, D-6-10, A-3-25 and A-3-27, A-3-48 through A-3-65, and D-3-56 through D-3-93.

In response to public comments, the GHG emissions totals for the Development Project were updated based on the updated CalEEMod run for truck trip lengths and the updated calculations for TRU emissions. See *Sunset Crossroads Supplemental Greenhouse Gas Emissions Assessment* (Final EIR Appendix C-6). The update identified an increase in the volume of unmitigated (62,844.96 MTCO2e/yr) GHG emissions. Section 3.6 of the Specific Plan has been revised to state that building roofs shall be solar ready in compliance with Solar Requirements with of the California Building Code, Title 24 standards (see revision in Final EIR, Section 3.5.3.10). With the Mitigation Measures identified in the EIR and additional quantified reductions[54], emissions of GHGs would total 45,067 MTCO2e/yr, a net increase of 5,942 MTCO2e/yr from that identified in the Draft EIR (see Final EIR, revised Tables 4.8.F and 4.8.J). The emission of GHGs was previously identified as a significant and unavoidable impact. While the revisions to the GHG analysis to address public comments identified an increase in the volume of GHG emitted, this change did not change the overall level of significance and does not constitute new significant information requiring recirculation of the Draft EIR.

The results of the updated GHG emissions for the Development Project are summarized in revised Tables 4.8.F and 4.8.J of the Final EIR (also see Tables E and F in Appendix C-6). The Development Project will construct extensive electrification infrastructure and implements operational procedures to reduce air pollutant emissions (please refer to the response to Comment D-6-8). The mitigation measures in the Draft EIR, implementation of State and regional requirements/programs that will apply to Development Site tenants, including the WAIRE program, will add additional mitigation and will facilitate the use of zero-emission vehicles to the extent feasible, resulting in further reduction of air quality and GHG emissions than specified in the Draft EIR. See the response to Comment D-6-13-A. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

**Response to Comment D-6-15**

The commenter states the City should consider additional measures for reducing vehicle miles traveled (VMT), including carpool incentives and transit passes for employees, and rideshare programs. Refer to Draft EIR Appendix J-1 pp 6-9, and see also Draft EIR p. 4.8-32, Table 4.8.K. Draft EIR Appendix J-1 includes Project Design Features that are incorporated in the Final EIR in Mitigation Measure TRA-1s (see MM TRA-1 and PDFs T-1 through T-3, Final EIR revised Section 4.17.6.3).

Although implementation of Mitigation Measure TRA-1 would reduce impacts to VMT, the reduction achieved is not enough to meet the City's VMT standard; therefore, impacts remain significant and unavoidable. See the response to Comment D-3-23. In the event the City decides to approve the Project and certify the EIR, Findings and a Statement of Overriding Consideration(s) would be required. Revisions to the Draft EIR are not required. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

[54] The Specific Plan, as updated, includes a project design feature requiring compliance with California Building Code Title 24, Part 6 solar requirements. Previously, for non-residential development, only solar ready roofs were required, Current Title 24, Part 6 requirements which keep the Development Project compliant with Title 24, Part 6 requirements, and is the basis for the GHG analysis in the supplement GHG memorandum (Final EIR, Appendix C-6).

**Response to Comment D-6-16**

The commenter cites CEQA Guidelines Appendix F considerations for analyzing energy use and states the Draft EIR's finding of less than significant impact relative to energy resources is not supported. Appendix F of the CEQA Guidelines identifies the energy-related factors to be considered "to the extent relevant and applicable." These include (but are limited to): the total energy requirements of the Project, the identification of energy supplies that will serve the Development Project, estimated daily trips and fuel usage, the effects of the Project on local energy supplies, and with an emphasis on reducing wasteful, inefficient, and unnecessary consumption of energy. These factors, as well as the other relevant factors in Appendix F were considered and analyzed in the Draft EIR (see Section 4.6). Electricity to the Development Project would be provided by Banning Electric Utility (BEU), which currently has a renewable portfolio of 81.3 percent (2022)[55], far exceeding the State's target of 50% by 2030. As described on page 4.8-9, Section 4.8 of the Draft EIR, SB 100 requires BEU's portfolio to be 100 percent renewable by 2045. The use of electric yard equipment and provision for EV chargers for passenger vehicles and trucks from renewable sources of energy complies with Appendix F requirements to conserve energy and decrease reliance on fossil fuels.

The City enforces mandatory building code requirements for solar roofs in new development, which currently include mandatory solar roofs on residential development and solar-ready roofs for non-residential development, as well as (1) installation of solar panels with the capacity to generate at least 20 percent of commercial buildings' expected electricity consumption; and (2) installation of solar panels on industrial buildings with the capacity to generate the expected electricity consumption of the office space of the warehouses. See also the response to Comment A-3-64.

The Development Project includes mitigation requiring electrification of uses (see Mitigation Measure AIR-2 [Draft EIR, pg 4.3-34 through -36]) and energy-efficient design/operation throughout the project (pg 4.8-23, CAP strategies (pg 4.8-32), and Mitigation Measures GHG 3- and -4 (pgs 4.8-29). See also response to Comment D-3-8 regarding EV charger stations, sufficient electric panels to expand for additional EV chargers, and electric yard equipment requirement. As such, the analysis in the Draft EIR supports the conclusion that impacts related to energy usage are less than significant. No further response is necessary.

**Response to Comment D-6-17**

The commenter states the Project will create a 'massive' demand for energy but does not increase reliance on renewable energy resources, and requests additional mitigation including rooftop solar for 50% of Project energy use. Please see the response to Comment A-3-64 regarding solar roofs and electricity generation in the City. Please also refer to the response to Comment D-6-16 which describes how Project energy use is mitigated in compliance with Appendix F. No further mitigation and no additional response is required.

**Response to Comment D-6-18**

The commenter states the City must impose measures to ensure compliance with CEQA Guidelines (Appendix F) and to advance the policies and goals of SB 100. SB 100 which requires a 100 percent

[55] Email confirmation from Jim Steffans, Banning Electric Utility, May 3, 2024, 12:09 PM.

renewable energy portfolio by 2045 applies only to retail utilities and not to private projects such as this. The Project's Specific Plan is designed with specific energy efficiency requirements. See Specific Plan section 3.6, Energy Efficiency Development Criteria; see also Project Description section 3.5.3.10 Sustainability and Energy Efficiency Features pp. 3-98-3-102. In addition, Mitigation Measures AIR-2 and GHG-1 through GHG-7 and Table 4.8.K in Draft EIR Chapter 4.8 reduce air quality and greenhouse gas impacts through the reduction in the amount and/or type of energy used for Project operation. A new mitigation (GHG-7) provides a mechanism for ensuring the actions detailed in Draft EIR Table 4.8 are implemented but does not constitute new information requiring recirculation of the Draft EIR. See the response to Comment D-6-13-A.

Section 3.6 of the Draft EIR contains an inventory of anticipated energy usage, sources, effects on existing supplies, and discusses energy-efficient measures of the Project as well as statutes and regulations that govern the Project which serve to reduce and/or make more efficient Project energy use. For example, the 2022 update to the California Energy Code (Title 24, Part 6) includes increased building efficiency standards, which are enforced through the local building permit process. Title 24, Part 11 (CALGreen Code) establishes mandatory measures for sustainable residential and non-residential building construction through code requirements for planning and design, energy, water, and resource efficiency and conservation, and indoor environmental quality. Please refer to the responses to Comments D-6-16, D-6-17, and A-3-64 regarding the requirement for renewable energy and BEU's existing renewable portfolio. Accordingly, no additional measures are required, and no further response is necessary.

**Response to Comment D-6-19**

The commenter states the Project results in significant land use impacts, including, but limited to conflicts between the Project and the City of Banning General Plan and that the Draft EIR must be revised with further analysis and mitigation. It is unclear what is meant by "land use conflicts." Project consistency with a general plan is not an environmental consideration and does not need to be addressed or mitigated in a CEQA document. See, e.g., *North Coast Rivers Alliance et al.* v. *Marin Municipal Water District* (2013) 216 Cal.App.4th 614, 633. CEQA only requires the EIR to address whether a project would conflict with a general plan such that it would cause a significant environmental effect. See CEQA Guidelines, Appendix G, XI.(b). Without a planning inconsistency that results in a significant environmental impact, an EIR is adequate when it states that no conflict would occur, which was done in the Draft EIR. The commenter does not identify specific planning consistency issues or state they result in an environmental effect. The comment is otherwise noted, and responses to specific General Plan policies are addressed below. No further response is required.

**Response to Comment D-6-20**

The commenter states the Project is inconsistent with protecting community character as established in General Plan Land Use Element Goal 1, Policy 2. The commenter is referencing the "Residential Goals, Policies, and Programs" section of the City's General Plan Land Use Element, which includes the goals and policies to "preserve and enhance the City's neighborhoods" and "to provide a range of housing densities while considering land use compatibility with non-residential uses." CEQA only requires an EIR to address whether the Project would conflict with the General Plan in such a way that it would result in an environmental effect. In the absence of a planning inconsistency that results in

an environmental effect, it is adequate to state that no conflict would occur, which was done in the Draft EIR. See Draft EIR section 4.11, Table 4.11.A. See also response to Comment D-6-19.

Separately, as a matter of consistency with City planning documents, the City is required to determine whether the Project is consistent with its General Plan, which will be provided in a staff report to the decision makers (Planning Commission and City Council). In addition, as a matter of law, a project need not be in perfect conformity with each and every general plan policy to be found consistent with the general plan. It need only be "compatible with" the objectives, policies, general land uses and programs specified in the general plan. *California Native Plant Soc'y v. City of Rancho Cordova* (2009) 172 Cal. App. 4th 603, 637-38. The Project is consistent with the overall goals of the City's General Plan Land Use Element, which are intended to ensure a balance of residential, commercial, industrial, open space and public lands, and to allow changes to the General Plan land use categories for the remaining capacity of undeveloped land. The Land Use Element also recognizes that industrial development has been an important source of jobs in the City, and the City would continue to attract industrial land uses. The General Plan Amendment proposed for the Project would update the General Plan Land Use Map to reflect the land uses of the Development Project while continuing to provide for a range of housing densities in the City through concurrent General Plan Amendment for the MSJC Site.

The Specific Plan (see Draft EIR, Appendix B and as revised/included in the Final EIR) specifies that the design, development, operation, and maintenance of uses, infrastructure, landscaping and open space will be governed by the guidelines detailed in the Specific Plan, which themselves have been drafted to be in conformance with the intent, goals and policies set forth by the City of Banning General Plan. Circulation and infrastructure improvements are in conformance with the roadway classification and design outlined in the City's General Plan. The commenter does not substantiate the claim that the design and development standards detailed in the Specific Plan would be "antithetical" to the notion of protecting existing community character since the existing neighborhoods will not be changed as a result of the Project. With respect to commenter's statement that the Project proposes to funnel thousands of vehicle trips per day onto local, neighborhood-serving roadways and is antithetical to protecting community character, see the response to Comment D-6-1-A. As stated in the responses to Comments A-3-2 and B-2-5, the LST and HRA analyses (as originally drafted and as revised per public comment on the Draft EIR) did not identify a significant localized air quality impact or a health risk impact at the sensitive receptors located closest to the Project Site. Moreover, while residential uses abut the western boundary of the site, Planning Areas 11 and 12 and the western portion of Planning Area 7 have been intentionally retained as open space, providing substantial buffers between those residential and industrial uses. Project Design Feature PDF N-1 that realigns Sunset Avenue further away from existing residential and MSJC campus uses eliminates the significant noise impacts identified in the Draft EIR (see the response to Comment D-6-29). The commenter does not provide any evidence that the Project would result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

**Response to Comment D-6-21**

The commenter states that the Project does not include bike lanes and does not provide access to a safe means of alternative transportation citing General Plan Parks and Recreation Element, Policies 6

and 8. These policies are directly applicable to the City, not to individual projects. However, the statement is incorrect. The Specific Plan for the Development Project, as revised, identifies 8-foot wide Class II Bikeways on both sides of Sunset Avenue from the I-10 to Sun Lakes Boulevard Extension and along both sides of Lincoln Street. Additionally, the revised Specific Plan (Section 3.4) has been revised to require that individual site plans identify and provide safe pathways for bicyclists from public roadways to on-site bicycle storage locations, using signage and/or striping. Please refer to Sunset Crossroads Specific Plan (Draft EIR Appendix B), Specific Plan Chapter 2.2, Circulation Plan, Chapter 4 Design Guidelines, et al.

While the development of Sun Lake Boulevard through the Development Site is a city project, plans for this future roadway state, "… Sun Lakes Boulevard will be constructed as an Arterial Highway with two eastbound and two westbound lanes, each containing a 12-feet wide lane and a 14-feet wide lane; a raised 18-foot wide median; eastbound and westbound 8-foot-wide bike lanes." As further provided in the Specific Plan industrial architectural guidelines: "…truck and service vehicle entries should be designed to provide clear and convenient access to truck courts and loading areas such that passenger vehicle, pedestrian, and bicycle circulation is not adversely affected by truck movements." (Specific Plan, Section 4.3.5). Secure bicycle storage racks or bicycle lockers are required within the industrial land uses (Specific Plan Section 3.6, Energy Efficient Development Criteria). In addition, Planning Areas 11 and 12 will provide passive recreational opportunities, including bicycle parking facilities and the commercial planning areas will include bicycle parking areas near the main entrances of buildings (Specific Plan Section 4.4.12). The Project provides a variety of bicycle facilities at locations sufficient to facilitate bicycle movement to and through the Development Site, ensuring compliance with General Plan Parks and Recreation Element, Policies 6 and 8. The Project would not result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the responses to Comments D-6-19 and D-6-20. No further response is necessary.

**Response to Comment D-6-22**

The commenter states the Project is not required to recycle water for irrigation as established in General Plan Water Resources Element Policy 3 and Riverside County General Plan Policies LU-4.1, 18.5, and OS 1.4. As noted in the Draft EIR p. 4.11-34, the Southern Portion of the Development Site will be annexed into the City, and because this portion of the Development Site will not remain in the County, the Project need not be consistent with the Riverside County General Plan policies, only the City of Banning's General Plan. The Riverside General Plan consistency analysis was provided for informational purposes. However, the Specific Plan (see Specific Plan Section 2.4) details the Development Project's Recycled Water Plan which will provide a recycled water system subject to the design requirements of the City of Banning Public Works Department and the demand criteria guidelines outlined in the City's Integrated Master Plan (IMP). In addition, Draft EIR Mitigation Measure GHG-2 requires the project to:

> Provide drought tolerant low-water landscaping and trees throughout the Project site and use recycled (purple pipe) irrigation water with drip irrigation and weather based smart irrigation controllers.

See also Draft EIR chapter 4.8, Table 4.8.K which also requires an on-site recycled water system. Thus, the project already includes the installation of reclaimed water infrastructure and the use of recycled water. The commenter does not state that the Project would result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the responses to Comment D-6-19. No further response is necessary.

**Response to Comment D-6-23**

The commenter states the Project does not comply with General Plan Air Quality Element Policy 3 which requires the City to "assure" that sensitive receptors are separated from polluting point sources. General Plan Air Quality Element Policy 3 Program 3.A defines air pollution point sources as "manufacturing operations and highways" which are not contemplated in the Project. Further, Program 3.A states, without definition, that these sources be located an "appropriate distance" from sensitive receptors. The sources of pollutants emitted during construction and operation of the Development Project were fully addressed in Section 4.3 of the Draft EIR. As stated in the responses to Comments A-3-2 and B-2-5, the LST and HRA analyses (as originally drafted and as revised per public comment on the Draft EIR) did not identify a significant localized air quality impact or a health risk impact at the sensitive receptors located closest to the Project Site. Moreover, while residential uses abut the western boundary of the site, Planning Areas 11 and 12 and the western portion of Planning Area 7 have been intentionally retained as open space, providing substantial buffers between those residential and industrial uses. Other residential areas to the east and south are separated from industrial uses by improved roadways and landscaped buffers and/or infiltration basins. The Project would not result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the response to Comment D-6-19. No further response is necessary.

**Response to Comment D-6-24**

The commenter states the Project does not mitigate its air quality impacts as required by General Plan Air Quality Element Policy 4 and the Project fails to propose all feasible mitigation for the identified significant impacts. Policy 4 provides that "Development proposals brought before the City shall be reviewed for their potential to adversely impact local and regional air quality and shall be required to mitigate any significant impacts." To be consistent with the general plan, a project need only be "compatible with" the objectives, policies, general land uses and programs specified in the general plan. *California Native Plant Soc'y v. City of Rancho Cordova* (2009) 172 Cal. App. 4th 603, 637-38. Here, compliance with Policy 4 must be understood in the context of Program 4.A which provides: "Projects that may generate significant levels of air pollution shall be required to conduct detailed impact analyses and incorporate mitigation measures into their designs using the most advanced technological methods feasible. All proposed mitigation measures shall be reviewed and approved by the City prior to the issuance of grading or demolition permits." Program 4.1 likewise provides, "Projects that may generate significant air pollution shall be required to conduct detailed impact analysis and incorporate mitigation measures into their designs using the most advanced technological methods feasible. The Draft EIR contains a detailed impacts analysis of air quality emissions for construction and operations and provides extensive feasible mitigation measures as required by the General Plan. See project design features (Draft EIR, pg 4.3-19) and Mitigation

Measures AIR-1 and AIR-2 (pgs 4.3-34 and -36, and as revised in the Final EIR). See the responses to Comments A-3-49 and B-2-15. See also responses to Comments A-3-24, A-3-25, and A-3-26 which provide detail on CARB's Advance Clean Fleets Rule regarding purchases of new zero-emission heavy trucks, the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project which will accelerate the deployment of zero-emission vehicles, and SCAQMD's WAIRE program which establishes a program large warehouse operator must follow to reduce emissions of air pollutants. The Project is designed to support use of ZE vehicles and trucks. See the response to Comment D-6-6 regarding EV truck chargers. In response to public comments, Mitigation Measure AIR-2 has been revised:

- At buildout of the industrial land uses a minimum of 50 ~~Class 8~~ electric vehicle (EV) truck chargers shall be installed at the tractor trailer parking spaces in logical locations to facilitate electric truck charging. These charges shall have the power rating sufficient to charge a Class 8 truck battery.

- For the warehouse/industrial portions of the Development Project, the buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for installation of electric charging systems for electric trucks and power transport refrigeration units (TRUs). Conduit shall be installed from the electrical room to all tractor trailer parking spaces in logical locations on site to facilitate future electric truck charging.

- ~~At buildout,~~ The Development Project shall include the higher value of either:

  - At least 350 Level 2 AC EV chargers; or

  A percentage of total parking spaces with Level 2 AC EV chargers to comply with the minimum requirements of CCR, Title 24, Part 11: California Green Building Standards Code.

  - The provision of EV chargers in each parking lot shall occur prior to occupancy of uses for said lots.

- All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric.

Please see the responses to Comments A-3-54, A-3-62, B-2-15, and D-6-4. See also responses to Comments D-6-13-A and D-6-18 regarding PDFs and mitigation measures GHG-1 through GHG-7. The commenter does not specify additional feasible mitigation measures they believe were not included in the Draft EIR. The Project does not conflict with a general plan policy and would not result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the response to Comment D-6-19. No further response is necessary.

**Response to Comment D-6-25**

The commenter states the Project does not, "...promote the use of clean and/or renewable energy for transportation, heating, and cooling" as stated in General Plan Air Quality Element Policy 5. The commenter further states the project does not propose the use of solar (renewable) energy to power the proposed buildings or measures for cleaner vehicles. This is not correct. Please refer to responses to Comments A-3-64, D-6-17, D-6-18, D-6-21, and D-6-24. The Project does not conflict with a general plan policy and would not result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the response to Comment D-6-19. No further response is necessary.

**Response to Comment D-6-26**

The commenter restates the Project does not propose bicycle paths and is not consistent with General Plan Air Quality Element Policy 6 regarding the provision of facilities that "...facilitate and enhance the use of alternative modes of transportation" include bicycle paths. This is not correct. Please refer to the response to Comment D-6-21. The Project does not conflict with a general plan policy and would not result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the response to Comment D-6-19. No further response is necessary.

**Response to Comment D-6-27**

The commenter states the Draft EIR is uncertain as to whether the Project provides transit stops or other means to access public transit established in General Plan Air Quality Element 6. The need to provide public transit features is determined in part by user demand. Currently, transit services are provided through Banning Connect, which is a bus service with routes along Highland Springs Avenue, Wilson Street, Ramsey Street, 2nd Street, 1st Street, Sunset Avenue, Lincoln Street, and Westward Avenue, but there is no transit in the vicinity of the Development Site. The nearest bus stop is currently located at Wilson Street, west of Sunset, which is north of the I-10 freeway. Approximately 5,993 employees are anticipated to work at the Development Site, the majority of whom are anticipated to use personal vehicles.

However, since the Project is widening Sunset Avenue and the City plans to extend Sun Lake Boulevard through the Development Site, there is adequate opportunity to provide for a transit stop on either street should the demand for such a feature be identified. The Development Project would include an internal circulation system, presenting an opportunity for new bus stops to be added to the existing transit system. As part of its annual review, Banning Connect would review transit service and bus stop locations in the area of the Development Site as uses are constructed and occupied on the Development Site. It is expected that transit service would be provided as needed and determined by Banning Connect once the Development Project reaches a transit-supportable level of operations or surpasses the existing transit facilities to the east of the Development Site (Draft EIR, p. 4.17-2). It is expected that transit service would be provided as needed and determined by Banning. The accommodation for future transit features, as determined necessary by the transit agency, ensures the Project is consistent with this General Plan policy. This comment does not raise any issues

regarding the adequacy of the environmental analysis contained in the Draft EIR or inconsistency with General Plan policies, and no further response is necessary.

**Response to Comment D-6-28**

The commenter states the Project does not adequately comply with General Plan Energy Element Policies 1 and 2, in that the Project does not propose feasible measures to promote energy conservation, especially alternative energy systems. Energy Element Policy 1 calls for the promotion of energy conservation through planning and construction of urban uses and in City transportation systems, while Policy 2 calls for the City to promote integration of alternative energy systems including solar and other clean energy systems into the design and construction of buildings. A project need not be in perfect conformity with each and every general plan policy to be found consistent with the general plan. It need only be "compatible with" the objectives, policies, general land uses and programs specified in the general plan. *California Native Plant Soc'y v. City of Rancho Cordova* (2009) 172 Cal. App. 4th 603, 637-38. See the responses to Comments D-6-19 and D-6-20.

Please refer to the response to Comment A-3-64 regarding the renewable energy portfolio maintained by BEU and rooftop solar requirements, as well as D-6-, D-6-16, and D-6-18 regarding mitigation and design features that will reduce use of or conserve energy. In addition, the Project includes a 65 megawatt-hours (MWh) Battery Energy Storage Systems (BESS) facility to support storage of energy by the City of Banning Electric Utility, which enhances the functionality of BEU's renewable portfolio. See Draft EIR section 3.0 at 3-2, 3-3. Furthermore, as required by Title 24 and Cal Green Building Code and implementing Program 1.A of the General Plan Energy Element, Project buildings have been designed and will be constructed to comply with all building code mandated energy efficiency and reduction provisions. The City enforces mandatory building code requirements for solar roofs in new development, which currently include mandatory solar roofs on residential development and solar-ready roofs for non-residential development, with required (1) installation of solar panels with the capacity to generate at least 20 percent of commercial buildings' expected electricity consumption; and (2) installation of solar on industrial buildings with the capacity to generate the expected electricity consumption of the office space of the warehouses. See also the response to Comment A-3-64. The requirements detailed in Mitigation Measures GHG-3 further provide a reasonable range of feasible measures to reduce energy usage. The Draft EIR and Specific Plan identify the feasible measures available that would be incorporated into the proposed buildings. Regarding bicycle facilities and transit facilities, please see the responses to Comments D-6-21 and D-6-26. The Draft EIR identifies that the Project provides sidewalks through and along the Development Site (see Draft EIR, Figures 3-16a through 3-16f). Regarding the provision of EV charging, please refer to the response to Comment D-6-24. Collectively, the Project appropriately provides for bicycle, pedestrian, and transit connectivity and facilitates the use of electric vehicles. Therefore, the Project does not conflict with a general plan policy and would not result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. No further response is necessary.

**Response to Comment D-6-29**

The commenter states the Project is inconsistent with General Plan Noise Element Policy 1 because the project results in significant noise impacts.[56] The Draft EIR identified two significant unavoidable noise impacts from operation of the proposed Development Project at nearby sensitive receptors from: (1) Project traffic at the residences located east of Sunset Avenue between Lincoln Street and Sun Lakes Boulevard/Westward Avenue and at the MSJC school on the east side of Sunset Avenue south of Sun Lakes Boulevard/Westward Avenue, and (2) noise generated on-site from Development Project operations at certain residences located immediately south of Bobcat Road. Although these impacts were identified in the Draft EIR as significant and unavoidable based on the original parameters of the Development Project, in response to public comments, the Development Project is modified by the inclusion of the following additional Project Design Features (PDF) in the Specific Plan and Final EIR to further address noise impacts. These project design features will be enforced by the City through incorporation of revised Mitigation Measure NOI-2.

- **PDF N-1:** To address traffic noise impacts along Sunset Avenue, the alignment of Sunset Avenue is shifted to the west from its previously proposed location to provide additional distance from sensitive receptors east of Sunset Avenue. More specifically, the centerline of Sunset Avenue between Lincoln Street and Sun Lakes Boulevard/Westward Avenue would be adjusted 42 ft to the west from the existing centerline with implementation of the Development Project, which results in the new centerline being 72 ft from the nearest residential property line and 115 feet from the school at the MSJC Site.

- **PDF N-2:** To address the potential for impacts to residences from on-site Development Project operations, on-site project operations are revised to require:

    - Cold storage equipment previously allowed on industrial building rooftops will be shielded or relocated to the ground floor; and

    - Construction of 10 ft high "wing walls" on the south end of warehouse buildings 1 and 2, and 6 ft high walls that surround the automobile parking lots south of warehouse buildings 1 and 2 as depicted in the SoundPLAN printouts in Attachment A to the Supplemental Noise Analysis (FEIR, Appendix I-2, Attachment A).

The adjustment to Sunset Avenue (PDF N-1) is detailed on page 2-9, and the sound/wing walls and location of refrigeration equipment (PDF N-2) are identified on page 2-10 of the revised Specific Plan, respectively. Incorporation of these features into the Project's design, are fully enforceable through adherence to provisions of the Specific Plan which will govern future construction and operation on the Development Site, and through implementation of revised mitigation measure MM NOI-2.

**Mitigation Measure NOI-2** Prior to approval of roadway plans for Sunset Avenue, the City will confirm that the Development Project design plans for Sunset Avenue incorporate project design feature N-1 (PDF N-1) and shift

[56] City Noise Element Policy 1 states: "The City shall protect noise sensitive land uses, including residential neighborhoods, schools, hospitals, libraries, churches, resorts and community open space, from potentially significant sources of community noise."

the alignment of Sunset Avenue between Lincoln Street and Sun Lakes Boulevard Extension/Westward Avenue to the west from the existing centerline as required by PDF N-1 to reduce traffic noise at neighboring sensitive uses to a less than significant level. To reduce operational noise impacts to a less than significant level, prior to issuance of building permits, the City will confirm that the following building design plans are consistent with PDF N-2: (1) design plans for each building proposed to contain cold storage facilities shall either shield rooftop cold storage equipment or locate such equipment on the ground level and (2) design plans for buildings adjacent to Bobcat Road (in the location depicted for Buildings 1 and 2 in the Specific Plan), shall include wing walls and parking lot walls meeting the requirements of PDF N-2.

As further described below and in the *Supplemental Noise Analysis for the Sunset Crossroads Project, Banning, California* (see Final EIR, Appendix I-2 and revised Section 4.13 Noise), all operational noise impacts from the Development Project are reduced to less than significant levels with implementation PDFs and revised MM NOI-2.

The original operational off-site traffic noise analysis in the Draft Environmental Impact Report (DEIR) and the Noise and Vibration Impact Analysis Report in Appendix I-1 of the Draft EIR analyzed noise impacts using the location of the centerline of Sunset Avenue in its existing location and identified significant and unavoidable traffic noise impacts for residences located on the east side of Sunset Avenue between Lincoln Street and Sun Lakes Boulevard/Westward Avenue and the Mount San Jacinto College (MSJC) Site on the east side of Sunset Avenue south of Sun Lakes Boulevard/Westward Avenue.

Under the Supplemental Noise Analysis (Final EIR, Appendix I-2) with the implementation of PDF N-1, residences would be exposed to future (2045) with project traffic noise levels of 69.9 dBA CNEL without the existing 5 ft to 7.5 ft high private property walls. The existing 5 to 7.5 ft high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 61.9 and 64.9 dBA CNEL, respectively. The areas along Sunset Avenue that do not have existing walls, which include the intersection at Jefferson Street and the driveway into the gated Serrano del Vista residential community, would not expose the residential backyards to traffic noise from Sunset Avenue. Therefore, the revised Development Project would have a less than significant impact on off-site residential uses because the worst traffic noise condition under Horizon Year (2045) with project traffic noise levels would not exceed 65 dBA CNEL for residential land uses. As further stated in the Supplemental Noise Analysis (see Final EIR, Appendix I-2 and revised Section 4.13), Draft EIR Mitigation Measure NOI-2 has been replaced by revised Mitigation Measure NOI-2 which will ensure that Sunset Avenue is relocated consistent with PDF NOI-1 to the west in proximity to the school facilities. This shift in alignment of Sunset Avenue will reduce noise levels to a less than significant level at this location.

As detailed in the Draft EIR, the 65 dBA CNEL is the applicable noise standard for residential land uses based on the conditionally acceptable noise level for residential uses in the City's Land Use Compatibility for Community Noise Environments in the General Plan Noise Element. Also, the

adjustment of Sunset Avenue between Lincoln Street and Sun Lakes Boulevard/Westward Avenue described in PDF N-1 would move the Sunset Avenue centerline to 115 ft from the school at the MSJC Site and would reduce the noise exposure at this location to a traffic noise level of 64.0 dBA CNEL. Therefore, traffic noise impacts from the revised Development Project are reduced to less than significant with respect to off-site noise-sensitive land uses because the worst traffic noise condition under the Horizon Year (2045) with project traffic noise levels would not exceed 65 dBA CNEL.

The original operational stationary noise analysis in the Draft EIR and the Noise and Vibration Impact Analysis (Draft EIR, Appendix I-1) identified significant and unavoidable stationary noise impacts for residences located south of Bobcat Road represented by Receptors R-8, R-11, and R-12. However, as detailed in the Supplemental Noise Analysis (see Appendix I-2, Table B, which replaces Table AB in Appendix I-1 to the Draft EIR), with implementation of PDF N-2, noise levels generated from operations of the Development Project would not exceed the City or County exterior daytime noise standard. As detailed there, noise levels generated from operations of the Development Project would not exceed the County's exterior nighttime 10-minute noise standard of 45 dBA $L_{eq}$ for residences located in the unincorporated County except for residences represented by Receptor R-11, which would exceed the County's exterior nighttime 10-minute noise standard of 45 dBA $L_{eq}$. The maximum increase in ambient noise levels during the nighttime for these County residences would be up to 2.9 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, noise levels generated from project operations at sensitive receptors would be less than significant.

Overall and as detailed in the Supplemental Noise Analysis, revisions to the Development Project will eliminate significant traffic and on-site stationary noise impacts and will reduce noise levels to a less than significant level. Based on the above, the Development Project does not conflict with Noise Element Policy 1 and would not result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the response to Comment D-6-19.

The deletion of the previous Mitigation Measure NOI-2 and inclusion of new project design features in the revised Mitigation Measure NOI-2 does not require recirculation of the Draft EIR. The revisions described above provide additional environmental protection and do not result in any additional impacts. Under applicable provisions of CEQA Guidelines §§15088.5(a)(1) and (3), additional information and additional mitigation measures require recirculation only if they are new and significant, narrowly defined as (1) changes to an EIR that deprive the public of a meaningful opportunity comment on substantial, adverse environmental project impacts, or (2) a feasible way to mitigate or avoid an effect that the project proponent declines to adopt. The project design features, analysis and mitigation measure modifications noted above and made in the Final EIR expand the scope of mitigation in the Draft EIR, further reduce impacts described in the Draft EIR and clarify, amplify, or make other modifications in an otherwise adequate EIR and do not result in adverse environmental impacts or identify mitigations measures that would reduce significant project impacts that the applicant declines to adopt; therefore, the modifications do not constitute new information. See CEQA Guidelines §15088.5(b). No further response is necessary.

**Response to Comment D-6-30**

The commenter states the Project shares roadways with local traffic and does not "mitigate" the "relationship between land use designations" in terms "of changes in the circulation pattern" that will negatively impact residents and is therefore inconsistent with General Plan Noise Element Policies 2 and 4.

Noise Element Policy 2 in full states: "The relationship between land use designations in the Land Use Element and changes in the circulation pattern of the City, as well as individual developments, shall be monitored and mitigated." "Nothing in this policy disallows new projects sharing of roadways with local traffic, which would not be possible." All land uses must use roadways used by others in the area. The intent of the Policy is clearly expressed by Program 2.A that implements the policy which states: "The City shall develop guidelines and minimal criteria requirements for noise analyses for proposed development projects. Studies shall evaluate project impacts and the effectiveness of proposed mitigation measures." The Draft EIR as amended by the Final EIR sets forth criteria developed by the City to analyze noise impacts of the Development Project. See DEIR Section 4.13. See also response to Comment D-6-29 above analyzing the Development Project with the additional PDF's implemented in the Specific Plan; as indicated there, with implementation, the Development Project does not exceed the City noise standards with respect to operational impacts. Further, as set forth in the Draft EIR, Section 4.13, page 4.13-47, 48 Mitigation Measure NOI-1 is implemented to reduce to the extent feasible the construction impacts from the Development Project. With implementation of MM NOI-1, it is anticipated that noise from on-site construction will be mitigated to a less than significant level. However, because it is not known whether a noise barrier can be constructed on City right of way in all circumstances, construction noise impacts for construction of the roadway and utilities on Sunset Avenue are considered significant and unavoidable. By providing detailed analysis of noise impacts and implementing and evaluating the effects of mitigation, the Draft EIR as modified by the Final EIR is consistent with Noise Element Policy 2 and Program 2.A. Therefore, the Project does not conflict with this general plan policy and would not result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the response to Comment D-6-19. No further response is necessary.

Noise Element Policy 4 states the City, "…shall maintain a General Plan Circulation Map and assure low levels of traffic within neighborhoods by assigning truck routes to major roadways only." Please refer to the response to Comment D-6-1-A. As noted there, the Development Project utilizes arterial highways and secondary highways for primary access to the Development Site and an additional PDF in the Specific Plan (see revised Specific Plan, Section 3.4, Final EIR PDF T-4) will require the Development Project to adopt a Truck Route Management Plan approved by the City to discourage truck travel along Sun Lakes Boulevard west of the Development Site. See the response to Comment D-6-1 for details regarding the Truck Route Management Plan. Therefore, the Project does not conflict with this general plan policy and would not result in an environmental effect due to a conflict with the City's General Plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the response to Comment D-6-19. No further response is necessary.

**Response to Comment D-6-31**

The commenter suggests the Project is inconsistent with Riverside County Land Use Element Policy 7.7 requiring buffers to the extent possible between development and watercourses, including their associated habitat. See the response to Comment D-6-22 regarding the inapplicability of Riverside General Plan. Nevertheless, as stated in Section 4.4 of the Draft EIR, approximately 32.58 of upland areas adjacent to riparian drainages will be conserved under a conservation easement or deed restriction (see Mitigation Measure BIO-10). This conservation area will be monitored and maintained by a third-party conservation organization as provided in Mitigation Measure BIO-15. Additionally, Mitigation Measures BIO-11 and BIO-12 require the avoidance of these upland areas, shielding of lighting to avoid pollution in the upland areas and adjacent drainages, and fencing during construction to prevent entry of personnel and equipment into conservation areas. As buffers to on-site drainage features have been provided, the Project is consistent with Riverside County Land Use Element Policy LU 7.7. The Project does not conflict with an applicable general plan policy and would not result in an environmental effect due to a conflict with an applicable general plan, and thus does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the response to Comment D-6-19. No further response is required.

**Response to Comment D-6-32**

The commenter states the Project does not encourage the conservation of productive agricultural lands consistent with Riverside County Land Use Element Policy 20.4. See the response to Comment D-6-22 regarding the inapplicability of Riverside General Plan. This policy encourages "conservation of productive agricultural lands" and the preservation of "prime agricultural lands for high-value crop production." Section 4.3 of the Draft EIR states that no Prime Farmland, Farmland of Statewide Importance, or Unique Farmland is located within the Development Site, and the commenter does not address or disagree with this analysis of the Project. Section 4.2.6.5 of the Draft EIR states:

> … the Development Site has not supported agricultural uses, apart from occasional livestock grazing, since the early 1900s. Although the Southern Portion of the Development Site is zoned A-1, Light Agriculture, there is currently no agricultural activity on the Southern Portion of the Development Site or on any adjacent or nearby property except for occasional cattle grazing. This temporary agricultural use contributes very little to the regional agricultural economy, and the implementation of the Development Project would not directly or indirectly catalyze the conversion of additional farmland to urban land uses.

As the Development Site does not contain Prime agricultural land, nor has it historically or currently been used to produce high-value crops and as the cited General Plan policy is an inapplicable County of Riverside policy, the Project does not conflict with an applicable general plan policy, would not result in an environmental effect due to a conflict with an applicable general plan, and does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. See the response to Comment D-6-19. No further response is required.

**Response to Comment D-6-33**

The commenter states the Project does not provide transportation and bikeways consistent with Riverside County General Plan Circulation Policies C 1.2 (to support development of a variety of transportation options for major employment and activity centers), C 1.7 (encourage and support

development of projects that facilitate and enhance the use of alternative modes of transportation, including pedestrian-oriented retail and activity centers and dedicated bicycle lanes and paths), and C.3.8 (restrict heavy duty truck through-traffic in residential and community center areas and plan land uses so that trucks do not need to traverse these areas). The commenter does not identify specific planning consistency issues or state they result in an environmental effect. Policies C 1.2 and C 1.7 are applicable to the County and not to individual projects as they describe the types of projects to be supported by the County. See also response to Comment D-6-22 regarding inapplicability of Riverside General Plan.

Nonetheless, the Development Project is consistent with the County policy statements in support of development of a variety of transportation options and facilitate and enhance alternative modes of transportation. See, e.g., response to Comment D-6-21 regarding construction of bike lanes. Additionally, the Specific Plan (Section 3.4) has been revised to require that individual site plans identify and provide for safe pathways for bicyclists from public roadways to on-site bicycle storage locations, using signage and/or striping. Mitigation Measure TRA-1 requires the applicant to prepare, prior to issuance of occupancy permits, a Transportation Demand Management (TDM) strategy report for review and approval by the City Traffic/Transportation Manager and recognizing that a variety of TDM strategies have been incorporated into the project design including commute trip reduction marketing, rideshare program, and end-of-trip bicycle facilities.

In addition to citing County General Plan Circulation Element Policy C 3.8 which seeks to restrict heavy duty truck through traffic in residential and community center areas and plan land uses that do not need to traverse these areas, the commenter states that the Project is designed so that a residential street is a primary access point for Project vehicles. The commenter does not identify the particular street referenced. However, as further discussed in response to Comment D-6-1-A, the commenter mislabels the streets on which trucks will travel as local streets. Primary Project access will be via Sunset Avenue to/from the full interchange at I-10 and the other surrounding roadways primarily identified for truck trips are identified in the City of Banning General Plan Circulation Element as arterial highways, major highways or secondary highways. In addition, although Sun Lakes Boulevard west of the Development Project boundary is identified in the City General Plan as a secondary highway, an additional Project Design Feature in the Specific Plan (see revised Specific Plan, Section 3.4) and as described in the response to Comment D-6-1-A will require the Development Project to adopt a Truck Route Management Plan approved by the City to discourage truck travel along Sun Lakes Boulevard west of the Development Site (see Final EIR, PDF T-4). For the foregoing reasons, the County General Plan policies are not applicable and if they were, the Development Project does not conflict with the identified County policies. Further, the commenter does not raise any issues under CEQA regarding the adequacy of the environmental analysis contained in the Draft EIR or that would result in an environmental effect due to a conflict with an applicable general plan. See the response to Comment D-6-19. No further response is required.

**Response to Comment D-6-34**

The commenter states the Project is not consistent with Riverside County General Plan Open Space Element OS 4.9 which discourages development within watercourses and within 100 feet of riparian vegetation or OS 3.5 to preserve and enhance existing native riparian habitat See the response to Comment D-6-22 regarding the inapplicability of Riverside General Plan.

As detailed in Section 4 of the Draft EIR, the Project conserves 7.92 of 8.99 acres of riparian/riverine lands on the Development Site as well as a surrounding buffer of approximately 32.58 acres, including use of a deed restriction and/or conservation easement[57]. Please refer to the response to Comment D-6-31 and Mitigation Measures BIO-9 through 12 regarding conservation of upland buffer areas on the Development Site. With respect to applicability of the County General Plan policies, please refer to the response to Comment D-6-22. The Project does not conflict with an applicable Riverside County general plan policy and would not result in an environmental effect due to a conflict with an applicable general plan, and does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. No further response is required.

**Response to Comment D-6-35**

The commenter states the Project is inconsistent with Riverside County General Plan Open Space Element Policies 11.1, 11.2, 11.3, and 16.9 regarding solar energy systems. See the response to Comment D-6-22 regarding the inapplicability of Riverside General Plan. These policies encourage, but do not require use of active and passive solar devices and other start-of-the-art energy devices and requires enforcement of the Solar Shade Control Act, which is inapplicable as it limits interference with solar panels by requiring setbacks for trees that could block the panels. Please refer to the response to Comment D-6-28. The Project does not conflict with an applicable general plan policy and would not result in an environmental effect due to a conflict with an applicable general plan, and does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. No further response is required.

**Response to Comment D-6-35-A**

The commenter states that the Draft EIR must be revised, and additional mitigation imposed to ensure consistency between the Project and general plan policies applicable to the Project. See the responses to Comments D-6-19 through D-6-35. The Project is consistent with applicable City of Banning General Plan policies, as described in response to Comment D-6-22, Riverside County General Plan policies (generally inapplicable) as required by CEQA. The Project does not conflict with applicable general plan policies, would not result in an environmental effect due to a conflict with an applicable general plan, and does not raise any issues under CEQA, or regarding the adequacy of the environmental analysis contained in the Draft EIR. No further response is required.

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[57] As required under Mitigation Measure BIO-13, Mitigation for impacts to Riparian/Riverine areas covered under the MSHCP would be achieved by conserving all remaining riparian/riverine lands on the Project Site (7.92 of 8.99-acres) as well as a surrounding buffer of approximately 32.58-acres. These areas will be preserved in perpetuity through the use of a deed restriction and/or conservation easement as further described in MM BIO-15. To mitigate for Project impacts to 1.07-acre of riparian/riverine, a minimum of 3.21-acres of Project Site riparian habitat will be enhanced and restored (a 3:1 ratio for permanent impacts), with riparian habitat spread throughout all three features within the Project Site, for compliance with the requirements of the MSHCP. Non-native invasive species will be removed (enhancement) and native riparian species will be planted (restored) which will increase the function and value of the currently disturbed drainage features following mitigation. In the event that land on the Project Site cannot be conserved, then the applicant shall either (1) contribute off-site land at a 3:1 ratio containing similar habitat and jurisdictional areas to the Reserve Assembly; or (2) make a fee payment to a mitigation bank pursuant to an in-lieu fee program at a 3:1 mitigation ratio.

**Response to Comment D-6-36**

The commenter states the Project is inconsistent with local, regional and state land use plans (including CARB's 2022 Scoping Plan), which seek to reduce VMT. See the response to Comment D-3-23. The Draft EIR includes Mitigation Measure TRA-1 which could result in a VMT reduction of 8.4 percent and is consistent with VMT reductions outlined in the *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality* (California Air Pollution Control Officers Association [CAPCOA] 2021). The Final EIR concludes that although implementation of Mitigation Measure TRA-1 could reduce impacts to VMT, the reduction achieved is not enough to meet the City's VMT standard; therefore, impacts remain significant and unavoidable.

Of note, "While CARB has included VMT reduction targets and strategies in the Scoping Plan and appendices, these targets are not regulatory requirements, but would inform future planning processes. CARB is not setting regulatory limits on VMT in the 2022 Scoping Plan; the authority to reduce VMT largely lies with state, regional, and local transportation, land use, and housing agencies, along with the Legislature and its budgeting choices." See 2022 Scoping Plan, page 193. The goal of transportation and motor vehicle measures in CARB's 2022 Scoping Plan is to transition all on-road and off-road vehicles to zero-emissions technologies and implement alternative modes of transportation. The Development Project would implement the use of zero emission vehicles (ZEV) and ZEV infrastructure (i.e., electric vehicle chargers) and would increase the use of alternative means of transportation. Appendix D of the Scoping Plan provides guidance so that local agency actions can align with the State's climate goals.[58] As provided in Table 4.8.M of the Draft EIR (pg. 4.8-25) the Development Project would not conflict with applicable pertinent Statewide action measures in the 2022 Scoping Plan. Therefore, the Development Project would not conflict with a plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and impacts would be less than significant.

**Response to Comment D-6-36-A**

The commenter states that the EIR should consider an alternate development scenario involving mixed-use development with a balance of housing, employment and commercial uses in order to reduce VMT. Furthermore, the commenter states the Project should consider an alternate development scenario involving mixed-use development with a balance of housing, employment and commercial uses; should incorporate safe and accessible bike lanes as well as access to public transit; should adopt a statement of overriding considerations for the Project's significant VMT impact before,

[58] Per the CARB Scoping Plan, Appendix D, "includes recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA). This appendix is not regulatory but is instead intended to provide clarification on specific topics requested by planners, CEQA practitioners, and community groups in response to challenges local jurisdictions face when implementing GHG reduction strategies or approving much-needed housing projects" (see https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-d-local-actions.pdf, site accessed May 1, 2024).

and that the City should also explore programmatic VMT mitigation options such as the City of Escondido's "VMT Exchange Programs".

Per CEQA Guidelines Section 15126.6, an Environmental Impact Report (EIR) must describe a reasonable range of alternatives to the project, or to the location of the project, that could feasibly attain most of the project's basic objectives, while avoiding or substantially reducing the project's significant environmental impacts. An EIR does not need to consider every conceivable alternative to a project, rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation (CEQA Guidelines, Section 15126.6(a)). The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. CEQA states that an EIR should not consider alternatives "whose effect cannot be ascertained and whose implementation is remote and speculative." To these ends, the DEIR considered 10 alternatives, 4 including residential alternatives, of which 3 were rejected as infeasible, either because they would exceed or not substantially lessen the impacts of the Project being analyzed, were repetitive of other alternatives, or, did not to meet most of the City's basic objectives and requirements.

Among the alternatives rejected were a reduced residential alternative (rejected because the City would be required to justify that zoning reduction under State law based on public health and safety reasons and because it would not satisfy the basic project objectives identified by the City), a residential alternative for the Southern Portion of the Development Site with annexation (rejected because the Draft EIR already considered impacts associated with development of the Development Site with residential uses under Alternative 2 and without inclusion of commercial or industrial uses in the Southern Portion of the Development Site, would not generate sufficient revenue to justify annexation into the City), and an increased residential alternative (rejected as it would generate traffic in excess of that identified for the Development Project, proportionally increase the emission of air and greenhouse gas pollutants, and likely increase vehicle miles traveled, making it unlikely to substantially lessen or avoid any of the significant impacts associated with the Development Project.

The DEIR analyzed four alternatives in detail (see DEIR Section 8.0, Alternatives). Alternatives considered in the DEIR include:

- **Alternative 1:** No Project/No Build;
- **Alternative 2**: No Project/Existing General Plan and Zoning/Residential and Commercial Development;
- **Alternative 3:** Reduced Commercial Alternative; and
- **Alternative 4:** Reduced Industrial Alternative.

Alternative 2 most directly addresses the commenter's request in that it provides for mixed-use residential and commercial development and is similar to the mixed-use alternative suggested by the commenter.

With respect to VMT, as discussed in the Draft EIR, Alternative 2 does result in a numeric reduction in VMT as compared with the Development Project. As discussed in the Draft EIR at p. 8-41, because the commercial component of the project under Alternative 2 remains the same as under the Development Project, it would have the same VMT result as the Development Project but VMT

impacts from the residential uses under Alternative 2 would be substantially reduced compared with the industrial components of the Development Project. Nonetheless as with the Development Project, the VMT impacts under Alternative 2 in the Draft EIR are significant and unavoidable.

Further, Alternative 2 was identified as not meeting the basic objectives of the Project in that it would not provide, to the same extent as the Development Project, the level of employment, variety of uses, or revenue increases that would: (1) create positive fiscal impact to the City, (2) promote job creating uses that reduce the need for City residents to commute outside of the City for employment, (3) improve transportation efficiency by taking advantage of the site's proximity to local and regional access for industrial and commercial use, (4) address a need in the City for commercial and industrial land uses that accommodate a variety of modern industrial, business, hospitality, and commercial activities, (5) provide uses that allow for a diversified economy, complements existing uses, and provide a range of employment opportunities, or (6) increase City sales and property tax revenues by establishing commercial and industrial uses in the City that can increase City revenues and assist in offsetting public services costs incurred by the City in development and maintenance of housing and public facilities.

The commenter also suggests that the Development Project include a commitment to hire locally to reduce VMT. However, the commenter provides no evidence that a such a commitment would substantially reduce VMT impacts beyond what is reflected in the DEIR. As indicated in the Draft EIR (p. 4.14-4), "The SCAG Connect SoCal Environmental Justice technical report indicates that Riverside County has a jobs-to-housing ratio of 0.88, indicating that the region is 'housing rich, but jobs poor.' The recently updated Connect SoCal document does not provide jobs-to-housing data for the City of Banning. However, previous evaluations indicated that the City of Banning followed similar trends as the County as a whole, with more housing available than employment opportunities within the City. The Development Project would provide additional employment opportunities, while not displacing or reducing housing opportunities." It is therefore anticipated that local employees will seek jobs at the Development Site. See also responses to Comments D-3-20, D-7-17, and D-7-18 regarding hiring locally. The VMT modeling in the Draft EIR reflects home-based work (HBW) trips and trip lengths as stipulated under the Riverside County Model (RIVCOM) and the City of Banning VMT Analysis Implementation Guidelines. In this manner, the DEIR analysis establishes a likely maximum VMT impact scenario. To the extent that trip lengths may be reduced through local hires, VMT impacts reflected in the DEIR may be reduced. However, there is no mechanism to reliably quantify any such reductions. Further, a commitment to hire locally is infeasible itself, vague and unenforceable language, and is therefore insufficient as a mitigation measure since the City cannot control who is hired to construct or work at the Project. The Project construction and operations workforce will be local and it is not feasible to quantify any reductions in VMT or other impacts from imposing a specific limit on commuting distance for Project workers. See the responses to Comments D-3-20-21, D-7-1-D, and D-7-9 through D-7-20.

The commenter also encourages the Development Project to incorporate safe and accessible bike lanes as well as access to public transit. With regard to alternative transportation modes, the Sunset Crossroads Specific Plan integrates pedestrian paths and bikeways supporting use of alternative transportation modes. Please refer to Sunset Crossroads Specific Plan (Draft EIR Appendix B), Specific

Plan Chapter 2.2, Circulation Plan, Chapter 4 Design Guidelines, et al. The Specific Plan specifically recognizes the importance of functional and safe bicycle amenities as indicated by the following:

- The Specific Plan for the Development Project identifies 8-foot wide Class II Bikeways on both sides of Sunset Avenue from the I-10 to Sun Lakes Boulevard Extension and along both sides of Lincoln Street.

- Additionally, the revised Specific Plan (Section 3.4) requires that individual site plans identify and provide safe pathways for bicyclists from public roadways to on-site bicycle storage locations, using signage and/or striping.

- Secure bicycle storage racks or bicycle lockers, and employee lockers will be provided within the industrial land uses (Specific Plan, p. 3-34).

- Truck and service vehicle entries should be designed to provide clear and convenient access to truck courts and loading areas such that bicycle circulation is not adversely affected by truck movements (Specific Plan, p. 4-7).

- Bicycle racks, lockers, and/or storage should be provided at each building or in a common area that serves multiple buildings to encourage non-vehicular circulation (Specific Plan, p. 4-8).

- The Specific Plan would implement a car/vanpool program with preferred parking (Specific Plan, p. 3-34).

The above Specific Plan design features act to generally reduce reliance on personal autos, with likely correlating reductions in VMT.

With regard to use of bicycle facilities and transit services, see the responses to Comments D-6-21 and D-6-27. Further, as discussed in the Draft EIR, "the Development Project would include an internal circulation system, as shown… presenting an opportunity for new bus stops to be added to the Banning Connect transit system. As part of its annual review, Banning Connect would review transit service and bus stop locations in the area of the Development Site as uses are constructed and occupied on the Development Site. Banning Connect would consistently evaluate if Route 5/6 and Route 6 and the bus stop located at the Westward Avenue/Sunset Avenue (MSJC Campus Parking Lot) area is adequate to provide transit services as buildout of the Development Project occurs. It is expected that transit service would be provided as needed and determined by Banning Connect once the Development Project reaches a transit-supportable level of operations or surpasses the existing transit facilities to the east of the Development Site ." (Draft EIR, p. 4.17-12).

Additionally, the commenter states that before adopting a statement of overriding considerations for the Project's significant VMT impact, the City should also explore programmatic VMT mitigation options including "VMT Exchange Programs". Mitigation Measure TRA-1 requires development and implementation of a Transportation Demand Management Program (TDM). Section 4.17.6.3 of the Draft EIR has been revised to more fully disclose the findings and analysis provided in Appendix J-1. As such, MM TRA-1 has been revised to include Project Design Features PDF T-1 (Commute Trip

Reduction Marketing), PDF T-2 (Ridesharing Program) and PDF T-3 (End of Trip Bicycle Facilities) that would act to reduce VMT (see the response to Comment D-3-23).

However, even with implementation of MM TRA-1, inclusive of the Development Project design features, Development Project VMT per employee would still exceed adopted VMT impact thresholds. Development Project VMT impacts would therefore be significant and unavoidable. If the City decides to approve the Development Project and certify the EIR, Findings and a Statement of Overriding Consideration(s) would be required.

The commenter suggests the City "explore programmatic VMT mitigation options" such as the City of Escondido VMT Exchange Program. The City of Escondido VMT Exchange Program is a voluntary City-implemented program designed to offer discretionary projects an option for reducing transportation VMT impacts either to less than significant or by providing mitigation to the extent feasible. This program identifies a system of active transportation improvements, transit use and other VMT reducing strategies and assigns a quantifiable benefit and cost for each reduction measure based on the California Air Pollution Control Officers (CAPCOA) 2021 *Handbook for Analyzing Greenhouse Gas Emission Reduction, Assessing Climate Vulnerabilities, and Advancing Health and Equity*. No similar program has yet to be established in the City of Banning which would require adoption of an ordinance to impose. The development of a VMT reduction program and/or the implementation of City-wide programmatic VMT measures is beyond the scope of the Development Project or the Draft EIR. This comment will be forwarded to the decision-makers for their consideration.

The Findings and conclusions of the Draft EIR would not be affected. Revisions to the Draft EIR related to this comment are not required, and no further response is necessary.

**Response to Comment D-6-36-B**

The commenter states that Project operations will exceed the City's nighttime noise standard at many of the measured adjacent sensitive receptors. The only significant unavoidable operational impact identified by the DEIR occurred adjacent to residences along Bobcat Road. Please refer to response to Comment D-6-29. As described there, the project design features added to the Development Project to address operational noise will result in the elimination of the significant on-site stationary noise impact and will reduce noise levels to a less than significant level. No further response is required.

**Response to Comment D-6-37**

The commenter states the City must adopt all feasible mitigation measures for significant operational noise impacts, with the commenter suggesting allowing more buffering between sensitive receptors and the proposed buildings as a way to reduce significant noise impacts. The only significant unavoidable operational impacts identified by the DEIR occurred adjacent to residences along Bobcat Road with respect to on-site operations and along Sunset Avenue with respect to operational traffic noise. Please refer to response to Comment D-6-29. As described there, the project design features (see PDFs N-1 and N-2) and the revised Mitigation Measure NOI-2 added to the Development Project to address on-site operational noise result in the elimination of the significant nighttime operational noise impact identified in the Draft EIR and reduce noise impacts to a less than significant level. With respect to the number of truck trips, see the response to Comment D-6-1-A. As operational traffic and

operational noise impacts are mitigated to less than significant with the adopted Development Project modifications, no further response is required.

**Response to Comment D-6-38**

The commenter suggests limiting the hours of operation/deliveries at loading docks to daytime hours as a feasible mitigation to reduce the significant nighttime noise impacts identified in the Draft EIR. Please refer to the response to Comment D-6-29. The only significant unavoidable on-site operational impact identified by the DEIR occurred adjacent to residences along Bobcat Road. As the revisions to the Development Project will result in the elimination of the significant on-site stationary noise impacts identified and will reduce noise levels to a less than significant level, no additional response is required.

**Response to Comment D-6-39**

The commenter states that Mitigation Measure NOI-2, which is intended to reduce noise impacts to less than significant levels adjacent to the MSJC school facilities, is ineffective, suggesting that a noise barrier up to 14 feet in height would allow for increased noise mitigation. Please refer to the response to Comment D-6-29. Although the wall height proposed in the mitigation measure was sufficient to reduce noise impacts to less than significant, the Draft EIR identified the impact as a significant and unavoidable impact because the construction of the wall would require approval of the property owner which had not been secured. As stated in PDF N-1 (see the response to Comment D-6-29) Sunset Avenue centerline was shifted 42 ft to the west, resulting in a reduction of traffic noise such that noise levels would no longer exceed the 65 dBA CNEL noise standard at the residences and the MSJC school along Sunset Avenue. As stated in *Supplemental Noise Analysis for the Sunset Crossroads Project, Banning, California* (see Final EIR, Appendix I-2 and revised Section 4.13), Mitigation Measure NOI-2 has been deleted because revisions to the Development Project that relocate Sunset Avenue to the west in proximity to the school facilities eliminate the significant traffic noise impact adjacent to the MSJC Site in its entirety and will reduce noise levels to a less than significant level at this location without requirement for mitigation. No further response is necessary.

The commenter also states that wing walls on buildings or other features will further shield residents from sound-producing activities at the Project Site. Please refer to response to Comment D-6-29. The movement of refrigeration equipment to ground level and the installation of wing walls barriers would reduce nighttime on-site operational noise to residential uses along Bobcat Road (see PDF N-2) to below County of Riverside standards. With the implementation of these additional project design feature the significant operational noise impacts identified in the Draft EIR would be eliminated and the reduced noise levels would be less than significant.

The deletion of Mitigation Measure NOI-2 and inclusion of new project design features does not require recirculation of the Draft EIR. These revisions, described in the Final EIR (see Appendix I-2), provide additional environmental protection and do result in any additional impacts. Under applicable provisions of CEQA Guidelines §§15088.5(a)(1) and (3), additional information and additional mitigation measures require recirculation only if they are new and significant, narrowly defined as (1) changes to an EIR that deprive the public of a meaningful opportunity comment on substantial, adverse environmental project impacts, or (2) a feasible way to mitigate or avoid an effect that the project proponent declines to adopt. The mitigation measures and added project design features

expand the scope of mitigation in the Draft EIR and clarify, amplify, or make other modifications in an otherwise adequate EIR and do not result in adverse environmental impacts or identify mitigations measures the applicant declines to adopt; therefore, the modifications do not constitute new information. See CEQA Guidelines §15088.5(b). No further response is required.

**Response to Comment D-6-40**

The commenter states that there is no evidence to support that Mitigation Measure NOI-2 will meet the City's nighttime residential noise standard of 55 dBA. Mitigation Measure NOI-2 has been eliminated due to the revisions to the Development Project as discussed in responses to Comments D-6-29 and D-6-39. As discussed in response to Comment D-6-29, the traffic noise analysis was revised to reflect PDF N-1, which would, with implementation, result in a shift of the existing Sunset Avenue centerline by 42 ft to the west[59]. As a result, traffic noise levels would no longer exceed the 65 dBA CNEL noise standard at the residences and the MSJC school along Sunset Avenue and traffic noise would be less than significant. Also, the applicable traffic noise standard for schools and residential uses is 65 dBA CNEL based on the conditionally acceptable noise level for residential uses in the City's Land Use Compatibility for Community Noise Environments in the General Plan Noise Element. The 55 dBA noise standard is for daytime residences in the City of Banning from on-site stationary noise sources and is not applicable to traffic noise (mobile noise sources).

**Response to Comment D-6-40-A**

The commenter states the Draft EIR proposes only one noise mitigation measure for significant, long-term noise impacts. Please refer to response to Comment D-6-29. The revisions to the Development Project will result in the elimination of the significant traffic and on-site stationary noise impacts and will reduce noise levels to a less than significant level and no further mitigation is required.

**Response to Comment D-6-41**

The commenter identifies low-noise asphalt as a feasible measure to reduce traffic noise. Please refer to the response to Comment D-6-29 which details the effect associated with the changes in the alignment of Sunset Avenue to eliminate the significant traffic noise impacts at residential and MSJC campus uses. The revisions to the Development Project will result in the elimination of the significant traffic noise impacts and will reduce noise levels to a less than significant level; therefore, no further response is necessary.

**Response to Comment D-6-42**

The commenter identifies attenuation features that may be used at truck loading docks to reduce noise resulting from loading/unloading operations. Please refer to the responses to Comments D-6-29 and D-6-39, which address the installation of wingwalls and sound barriers to reduce noise generated from on-site operations. No additional response is necessary.

[59] Compared to the condition assessed in the Draft EIR, the shift of Sunset Avenue to the west by 42 feet result in the roadway centerline being 72 ft from the nearest residential property line and 115 feet from MSJC campus uses located east of Sunset Avenue.

**Response to Comment D-6-43**

The commenter suggests that nighttime truck travel may be limited to a route that is least sensitive to impacts on sensitive receptors. Please refer to the response to Comment D-6-29 which details changes to the Development Project to eliminate the significant traffic and on-site stationary noise impacts and will reduce noise levels to a less than significant level; therefore, no further response is required.

**Response to Comment D-6-44**

The commenter suggests gates should be installed to disallow trucks from using entrances that adversely impact residences. Please refer to the response to Comment D-6-29 which details the changes to the Development Project to eliminate the significant traffic and on-site stationary noise impacts and will reduce noise levels to a less than significant level; therefore, no further response is required.

**Response to Comment D-6-45**

The commenter suggests that self-adjusting "back-up" beepers that adjust to the noise environment be installed on all cargo moving equipment. The noise assessment included in the Draft EIR addressed various operational noise sources, including those caused by cargo moving equipment. Please refer to the response to Comment D-6-29, which details the changes to the Development Project to eliminate the significant traffic and on-site stationary noise impacts that reduce noise levels to a less than significant level. Therefore, no further response is required.

**Response to Comment D-6-46**

The commenter disputes the Draft EIR's conclusion that walls are the only feasible noise mitigation option and that the City demonstrate a good faith effort to investigate and impose feasible mitigation for significant noise impacts prior to adopting a statement of overriding considerations. The noise environment and the noise impacts associated with the Development Project analyzed in the Draft EIR were reassessed to address the noise impacts of the Development Project. Based on this reassessment, including the incorporation of project revisions, the significant noise impacts identified in the Draft EIR have been eliminated (traffic and on-site stationary noise) and noise levels are reduced with respect to these impacts to a less than significant level. Please refer to the response to Comment D-6-29. No further response is necessary.

**Response to Comment D-6-47**

The commenter describes CEQA's requirement that an EIR describe a reasonable range of alternatives to the project or the location of the project which would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects identified in the Draft EIR. The comment further states the Draft EIR should evaluate a development alternative with a greater mix of uses, such as business park or professional park uses to reduce VMT and noise from heavy-duty truck use. As established under CEQA Guidelines 15126.6(a), an EIR does not need to consider every conceivable alternative to a project, rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible. Among factors that may be used to

eliminate potential alternatives from detailed consideration in an EIR are the inability to meet most of the basic project objectives and/or inability to mitigate, reduce, or avoid significant environment impacts.

As stated in the response to Comment D-6-36-A, the Section 8.0 of the Draft EIR provides an assessment of alternatives to the project. Section 8.2 of the Draft EIR considered six other potential alternatives (including an off-site alternative) determined to be infeasible because they would exceed or not substantially lessen the impacts of the Development Project being analyzed, are repetitive of other alternatives, or, based on City input, would not meet most of the City's basic objectives for the Development Project. As stated in Section 8.2.3 of the Draft EIR, the City considered an "Office Use" Alternative, which replaces the industrial uses with office uses and is similar to the alternative suggested by the commenter to reduce VMT and noise impacts. However, the number of vehicle trips generated by office uses exceeds that associated with industrial uses by approximately 400 percent (see footnote 8, Section 8.0 of the Draft EIR) and would not reduce VMT as the commenter suggested; therefore, it is not reasonable to further consider the suggested alternative. Alternative 2 (No Project/Existing General Plan) provides for mixed use- residential and commercial development and would substantially reduce total VMT (see Table 1, Draft EIR Appendix L-4) when compared to the Project but remains significant and unavoidable because while adding residential density and intensity to the Project would reduce the VMT per capita, the retail component continues to increase boundary VMT to the region; therefore, the VMT impact resulting from Alternative 2 in its entirety would be considered potentially significant. As provided in the VMT analysis (see Draft EIR, Appendix J-1, Table 2 and Draft EIR, Table 4.17.B), compared to the "No Project" VMT condition in the Western Riverside County region, the Project Retail VMT ("with Project condition") results in a slight net decrease to total VMT. The commenter provides a suggested alternative that would substantially reduce the Project's VMT impacts, though as stated in the Draft EIR (Page 8-46), the retention of the commercial center would not satisfy, to the same level, the basic objectives of the Development Project.

As detailed in the response to Comment D-6-29, the revisions to the Development Project will result in the elimination of significant traffic and on-site stationary noise impacts and will reduce noise levels to a less than significant level. Moreover, the Winter 2024 Allen Matkins/UCLA Anderson Forecast[60] indicates that office vacancy rates remain high in Southern California, and over 20% of existing office space may be converted to other uses. Thus, adding business park/office space uses over those included in the Development Project as suggested by the commenter would not meet most of the basic Project objectives related to fiscal and employments goals. The Draft EIR identified other alternatives that meet most of the City's primary project objectives for the site; therefore, the alternatives addressed in the Draft EIR provide a reasonable range of alternatives to the Project. No further response is required.

[60] Commercial Real Estate Survey, Allen Matkins/UCLA Anderson Forecast, Issue No. 24. Winter 2024. https://connect.allenmatkins.com/hubfs/Anderson%20Forecast/Winter%202024/AMCRES_Winter_2024_FINAL.pdf?hsCtaTracking=14768dce-ab63-4e32-8a66-61ca3f21352f%7C7cf1b952-e37e-4013-854d-c920b8031348, accessed April 20, 2024.

**Response to Comment D-6-48**

The commenter states the redesignation and rezoning of the Development Site for industrial uses is not a foregone conclusion and that the City should explore a development alternative that balances uses to create an "infill" or "transit oriented" project that reduces VMT. The commenter does not specify what these alternatives may include, or how such alternatives would meet the stated project objectives. It is also unclear whether the Development Project site would qualify as an area for an infill or transit-oriented project based on the limited existing transit resources available in the City and County and the location of the Development Project. The City seeks to improve the housing jobs balance. See Draft EIR, Section 3.7. As established in the Draft EIR, the Development Project would result in the creation of new employment and retail opportunities to serve the existing and future residents of the City. See Draft EIR, pg 4.14-8. As stated in response to Comment D-6-47, a variety of office and commercial uses and combination of uses were considered. See the response to Comment D-6-47 and Draft EIR Sections 8.2.2, 8.2.3, and 8.2.4. These options were properly rejected because they did not lessen or eliminate VMT and they do not meet the City's financial and other objectives for development of the Project.

As stated in the response to Comment D-6-47, the Draft EIR considered a reasonable range of alternatives, carrying forward four which were comprehensively addressed. An EIR is not required to consider multiple variations on an alternative that it considers or that falls within the continuum discussed in the EIR. See *Mira Mar Mobile Community v. City. of Oceanside* (2004) 119 Cal.App.4$^{th}$ 477, 491. No additional alternatives need to be considered, and no further response is necessary.

**Response to Comment D-6-49**

The commenter cites CEQA requirements related to the identification of feasible alternatives or mitigation measures that can substantially lessen or avoid significant environmental effects. The commenter further states that prior to adopting a statement of overriding consideration, the City must either provide the substantial evidence necessary to reject a project alternative or adopt the environmentally superior alternative. The comment is noted. Please refer to the responses to Comments D-6-47 and D-6-48. As required under CEQA Guidelines Section 15126.6, the City considered a reasonable range of alternatives that lessen the Development Project's contribution to significant environmental impacts. Sections 8.3 through 8.5 include a robust discussion of alternatives to the Project including a comparative quantification of each alternatives' contribution to the environmental impacts. As mandated under CEQA, the City will make appropriate findings regarding the infeasibility of alternatives if it adopts the Project or an alternative that has significant unmitigable impacts. No further response is required.

**Response to Comment D-6-50**

The commenter states without substantiation that the Project's development pattern and expansion of infrastructure, including roadways and utilities, given the proximity to underdeveloped and rural residential lands, presents the potential for growth-inducing impacts contrary to the conclusions in the Draft EIR. As detailed in Section 7.2.1 of the Draft EIR, the installation of necessary utility connections would extend from existing or currently planned utility infrastructure and are designed to serve only the Project or are already planned for in the City's General Plan, Master Plan, and Capital Improvement Program. Infrastructure designated in agency planning documents to accommodate

planned for growth is not growth-inducing. See *Sierra Club v. West Side Irrig. Distr.* (2005) 108 Cal.App.4th 690. For example, the proposed roadway improvements on the project perimeter (e.g., Sunset Avenue, Bobcat Road, and Highland Home Road) would serve to access the proposed uses and do not extend the roadway network further than previously anticipated under the City's General Plan. As shown in Exhibit III-5 of the City's 2013 Circulation element, Bobcat Road and Highland Home Road south of Sun Lakes Boulevard are identified as 'collector' roads, envisioning two lanes. Exhibit III-5 identified Highland Home Road north of Sun Lakes Boulevard as a secondary highway. Sunset Avenue is designated as 'major/arterial highway' (four-lane divided) and 'secondary highway' (four lane). Furthermore, various public improvements that may occur on or adjacent to the Development Site (e.g., Sun Lakes Boulevard Extension, reverse osmosis facility, Sunset Avenue Bridge, potable water reservoir, electrical substation) are intended to accommodate previously anticipated growth in the city or its sphere of influence. These public facilities are not project components (see Draft EIR, pgs 6-15 through 6-16) and are proposed to occur whether or not the Project proceeds. The need for these non-project components has been identified in previously approved or adopted planning documents (e.g., Circulation Element[61] update, Integrated Master Plan[62], Rancho San Gorgonio Specific Plan EIR[63]). The anticipated employment generated by the Development Project will serve to improve the jobs/housing balance by creating jobs in the city and nearby areas and will not result in a direct increase in population. See the response to Comment D-6-20. As the proposed public infrastructure is consistent with that required to accommodate previously anticipated growth, and because the proposed uses would provide employment opportunities to persons residing in the project area, no significant growth-inducing impact would occur. No further response is required.

**Response to Comment D-6-51**

The commenter states that based on its comments, the Draft EIR should be revised, and additional mitigation proposed. The comment is noted. The commenter is referred to previous responses to the commenter's comments. No further response is necessary/required. No further response is necessary.

**Response to Comment D-6-52**

The commenter provides an enclosure to the comment letter. This enclosure was provided in a separate submittal to the City and is addressed in the response to Comment D-5-1. No further response is required.

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61 GPA 19-2502 modified the City's Circulation Element GPA 16-2501 by changing the Sun Lakes Boulevard alignment that such that instead of connecting South Highland Home Road to West Lincoln, Sun Lakes Boulevard now connects South Highland Home Road to Sunset Avenue. There was no change in the road classification and Sun Lakes Boulevard remained an east/west Arterial Highway.

62 Section 6.3.5, pg 6-45, *2018 Integrated Master Plan Final Report*, March 2018.

63 *Draft Environmental Impact Report, Rancho San Gorgonio Specific Plan*, p 3-17, June 2016.

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**VIA E-MAIL**

January 30, 2024

Adam Rush
Community Development Director
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Banning, CA 92220
P: (951) 922-3131
E: arush@banningca.gov

**RE: City of Banning, Sunset Crossroads Specific Plan Project Draft Environmental Impact Report (SCH No. 2021020011)**

Dear Mr. Rush:

On behalf of the Western States Regional Council of Carpenters ("**Western Carpenters**" or "**WSRCC**"), my office is submitting these comments ahead of the City of Banning's ("**City**") January 30, 2024, Draft Environmental Impact Report (**DEIR**) comment deadline for the Sunset Crossroads Specific Plan project.

The Project seeks to entitle and permit the development of an approximately 532.7-acre site with approximately 47.9 acres of freeway-oriented General Commercial land uses, approximately 397.1 acres of Industrial land uses, and approximately 68.7 acres to be designated as Open Space-Resource (54.1 acres) or Open Space-Parks (14.6 acres) or assigned for circulation features (19.0 acres.). The proposed Specific Plan will establish zoning regulations for each proposed use type, including allowed uses, intensity of use, building heights, setbacks, lot area and dimensions, parking, landscaping, signage, as well identify on-site circulation and infrastructure improvements necessary to support the proposed project components. The Project also includes the annexation of the southern 252.9 acres of the site into the City of Banning. D-7-1

The Western Carpenters is a labor union representing roughly 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects.

Individual members of the Western Carpenters live, work, and recreate in the City and surrounding communities and would be directly affected by the SP's environmental impacts. D-7-1-A

The Western Carpenters expressly reserves the right to supplement these comments at or prior to hearings on the SP, and at any later hearing and proceeding related to this SP. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121. D-7-1-B

The Western Carpenters incorporates by reference all comments raising issues regarding the Environmental Impact Report (EIR) submitted prior to certification of the EIR for the SP. See *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected to the project's environmental documentation may assert any issue timely raised by other parties).

Moreover, the Western Carpenters requests that the City provide notice for any and all notices referring or related to the SP issued under the California Environmental Quality Act (**CEQA**) (Pub. Res. Code, § 21000 *et seq.*), and the California Planning and Zoning Law ("**Planning and Zoning Law**") (Gov. Code, §§ 65000–65010). California Public Resources Code Sections 21092.2, and 21167(f) and California Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. D-7-1-C

## I. THE CITY SHOULD INCORPORATE LANGUAGE THAT REQUIRE THE USE OF A LOCAL WORKFORCE TO BENEFIT THE COMMUNITY'S ECONOMIC DEVELOPMENT AND ENVIRONMENT D-7-1-D

The City should incorporate language into the proposed SP requiring residential, commercial and mixed-use developments within the SP area to be built using local workers who have graduated from a Joint Labor-Management Apprenticeship Program approved by the State of California, have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state-approved apprenticeship training program, or who are registered apprentices in a state-approved apprenticeship training program. D-7-2

Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impact of the SP. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of projects within the SP area can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note: D-7-3

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the University of California, Berkeley Center for Labor Research and Education concluded: D-7-3-A

> [L]abor should be considered an investment rather than a cost and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

Furthermore, workforce policies have significant environmental benefits given that they improve an area's jobs-housing balance, decreasing the amount and length of job commutes and the associated greenhouse gas (GHG) emissions. In fact, on May 7, 2021, the South Coast Air Quality Management District found that that the "[u]se of a local state-certified apprenticeship program" can result in air pollutant reductions.[2] D-7-3-B

[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf.

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008: D-7-3-C

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[3]

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (VMT). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions given that the skill requirements of available local jobs must match those held by local residents.[4] Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that: D-7-3-D

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

Recently, the State of California verified its commitment towards workforce development through the Affordable Housing and High Road Jobs Act of 2022, D-7-3-E

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Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10.

[3] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf

[4] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at* http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

otherwise known as Assembly Bill No. 2011 ("**AB2011**"). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements. D-7-3-E Cont

The City should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate greenhouse gas, improve air quality, and reduce transportation impacts. D-7-3-F

## II. THE CITY SHOULD INCORPORATE LANGUAGE IMPOSING TRAINING REQUIREMENTS FOR CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES INTO THE SP. D-7-3-G

Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.[5]

Western Carpenters recommend that the City adopt additional requirements to mitigate public health risks from various residential, commercial and mixed-use development construction activities. Western Carpenters requests that the City require safe on-site construction work practices as well as training and certification for any construction workers on residential, commercial and mixed-use developments within the SP area. D-7-4

In particular, based upon Western Carpenters' experience with safe construction site work practices, Western Carpenters recommends that the City require that while construction activities are being conducted within the SP area ("**Project Site**"): D-7-5

**Construction Site Design:**

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.

[5] Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, *available at* https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx.

- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

D-7-5 Cont

**Testing Procedures:**

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.

D-7-5 Cont

- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody

gaining entry to the project site such as returning personnel, deliveries, and visitors.

- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

D-7-5 Cont

**Planning**

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.[6]

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The City should require that all

D-7-6

[6] *See also* The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVIC-19 Standards for U.S Constructions Sites, *available at* https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, *available at* https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

D-7-6 Cont

Western Carpenters has also developed a rigorous Infection Control Risk Assessment ("**ICRA**") training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments.[7]

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance, and renovation of healthcare facilities. ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

The City should incorporate language requiring the residential developments related to the SP be built using a workforce trained in ICRA protocols.

D-7-7

Sincerely,

Reza Mohamadzadeh
Attorney for Western States Regional Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

[7] For details concerning Western Carpenters' ICRA training program, *see* https://icrahealthcare.com/.

# EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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March 8, 2021

Mitchell M. Tsai
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**Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling**

Dear Mr. Tsai,

Soil Water Air Protection Enterprise ("SWAPE") is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas ("GHG") emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

## Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model ("CalEEMod") is a "statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects."[1] CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.[2] D-7-8

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[3] D-7-9

[1] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[2] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[3] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

D-7

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled ("VMT") associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.[4]

D-7-10

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

> "$VMT_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$
>
> Where:
>
> n = Number of land uses being modeled."[5]

D-7-11

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

> "$\text{Emissions}_{pollutant} = VMT * EF_{running,pollutant}$
>
> Where:
>
> $\text{Emissions}_{pollutant}$ = emissions from vehicle running for each pollutant
>
> VMT = vehicle miles traveled
>
> $EF_{running,pollutant}$ = emission factor for running emissions."[6]

D-7-12

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

## Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[7] In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence.[8] The default number of construction-related worker trips is calculated by multiplying the

D-7-13

D-7-14

[4] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.
[5] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.
[6] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[7] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[8] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.[9] Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively."[10] Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.[11] The operational home-to-work vehicle trip lengths are:

D-7-14 Cont

> "[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings" (emphasis added). [12]

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).[13]

D-7-15

| Worker Trip Length by Air Basin | | |
|---|---|---|
| **Air Basin** | **Rural (miles)** | **Urban (miles)** |
| Great Basin Valleys | 16.8 | 10.8 |
| Lake County | 16.8 | 10.8 |
| Lake Tahoe | 16.8 | 10.8 |
| Mojave Desert | 16.8 | 10.8 |
| Mountain Counties | 16.8 | 10.8 |
| North Central Coast | 17.1 | 12.3 |
| North Coast | 16.8 | 10.8 |
| Northeast Plateau | 16.8 | 10.8 |
| Sacramento Valley | 16.8 | 10.8 |
| Salton Sea | 14.6 | 11 |
| San Diego | 16.8 | 10.8 |
| San Francisco Bay Area | 10.8 | 10.8 |
| San Joaquin Valley | 16.8 | 10.8 |
| South Central Coast | 16.8 | 10.8 |
| South Coast | 19.8 | 14.7 |
| **Average** | **16.47** | **11.17** |
| **Minimum** | **10.80** | **10.80** |
| **Maximum** | **19.80** | **14.70** |
| **Range** | **9.00** | **3.90** |

[9] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[10] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[11] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.
[12] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.
[13] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8-miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7-miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location. D-7-16

## Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan ("Project") located in the City of Claremont ("City"). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.[14] In an effort to evaluate the potential for a local hire provision to reduce the Project's construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C). D-7-17 D-7-18

| Local Hire Provision Net Change | |
|---|---|
| **Without Local Hire Provision** | |
| Total Construction GHG Emissions (MT $CO_2e$) | 3,623 |
| Amortized Construction GHG Emissions (MT $CO_2e$/year) | 120.77 |
| **With Local Hire Provision** | |
| Total Construction GHG Emissions (MT CO2e) | 3,024 |
| Amortized Construction GHG Emissions (MT $CO_2e$/year) | 100.80 |
| ***% Decrease in Construction-related GHG Emissions*** | ***17%*** |

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site. D-7-19

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project's urbanization level and location. D-7-20

[14] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.agmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

## Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

D-7-21

Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

| Location Type | Location Name | Rural H-W (miles) | Urban H-W (miles) |
|---|---|---|---|
| Air Basin | Great Basin | 16.8 | 10.8 |
| Air Basin | Lake County | 16.8 | 10.8 |
| Air Basin | Lake Tahoe | 16.8 | 10.8 |
| Air Basin | Mojave Desert | 16.8 | 10.8 |
| Air Basin | Mountain | 16.8 | 10.8 |
| Air Basin | North Central | 17.1 | 12.3 |
| Air Basin | North Coast | 16.8 | 10.8 |
| Air Basin | Northeast | 16.8 | 10.8 |
| Air Basin | Sacramento | 16.8 | 10.8 |
| Air Basin | Salton Sea | 14.6 | 11 |
| Air Basin | San Diego | 16.8 | 10.8 |
| Air Basin | San Francisco | 10.8 | 10.8 |
| Air Basin | San Joaquin | 16.8 | 10.8 |
| Air Basin | South Central | 16.8 | 10.8 |
| Air Basin | South Coast | 19.8 | 14.7 |
| Air District | Amador County | 16.8 | 10.8 |
| Air District | Antelope Valley | 16.8 | 10.8 |
| Air District | Bay Area AQMD | 10.8 | 10.8 |
| Air District | Butte County | 12.54 | 12.54 |
| Air District | Calaveras | 16.8 | 10.8 |
| Air District | Colusa County | 16.8 | 10.8 |
| Air District | El Dorado | 16.8 | 10.8 |
| Air District | Feather River | 16.8 | 10.8 |
| Air District | Glenn County | 16.8 | 10.8 |
| Air District | Great Basin | 16.8 | 10.8 |
| Air District | Imperial County | 10.2 | 7.3 |
| Air District | Kern County | 16.8 | 10.8 |
| Air District | Lake County | 16.8 | 10.8 |
| Air District | Lassen County | 16.8 | 10.8 |
| Air District | Mariposa | 16.8 | 10.8 |
| Air District | Mendocino | 16.8 | 10.8 |
| Air District | Modoc County | 16.8 | 10.8 |
| Air District | Mojave Desert | 16.8 | 10.8 |
| Air District | Monterey Bay | 16.8 | 10.8 |
| Air District | North Coast | 16.8 | 10.8 |
| Air District | Northern Sierra | 16.8 | 10.8 |
| Air District | Northern | 16.8 | 10.8 |
| Air District | Placer County | 16.8 | 10.8 |
| Air District | Sacramento | 15 | 10 |

| | | | |
|---|---|---|---|
| Air District | San Diego | 16.8 | 10.8 |
| Air District | San Joaquin | 16.8 | 10.8 |
| Air District | San Luis Obispo | 13 | 13 |
| Air District | Santa Barbara | 8.3 | 8.3 |
| Air District | Shasta County | 16.8 | 10.8 |
| Air District | Siskiyou County | 16.8 | 10.8 |
| Air District | South Coast | 19.8 | 14.7 |
| Air District | Tehama County | 16.8 | 10.8 |
| Air District | Tuolumne | 16.8 | 10.8 |
| Air District | Ventura County | 16.8 | 10.8 |
| Air District | Yolo/Solano | 15 | 10 |
| County | Alameda | 10.8 | 10.8 |
| County | Alpine | 16.8 | 10.8 |
| County | Amador | 16.8 | 10.8 |
| County | Butte | 12.54 | 12.54 |
| County | Calaveras | 16.8 | 10.8 |
| County | Colusa | 16.8 | 10.8 |
| County | Contra Costa | 10.8 | 10.8 |
| County | Del Norte | 16.8 | 10.8 |
| County | El Dorado-Lake | 16.8 | 10.8 |
| County | El Dorado- | 16.8 | 10.8 |
| County | Fresno | 16.8 | 10.8 |
| County | Glenn | 16.8 | 10.8 |
| County | Humboldt | 16.8 | 10.8 |
| County | Imperial | 10.2 | 7.3 |
| County | Inyo | 16.8 | 10.8 |
| County | Kern-Mojave | 16.8 | 10.8 |
| County | Kern-San | 16.8 | 10.8 |
| County | Kings | 16.8 | 10.8 |
| County | Lake | 16.8 | 10.8 |
| County | Lassen | 16.8 | 10.8 |
| County | Los Angeles- | 16.8 | 10.8 |
| County | Los Angeles- | 19.8 | 14.7 |
| County | Madera | 16.8 | 10.8 |
| County | Marin | 10.8 | 10.8 |
| County | Mariposa | 16.8 | 10.8 |
| County | Mendocino- | 16.8 | 10.8 |
| County | Mendocino- | 16.8 | 10.8 |
| County | Mendocino- | 16.8 | 10.8 |
| County | Mendocino- | 16.8 | 10.8 |
| County | Merced | 16.8 | 10.8 |
| County | Modoc | 16.8 | 10.8 |
| County | Mono | 16.8 | 10.8 |
| County | Monterey | 16.8 | 10.8 |
| County | Napa | 10.8 | 10.8 |

| | | | |
|---|---|---|---|
| County | Nevada | 16.8 | 10.8 |
| County | Orange | 19.8 | 14.7 |
| County | Placer-Lake | 16.8 | 10.8 |
| County | Placer-Mountain | 16.8 | 10.8 |
| County | Placer- | 16.8 | 10.8 |
| County | Plumas | 16.8 | 10.8 |
| County | Riverside- | 16.8 | 10.8 |
| County | Riverside- | 19.8 | 14.7 |
| County | Riverside-Salton | 14.6 | 11 |
| County | Riverside-South | 19.8 | 14.7 |
| County | Sacramento | 15 | 10 |
| County | San Benito | 16.8 | 10.8 |
| County | San Bernardino- | 16.8 | 10.8 |
| County | San Bernardino- | 19.8 | 14.7 |
| County | San Diego | 16.8 | 10.8 |
| County | San Francisco | 10.8 | 10.8 |
| County | San Joaquin | 16.8 | 10.8 |
| County | San Luis Obispo | 13 | 13 |
| County | San Mateo | 10.8 | 10.8 |
| County | Santa Barbara- | 8.3 | 8.3 |
| County | Santa Barbara- | 8.3 | 8.3 |
| County | Santa Clara | 10.8 | 10.8 |
| County | Santa Cruz | 16.8 | 10.8 |
| County | Shasta | 16.8 | 10.8 |
| County | Sierra | 16.8 | 10.8 |
| County | Siskiyou | 16.8 | 10.8 |
| County | Solano- | 15 | 10 |
| County | Solano-San | 16.8 | 10.8 |
| County | Sonoma-North | 16.8 | 10.8 |
| County | Sonoma-San | 10.8 | 10.8 |
| County | Stanislaus | 16.8 | 10.8 |
| County | Sutter | 16.8 | 10.8 |
| County | Tehama | 16.8 | 10.8 |
| County | Trinity | 16.8 | 10.8 |
| County | Tulare | 16.8 | 10.8 |
| County | Tuolumne | 16.8 | 10.8 |
| County | Ventura | 16.8 | 10.8 |
| County | Yolo | 15 | 10 |
| County | Yuba | 16.8 | 10.8 |
| Statewide | Statewide | 16.8 | 10.8 |

| Worker Trip Length by Air Basin | | |
|---|---|---|
| **Air Basin** | **Rural (miles)** | **Urban (miles)** |
| Great Basin Valleys | 16.8 | 10.8 |
| Lake County | 16.8 | 10.8 |
| Lake Tahoe | 16.8 | 10.8 |
| Mojave Desert | 16.8 | 10.8 |
| Mountain Counties | 16.8 | 10.8 |
| North Central Coast | 17.1 | 12.3 |
| North Coast | 16.8 | 10.8 |
| Northeast Plateau | 16.8 | 10.8 |
| Sacramento Valley | 16.8 | 10.8 |
| Salton Sea | 14.6 | 11 |
| San Diego | 16.8 | 10.8 |
| San Francisco Bay Area | 10.8 | 10.8 |
| San Joaquin Valley | 16.8 | 10.8 |
| South Central Coast | 16.8 | 10.8 |
| South Coast | 19.8 | 14.7 |
| **Average** | **16.47** | **11.17** |
| **Mininum** | **10.80** | **10.80** |
| **Maximum** | **19.80** | **14.70** |
| **Range** | **9.00** | **3.90** |

# Village South Specific Plan (Proposed)

## Los Angeles-South Coast County, Annual

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| General Office Building | 45.00 | 1000sqft | 1.03 | 45,000.00 | 0 |
| High Turnover (Sit Down Restaurant) | 36.00 | 1000sqft | 0.83 | 36,000.00 | 0 |
| Hotel | 50.00 | Room | 1.67 | 72,600.00 | 0 |
| Quality Restaurant | 8.00 | 1000sqft | 0.18 | 8,000.00 | 0 |
| Apartments Low Rise | 25.00 | Dwelling Unit | 1.56 | 25,000.00 | 72 |
| Apartments Mid Rise | 975.00 | Dwelling Unit | 25.66 | 975,000.00 | 2789 |
| Regional Shopping Center | 56.00 | 1000sqft | 1.29 | 56,000.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 9 | | | **Operational Year** | 2028 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 702.44 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | NumberWood | 1.25 | 0.00 |
| tblFireplaces | NumberWood | 48.75 | 0.00 |
| tblVehicleTrips | ST_TR | 7.16 | 6.17 |
| tblVehicleTrips | ST_TR | 6.39 | 3.87 |
| tblVehicleTrips | ST_TR | 2.46 | 1.39 |
| tblVehicleTrips | ST_TR | 158.37 | 79.82 |
| tblVehicleTrips | ST_TR | 8.19 | 3.75 |
| tblVehicleTrips | ST_TR | 94.36 | 63.99 |
| tblVehicleTrips | ST_TR | 49.97 | 10.74 |
| tblVehicleTrips | SU_TR | 6.07 | 6.16 |
| tblVehicleTrips | SU_TR | 5.86 | 4.18 |
| tblVehicleTrips | SU_TR | 1.05 | 0.69 |
| tblVehicleTrips | SU_TR | 131.84 | 78.27 |

| | | | |
|---|---|---|---|
| tblVehicleTrips | SU_TR | 5.95 | 3.20 |
| tblVehicleTrips | SU_TR | 72.16 | 57.65 |
| tblVehicleTrips | SU_TR | 25.24 | 6.39 |
| tblVehicleTrips | WD_TR | 6.59 | 5.83 |
| tblVehicleTrips | WD_TR | 6.65 | 4.13 |
| tblVehicleTrips | WD_TR | 11.03 | 6.41 |
| tblVehicleTrips | WD_TR | 127.15 | 65.80 |
| tblVehicleTrips | WD_TR | 8.17 | 3.84 |
| tblVehicleTrips | WD_TR | 89.95 | 62.64 |
| tblVehicleTrips | WD_TR | 42.70 | 9.43 |
| tblWoodstoves | NumberCatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberCatalytic | 48.75 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 48.75 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |

## 2.0 Emissions Summary

## 2.1 Overall Construction

### Unmitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2021 | 0.1713 | 1.8242 | 1.1662 | 2.4000e-003 | 0.4169 | 0.0817 | 0.4986 | 0.1795 | 0.0754 | 0.2549 | 0.0000 | 213.1969 | 213.1969 | 0.0601 | 0.0000 | 214.6993 |
| 2022 | 0.6904 | 4.1142 | 6.1625 | 0.0189 | 1.3058 | 0.1201 | 1.4259 | 0.3460 | 0.1128 | 0.4588 | 0.0000 | 1,721.6826 | 1,721.6826 | 0.1294 | 0.0000 | 1,724.9187 |
| 2023 | 0.6148 | 3.3649 | 5.6747 | 0.0178 | 1.1963 | 0.0996 | 1.2959 | 0.3203 | 0.0935 | 0.4138 | 0.0000 | 1,627.5295 | 1,627.5295 | 0.1185 | 0.0000 | 1,630.4925 |
| 2024 | 4.1619 | 0.1335 | 0.2810 | 5.9000e-004 | 0.0325 | 6.4700e-003 | 0.0390 | 8.6300e-003 | 6.0400e-003 | 0.0147 | 0.0000 | 52.9078 | 52.9078 | 8.0200e-003 | 0.0000 | 53.1082 |
| **Maximum** | **4.1619** | **4.1142** | **6.1625** | **0.0189** | **1.3058** | **0.1201** | **1.4259** | **0.3460** | **0.1128** | **0.4588** | **0.0000** | **1,721.6826** | **1,721.6826** | **0.1294** | **0.0000** | **1,724.9187** |

## 2.1 Overall Construction

### Mitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2021 | 0.1713 | 1.8242 | 1.1662 | 2.4000e-003 | 0.4169 | 0.0817 | 0.4986 | 0.1795 | 0.0754 | 0.2549 | 0.0000 | 213.1967 | 213.1967 | 0.0601 | 0.0000 | 214.6991 |
| 2022 | 0.6904 | 4.1142 | 6.1625 | 0.0189 | 1.3058 | 0.1201 | 1.4259 | 0.3460 | 0.1128 | 0.4588 | 0.0000 | 1,721.6823 | 1,721.6823 | 0.1294 | 0.0000 | 1,724.9183 |
| 2023 | 0.6148 | 3.3648 | 5.6747 | 0.0178 | 1.1963 | 0.0996 | 1.2959 | 0.3203 | 0.0935 | 0.4138 | 0.0000 | 1,627.5291 | 1,627.5291 | 0.1185 | 0.0000 | 1,630.4921 |
| 2024 | 4.1619 | 0.1335 | 0.2810 | 5.9000e-004 | 0.0325 | 6.4700e-003 | 0.0390 | 8.6300e-003 | 6.0400e-003 | 0.0147 | 0.0000 | 52.9077 | 52.9077 | 8.0200e-003 | 0.0000 | 53.1082 |
| **Maximum** | **4.1619** | **4.1142** | **6.1625** | **0.0189** | **1.3058** | **0.1201** | **1.4259** | **0.3460** | **0.1128** | **0.4588** | **0.0000** | **1,721.6823** | **1,721.6823** | **0.1294** | **0.0000** | **1,724.9183** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| 1 | 9-1-2021 | 11-30-2021 | 1.4103 | 1.4103 |
| 2 | 12-1-2021 | 2-28-2022 | 1.3613 | 1.3613 |
| 3 | 3-1-2022 | 5-31-2022 | 1.1985 | 1.1985 |
| 4 | 6-1-2022 | 8-31-2022 | 1.1921 | 1.1921 |
| 5 | 9-1-2022 | 11-30-2022 | 1.1918 | 1.1918 |
| 6 | 12-1-2022 | 2-28-2023 | 1.0774 | 1.0774 |
| 7 | 3-1-2023 | 5-31-2023 | 1.0320 | 1.0320 |
| 8 | 6-1-2023 | 8-31-2023 | 1.0260 | 1.0260 |

| | | | | |
|---|---|---|---|---|
| **9** | **9-1-2023** | **11-30-2023** | 1.0265 | 1.0265 |
| **10** | **12-1-2023** | **2-29-2024** | 2.8857 | 2.8857 |
| **11** | **3-1-2024** | **5-31-2024** | 1.6207 | 1.6207 |
| | | **Highest** | 2.8857 | 2.8857 |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 5.1437 | 0.2950 | 10.3804 | 1.6700e-003 | | 0.0714 | 0.0714 | | 0.0714 | 0.0714 | 0.0000 | 220.9670 | 220.9670 | 0.0201 | 3.7400e-003 | 222.5835 |
| Energy | 0.1398 | 1.2312 | 0.7770 | 7.6200e-003 | | 0.0966 | 0.0966 | | 0.0966 | 0.0966 | 0.0000 | 3,896.0732 | 3,896.0732 | 0.1303 | 0.0468 | 3,913.2833 |
| Mobile | 1.5857 | 7.9962 | 19.1834 | 0.0821 | 7.7979 | 0.0580 | 7.8559 | 2.0895 | 0.0539 | 2.1434 | 0.0000 | 7,620.4986 | 7,620.4986 | 0.3407 | 0.0000 | 7,629.0162 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 207.8079 | 0.0000 | 207.8079 | 12.2811 | 0.0000 | 514.8354 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 29.1632 | 556.6420 | 585.8052 | 3.0183 | 0.0755 | 683.7567 |
| **Total** | **6.8692** | **9.5223** | **30.3407** | **0.0914** | **7.7979** | **0.2260** | **8.0240** | **2.0895** | **0.2219** | **2.3114** | **236.9712** | **12,294.1807** | **12,531.1519** | **15.7904** | **0.1260** | **12,963.4751** |

## 2.2 Overall Operational

### Mitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 5.1437 | 0.2950 | 10.3804 | 1.6700e-003 | | 0.0714 | 0.0714 | | 0.0714 | 0.0714 | 0.0000 | 220.9670 | 220.9670 | 0.0201 | 3.7400e-003 | 222.5835 |
| Energy | 0.1398 | 1.2312 | 0.7770 | 7.6200e-003 | | 0.0966 | 0.0966 | | 0.0966 | 0.0966 | 0.0000 | 3,896.0732 | 3,896.0732 | 0.1303 | 0.0468 | 3,913.2833 |
| Mobile | 1.5857 | 7.9962 | 19.1834 | 0.0821 | 7.7979 | 0.0580 | 7.8559 | 2.0895 | 0.0539 | 2.1434 | 0.0000 | 7,620.4986 | 7,620.4986 | 0.3407 | 0.0000 | 7,629.0162 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 207.8079 | 0.0000 | 207.8079 | 12.2811 | 0.0000 | 514.8354 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 29.1632 | 556.6420 | 585.8052 | 3.0183 | 0.0755 | 683.7567 |
| **Total** | **6.8692** | **9.5223** | **30.3407** | **0.0914** | **7.7979** | **0.2260** | **8.0240** | **2.0895** | **0.2219** | **2.3114** | **236.9712** | **12,294.1807** | **12,531.1519** | **15.7904** | **0.1260** | **12,963.4751** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 3.0 Construction Detail

### Construction Phase

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 9/1/2021 | 10/12/2021 | 5 | 30 | |
| 2 | Site Preparation | Site Preparation | 10/13/2021 | 11/9/2021 | 5 | 20 | |
| 3 | Grading | Grading | 11/10/2021 | 1/11/2022 | 5 | 45 | |
| 4 | Building Construction | Building Construction | 1/12/2022 | 12/12/2023 | 5 | 500 | |
| 5 | Paving | Paving | 12/13/2023 | 1/30/2024 | 5 | 35 | |
| 6 | Architectural Coating | Architectural Coating | 1/31/2024 | 3/19/2024 | 5 | 35 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 112.5**

**Acres of Paving: 0**

**Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 458.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 801.00 | 143.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 160.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.0496 | 0.0000 | 0.0496 | 7.5100e-003 | 0.0000 | 7.5100e-003 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0475 | 0.4716 | 0.3235 | 5.8000e-004 | | 0.0233 | 0.0233 | | 0.0216 | 0.0216 | 0.0000 | 51.0012 | 51.0012 | 0.0144 | 0.0000 | 51.3601 |
| **Total** | **0.0475** | **0.4716** | **0.3235** | **5.8000e-004** | **0.0496** | **0.0233** | **0.0729** | **7.5100e-003** | **0.0216** | **0.0291** | **0.0000** | **51.0012** | **51.0012** | **0.0144** | **0.0000** | **51.3601** |

## 3.2 Demolition - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 1.9300e-003 | 0.0634 | 0.0148 | 1.8000e-004 | 3.9400e-003 | 1.9000e-004 | 4.1300e-003 | 1.0800e-003 | 1.8000e-004 | 1.2600e-003 | 0.0000 | 17.4566 | 17.4566 | 1.2100e-003 | 0.0000 | 17.4869 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 9.7000e-004 | 7.5000e-004 | 8.5100e-003 | 2.0000e-005 | 2.4700e-003 | 2.0000e-005 | 2.4900e-003 | 6.5000e-004 | 2.0000e-005 | 6.7000e-004 | 0.0000 | 2.2251 | 2.2251 | 7.0000e-005 | 0.0000 | 2.2267 |
| **Total** | **2.9000e-003** | **0.0641** | **0.0233** | **2.0000e-004** | **6.4100e-003** | **2.1000e-004** | **6.6200e-003** | **1.7300e-003** | **2.0000e-004** | **1.9300e-003** | **0.0000** | **19.6816** | **19.6816** | **1.2800e-003** | **0.0000** | **19.7136** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.0496 | 0.0000 | 0.0496 | 7.5100e-003 | 0.0000 | 7.5100e-003 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0475 | 0.4716 | 0.3235 | 5.8000e-004 | | 0.0233 | 0.0233 | | 0.0216 | 0.0216 | 0.0000 | 51.0011 | 51.0011 | 0.0144 | 0.0000 | 51.3600 |
| **Total** | **0.0475** | **0.4716** | **0.3235** | **5.8000e-004** | **0.0496** | **0.0233** | **0.0729** | **7.5100e-003** | **0.0216** | **0.0291** | **0.0000** | **51.0011** | **51.0011** | **0.0144** | **0.0000** | **51.3600** |

## 3.2 Demolition - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 1.9300e-003 | 0.0634 | 0.0148 | 1.8000e-004 | 3.9400e-003 | 1.9000e-004 | 4.1300e-003 | 1.0800e-003 | 1.8000e-004 | 1.2600e-003 | 0.0000 | 17.4566 | 17.4566 | 1.2100e-003 | 0.0000 | 17.4869 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 9.7000e-004 | 7.5000e-004 | 8.5100e-003 | 2.0000e-005 | 2.4700e-003 | 2.0000e-005 | 2.4900e-003 | 6.5000e-004 | 2.0000e-005 | 6.7000e-004 | 0.0000 | 2.2251 | 2.2251 | 7.0000e-005 | 0.0000 | 2.2267 |
| **Total** | **2.9000e-003** | **0.0641** | **0.0233** | **2.0000e-004** | **6.4100e-003** | **2.1000e-004** | **6.6200e-003** | **1.7300e-003** | **2.0000e-004** | **1.9300e-003** | **0.0000** | **19.6816** | **19.6816** | **1.2800e-003** | **0.0000** | **19.7136** |

## 3.3 Site Preparation - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.1807 | 0.0000 | 0.1807 | 0.0993 | 0.0000 | 0.0993 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0389 | 0.4050 | 0.2115 | 3.8000e-004 | | 0.0204 | 0.0204 | | 0.0188 | 0.0188 | 0.0000 | 33.4357 | 33.4357 | 0.0108 | 0.0000 | 33.7061 |
| **Total** | **0.0389** | **0.4050** | **0.2115** | **3.8000e-004** | **0.1807** | **0.0204** | **0.2011** | **0.0993** | **0.0188** | **0.1181** | **0.0000** | **33.4357** | **33.4357** | **0.0108** | **0.0000** | **33.7061** |

## 3.3 Site Preparation - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 7.7000e-004 | 6.0000e-004 | 6.8100e-003 | 2.0000e-005 | 1.9700e-003 | 2.0000e-005 | 1.9900e-003 | 5.2000e-004 | 1.0000e-005 | 5.4000e-004 | 0.0000 | 1.7801 | 1.7801 | 5.0000e-005 | 0.0000 | 1.7814 |
| **Total** | **7.7000e-004** | **6.0000e-004** | **6.8100e-003** | **2.0000e-005** | **1.9700e-003** | **2.0000e-005** | **1.9900e-003** | **5.2000e-004** | **1.0000e-005** | **5.4000e-004** | **0.0000** | **1.7801** | **1.7801** | **5.0000e-005** | **0.0000** | **1.7814** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.1807 | 0.0000 | 0.1807 | 0.0993 | 0.0000 | 0.0993 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0389 | 0.4050 | 0.2115 | 3.8000e-004 | | 0.0204 | 0.0204 | | 0.0188 | 0.0188 | 0.0000 | 33.4357 | 33.4357 | 0.0108 | 0.0000 | 33.7060 |
| **Total** | **0.0389** | **0.4050** | **0.2115** | **3.8000e-004** | **0.1807** | **0.0204** | **0.2011** | **0.0993** | **0.0188** | **0.1181** | **0.0000** | **33.4357** | **33.4357** | **0.0108** | **0.0000** | **33.7060** |

## 3.3 Site Preparation - 2021

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 7.7000e-004 | 6.0000e-004 | 6.8100e-003 | 2.0000e-005 | 1.9700e-003 | 2.0000e-005 | 1.9900e-003 | 5.2000e-004 | 1.0000e-005 | 5.4000e-004 | 0.0000 | 1.7801 | 1.7801 | 5.0000e-005 | 0.0000 | 1.7814 |
| **Total** | **7.7000e-004** | **6.0000e-004** | **6.8100e-003** | **2.0000e-005** | **1.9700e-003** | **2.0000e-005** | **1.9900e-003** | **5.2000e-004** | **1.0000e-005** | **5.4000e-004** | **0.0000** | **1.7801** | **1.7801** | **5.0000e-005** | **0.0000** | **1.7814** |

## 3.4 Grading - 2021

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.1741 | 0.0000 | 0.1741 | 0.0693 | 0.0000 | 0.0693 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0796 | 0.8816 | 0.5867 | 1.1800e-003 | | 0.0377 | 0.0377 | | 0.0347 | 0.0347 | 0.0000 | 103.5405 | 103.5405 | 0.0335 | 0.0000 | 104.3776 |
| **Total** | **0.0796** | **0.8816** | **0.5867** | **1.1800e-003** | **0.1741** | **0.0377** | **0.2118** | **0.0693** | **0.0347** | **0.1040** | **0.0000** | **103.5405** | **103.5405** | **0.0335** | **0.0000** | **104.3776** |

## 3.4 Grading - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 1.6400e-003 | 1.2700e-003 | 0.0144 | 4.0000e-005 | 4.1600e-003 | 3.0000e-005 | 4.2000e-003 | 1.1100e-003 | 3.0000e-005 | 1.1400e-003 | 0.0000 | 3.7579 | 3.7579 | 1.1000e-004 | 0.0000 | 3.7607 |
| **Total** | **1.6400e-003** | **1.2700e-003** | **0.0144** | **4.0000e-005** | **4.1600e-003** | **3.0000e-005** | **4.2000e-003** | **1.1100e-003** | **3.0000e-005** | **1.1400e-003** | **0.0000** | **3.7579** | **3.7579** | **1.1000e-004** | **0.0000** | **3.7607** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.1741 | 0.0000 | 0.1741 | 0.0693 | 0.0000 | 0.0693 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0796 | 0.8816 | 0.5867 | 1.1800e-003 | | 0.0377 | 0.0377 | | 0.0347 | 0.0347 | 0.0000 | 103.5403 | 103.5403 | 0.0335 | 0.0000 | 104.3775 |
| **Total** | **0.0796** | **0.8816** | **0.5867** | **1.1800e-003** | **0.1741** | **0.0377** | **0.2118** | **0.0693** | **0.0347** | **0.1040** | **0.0000** | **103.5403** | **103.5403** | **0.0335** | **0.0000** | **104.3775** |

## 3.4 Grading - 2021

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 1.6400e-003 | 1.2700e-003 | 0.0144 | 4.0000e-005 | 4.1600e-003 | 3.0000e-005 | 4.2000e-003 | 1.1100e-003 | 3.0000e-005 | 1.1400e-003 | 0.0000 | 3.7579 | 3.7579 | 1.1000e-004 | 0.0000 | 3.7607 |
| **Total** | **1.6400e-003** | **1.2700e-003** | **0.0144** | **4.0000e-005** | **4.1600e-003** | **3.0000e-005** | **4.2000e-003** | **1.1100e-003** | **3.0000e-005** | **1.1400e-003** | **0.0000** | **3.7579** | **3.7579** | **1.1000e-004** | **0.0000** | **3.7607** |

## 3.4 Grading - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.0807 | 0.0000 | 0.0807 | 0.0180 | 0.0000 | 0.0180 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0127 | 0.1360 | 0.1017 | 2.2000e-004 | | 5.7200e-003 | 5.7200e-003 | | 5.2600e-003 | 5.2600e-003 | 0.0000 | 19.0871 | 19.0871 | 6.1700e-003 | 0.0000 | 19.2414 |
| **Total** | **0.0127** | **0.1360** | **0.1017** | **2.2000e-004** | **0.0807** | **5.7200e-003** | **0.0865** | **0.0180** | **5.2600e-003** | **0.0233** | **0.0000** | **19.0871** | **19.0871** | **6.1700e-003** | **0.0000** | **19.2414** |

## 3.4 Grading - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 2.8000e-004 | 2.1000e-004 | 2.4400e-003 | 1.0000e-005 | 7.7000e-004 | 1.0000e-005 | 7.7000e-004 | 2.0000e-004 | 1.0000e-005 | 2.1000e-004 | 0.0000 | 0.6679 | 0.6679 | 2.0000e-005 | 0.0000 | 0.6684 |
| **Total** | **2.8000e-004** | **2.1000e-004** | **2.4400e-003** | **1.0000e-005** | **7.7000e-004** | **1.0000e-005** | **7.7000e-004** | **2.0000e-004** | **1.0000e-005** | **2.1000e-004** | **0.0000** | **0.6679** | **0.6679** | **2.0000e-005** | **0.0000** | **0.6684** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.0807 | 0.0000 | 0.0807 | 0.0180 | 0.0000 | 0.0180 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0127 | 0.1360 | 0.1017 | 2.2000e-004 | | 5.7200e-003 | 5.7200e-003 | | 5.2600e-003 | 5.2600e-003 | 0.0000 | 19.0871 | 19.0871 | 6.1700e-003 | 0.0000 | 19.2414 |
| **Total** | **0.0127** | **0.1360** | **0.1017** | **2.2000e-004** | **0.0807** | **5.7200e-003** | **0.0865** | **0.0180** | **5.2600e-003** | **0.0233** | **0.0000** | **19.0871** | **19.0871** | **6.1700e-003** | **0.0000** | **19.2414** |

## 3.4 Grading - 2022

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 2.8000e-004 | 2.1000e-004 | 2.4400e-003 | 1.0000e-005 | 7.7000e-004 | 1.0000e-005 | 7.7000e-004 | 2.0000e-004 | 1.0000e-005 | 2.1000e-004 | 0.0000 | 0.6679 | 0.6679 | 2.0000e-005 | 0.0000 | 0.6684 |
| **Total** | **2.8000e-004** | **2.1000e-004** | **2.4400e-003** | **1.0000e-005** | **7.7000e-004** | **1.0000e-005** | **7.7000e-004** | **2.0000e-004** | **1.0000e-005** | **2.1000e-004** | **0.0000** | **0.6679** | **0.6679** | **2.0000e-005** | **0.0000** | **0.6684** |

## 3.5 Building Construction - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.2158 | 1.9754 | 2.0700 | 3.4100e-003 | | 0.1023 | 0.1023 | | 0.0963 | 0.0963 | 0.0000 | 293.1324 | 293.1324 | 0.0702 | 0.0000 | 294.8881 |
| **Total** | **0.2158** | **1.9754** | **2.0700** | **3.4100e-003** | | **0.1023** | **0.1023** | | **0.0963** | **0.0963** | **0.0000** | **293.1324** | **293.1324** | **0.0702** | **0.0000** | **294.8881** |

## 3.5 Building Construction - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0527 | 1.6961 | 0.4580 | 4.5500e-003 | 0.1140 | 3.1800e-003 | 0.1171 | 0.0329 | 3.0400e-003 | 0.0359 | 0.0000 | 441.9835 | 441.9835 | 0.0264 | 0.0000 | 442.6435 |
| Worker | 0.4088 | 0.3066 | 3.5305 | 0.0107 | 1.1103 | 8.8700e-003 | 1.1192 | 0.2949 | 8.1700e-003 | 0.3031 | 0.0000 | 966.8117 | 966.8117 | 0.0266 | 0.0000 | 967.4773 |
| **Total** | **0.4616** | **2.0027** | **3.9885** | **0.0152** | **1.2243** | **0.0121** | **1.2363** | **0.3278** | **0.0112** | **0.3390** | **0.0000** | **1,408.7952** | **1,408.7952** | **0.0530** | **0.0000** | **1,410.1208** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.2158 | 1.9754 | 2.0700 | 3.4100e-003 | | 0.1023 | 0.1023 | | 0.0963 | 0.0963 | 0.0000 | 293.1321 | 293.1321 | 0.0702 | 0.0000 | 294.8877 |
| **Total** | **0.2158** | **1.9754** | **2.0700** | **3.4100e-003** | | **0.1023** | **0.1023** | | **0.0963** | **0.0963** | **0.0000** | **293.1321** | **293.1321** | **0.0702** | **0.0000** | **294.8877** |

## 3.5 Building Construction - 2022

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0527 | 1.6961 | 0.4580 | 4.5500e-003 | 0.1140 | 3.1800e-003 | 0.1171 | 0.0329 | 3.0400e-003 | 0.0359 | 0.0000 | 441.9835 | 441.9835 | 0.0264 | 0.0000 | 442.6435 |
| Worker | 0.4088 | 0.3066 | 3.5305 | 0.0107 | 1.1103 | 8.8700e-003 | 1.1192 | 0.2949 | 8.1700e-003 | 0.3031 | 0.0000 | 966.8117 | 966.8117 | 0.0266 | 0.0000 | 967.4773 |
| **Total** | **0.4616** | **2.0027** | **3.9885** | **0.0152** | **1.2243** | **0.0121** | **1.2363** | **0.3278** | **0.0112** | **0.3390** | **0.0000** | **1,408.7952** | **1,408.7952** | **0.0530** | **0.0000** | **1,410.1208** |

## 3.5 Building Construction - 2023

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.1942 | 1.7765 | 2.0061 | 3.3300e-003 | | 0.0864 | 0.0864 | | 0.0813 | 0.0813 | 0.0000 | 286.2789 | 286.2789 | 0.0681 | 0.0000 | 287.9814 |
| **Total** | **0.1942** | **1.7765** | **2.0061** | **3.3300e-003** | | **0.0864** | **0.0864** | | **0.0813** | **0.0813** | **0.0000** | **286.2789** | **286.2789** | **0.0681** | **0.0000** | **287.9814** |

## 3.5 Building Construction - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0382 | 1.2511 | 0.4011 | 4.3000e-003 | 0.1113 | 1.4600e-003 | 0.1127 | 0.0321 | 1.4000e-003 | 0.0335 | 0.0000 | 417.9930 | 417.9930 | 0.0228 | 0.0000 | 418.5624 |
| Worker | 0.3753 | 0.2708 | 3.1696 | 0.0101 | 1.0840 | 8.4100e-003 | 1.0924 | 0.2879 | 7.7400e-003 | 0.2957 | 0.0000 | 909.3439 | 909.3439 | 0.0234 | 0.0000 | 909.9291 |
| **Total** | **0.4135** | **1.5218** | **3.5707** | **0.0144** | **1.1953** | **9.8700e-003** | **1.2051** | **0.3200** | **9.1400e-003** | **0.3292** | **0.0000** | **1,327.3369** | **1,327.3369** | **0.0462** | **0.0000** | **1,328.4916** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.1942 | 1.7765 | 2.0061 | 3.3300e-003 | | 0.0864 | 0.0864 | | 0.0813 | 0.0813 | 0.0000 | 286.2785 | 286.2785 | 0.0681 | 0.0000 | 287.9811 |
| **Total** | **0.1942** | **1.7765** | **2.0061** | **3.3300e-003** | | **0.0864** | **0.0864** | | **0.0813** | **0.0813** | **0.0000** | **286.2785** | **286.2785** | **0.0681** | **0.0000** | **287.9811** |

## 3.5 Building Construction - 2023

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0382 | 1.2511 | 0.4011 | 4.3000e-003 | 0.1113 | 1.4600e-003 | 0.1127 | 0.0321 | 1.4000e-003 | 0.0335 | 0.0000 | 417.9930 | 417.9930 | 0.0228 | 0.0000 | 418.5624 |
| Worker | 0.3753 | 0.2708 | 3.1696 | 0.0101 | 1.0840 | 8.4100e-003 | 1.0924 | 0.2879 | 7.7400e-003 | 0.2957 | 0.0000 | 909.3439 | 909.3439 | 0.0234 | 0.0000 | 909.9291 |
| **Total** | **0.4135** | **1.5218** | **3.5707** | **0.0144** | **1.1953** | **9.8700e-003** | **1.2051** | **0.3200** | **9.1400e-003** | **0.3292** | **0.0000** | **1,327.3369** | **1,327.3369** | **0.0462** | **0.0000** | **1,328.4916** |

## 3.6 Paving - 2023

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 6.7100e-003 | 0.0663 | 0.0948 | 1.5000e-004 | | 3.3200e-003 | 3.3200e-003 | | 3.0500e-003 | 3.0500e-003 | 0.0000 | 13.0175 | 13.0175 | 4.2100e-003 | 0.0000 | 13.1227 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **6.7100e-003** | **0.0663** | **0.0948** | **1.5000e-004** | | **3.3200e-003** | **3.3200e-003** | | **3.0500e-003** | **3.0500e-003** | **0.0000** | **13.0175** | **13.0175** | **4.2100e-003** | **0.0000** | **13.1227** |

## 3.6 Paving - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 3.7000e-004 | 2.7000e-004 | 3.1200e-003 | 1.0000e-005 | 1.0700e-003 | 1.0000e-005 | 1.0800e-003 | 2.8000e-004 | 1.0000e-005 | 2.9000e-004 | 0.0000 | 0.8963 | 0.8963 | 2.0000e-005 | 0.0000 | 0.8968 |
| **Total** | **3.7000e-004** | **2.7000e-004** | **3.1200e-003** | **1.0000e-005** | **1.0700e-003** | **1.0000e-005** | **1.0800e-003** | **2.8000e-004** | **1.0000e-005** | **2.9000e-004** | **0.0000** | **0.8963** | **0.8963** | **2.0000e-005** | **0.0000** | **0.8968** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 6.7100e-003 | 0.0663 | 0.0948 | 1.5000e-004 | | 3.3200e-003 | 3.3200e-003 | | 3.0500e-003 | 3.0500e-003 | 0.0000 | 13.0175 | 13.0175 | 4.2100e-003 | 0.0000 | 13.1227 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **6.7100e-003** | **0.0663** | **0.0948** | **1.5000e-004** | | **3.3200e-003** | **3.3200e-003** | | **3.0500e-003** | **3.0500e-003** | **0.0000** | **13.0175** | **13.0175** | **4.2100e-003** | **0.0000** | **13.1227** |

## 3.6 Paving - 2023

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 3.7000e-004 | 2.7000e-004 | 3.1200e-003 | 1.0000e-005 | 1.0700e-003 | 1.0000e-005 | 1.0800e-003 | 2.8000e-004 | 1.0000e-005 | 2.9000e-004 | 0.0000 | 0.8963 | 0.8963 | 2.0000e-005 | 0.0000 | 0.8968 |
| **Total** | **3.7000e-004** | **2.7000e-004** | **3.1200e-003** | **1.0000e-005** | **1.0700e-003** | **1.0000e-005** | **1.0800e-003** | **2.8000e-004** | **1.0000e-005** | **2.9000e-004** | **0.0000** | **0.8963** | **0.8963** | **2.0000e-005** | **0.0000** | **0.8968** |

## 3.6 Paving - 2024

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0109 | 0.1048 | 0.1609 | 2.5000e-004 | | 5.1500e-003 | 5.1500e-003 | | 4.7400e-003 | 4.7400e-003 | 0.0000 | 22.0292 | 22.0292 | 7.1200e-003 | 0.0000 | 22.2073 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0109** | **0.1048** | **0.1609** | **2.5000e-004** | | **5.1500e-003** | **5.1500e-003** | | **4.7400e-003** | **4.7400e-003** | **0.0000** | **22.0292** | **22.0292** | **7.1200e-003** | **0.0000** | **22.2073** |

## 3.6 Paving - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 5.9000e-004 | 4.1000e-004 | 4.9200e-003 | 2.0000e-005 | 1.8100e-003 | 1.0000e-005 | 1.8200e-003 | 4.8000e-004 | 1.0000e-005 | 4.9000e-004 | 0.0000 | 1.4697 | 1.4697 | 4.0000e-005 | 0.0000 | 1.4706 |
| **Total** | **5.9000e-004** | **4.1000e-004** | **4.9200e-003** | **2.0000e-005** | **1.8100e-003** | **1.0000e-005** | **1.8200e-003** | **4.8000e-004** | **1.0000e-005** | **4.9000e-004** | **0.0000** | **1.4697** | **1.4697** | **4.0000e-005** | **0.0000** | **1.4706** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0109 | 0.1048 | 0.1609 | 2.5000e-004 | | 5.1500e-003 | 5.1500e-003 | | 4.7400e-003 | 4.7400e-003 | 0.0000 | 22.0292 | 22.0292 | 7.1200e-003 | 0.0000 | 22.2073 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0109** | **0.1048** | **0.1609** | **2.5000e-004** | | **5.1500e-003** | **5.1500e-003** | | **4.7400e-003** | **4.7400e-003** | **0.0000** | **22.0292** | **22.0292** | **7.1200e-003** | **0.0000** | **22.2073** |

## 3.6 Paving - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 5.9000e-004 | 4.1000e-004 | 4.9200e-003 | 2.0000e-005 | 1.8100e-003 | 1.0000e-005 | 1.8200e-003 | 4.8000e-004 | 1.0000e-005 | 4.9000e-004 | 0.0000 | 1.4697 | 1.4697 | 4.0000e-005 | 0.0000 | 1.4706 |
| **Total** | **5.9000e-004** | **4.1000e-004** | **4.9200e-003** | **2.0000e-005** | **1.8100e-003** | **1.0000e-005** | **1.8200e-003** | **4.8000e-004** | **1.0000e-005** | **4.9000e-004** | **0.0000** | **1.4697** | **1.4697** | **4.0000e-005** | **0.0000** | **1.4706** |

## 3.7 Architectural Coating - 2024

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 4.1372 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 3.1600e-003 | 0.0213 | 0.0317 | 5.0000e-005 | | 1.0700e-003 | 1.0700e-003 | | 1.0700e-003 | 1.0700e-003 | 0.0000 | 4.4682 | 4.4682 | 2.5000e-004 | 0.0000 | 4.4745 |
| **Total** | **4.1404** | **0.0213** | **0.0317** | **5.0000e-005** | | **1.0700e-003** | **1.0700e-003** | | **1.0700e-003** | **1.0700e-003** | **0.0000** | **4.4682** | **4.4682** | **2.5000e-004** | **0.0000** | **4.4745** |

## 3.7 Architectural Coating - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0101 | 6.9900e-003 | 0.0835 | 2.8000e-004 | 0.0307 | 2.3000e-004 | 0.0309 | 8.1500e-003 | 2.2000e-004 | 8.3700e-003 | 0.0000 | 24.9407 | 24.9407 | 6.1000e-004 | 0.0000 | 24.9558 |
| **Total** | **0.0101** | **6.9900e-003** | **0.0835** | **2.8000e-004** | **0.0307** | **2.3000e-004** | **0.0309** | **8.1500e-003** | **2.2000e-004** | **8.3700e-003** | **0.0000** | **24.9407** | **24.9407** | **6.1000e-004** | **0.0000** | **24.9558** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 4.1372 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 3.1600e-003 | 0.0213 | 0.0317 | 5.0000e-005 | | 1.0700e-003 | 1.0700e-003 | | 1.0700e-003 | 1.0700e-003 | 0.0000 | 4.4682 | 4.4682 | 2.5000e-004 | 0.0000 | 4.4745 |
| **Total** | **4.1404** | **0.0213** | **0.0317** | **5.0000e-005** | | **1.0700e-003** | **1.0700e-003** | | **1.0700e-003** | **1.0700e-003** | **0.0000** | **4.4682** | **4.4682** | **2.5000e-004** | **0.0000** | **4.4745** |

### 3.7 Architectural Coating - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0101 | 6.9900e-003 | 0.0835 | 2.8000e-004 | 0.0307 | 2.3000e-004 | 0.0309 | 8.1500e-003 | 2.2000e-004 | 8.3700e-003 | 0.0000 | 24.9407 | 24.9407 | 6.1000e-004 | 0.0000 | 24.9558 |
| **Total** | **0.0101** | **6.9900e-003** | **0.0835** | **2.8000e-004** | **0.0307** | **2.3000e-004** | **0.0309** | **8.1500e-003** | **2.2000e-004** | **8.3700e-003** | **0.0000** | **24.9407** | **24.9407** | **6.1000e-004** | **0.0000** | **24.9558** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 1.5857 | 7.9962 | 19.1834 | 0.0821 | 7.7979 | 0.0580 | 7.8559 | 2.0895 | 0.0539 | 2.1434 | 0.0000 | 7,620.4986 | 7,620.4986 | 0.3407 | 0.0000 | 7,629.0162 |
| Unmitigated | 1.5857 | 7.9962 | 19.1834 | 0.0821 | 7.7979 | 0.0580 | 7.8559 | 2.0895 | 0.0539 | 2.1434 | 0.0000 | 7,620.4986 | 7,620.4986 | 0.3407 | 0.0000 | 7,629.0162 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 145.75 | 154.25 | 154.00 | 506,227 | 506,227 |
| Apartments Mid Rise | 4,026.75 | 3,773.25 | 4075.50 | 13,660,065 | 13,660,065 |
| General Office Building | 288.45 | 62.55 | 31.05 | 706,812 | 706,812 |
| High Turnover (Sit Down Restaurant) | 2,368.80 | 2,873.52 | 2817.72 | 3,413,937 | 3,413,937 |
| Hotel | 192.00 | 187.50 | 160.00 | 445,703 | 445,703 |
| Quality Restaurant | 501.12 | 511.92 | 461.20 | 707,488 | 707,488 |
| Regional Shopping Center | 528.08 | 601.44 | 357.84 | 1,112,221 | 1,112,221 |
| Total | 8,050.95 | 8,164.43 | 8,057.31 | 20,552,452 | 20,552,452 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| General Office Building | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 77 | 19 | 4 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Hotel | 16.60 | 8.40 | 6.90 | 19.40 | 61.60 | 19.00 | 58 | 38 | 4 |
| Quality Restaurant | 16.60 | 8.40 | 6.90 | 12.00 | 69.00 | 19.00 | 38 | 18 | 44 |
| Regional Shopping Center | 16.60 | 8.40 | 6.90 | 16.30 | 64.70 | 19.00 | 54 | 35 | 11 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Apartments Mid Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| General Office Building | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| High Turnover (Sit Down Restaurant) | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Hotel | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Quality Restaurant | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Regional Shopping Center | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 2,512.6465 | 2,512.6465 | 0.1037 | 0.0215 | 2,521.6356 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 2,512.6465 | 2,512.6465 | 0.1037 | 0.0215 | 2,521.6356 |
| NaturalGas Mitigated | 0.1398 | 1.2312 | 0.7770 | 7.6200e-003 | | 0.0966 | 0.0966 | | 0.0966 | 0.0966 | 0.0000 | 1,383.4267 | 1,383.4267 | 0.0265 | 0.0254 | 1,391.6478 |
| NaturalGas Unmitigated | 0.1398 | 1.2312 | 0.7770 | 7.6200e-003 | | 0.0966 | 0.0966 | | 0.0966 | 0.0966 | 0.0000 | 1,383.4267 | 1,383.4267 | 0.0265 | 0.0254 | 1,391.6478 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Low Rise | 408494 | 2.2000e-003 | 0.0188 | 8.0100e-003 | 1.2000e-004 | | 1.5200e-003 | 1.5200e-003 | | 1.5200e-003 | 1.5200e-003 | 0.0000 | 21.7988 | 21.7988 | 4.2000e-004 | 4.0000e-004 | 21.9284 |
| Apartments Mid Rise | 1.30613e+007 | 0.0704 | 0.6018 | 0.2561 | 3.8400e-003 | | 0.0487 | 0.0487 | | 0.0487 | 0.0487 | 0.0000 | 696.9989 | 696.9989 | 0.0134 | 0.0128 | 701.1408 |
| General Office Building | 468450 | 2.5300e-003 | 0.0230 | 0.0193 | 1.4000e-004 | | 1.7500e-003 | 1.7500e-003 | | 1.7500e-003 | 1.7500e-003 | 0.0000 | 24.9983 | 24.9983 | 4.8000e-004 | 4.6000e-004 | 25.1468 |
| High Turnover (Sit Down Restaurant) | 8.30736e+006 | 0.0448 | 0.4072 | 0.3421 | 2.4400e-003 | | 0.0310 | 0.0310 | | 0.0310 | 0.0310 | 0.0000 | 443.3124 | 443.3124 | 8.5000e-003 | 8.1300e-003 | 445.9468 |
| Hotel | 1.74095e+006 | 9.3900e-003 | 0.0853 | 0.0717 | 5.1000e-004 | | 6.4900e-003 | 6.4900e-003 | | 6.4900e-003 | 6.4900e-003 | 0.0000 | 92.9036 | 92.9036 | 1.7800e-003 | 1.7000e-003 | 93.4557 |
| Quality Restaurant | 1.84608e+006 | 9.9500e-003 | 0.0905 | 0.0760 | 5.4000e-004 | | 6.8800e-003 | 6.8800e-003 | | 6.8800e-003 | 6.8800e-003 | 0.0000 | 98.5139 | 98.5139 | 1.8900e-003 | 1.8100e-003 | 99.0993 |
| Regional Shopping Center | 91840 | 5.0000e-004 | 4.5000e-003 | 3.7800e-003 | 3.0000e-005 | | 3.4000e-004 | 3.4000e-004 | | 3.4000e-004 | 3.4000e-004 | 0.0000 | 4.9009 | 4.9009 | 9.0000e-005 | 9.0000e-005 | 4.9301 |
| **Total** | | **0.1398** | **1.2312** | **0.7770** | **7.6200e-003** | | **0.0966** | **0.0966** | | **0.0966** | **0.0966** | **0.0000** | **1,383.4268** | **1,383.4268** | **0.0265** | **0.0254** | **1,391.6478** |

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Low Rise | 408494 | 2.2000e-003 | 0.0188 | 8.0100e-003 | 1.2000e-004 | | 1.5200e-003 | 1.5200e-003 | | 1.5200e-003 | 1.5200e-003 | 0.0000 | 21.7988 | 21.7988 | 4.2000e-004 | 4.0000e-004 | 21.9284 |
| Apartments Mid Rise | 1.30613e+007 | 0.0704 | 0.6018 | 0.2561 | 3.8400e-003 | | 0.0487 | 0.0487 | | 0.0487 | 0.0487 | 0.0000 | 696.9989 | 696.9989 | 0.0134 | 0.0128 | 701.1408 |
| General Office Building | 468450 | 2.5300e-003 | 0.0230 | 0.0193 | 1.4000e-004 | | 1.7500e-003 | 1.7500e-003 | | 1.7500e-003 | 1.7500e-003 | 0.0000 | 24.9983 | 24.9983 | 4.8000e-004 | 4.6000e-004 | 25.1468 |
| High Turnover (Sit Down Restaurant) | 8.30736e+006 | 0.0448 | 0.4072 | 0.3421 | 2.4400e-003 | | 0.0310 | 0.0310 | | 0.0310 | 0.0310 | 0.0000 | 443.3124 | 443.3124 | 8.5000e-003 | 8.1300e-003 | 445.9468 |
| Hotel | 1.74095e+006 | 9.3900e-003 | 0.0853 | 0.0717 | 5.1000e-004 | | 6.4900e-003 | 6.4900e-003 | | 6.4900e-003 | 6.4900e-003 | 0.0000 | 92.9036 | 92.9036 | 1.7800e-003 | 1.7000e-003 | 93.4557 |
| Quality Restaurant | 1.84608e+006 | 9.9500e-003 | 0.0905 | 0.0760 | 5.4000e-004 | | 6.8800e-003 | 6.8800e-003 | | 6.8800e-003 | 6.8800e-003 | 0.0000 | 98.5139 | 98.5139 | 1.8900e-003 | 1.8100e-003 | 99.0993 |
| Regional Shopping Center | 91840 | 5.0000e-004 | 4.5000e-003 | 3.7800e-003 | 3.0000e-005 | | 3.4000e-004 | 3.4000e-004 | | 3.4000e-004 | 3.4000e-004 | 0.0000 | 4.9009 | 4.9009 | 9.0000e-005 | 9.0000e-005 | 4.9301 |
| **Total** | | **0.1398** | **1.2312** | **0.7770** | **7.6200e-003** | | **0.0966** | **0.0966** | | **0.0966** | **0.0966** | **0.0000** | **1,383.4268** | **1,383.4268** | **0.0265** | **0.0254** | **1,391.6478** |

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Low Rise | 106010 | 33.7770 | 1.3900e-003 | 2.9000e-004 | 33.8978 |
| Apartments Mid Rise | 3.94697e+006 | 1,257.5879 | 0.0519 | 0.0107 | 1,262.0869 |
| General Office Building | 584550 | 186.2502 | 7.6900e-003 | 1.5900e-003 | 186.9165 |
| High Turnover (Sit Down Restaurant) | 1.58904e+006 | 506.3022 | 0.0209 | 4.3200e-003 | 508.1135 |
| Hotel | 550308 | 175.3399 | 7.2400e-003 | 1.5000e-003 | 175.9672 |
| Quality Restaurant | 353120 | 112.5116 | 4.6500e-003 | 9.6000e-004 | 112.9141 |
| Regional Shopping Center | 756000 | 240.8778 | 9.9400e-003 | 2.0600e-003 | 241.7395 |
| **Total** | | **2,512.6465** | **0.1037** | **0.0215** | **2,521.6356** |

## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Low Rise | 106010 | 33.7770 | 1.3900e-003 | 2.9000e-004 | 33.8978 |
| Apartments Mid Rise | 3.94697e+006 | 1,257.5879 | 0.0519 | 0.0107 | 1,262.0869 |
| General Office Building | 584550 | 186.2502 | 7.6900e-003 | 1.5900e-003 | 186.9165 |
| High Turnover (Sit Down Restaurant) | 1.58904e+006 | 506.3022 | 0.0209 | 4.3200e-003 | 508.1135 |
| Hotel | 550308 | 175.3399 | 7.2400e-003 | 1.5000e-003 | 175.9672 |
| Quality Restaurant | 353120 | 112.5116 | 4.6500e-003 | 9.6000e-004 | 112.9141 |
| Regional Shopping Center | 756000 | 240.8778 | 9.9400e-003 | 2.0600e-003 | 241.7395 |
| **Total** | | **2,512.6465** | **0.1037** | **0.0215** | **2,521.6356** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 5.1437 | 0.2950 | 10.3804 | 1.6700e-003 | | 0.0714 | 0.0714 | | 0.0714 | 0.0714 | 0.0000 | 220.9670 | 220.9670 | 0.0201 | 3.7400e-003 | 222.5835 |
| Unmitigated | 5.1437 | 0.2950 | 10.3804 | 1.6700e-003 | | 0.0714 | 0.0714 | | 0.0714 | 0.0714 | 0.0000 | 220.9670 | 220.9670 | 0.0201 | 3.7400e-003 | 222.5835 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.4137 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 4.3998 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0206 | 0.1763 | 0.0750 | 1.1200e-003 | | 0.0143 | 0.0143 | | 0.0143 | 0.0143 | 0.0000 | 204.1166 | 204.1166 | 3.9100e-003 | 3.7400e-003 | 205.3295 |
| Landscaping | 0.3096 | 0.1187 | 10.3054 | 5.4000e-004 | | 0.0572 | 0.0572 | | 0.0572 | 0.0572 | 0.0000 | 16.8504 | 16.8504 | 0.0161 | 0.0000 | 17.2540 |
| **Total** | **5.1437** | **0.2950** | **10.3804** | **1.6600e-003** | | **0.0714** | **0.0714** | | **0.0714** | **0.0714** | **0.0000** | **220.9670** | **220.9670** | **0.0201** | **3.7400e-003** | **222.5835** |

## 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.4137 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 4.3998 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0206 | 0.1763 | 0.0750 | 1.1200e-003 | | 0.0143 | 0.0143 | | 0.0143 | 0.0143 | 0.0000 | 204.1166 | 204.1166 | 3.9100e-003 | 3.7400e-003 | 205.3295 |
| Landscaping | 0.3096 | 0.1187 | 10.3054 | 5.4000e-004 | | 0.0572 | 0.0572 | | 0.0572 | 0.0572 | 0.0000 | 16.8504 | 16.8504 | 0.0161 | 0.0000 | 17.2540 |
| **Total** | **5.1437** | **0.2950** | **10.3804** | **1.6600e-003** | | **0.0714** | **0.0714** | | **0.0714** | **0.0714** | **0.0000** | **220.9670** | **220.9670** | **0.0201** | **3.7400e-003** | **222.5835** |

# 7.0 Water Detail

## 7.1 Mitigation Measures Water

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 585.8052 | 3.0183 | 0.0755 | 683.7567 |
| Unmitigated | 585.8052 | 3.0183 | 0.0755 | 683.7567 |

## 7.2 Water by Land Use

### Unmitigated

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Low Rise | 1.62885 / 1.02688 | 10.9095 | 0.0535 | 1.3400e-003 | 12.6471 |
| Apartments Mid Rise | 63.5252 / 40.0485 | 425.4719 | 2.0867 | 0.0523 | 493.2363 |
| General Office Building | 7.99802 / 4.90201 | 53.0719 | 0.2627 | 6.5900e-003 | 61.6019 |
| High Turnover (Sit Down Restaurant) | 10.9272 / 0.697482 | 51.2702 | 0.3580 | 8.8200e-003 | 62.8482 |
| Hotel | 1.26834 / 0.140927 | 6.1633 | 0.0416 | 1.0300e-003 | 7.5079 |
| Quality Restaurant | 2.42827 / 0.154996 | 11.3934 | 0.0796 | 1.9600e-003 | 13.9663 |
| Regional Shopping Center | 4.14806 / 2.54236 | 27.5250 | 0.1363 | 3.4200e-003 | 31.9490 |
| **Total** | | **585.8052** | **3.0183** | **0.0755** | **683.7567** |

## 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Low Rise | 1.62885 / 1.02688 | 10.9095 | 0.0535 | 1.3400e-003 | 12.6471 |
| Apartments Mid Rise | 63.5252 / 40.0485 | 425.4719 | 2.0867 | 0.0523 | 493.2363 |
| General Office Building | 7.99802 / 4.90201 | 53.0719 | 0.2627 | 6.5900e-003 | 61.6019 |
| High Turnover (Sit Down Restaurant) | 10.9272 / 0.697482 | 51.2702 | 0.3580 | 8.8200e-003 | 62.8482 |
| Hotel | 1.26834 / 0.140927 | 6.1633 | 0.0416 | 1.0300e-003 | 7.5079 |
| Quality Restaurant | 2.42827 / 0.154996 | 11.3934 | 0.0796 | 1.9600e-003 | 13.9663 |
| Regional Shopping Center | 4.14806 / 2.54236 | 27.5250 | 0.1363 | 3.4200e-003 | 31.9490 |
| **Total** | | **585.8052** | **3.0183** | **0.0755** | **683.7567** |

# 8.0 Waste Detail

## 8.1 Mitigation Measures Waste

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 207.8079 | 12.2811 | 0.0000 | 514.8354 |
| Unmitigated | 207.8079 | 12.2811 | 0.0000 | 514.8354 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Low Rise | 11.5 | 2.3344 | 0.1380 | 0.0000 | 5.7834 |
| Apartments Mid Rise | 448.5 | 91.0415 | 5.3804 | 0.0000 | 225.5513 |
| General Office Building | 41.85 | 8.4952 | 0.5021 | 0.0000 | 21.0464 |
| High Turnover (Sit Down Restaurant) | 428.4 | 86.9613 | 5.1393 | 0.0000 | 215.4430 |
| Hotel | 27.38 | 5.5579 | 0.3285 | 0.0000 | 13.7694 |
| Quality Restaurant | 7.3 | 1.4818 | 0.0876 | 0.0000 | 3.6712 |
| Regional Shopping Center | 58.8 | 11.9359 | 0.7054 | 0.0000 | 29.5706 |
| **Total** | | **207.8079** | **12.2811** | **0.0000** | **514.8354** |

## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Low Rise | 11.5 | 2.3344 | 0.1380 | 0.0000 | 5.7834 |
| Apartments Mid Rise | 448.5 | 91.0415 | 5.3804 | 0.0000 | 225.5513 |
| General Office Building | 41.85 | 8.4952 | 0.5021 | 0.0000 | 21.0464 |
| High Turnover (Sit Down Restaurant) | 428.4 | 86.9613 | 5.1393 | 0.0000 | 215.4430 |
| Hotel | 27.38 | 5.5579 | 0.3285 | 0.0000 | 13.7694 |
| Quality Restaurant | 7.3 | 1.4818 | 0.0876 | 0.0000 | 3.6712 |
| Regional Shopping Center | 58.8 | 11.9359 | 0.7054 | 0.0000 | 29.5706 |
| **Total** | | **207.8079** | **12.2811** | **0.0000** | **514.8354** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

# Village South Specific Plan (Proposed)

**Los Angeles-South Coast County, Summer**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| General Office Building | 45.00 | 1000sqft | 1.03 | 45,000.00 | 0 |
| High Turnover (Sit Down Restaurant) | 36.00 | 1000sqft | 0.83 | 36,000.00 | 0 |
| Hotel | 50.00 | Room | 1.67 | 72,600.00 | 0 |
| Quality Restaurant | 8.00 | 1000sqft | 0.18 | 8,000.00 | 0 |
| Apartments Low Rise | 25.00 | Dwelling Unit | 1.56 | 25,000.00 | 72 |
| Apartments Mid Rise | 975.00 | Dwelling Unit | 25.66 | 975,000.00 | 2789 |
| Regional Shopping Center | 56.00 | 1000sqft | 1.29 | 56,000.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 9 | | | **Operational Year** | 2028 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 702.44 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | NumberWood | 1.25 | 0.00 |
| tblFireplaces | NumberWood | 48.75 | 0.00 |
| tblVehicleTrips | ST_TR | 7.16 | 6.17 |
| tblVehicleTrips | ST_TR | 6.39 | 3.87 |
| tblVehicleTrips | ST_TR | 2.46 | 1.39 |
| tblVehicleTrips | ST_TR | 158.37 | 79.82 |
| tblVehicleTrips | ST_TR | 8.19 | 3.75 |
| tblVehicleTrips | ST_TR | 94.36 | 63.99 |
| tblVehicleTrips | ST_TR | 49.97 | 10.74 |
| tblVehicleTrips | SU_TR | 6.07 | 6.16 |
| tblVehicleTrips | SU_TR | 5.86 | 4.18 |
| tblVehicleTrips | SU_TR | 1.05 | 0.69 |
| tblVehicleTrips | SU_TR | 131.84 | 78.27 |

| | | | |
|---|---|---|---|
| tblVehicleTrips | SU_TR | 5.95 | 3.20 |
| tblVehicleTrips | SU_TR | 72.16 | 57.65 |
| tblVehicleTrips | SU_TR | 25.24 | 6.39 |
| tblVehicleTrips | WD_TR | 6.59 | 5.83 |
| tblVehicleTrips | WD_TR | 6.65 | 4.13 |
| tblVehicleTrips | WD_TR | 11.03 | 6.41 |
| tblVehicleTrips | WD_TR | 127.15 | 65.80 |
| tblVehicleTrips | WD_TR | 8.17 | 3.84 |
| tblVehicleTrips | WD_TR | 89.95 | 62.64 |
| tblVehicleTrips | WD_TR | 42.70 | 9.43 |
| tblWoodstoves | NumberCatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberCatalytic | 48.75 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 48.75 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |

## 2.0 Emissions Summary

## 2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2021 | 4.2769 | 46.4588 | 31.6840 | 0.0643 | 18.2675 | 2.0461 | 20.3135 | 9.9840 | 1.8824 | 11.8664 | 0.0000 | 6,234.7974 | 6,234.7974 | 1.9495 | 0.0000 | 6,283.5352 |
| 2022 | 5.3304 | 38.8967 | 49.5629 | 0.1517 | 9.8688 | 1.6366 | 10.7727 | 3.6558 | 1.5057 | 5.1615 | 0.0000 | 15,251.5674 | 15,251.5674 | 1.9503 | 0.0000 | 15,278.5288 |
| 2023 | 4.8957 | 26.3317 | 46.7567 | 0.1472 | 9.8688 | 0.7794 | 10.6482 | 2.6381 | 0.7322 | 3.3702 | 0.0000 | 14,807.5269 | 14,807.5269 | 1.0250 | 0.0000 | 14,833.1521 |
| 2024 | 237.1630 | 9.5575 | 15.1043 | 0.0244 | 1.7884 | 0.4698 | 1.8628 | 0.4743 | 0.4322 | 0.5476 | 0.0000 | 2,361.3989 | 2,361.3989 | 0.7177 | 0.0000 | 2,379.3421 |
| **Maximum** | **237.1630** | **46.4588** | **49.5629** | **0.1517** | **18.2675** | **2.0461** | **20.3135** | **9.9840** | **1.8824** | **11.8664** | **0.0000** | **15,251.5674** | **15,251.5674** | **1.9503** | **0.0000** | **15,278.5288** |

## 2.1 Overall Construction (Maximum Daily Emission)

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2021 | 4.2769 | 46.4588 | 31.6840 | 0.0643 | 18.2675 | 2.0461 | 20.3135 | 9.9840 | 1.8824 | 11.8664 | 0.0000 | 6,234.7974 | 6,234.7974 | 1.9495 | 0.0000 | 6,283.5352 |
| 2022 | 5.3304 | 38.8967 | 49.5629 | 0.1517 | 9.8688 | 1.6366 | 10.7727 | 3.6558 | 1.5057 | 5.1615 | 0.0000 | 15,251.5674 | 15,251.5674 | 1.9503 | 0.0000 | 15,278.5288 |
| 2023 | 4.8957 | 26.3317 | 46.7567 | 0.1472 | 9.8688 | 0.7794 | 10.6482 | 2.6381 | 0.7322 | 3.3702 | 0.0000 | 14,807.5269 | 14,807.5269 | 1.0250 | 0.0000 | 14,833.1520 |
| 2024 | 237.1630 | 9.5575 | 15.1043 | 0.0244 | 1.7884 | 0.4698 | 1.8628 | 0.4743 | 0.4322 | 0.5476 | 0.0000 | 2,361.3989 | 2,361.3989 | 0.7177 | 0.0000 | 2,379.3421 |
| **Maximum** | **237.1630** | **46.4588** | **49.5629** | **0.1517** | **18.2675** | **2.0461** | **20.3135** | **9.9840** | **1.8824** | **11.8664** | **0.0000** | **15,251.5674** | **15,251.5674** | **1.9503** | **0.0000** | **15,278.5288** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Energy | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| Mobile | 9.8489 | 45.4304 | 114.8495 | 0.4917 | 45.9592 | 0.3360 | 46.2951 | 12.2950 | 0.3119 | 12.6070 | | 50,306.6034 | 50,306.6034 | 2.1807 | | 50,361.1208 |
| **Total** | **41.1168** | **67.2262** | **207.5497** | **0.6278** | **45.9592** | **2.4626** | **48.4217** | **12.2950** | **2.4385** | **14.7336** | **0.0000** | **76,811.1816** | **76,811.1816** | **2.8282** | **0.4832** | **77,025.8786** |

### Mitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Energy | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| Mobile | 9.8489 | 45.4304 | 114.8495 | 0.4917 | 45.9592 | 0.3360 | 46.2951 | 12.2950 | 0.3119 | 12.6070 | | 50,306.6034 | 50,306.6034 | 2.1807 | | 50,361.1208 |
| **Total** | **41.1168** | **67.2262** | **207.5497** | **0.6278** | **45.9592** | **2.4626** | **48.4217** | **12.2950** | **2.4385** | **14.7336** | **0.0000** | **76,811.1816** | **76,811.1816** | **2.8282** | **0.4832** | **77,025.8786** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 9/1/2021 | 10/12/2021 | 5 | 30 | |
| 2 | Site Preparation | Site Preparation | 10/13/2021 | 11/9/2021 | 5 | 20 | |
| 3 | Grading | Grading | 11/10/2021 | 1/11/2022 | 5 | 45 | |
| 4 | Building Construction | Building Construction | 1/12/2022 | 12/12/2023 | 5 | 500 | |
| 5 | Paving | Paving | 12/13/2023 | 1/30/2024 | 5 | 35 | |
| 6 | Architectural Coating | Architectural Coating | 1/31/2024 | 3/19/2024 | 5 | 35 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 112.5**

**Acres of Paving: 0**

**Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 458.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 801.00 | 143.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 160.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 3.3074 | 0.0000 | 3.3074 | 0.5008 | 0.0000 | 0.5008 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1651 | 31.4407 | 21.5650 | 0.0388 | | 1.5513 | 1.5513 | | 1.4411 | 1.4411 | | 3,747.9449 | 3,747.9449 | 1.0549 | | 3,774.3174 |
| **Total** | **3.1651** | **31.4407** | **21.5650** | **0.0388** | **3.3074** | **1.5513** | **4.8588** | **0.5008** | **1.4411** | **1.9419** | | **3,747.9449** | **3,747.9449** | **1.0549** | | **3,774.3174** |

## 3.2 Demolition - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.1273 | 4.0952 | 0.9602 | 0.0119 | 0.2669 | 0.0126 | 0.2795 | 0.0732 | 0.0120 | 0.0852 | | 1,292.2413 | 1,292.2413 | 0.0877 | | 1,294.4337 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0643 | 0.0442 | 0.6042 | 1.7100e-003 | 0.1677 | 1.3500e-003 | 0.1690 | 0.0445 | 1.2500e-003 | 0.0457 | | 170.8155 | 170.8155 | 5.0300e-003 | | 170.9413 |
| **Total** | **0.1916** | **4.1394** | **1.5644** | **0.0136** | **0.4346** | **0.0139** | **0.4485** | **0.1176** | **0.0133** | **0.1309** | | **1,463.0568** | **1,463.0568** | **0.0927** | | **1,465.3750** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 3.3074 | 0.0000 | 3.3074 | 0.5008 | 0.0000 | 0.5008 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1651 | 31.4407 | 21.5650 | 0.0388 | | 1.5513 | 1.5513 | | 1.4411 | 1.4411 | 0.0000 | 3,747.9449 | 3,747.9449 | 1.0549 | | 3,774.3174 |
| **Total** | **3.1651** | **31.4407** | **21.5650** | **0.0388** | **3.3074** | **1.5513** | **4.8588** | **0.5008** | **1.4411** | **1.9419** | **0.0000** | **3,747.9449** | **3,747.9449** | **1.0549** | | **3,774.3174** |

## 3.2 Demolition - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.1273 | 4.0952 | 0.9602 | 0.0119 | 0.2669 | 0.0126 | 0.2795 | 0.0732 | 0.0120 | 0.0852 | | 1,292.2413 | 1,292.2413 | 0.0877 | | 1,294.4337 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0643 | 0.0442 | 0.6042 | 1.7100e-003 | 0.1677 | 1.3500e-003 | 0.1690 | 0.0445 | 1.2500e-003 | 0.0457 | | 170.8155 | 170.8155 | 5.0300e-003 | | 170.9413 |
| **Total** | **0.1916** | **4.1394** | **1.5644** | **0.0136** | **0.4346** | **0.0139** | **0.4485** | **0.1176** | **0.0133** | **0.1309** | | **1,463.0568** | **1,463.0568** | **0.0927** | | **1,465.3750** |

## 3.3 Site Preparation - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.8882 | 40.4971 | 21.1543 | 0.0380 | | 2.0445 | 2.0445 | | 1.8809 | 1.8809 | | 3,685.6569 | 3,685.6569 | 1.1920 | | 3,715.4573 |
| **Total** | **3.8882** | **40.4971** | **21.1543** | **0.0380** | **18.0663** | **2.0445** | **20.1107** | **9.9307** | **1.8809** | **11.8116** | | **3,685.6569** | **3,685.6569** | **1.1920** | | **3,715.4573** |

## 3.3 Site Preparation - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0772 | 0.0530 | 0.7250 | 2.0600e-003 | 0.2012 | 1.6300e-003 | 0.2028 | 0.0534 | 1.5000e-003 | 0.0549 | | 204.9786 | 204.9786 | 6.0400e-003 | | 205.1296 |
| **Total** | **0.0772** | **0.0530** | **0.7250** | **2.0600e-003** | **0.2012** | **1.6300e-003** | **0.2028** | **0.0534** | **1.5000e-003** | **0.0549** | | **204.9786** | **204.9786** | **6.0400e-003** | | **205.1296** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.8882 | 40.4971 | 21.1543 | 0.0380 | | 2.0445 | 2.0445 | | 1.8809 | 1.8809 | 0.0000 | 3,685.6569 | 3,685.6569 | 1.1920 | | 3,715.4573 |
| **Total** | **3.8882** | **40.4971** | **21.1543** | **0.0380** | **18.0663** | **2.0445** | **20.1107** | **9.9307** | **1.8809** | **11.8116** | **0.0000** | **3,685.6569** | **3,685.6569** | **1.1920** | | **3,715.4573** |

## 3.3 Site Preparation - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0772 | 0.0530 | 0.7250 | 2.0600e-003 | 0.2012 | 1.6300e-003 | 0.2028 | 0.0534 | 1.5000e-003 | 0.0549 | | 204.9786 | 204.9786 | 6.0400e-003 | | 205.1296 |
| **Total** | **0.0772** | **0.0530** | **0.7250** | **2.0600e-003** | **0.2012** | **1.6300e-003** | **0.2028** | **0.0534** | **1.5000e-003** | **0.0549** | | **204.9786** | **204.9786** | **6.0400e-003** | | **205.1296** |

## 3.4 Grading - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.1912 | 46.3998 | 30.8785 | 0.0620 | | 1.9853 | 1.9853 | | 1.8265 | 1.8265 | | 6,007.0434 | 6,007.0434 | 1.9428 | | 6,055.6134 |
| **Total** | **4.1912** | **46.3998** | **30.8785** | **0.0620** | **8.6733** | **1.9853** | **10.6587** | **3.5965** | **1.8265** | **5.4230** | | **6,007.0434** | **6,007.0434** | **1.9428** | | **6,055.6134** |

## 3.4 Grading - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0857 | 0.0589 | 0.8056 | 2.2900e-003 | 0.2236 | 1.8100e-003 | 0.2254 | 0.0593 | 1.6600e-003 | 0.0610 | | 227.7540 | 227.7540 | 6.7100e-003 | | 227.9217 |
| **Total** | **0.0857** | **0.0589** | **0.8056** | **2.2900e-003** | **0.2236** | **1.8100e-003** | **0.2254** | **0.0593** | **1.6600e-003** | **0.0610** | | **227.7540** | **227.7540** | **6.7100e-003** | | **227.9217** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.1912 | 46.3998 | 30.8785 | 0.0620 | | 1.9853 | 1.9853 | | 1.8265 | 1.8265 | 0.0000 | 6,007.0434 | 6,007.0434 | 1.9428 | | 6,055.6134 |
| **Total** | **4.1912** | **46.3998** | **30.8785** | **0.0620** | **8.6733** | **1.9853** | **10.6587** | **3.5965** | **1.8265** | **5.4230** | **0.0000** | **6,007.0434** | **6,007.0434** | **1.9428** | | **6,055.6134** |

## 3.4 Grading - 2021

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0857 | 0.0589 | 0.8056 | 2.2900e-003 | 0.2236 | 1.8100e-003 | 0.2254 | 0.0593 | 1.6600e-003 | 0.0610 | | 227.7540 | 227.7540 | 6.7100e-003 | | 227.9217 |
| **Total** | **0.0857** | **0.0589** | **0.8056** | **2.2900e-003** | **0.2236** | **1.8100e-003** | **0.2254** | **0.0593** | **1.6600e-003** | **0.0610** | | **227.7540** | **227.7540** | **6.7100e-003** | | **227.9217** |

## 3.4 Grading - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **8.6733** | **1.6349** | **10.3082** | **3.5965** | **1.5041** | **5.1006** | | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

## 3.4 Grading - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0803 | 0.0532 | 0.7432 | 2.2100e-003 | 0.2236 | 1.7500e-003 | 0.2253 | 0.0593 | 1.6100e-003 | 0.0609 | | 219.7425 | 219.7425 | 6.0600e-003 | | 219.8941 |
| **Total** | **0.0803** | **0.0532** | **0.7432** | **2.2100e-003** | **0.2236** | **1.7500e-003** | **0.2253** | **0.0593** | **1.6100e-003** | **0.0609** | | **219.7425** | **219.7425** | **6.0600e-003** | | **219.8941** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | 0.0000 | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **8.6733** | **1.6349** | **10.3082** | **3.5965** | **1.5041** | **5.1006** | **0.0000** | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

## 3.4 Grading - 2022

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0803 | 0.0532 | 0.7432 | 2.2100e-003 | 0.2236 | 1.7500e-003 | 0.2253 | 0.0593 | 1.6100e-003 | 0.0609 | | 219.7425 | 219.7425 | 6.0600e-003 | | 219.8941 |
| **Total** | **0.0803** | **0.0532** | **0.7432** | **2.2100e-003** | **0.2236** | **1.7500e-003** | **0.2253** | **0.0593** | **1.6100e-003** | **0.0609** | | **219.7425** | **219.7425** | **6.0600e-003** | | **219.8941** |

## 3.5 Building Construction - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

## 3.5 Building Construction - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.4079 | 13.2032 | 3.4341 | 0.0364 | 0.9155 | 0.0248 | 0.9404 | 0.2636 | 0.0237 | 0.2873 | | 3,896.5482 | 3,896.5482 | 0.2236 | | 3,902.1384 |
| Worker | 3.2162 | 2.1318 | 29.7654 | 0.0883 | 8.9533 | 0.0701 | 9.0234 | 2.3745 | 0.0646 | 2.4390 | | 8,800.6857 | 8,800.6857 | 0.2429 | | 8,806.7582 |
| **Total** | **3.6242** | **15.3350** | **33.1995** | **0.1247** | **9.8688** | **0.0949** | **9.9637** | **2.6381** | **0.0883** | **2.7263** | | **12,697.2339** | **12,697.2339** | **0.4665** | | **12,708.8966** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | 0.0000 | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | **0.0000** | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

## 3.5 Building Construction - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.4079 | 13.2032 | 3.4341 | 0.0364 | 0.9155 | 0.0248 | 0.9404 | 0.2636 | 0.0237 | 0.2873 | | 3,896.5482 | 3,896.5482 | 0.2236 | | 3,902.1384 |
| Worker | 3.2162 | 2.1318 | 29.7654 | 0.0883 | 8.9533 | 0.0701 | 9.0234 | 2.3745 | 0.0646 | 2.4390 | | 8,800.6857 | 8,800.6857 | 0.2429 | | 8,806.7582 |
| **Total** | **3.6242** | **15.3350** | **33.1995** | **0.1247** | **9.8688** | **0.0949** | **9.9637** | **2.6381** | **0.0883** | **2.7263** | | **12,697.2339** | **12,697.2339** | **0.4665** | | **12,708.8966** |

## 3.5 Building Construction - 2023

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.5728 | 14.3849 | 16.2440 | 0.0269 | | 0.6997 | 0.6997 | | 0.6584 | 0.6584 | | 2,555.2099 | 2,555.2099 | 0.6079 | | 2,570.4061 |
| **Total** | **1.5728** | **14.3849** | **16.2440** | **0.0269** | | **0.6997** | **0.6997** | | **0.6584** | **0.6584** | | **2,555.2099** | **2,555.2099** | **0.6079** | | **2,570.4061** |

## 3.5 Building Construction - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.3027 | 10.0181 | 3.1014 | 0.0352 | 0.9156 | 0.0116 | 0.9271 | 0.2636 | 0.0111 | 0.2747 | | 3,773.8762 | 3,773.8762 | 0.1982 | | 3,778.8300 |
| Worker | 3.0203 | 1.9287 | 27.4113 | 0.0851 | 8.9533 | 0.0681 | 9.0214 | 2.3745 | 0.0627 | 2.4372 | | 8,478.4408 | 8,478.4408 | 0.2190 | | 8,483.9160 |
| **Total** | **3.3229** | **11.9468** | **30.5127** | **0.1203** | **9.8688** | **0.0797** | **9.9485** | **2.6381** | **0.0738** | **2.7118** | | **12,252.3170** | **12,252.3170** | **0.4172** | | **12,262.7460** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.5728 | 14.3849 | 16.2440 | 0.0269 | | 0.6997 | 0.6997 | | 0.6584 | 0.6584 | 0.0000 | 2,555.2099 | 2,555.2099 | 0.6079 | | 2,570.4061 |
| **Total** | **1.5728** | **14.3849** | **16.2440** | **0.0269** | | **0.6997** | **0.6997** | | **0.6584** | **0.6584** | **0.0000** | **2,555.2099** | **2,555.2099** | **0.6079** | | **2,570.4061** |

## 3.5 Building Construction - 2023

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.3027 | 10.0181 | 3.1014 | 0.0352 | 0.9156 | 0.0116 | 0.9271 | 0.2636 | 0.0111 | 0.2747 | | 3,773.8762 | 3,773.8762 | 0.1982 | | 3,778.8300 |
| Worker | 3.0203 | 1.9287 | 27.4113 | 0.0851 | 8.9533 | 0.0681 | 9.0214 | 2.3745 | 0.0627 | 2.4372 | | 8,478.4408 | 8,478.4408 | 0.2190 | | 8,483.9160 |
| **Total** | **3.3229** | **11.9468** | **30.5127** | **0.1203** | **9.8688** | **0.0797** | **9.9485** | **2.6381** | **0.0738** | **2.7118** | | **12,252.3170** | **12,252.3170** | **0.4172** | | **12,262.7460** |

## 3.6 Paving - 2023

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.0327 | 10.1917 | 14.5842 | 0.0228 | | 0.5102 | 0.5102 | | 0.4694 | 0.4694 | | 2,207.5841 | 2,207.5841 | 0.7140 | | 2,225.4336 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.0327** | **10.1917** | **14.5842** | **0.0228** | | **0.5102** | **0.5102** | | **0.4694** | **0.4694** | | **2,207.5841** | **2,207.5841** | **0.7140** | | **2,225.4336** |

## 3.6 Paving - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0566 | 0.0361 | 0.5133 | 1.5900e-003 | 0.1677 | 1.2800e-003 | 0.1689 | 0.0445 | 1.1700e-003 | 0.0456 | | 158.7723 | 158.7723 | 4.1000e-003 | | 158.8748 |
| **Total** | **0.0566** | **0.0361** | **0.5133** | **1.5900e-003** | **0.1677** | **1.2800e-003** | **0.1689** | **0.0445** | **1.1700e-003** | **0.0456** | | **158.7723** | **158.7723** | **4.1000e-003** | | **158.8748** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.0327 | 10.1917 | 14.5842 | 0.0228 | | 0.5102 | 0.5102 | | 0.4694 | 0.4694 | 0.0000 | 2,207.5841 | 2,207.5841 | 0.7140 | | 2,225.4336 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.0327** | **10.1917** | **14.5842** | **0.0228** | | **0.5102** | **0.5102** | | **0.4694** | **0.4694** | **0.0000** | **2,207.5841** | **2,207.5841** | **0.7140** | | **2,225.4336** |

## 3.6 Paving - 2023

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0566 | 0.0361 | 0.5133 | 1.5900e-003 | 0.1677 | 1.2800e-003 | 0.1689 | 0.0445 | 1.1700e-003 | 0.0456 | | 158.7723 | 158.7723 | 4.1000e-003 | | 158.8748 |
| **Total** | **0.0566** | **0.0361** | **0.5133** | **1.5900e-003** | **0.1677** | **1.2800e-003** | **0.1689** | **0.0445** | **1.1700e-003** | **0.0456** | | **158.7723** | **158.7723** | **4.1000e-003** | | **158.8748** |

## 3.6 Paving - 2024

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.9882 | 9.5246 | 14.6258 | 0.0228 | | 0.4685 | 0.4685 | | 0.4310 | 0.4310 | | 2,207.5472 | 2,207.5472 | 0.7140 | | 2,225.3963 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.9882** | **9.5246** | **14.6258** | **0.0228** | | **0.4685** | **0.4685** | | **0.4310** | **0.4310** | | **2,207.5472** | **2,207.5472** | **0.7140** | | **2,225.3963** |

## 3.6 Paving - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0535 | 0.0329 | 0.4785 | 1.5400e-003 | 0.1677 | 1.2600e-003 | 0.1689 | 0.0445 | 1.1600e-003 | 0.0456 | | 153.8517 | 153.8517 | 3.7600e-003 | | 153.9458 |
| **Total** | **0.0535** | **0.0329** | **0.4785** | **1.5400e-003** | **0.1677** | **1.2600e-003** | **0.1689** | **0.0445** | **1.1600e-003** | **0.0456** | | **153.8517** | **153.8517** | **3.7600e-003** | | **153.9458** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.9882 | 9.5246 | 14.6258 | 0.0228 | | 0.4685 | 0.4685 | | 0.4310 | 0.4310 | 0.0000 | 2,207.5472 | 2,207.5472 | 0.7140 | | 2,225.3963 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.9882** | **9.5246** | **14.6258** | **0.0228** | | **0.4685** | **0.4685** | | **0.4310** | **0.4310** | **0.0000** | **2,207.5472** | **2,207.5472** | **0.7140** | | **2,225.3963** |

## 3.6 Paving - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0535 | 0.0329 | 0.4785 | 1.5400e-003 | 0.1677 | 1.2600e-003 | 0.1689 | 0.0445 | 1.1600e-003 | 0.0456 | | 153.8517 | 153.8517 | 3.7600e-003 | | 153.9458 |
| **Total** | **0.0535** | **0.0329** | **0.4785** | **1.5400e-003** | **0.1677** | **1.2600e-003** | **0.1689** | **0.0445** | **1.1600e-003** | **0.0456** | | **153.8517** | **153.8517** | **3.7600e-003** | | **153.9458** |

## 3.7 Architectural Coating - 2024

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 236.4115 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.1808 | 1.2188 | 1.8101 | 2.9700e-003 | | 0.0609 | 0.0609 | | 0.0609 | 0.0609 | | 281.4481 | 281.4481 | 0.0159 | | 281.8443 |
| **Total** | **236.5923** | **1.2188** | **1.8101** | **2.9700e-003** | | **0.0609** | **0.0609** | | **0.0609** | **0.0609** | | **281.4481** | **281.4481** | **0.0159** | | **281.8443** |

## 3.7 Architectural Coating - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.5707 | 0.3513 | 5.1044 | 0.0165 | 1.7884 | 0.0134 | 1.8018 | 0.4743 | 0.0123 | 0.4866 | | 1,641.0852 | 1,641.0852 | 0.0401 | | 1,642.0886 |
| **Total** | **0.5707** | **0.3513** | **5.1044** | **0.0165** | **1.7884** | **0.0134** | **1.8018** | **0.4743** | **0.0123** | **0.4866** | | **1,641.0852** | **1,641.0852** | **0.0401** | | **1,642.0886** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 236.4115 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.1808 | 1.2188 | 1.8101 | 2.9700e-003 | | 0.0609 | 0.0609 | | 0.0609 | 0.0609 | 0.0000 | 281.4481 | 281.4481 | 0.0159 | | 281.8443 |
| **Total** | **236.5923** | **1.2188** | **1.8101** | **2.9700e-003** | | **0.0609** | **0.0609** | | **0.0609** | **0.0609** | **0.0000** | **281.4481** | **281.4481** | **0.0159** | | **281.8443** |

### 3.7 Architectural Coating - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.5707 | 0.3513 | 5.1044 | 0.0165 | 1.7884 | 0.0134 | 1.8018 | 0.4743 | 0.0123 | 0.4866 | | 1,641.0852 | 1,641.0852 | 0.0401 | | 1,642.0886 |
| **Total** | **0.5707** | **0.3513** | **5.1044** | **0.0165** | **1.7884** | **0.0134** | **1.8018** | **0.4743** | **0.0123** | **0.4866** | | **1,641.0852** | **1,641.0852** | **0.0401** | | **1,642.0886** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 9.8489 | 45.4304 | 114.8495 | 0.4917 | 45.9592 | 0.3360 | 46.2951 | 12.2950 | 0.3119 | 12.6070 | | 50,306.6034 | 50,306.6034 | 2.1807 | | 50,361.1208 |
| Unmitigated | 9.8489 | 45.4304 | 114.8495 | 0.4917 | 45.9592 | 0.3360 | 46.2951 | 12.2950 | 0.3119 | 12.6070 | | 50,306.6034 | 50,306.6034 | 2.1807 | | 50,361.1208 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 145.75 | 154.25 | 154.00 | 506,227 | 506,227 |
| Apartments Mid Rise | 4,026.75 | 3,773.25 | 4075.50 | 13,660,065 | 13,660,065 |
| General Office Building | 288.45 | 62.55 | 31.05 | 706,812 | 706,812 |
| High Turnover (Sit Down Restaurant) | 2,368.80 | 2,873.52 | 2817.72 | 3,413,937 | 3,413,937 |
| Hotel | 192.00 | 187.50 | 160.00 | 445,703 | 445,703 |
| Quality Restaurant | 501.12 | 511.92 | 461.20 | 707,488 | 707,488 |
| Regional Shopping Center | 528.08 | 601.44 | 357.84 | 1,112,221 | 1,112,221 |
| Total | 8,050.95 | 8,164.43 | 8,057.31 | 20,552,452 | 20,552,452 |

## 4.3 Trip Type Information

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| General Office Building | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 77 | 19 | 4 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Hotel | 16.60 | 8.40 | 6.90 | 19.40 | 61.60 | 19.00 | 58 | 38 | 4 |
| Quality Restaurant | 16.60 | 8.40 | 6.90 | 12.00 | 69.00 | 19.00 | 38 | 18 | 44 |
| Regional Shopping Center | 16.60 | 8.40 | 6.90 | 16.30 | 64.70 | 19.00 | 54 | 35 | 11 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Apartments Mid Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| General Office Building | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| High Turnover (Sit Down Restaurant) | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Hotel | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Quality Restaurant | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Regional Shopping Center | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| NaturalGas Mitigated | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| NaturalGas Unmitigated | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 1119.16 | 0.0121 | 0.1031 | 0.0439 | 6.6000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | | 131.6662 | 131.6662 | 2.5200e-003 | 2.4100e-003 | 132.4486 |
| Apartments Mid Rise | 35784.3 | 0.3859 | 3.2978 | 1.4033 | 0.0211 | | 0.2666 | 0.2666 | | 0.2666 | 0.2666 | | 4,209.9164 | 4,209.9164 | 0.0807 | 0.0772 | 4,234.9339 |
| General Office Building | 1283.42 | 0.0138 | 0.1258 | 0.1057 | 7.5000e-004 | | 9.5600e-003 | 9.5600e-003 | | 9.5600e-003 | 9.5600e-003 | | 150.9911 | 150.9911 | 2.8900e-003 | 2.7700e-003 | 151.8884 |
| High Turnover (Sit Down Restaurant) | 22759.9 | 0.2455 | 2.2314 | 1.8743 | 0.0134 | | 0.1696 | 0.1696 | | 0.1696 | 0.1696 | | 2,677.6342 | 2,677.6342 | 0.0513 | 0.0491 | 2,693.5460 |
| Hotel | 4769.72 | 0.0514 | 0.4676 | 0.3928 | 2.8100e-003 | | 0.0355 | 0.0355 | | 0.0355 | 0.0355 | | 561.1436 | 561.1436 | 0.0108 | 0.0103 | 564.4782 |
| Quality Restaurant | 5057.75 | 0.0545 | 0.4959 | 0.4165 | 2.9800e-003 | | 0.0377 | 0.0377 | | 0.0377 | 0.0377 | | 595.0298 | 595.0298 | 0.0114 | 0.0109 | 598.5658 |
| Regional Shopping Center | 251.616 | 2.7100e-003 | 0.0247 | 0.0207 | 1.5000e-004 | | 1.8700e-003 | 1.8700e-003 | | 1.8700e-003 | 1.8700e-003 | | 29.6019 | 29.6019 | 5.7000e-004 | 5.4000e-004 | 29.7778 |
| **Total** | | **0.7660** | **6.7463** | **4.2573** | **0.0418** | | **0.5292** | **0.5292** | | **0.5292** | **0.5292** | | **8,355.9832** | **8,355.9832** | **0.1602** | **0.1532** | **8,405.6387** |

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 1.11916 | 0.0121 | 0.1031 | 0.0439 | 6.6000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | | 131.6662 | 131.6662 | 2.5200e-003 | 2.4100e-003 | 132.4486 |
| Apartments Mid Rise | 35.7843 | 0.3859 | 3.2978 | 1.4033 | 0.0211 | | 0.2666 | 0.2666 | | 0.2666 | 0.2666 | | 4,209.9164 | 4,209.9164 | 0.0807 | 0.0772 | 4,234.9339 |
| General Office Building | 1.28342 | 0.0138 | 0.1258 | 0.1057 | 7.5000e-004 | | 9.5600e-003 | 9.5600e-003 | | 9.5600e-003 | 9.5600e-003 | | 150.9911 | 150.9911 | 2.8900e-003 | 2.7700e-003 | 151.8884 |
| High Turnover (Sit Down Restaurant) | 22.7599 | 0.2455 | 2.2314 | 1.8743 | 0.0134 | | 0.1696 | 0.1696 | | 0.1696 | 0.1696 | | 2,677.6342 | 2,677.6342 | 0.0513 | 0.0491 | 2,693.5460 |
| Hotel | 4.76972 | 0.0514 | 0.4676 | 0.3928 | 2.8100e-003 | | 0.0355 | 0.0355 | | 0.0355 | 0.0355 | | 561.1436 | 561.1436 | 0.0108 | 0.0103 | 564.4782 |
| Quality Restaurant | 5.05775 | 0.0545 | 0.4959 | 0.4165 | 2.9800e-003 | | 0.0377 | 0.0377 | | 0.0377 | 0.0377 | | 595.0298 | 595.0298 | 0.0114 | 0.0109 | 598.5658 |
| Regional Shopping Center | 0.251616 | 2.7100e-003 | 0.0247 | 0.0207 | 1.5000e-004 | | 1.8700e-003 | 1.8700e-003 | | 1.8700e-003 | 1.8700e-003 | | 29.6019 | 29.6019 | 5.7000e-004 | 5.4000e-004 | 29.7778 |
| **Total** | | **0.7660** | **6.7463** | **4.2573** | **0.0418** | | **0.5292** | **0.5292** | | **0.5292** | **0.5292** | | **8,355.9832** | **8,355.9832** | **0.1602** | **0.1532** | **8,405.6387** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Unmitigated | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 2.2670 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 24.1085 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 1.6500 | 14.1000 | 6.0000 | 0.0900 | | 1.1400 | 1.1400 | | 1.1400 | 1.1400 | 0.0000 | 18,000.0000 | 18,000.0000 | 0.3450 | 0.3300 | 18,106.9650 |
| Landscaping | 2.4766 | 0.9496 | 82.4430 | 4.3600e-003 | | 0.4574 | 0.4574 | | 0.4574 | 0.4574 | | 148.5950 | 148.5950 | 0.1424 | | 152.1542 |
| **Total** | **30.5020** | **15.0496** | **88.4430** | **0.0944** | | **1.5974** | **1.5974** | | **1.5974** | **1.5974** | **0.0000** | **18,148.5950** | **18,148.5950** | **0.4874** | **0.3300** | **18,259.1192** |

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 2.2670 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 24.1085 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 1.6500 | 14.1000 | 6.0000 | 0.0900 | | 1.1400 | 1.1400 | | 1.1400 | 1.1400 | 0.0000 | 18,000.0000 | 18,000.0000 | 0.3450 | 0.3300 | 18,106.9650 |
| Landscaping | 2.4766 | 0.9496 | 82.4430 | 4.3600e-003 | | 0.4574 | 0.4574 | | 0.4574 | 0.4574 | | 148.5950 | 148.5950 | 0.1424 | | 152.1542 |
| **Total** | **30.5020** | **15.0496** | **88.4430** | **0.0944** | | **1.5974** | **1.5974** | | **1.5974** | **1.5974** | **0.0000** | **18,148.5950** | **18,148.5950** | **0.4874** | **0.3300** | **18,259.1192** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

# Village South Specific Plan (Proposed)

**Los Angeles-South Coast County, Winter**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| General Office Building | 45.00 | 1000sqft | 1.03 | 45,000.00 | 0 |
| High Turnover (Sit Down Restaurant) | 36.00 | 1000sqft | 0.83 | 36,000.00 | 0 |
| Hotel | 50.00 | Room | 1.67 | 72,600.00 | 0 |
| Quality Restaurant | 8.00 | 1000sqft | 0.18 | 8,000.00 | 0 |
| Apartments Low Rise | 25.00 | Dwelling Unit | 1.56 | 25,000.00 | 72 |
| Apartments Mid Rise | 975.00 | Dwelling Unit | 25.66 | 975,000.00 | 2789 |
| Regional Shopping Center | 56.00 | 1000sqft | 1.29 | 56,000.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 9 | | | **Operational Year** | 2028 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 702.44 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | NumberWood | 1.25 | 0.00 |
| tblFireplaces | NumberWood | 48.75 | 0.00 |
| tblVehicleTrips | ST_TR | 7.16 | 6.17 |
| tblVehicleTrips | ST_TR | 6.39 | 3.87 |
| tblVehicleTrips | ST_TR | 2.46 | 1.39 |
| tblVehicleTrips | ST_TR | 158.37 | 79.82 |
| tblVehicleTrips | ST_TR | 8.19 | 3.75 |
| tblVehicleTrips | ST_TR | 94.36 | 63.99 |
| tblVehicleTrips | ST_TR | 49.97 | 10.74 |
| tblVehicleTrips | SU_TR | 6.07 | 6.16 |
| tblVehicleTrips | SU_TR | 5.86 | 4.18 |
| tblVehicleTrips | SU_TR | 1.05 | 0.69 |
| tblVehicleTrips | SU_TR | 131.84 | 78.27 |

| | | | |
|---|---|---|---|
| tblVehicleTrips | SU_TR | 5.95 | 3.20 |
| tblVehicleTrips | SU_TR | 72.16 | 57.65 |
| tblVehicleTrips | SU_TR | 25.24 | 6.39 |
| tblVehicleTrips | WD_TR | 6.59 | 5.83 |
| tblVehicleTrips | WD_TR | 6.65 | 4.13 |
| tblVehicleTrips | WD_TR | 11.03 | 6.41 |
| tblVehicleTrips | WD_TR | 127.15 | 65.80 |
| tblVehicleTrips | WD_TR | 8.17 | 3.84 |
| tblVehicleTrips | WD_TR | 89.95 | 62.64 |
| tblVehicleTrips | WD_TR | 42.70 | 9.43 |
| tblWoodstoves | NumberCatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberCatalytic | 48.75 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 48.75 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |

## 2.0 Emissions Summary

## 2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2021 | 4.2865 | 46.4651 | 31.6150 | 0.0642 | 18.2675 | 2.0461 | 20.3135 | 9.9840 | 1.8824 | 11.8664 | 0.0000 | 6,221.4937 | 6,221.4937 | 1.9491 | 0.0000 | 6,270.2214 |
| 2022 | 5.7218 | 38.9024 | 47.3319 | 0.1455 | 9.8688 | 1.6366 | 10.7736 | 3.6558 | 1.5057 | 5.1615 | 0.0000 | 14,630.3099 | 14,630.3099 | 1.9499 | 0.0000 | 14,657.2663 |
| 2023 | 5.2705 | 26.4914 | 44.5936 | 0.1413 | 9.8688 | 0.7800 | 10.6488 | 2.6381 | 0.7328 | 3.3708 | 0.0000 | 14,210.3424 | 14,210.3424 | 1.0230 | 0.0000 | 14,235.9160 |
| 2024 | 237.2328 | 9.5610 | 15.0611 | 0.0243 | 1.7884 | 0.4698 | 1.8628 | 0.4743 | 0.4322 | 0.5476 | 0.0000 | 2,352.4178 | 2,352.4178 | 0.7175 | 0.0000 | 2,370.3550 |
| **Maximum** | **237.2328** | **46.4651** | **47.3319** | **0.1455** | **18.2675** | **2.0461** | **20.3135** | **9.9840** | **1.8824** | **11.8664** | **0.0000** | **14,630.3099** | **14,630.3099** | **1.9499** | **0.0000** | **14,657.2663** |

## 2.1 Overall Construction (Maximum Daily Emission)

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2021 | 4.2865 | 46.4651 | 31.6150 | 0.0642 | 18.2675 | 2.0461 | 20.3135 | 9.9840 | 1.8824 | 11.8664 | 0.0000 | 6,221.4937 | 6,221.4937 | 1.9491 | 0.0000 | 6,270.2214 |
| 2022 | 5.7218 | 38.9024 | 47.3319 | 0.1455 | 9.8688 | 1.6366 | 10.7736 | 3.6558 | 1.5057 | 5.1615 | 0.0000 | 14,630.3099 | 14,630.3099 | 1.9499 | 0.0000 | 14,657.2663 |
| 2023 | 5.2705 | 26.4914 | 44.5936 | 0.1413 | 9.8688 | 0.7800 | 10.6488 | 2.6381 | 0.7328 | 3.3708 | 0.0000 | 14,210.3424 | 14,210.3424 | 1.0230 | 0.0000 | 14,235.9160 |
| 2024 | 237.2328 | 9.5610 | 15.0611 | 0.0243 | 1.7884 | 0.4698 | 1.8628 | 0.4743 | 0.4322 | 0.5476 | 0.0000 | 2,352.4178 | 2,352.4178 | 0.7175 | 0.0000 | 2,370.3550 |
| **Maximum** | **237.2328** | **46.4651** | **47.3319** | **0.1455** | **18.2675** | **2.0461** | **20.3135** | **9.9840** | **1.8824** | **11.8664** | **0.0000** | **14,630.3099** | **14,630.3099** | **1.9499** | **0.0000** | **14,657.2663** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Energy | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| Mobile | 9.5233 | 45.9914 | 110.0422 | 0.4681 | 45.9592 | 0.3373 | 46.2965 | 12.2950 | 0.3132 | 12.6083 | | 47,917.8005 | 47,917.8005 | 2.1953 | | 47,972.6839 |
| **Total** | **40.7912** | **67.7872** | **202.7424** | **0.6043** | **45.9592** | **2.4640** | **48.4231** | **12.2950** | **2.4399** | **14.7349** | **0.0000** | **74,422.3787** | **74,422.3787** | **2.8429** | **0.4832** | **74,637.4417** |

### Mitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Energy | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| Mobile | 9.5233 | 45.9914 | 110.0422 | 0.4681 | 45.9592 | 0.3373 | 46.2965 | 12.2950 | 0.3132 | 12.6083 | | 47,917.8005 | 47,917.8005 | 2.1953 | | 47,972.6839 |
| **Total** | **40.7912** | **67.7872** | **202.7424** | **0.6043** | **45.9592** | **2.4640** | **48.4231** | **12.2950** | **2.4399** | **14.7349** | **0.0000** | **74,422.3787** | **74,422.3787** | **2.8429** | **0.4832** | **74,637.4417** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 9/1/2021 | 10/12/2021 | 5 | 30 | |
| 2 | Site Preparation | Site Preparation | 10/13/2021 | 11/9/2021 | 5 | 20 | |
| 3 | Grading | Grading | 11/10/2021 | 1/11/2022 | 5 | 45 | |
| 4 | Building Construction | Building Construction | 1/12/2022 | 12/12/2023 | 5 | 500 | |
| 5 | Paving | Paving | 12/13/2023 | 1/30/2024 | 5 | 35 | |
| 6 | Architectural Coating | Architectural Coating | 1/31/2024 | 3/19/2024 | 5 | 35 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 112.5**

**Acres of Paving: 0**

**Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 458.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 801.00 | 143.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 160.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 3.3074 | 0.0000 | 3.3074 | 0.5008 | 0.0000 | 0.5008 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1651 | 31.4407 | 21.5650 | 0.0388 | | 1.5513 | 1.5513 | | 1.4411 | 1.4411 | | 3,747.9449 | 3,747.9449 | 1.0549 | | 3,774.3174 |
| **Total** | **3.1651** | **31.4407** | **21.5650** | **0.0388** | **3.3074** | **1.5513** | **4.8588** | **0.5008** | **1.4411** | **1.9419** | | **3,747.9449** | **3,747.9449** | **1.0549** | | **3,774.3174** |

## 3.2 Demolition - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.1304 | 4.1454 | 1.0182 | 0.0117 | 0.2669 | 0.0128 | 0.2797 | 0.0732 | 0.0122 | 0.0854 | | 1,269.8555 | 1,269.8555 | 0.0908 | | 1,272.1252 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0715 | 0.0489 | 0.5524 | 1.6100e-003 | 0.1677 | 1.3500e-003 | 0.1690 | 0.0445 | 1.2500e-003 | 0.0457 | | 160.8377 | 160.8377 | 4.7300e-003 | | 160.9560 |
| **Total** | **0.2019** | **4.1943** | **1.5706** | **0.0133** | **0.4346** | **0.0141** | **0.4487** | **0.1176** | **0.0135** | **0.1311** | | **1,430.6932** | **1,430.6932** | **0.0955** | | **1,433.0812** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 3.3074 | 0.0000 | 3.3074 | 0.5008 | 0.0000 | 0.5008 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1651 | 31.4407 | 21.5650 | 0.0388 | | 1.5513 | 1.5513 | | 1.4411 | 1.4411 | 0.0000 | 3,747.9449 | 3,747.9449 | 1.0549 | | 3,774.3174 |
| **Total** | **3.1651** | **31.4407** | **21.5650** | **0.0388** | **3.3074** | **1.5513** | **4.8588** | **0.5008** | **1.4411** | **1.9419** | **0.0000** | **3,747.9449** | **3,747.9449** | **1.0549** | | **3,774.3174** |

## 3.2 Demolition - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.1304 | 4.1454 | 1.0182 | 0.0117 | 0.2669 | 0.0128 | 0.2797 | 0.0732 | 0.0122 | 0.0854 | | 1,269.8555 | 1,269.8555 | 0.0908 | | 1,272.1252 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0715 | 0.0489 | 0.5524 | 1.6100e-003 | 0.1677 | 1.3500e-003 | 0.1690 | 0.0445 | 1.2500e-003 | 0.0457 | | 160.8377 | 160.8377 | 4.7300e-003 | | 160.9560 |
| **Total** | **0.2019** | **4.1943** | **1.5706** | **0.0133** | **0.4346** | **0.0141** | **0.4487** | **0.1176** | **0.0135** | **0.1311** | | **1,430.6932** | **1,430.6932** | **0.0955** | | **1,433.0812** |

## 3.3 Site Preparation - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.8882 | 40.4971 | 21.1543 | 0.0380 | | 2.0445 | 2.0445 | | 1.8809 | 1.8809 | | 3,685.6569 | 3,685.6569 | 1.1920 | | 3,715.4573 |
| **Total** | **3.8882** | **40.4971** | **21.1543** | **0.0380** | **18.0663** | **2.0445** | **20.1107** | **9.9307** | **1.8809** | **11.8116** | | **3,685.6569** | **3,685.6569** | **1.1920** | | **3,715.4573** |

## 3.3 Site Preparation - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0858 | 0.0587 | 0.6629 | 1.9400e-003 | 0.2012 | 1.6300e-003 | 0.2028 | 0.0534 | 1.5000e-003 | 0.0549 | | 193.0052 | 193.0052 | 5.6800e-003 | | 193.1472 |
| **Total** | **0.0858** | **0.0587** | **0.6629** | **1.9400e-003** | **0.2012** | **1.6300e-003** | **0.2028** | **0.0534** | **1.5000e-003** | **0.0549** | | **193.0052** | **193.0052** | **5.6800e-003** | | **193.1472** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.8882 | 40.4971 | 21.1543 | 0.0380 | | 2.0445 | 2.0445 | | 1.8809 | 1.8809 | 0.0000 | 3,685.6569 | 3,685.6569 | 1.1920 | | 3,715.4573 |
| **Total** | **3.8882** | **40.4971** | **21.1543** | **0.0380** | **18.0663** | **2.0445** | **20.1107** | **9.9307** | **1.8809** | **11.8116** | **0.0000** | **3,685.6569** | **3,685.6569** | **1.1920** | | **3,715.4573** |

## 3.3 Site Preparation - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0858 | 0.0587 | 0.6629 | 1.9400e-003 | 0.2012 | 1.6300e-003 | 0.2028 | 0.0534 | 1.5000e-003 | 0.0549 | | 193.0052 | 193.0052 | 5.6800e-003 | | 193.1472 |
| **Total** | **0.0858** | **0.0587** | **0.6629** | **1.9400e-003** | **0.2012** | **1.6300e-003** | **0.2028** | **0.0534** | **1.5000e-003** | **0.0549** | | **193.0052** | **193.0052** | **5.6800e-003** | | **193.1472** |

## 3.4 Grading - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.1912 | 46.3998 | 30.8785 | 0.0620 | | 1.9853 | 1.9853 | | 1.8265 | 1.8265 | | 6,007.0434 | 6,007.0434 | 1.9428 | | 6,055.6134 |
| **Total** | **4.1912** | **46.3998** | **30.8785** | **0.0620** | **8.6733** | **1.9853** | **10.6587** | **3.5965** | **1.8265** | **5.4230** | | **6,007.0434** | **6,007.0434** | **1.9428** | | **6,055.6134** |

## 3.4 Grading - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0954 | 0.0652 | 0.7365 | 2.1500e-003 | 0.2236 | 1.8100e-003 | 0.2254 | 0.0593 | 1.6600e-003 | 0.0610 | | 214.4502 | 214.4502 | 6.3100e-003 | | 214.6080 |
| **Total** | **0.0954** | **0.0652** | **0.7365** | **2.1500e-003** | **0.2236** | **1.8100e-003** | **0.2254** | **0.0593** | **1.6600e-003** | **0.0610** | | **214.4502** | **214.4502** | **6.3100e-003** | | **214.6080** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.1912 | 46.3998 | 30.8785 | 0.0620 | | 1.9853 | 1.9853 | | 1.8265 | 1.8265 | 0.0000 | 6,007.0434 | 6,007.0434 | 1.9428 | | 6,055.6134 |
| **Total** | **4.1912** | **46.3998** | **30.8785** | **0.0620** | **8.6733** | **1.9853** | **10.6587** | **3.5965** | **1.8265** | **5.4230** | **0.0000** | **6,007.0434** | **6,007.0434** | **1.9428** | | **6,055.6134** |

## 3.4 Grading - 2021

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0954 | 0.0652 | 0.7365 | 2.1500e-003 | 0.2236 | 1.8100e-003 | 0.2254 | 0.0593 | 1.6600e-003 | 0.0610 | | 214.4502 | 214.4502 | 6.3100e-003 | | 214.6080 |
| **Total** | **0.0954** | **0.0652** | **0.7365** | **2.1500e-003** | **0.2236** | **1.8100e-003** | **0.2254** | **0.0593** | **1.6600e-003** | **0.0610** | | **214.4502** | **214.4502** | **6.3100e-003** | | **214.6080** |

## 3.4 Grading - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **8.6733** | **1.6349** | **10.3082** | **3.5965** | **1.5041** | **5.1006** | | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

## 3.4 Grading - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0896 | 0.0589 | 0.6784 | 2.0800e-003 | 0.2236 | 1.7500e-003 | 0.2253 | 0.0593 | 1.6100e-003 | 0.0609 | | 206.9139 | 206.9139 | 5.7000e-003 | | 207.0563 |
| **Total** | **0.0896** | **0.0589** | **0.6784** | **2.0800e-003** | **0.2236** | **1.7500e-003** | **0.2253** | **0.0593** | **1.6100e-003** | **0.0609** | | **206.9139** | **206.9139** | **5.7000e-003** | | **207.0563** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | 0.0000 | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **8.6733** | **1.6349** | **10.3082** | **3.5965** | **1.5041** | **5.1006** | **0.0000** | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

## 3.4 Grading - 2022

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0896 | 0.0589 | 0.6784 | 2.0800e-003 | 0.2236 | 1.7500e-003 | 0.2253 | 0.0593 | 1.6100e-003 | 0.0609 | | 206.9139 | 206.9139 | 5.7000e-003 | | 207.0563 |
| **Total** | **0.0896** | **0.0589** | **0.6784** | **2.0800e-003** | **0.2236** | **1.7500e-003** | **0.2253** | **0.0593** | **1.6100e-003** | **0.0609** | | **206.9139** | **206.9139** | **5.7000e-003** | | **207.0563** |

## 3.5 Building Construction - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

## 3.5 Building Construction - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.4284 | 13.1673 | 3.8005 | 0.0354 | 0.9155 | 0.0256 | 0.9412 | 0.2636 | 0.0245 | 0.2881 | | 3,789.0750 | 3,789.0750 | 0.2381 | | 3,795.0283 |
| Worker | 3.5872 | 2.3593 | 27.1680 | 0.0832 | 8.9533 | 0.0701 | 9.0234 | 2.3745 | 0.0646 | 2.4390 | | 8,286.9013 | 8,286.9013 | 0.2282 | | 8,292.6058 |
| **Total** | **4.0156** | **15.5266** | **30.9685** | **0.1186** | **9.8688** | **0.0957** | **9.9645** | **2.6381** | **0.0891** | **2.7271** | | **12,075.9763** | **12,075.9763** | **0.4663** | | **12,087.6341** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | 0.0000 | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | **0.0000** | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

## 3.5 Building Construction - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.4284 | 13.1673 | 3.8005 | 0.0354 | 0.9155 | 0.0256 | 0.9412 | 0.2636 | 0.0245 | 0.2881 | | 3,789.0750 | 3,789.0750 | 0.2381 | | 3,795.0283 |
| Worker | 3.5872 | 2.3593 | 27.1680 | 0.0832 | 8.9533 | 0.0701 | 9.0234 | 2.3745 | 0.0646 | 2.4390 | | 8,286.9013 | 8,286.9013 | 0.2282 | | 8,292.6058 |
| **Total** | **4.0156** | **15.5266** | **30.9685** | **0.1186** | **9.8688** | **0.0957** | **9.9645** | **2.6381** | **0.0891** | **2.7271** | | **12,075.9763** | **12,075.9763** | **0.4663** | | **12,087.6341** |

## 3.5 Building Construction - 2023

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.5728 | 14.3849 | 16.2440 | 0.0269 | | 0.6997 | 0.6997 | | 0.6584 | 0.6584 | | 2,555.2099 | 2,555.2099 | 0.6079 | | 2,570.4061 |
| **Total** | **1.5728** | **14.3849** | **16.2440** | **0.0269** | | **0.6997** | **0.6997** | | **0.6584** | **0.6584** | | **2,555.2099** | **2,555.2099** | **0.6079** | | **2,570.4061** |

## 3.5 Building Construction - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.3183 | 9.9726 | 3.3771 | 0.0343 | 0.9156 | 0.0122 | 0.9277 | 0.2636 | 0.0116 | 0.2752 | | 3,671.4007 | 3,671.4007 | 0.2096 | | 3,676.6417 |
| Worker | 3.3795 | 2.1338 | 24.9725 | 0.0801 | 8.9533 | 0.0681 | 9.0214 | 2.3745 | 0.0627 | 2.4372 | | 7,983.7318 | 7,983.7318 | 0.2055 | | 7,988.8683 |
| **Total** | **3.6978** | **12.1065** | **28.3496** | **0.1144** | **9.8688** | **0.0803** | **9.9491** | **2.6381** | **0.0743** | **2.7124** | | **11,655.1325** | **11,655.1325** | **0.4151** | | **11,665.5099** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.5728 | 14.3849 | 16.2440 | 0.0269 | | 0.6997 | 0.6997 | | 0.6584 | 0.6584 | 0.0000 | 2,555.2099 | 2,555.2099 | 0.6079 | | 2,570.4061 |
| **Total** | **1.5728** | **14.3849** | **16.2440** | **0.0269** | | **0.6997** | **0.6997** | | **0.6584** | **0.6584** | **0.0000** | **2,555.2099** | **2,555.2099** | **0.6079** | | **2,570.4061** |

## 3.5 Building Construction - 2023

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.3183 | 9.9726 | 3.3771 | 0.0343 | 0.9156 | 0.0122 | 0.9277 | 0.2636 | 0.0116 | 0.2752 | | 3,671.4007 | 3,671.4007 | 0.2096 | | 3,676.6417 |
| Worker | 3.3795 | 2.1338 | 24.9725 | 0.0801 | 8.9533 | 0.0681 | 9.0214 | 2.3745 | 0.0627 | 2.4372 | | 7,983.7318 | 7,983.7318 | 0.2055 | | 7,988.8683 |
| **Total** | **3.6978** | **12.1065** | **28.3496** | **0.1144** | **9.8688** | **0.0803** | **9.9491** | **2.6381** | **0.0743** | **2.7124** | | **11,655.1325** | **11,655.1325** | **0.4151** | | **11,665.5099** |

## 3.6 Paving - 2023

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.0327 | 10.1917 | 14.5842 | 0.0228 | | 0.5102 | 0.5102 | | 0.4694 | 0.4694 | | 2,207.5841 | 2,207.5841 | 0.7140 | | 2,225.4336 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.0327** | **10.1917** | **14.5842** | **0.0228** | | **0.5102** | **0.5102** | | **0.4694** | **0.4694** | | **2,207.5841** | **2,207.5841** | **0.7140** | | **2,225.4336** |

## 3.6 Paving - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0633 | 0.0400 | 0.4677 | 1.5000e-003 | 0.1677 | 1.2800e-003 | 0.1689 | 0.0445 | 1.1700e-003 | 0.0456 | | 149.5081 | 149.5081 | 3.8500e-003 | | 149.6043 |
| **Total** | **0.0633** | **0.0400** | **0.4677** | **1.5000e-003** | **0.1677** | **1.2800e-003** | **0.1689** | **0.0445** | **1.1700e-003** | **0.0456** | | **149.5081** | **149.5081** | **3.8500e-003** | | **149.6043** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.0327 | 10.1917 | 14.5842 | 0.0228 | | 0.5102 | 0.5102 | | 0.4694 | 0.4694 | 0.0000 | 2,207.5841 | 2,207.5841 | 0.7140 | | 2,225.4336 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.0327** | **10.1917** | **14.5842** | **0.0228** | | **0.5102** | **0.5102** | | **0.4694** | **0.4694** | **0.0000** | **2,207.5841** | **2,207.5841** | **0.7140** | | **2,225.4336** |

## 3.6 Paving - 2023

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0633 | 0.0400 | 0.4677 | 1.5000e-003 | 0.1677 | 1.2800e-003 | 0.1689 | 0.0445 | 1.1700e-003 | 0.0456 | | 149.5081 | 149.5081 | 3.8500e-003 | | 149.6043 |
| **Total** | **0.0633** | **0.0400** | **0.4677** | **1.5000e-003** | **0.1677** | **1.2800e-003** | **0.1689** | **0.0445** | **1.1700e-003** | **0.0456** | | **149.5081** | **149.5081** | **3.8500e-003** | | **149.6043** |

## 3.6 Paving - 2024

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.9882 | 9.5246 | 14.6258 | 0.0228 | | 0.4685 | 0.4685 | | 0.4310 | 0.4310 | | 2,207.5472 | 2,207.5472 | 0.7140 | | 2,225.3963 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.9882** | **9.5246** | **14.6258** | **0.0228** | | **0.4685** | **0.4685** | | **0.4310** | **0.4310** | | **2,207.5472** | **2,207.5472** | **0.7140** | | **2,225.3963** |

## 3.6 Paving - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0601 | 0.0364 | 0.4354 | 1.4500e-003 | 0.1677 | 1.2600e-003 | 0.1689 | 0.0445 | 1.1600e-003 | 0.0456 | | 144.8706 | 144.8706 | 3.5300e-003 | | 144.9587 |
| **Total** | **0.0601** | **0.0364** | **0.4354** | **1.4500e-003** | **0.1677** | **1.2600e-003** | **0.1689** | **0.0445** | **1.1600e-003** | **0.0456** | | **144.8706** | **144.8706** | **3.5300e-003** | | **144.9587** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.9882 | 9.5246 | 14.6258 | 0.0228 | | 0.4685 | 0.4685 | | 0.4310 | 0.4310 | 0.0000 | 2,207.5472 | 2,207.5472 | 0.7140 | | 2,225.3963 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.9882** | **9.5246** | **14.6258** | **0.0228** | | **0.4685** | **0.4685** | | **0.4310** | **0.4310** | **0.0000** | **2,207.5472** | **2,207.5472** | **0.7140** | | **2,225.3963** |

## 3.6 Paving - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0601 | 0.0364 | 0.4354 | 1.4500e-003 | 0.1677 | 1.2600e-003 | 0.1689 | 0.0445 | 1.1600e-003 | 0.0456 | | 144.8706 | 144.8706 | 3.5300e-003 | | 144.9587 |
| **Total** | **0.0601** | **0.0364** | **0.4354** | **1.4500e-003** | **0.1677** | **1.2600e-003** | **0.1689** | **0.0445** | **1.1600e-003** | **0.0456** | | **144.8706** | **144.8706** | **3.5300e-003** | | **144.9587** |

## 3.7 Architectural Coating - 2024

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 236.4115 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.1808 | 1.2188 | 1.8101 | 2.9700e-003 | | 0.0609 | 0.0609 | | 0.0609 | 0.0609 | | 281.4481 | 281.4481 | 0.0159 | | 281.8443 |
| **Total** | **236.5923** | **1.2188** | **1.8101** | **2.9700e-003** | | **0.0609** | **0.0609** | | **0.0609** | **0.0609** | | **281.4481** | **281.4481** | **0.0159** | | **281.8443** |

## 3.7 Architectural Coating - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.6406 | 0.3886 | 4.6439 | 0.0155 | 1.7884 | 0.0134 | 1.8018 | 0.4743 | 0.0123 | 0.4866 | | 1,545.2860 | 1,545.2860 | 0.0376 | | 1,546.2262 |
| **Total** | **0.6406** | **0.3886** | **4.6439** | **0.0155** | **1.7884** | **0.0134** | **1.8018** | **0.4743** | **0.0123** | **0.4866** | | **1,545.2860** | **1,545.2860** | **0.0376** | | **1,546.2262** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 236.4115 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.1808 | 1.2188 | 1.8101 | 2.9700e-003 | | 0.0609 | 0.0609 | | 0.0609 | 0.0609 | 0.0000 | 281.4481 | 281.4481 | 0.0159 | | 281.8443 |
| **Total** | **236.5923** | **1.2188** | **1.8101** | **2.9700e-003** | | **0.0609** | **0.0609** | | **0.0609** | **0.0609** | **0.0000** | **281.4481** | **281.4481** | **0.0159** | | **281.8443** |

### 3.7 Architectural Coating - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.6406 | 0.3886 | 4.6439 | 0.0155 | 1.7884 | 0.0134 | 1.8018 | 0.4743 | 0.0123 | 0.4866 | | 1,545.2860 | 1,545.2860 | 0.0376 | | 1,546.2262 |
| **Total** | **0.6406** | **0.3886** | **4.6439** | **0.0155** | **1.7884** | **0.0134** | **1.8018** | **0.4743** | **0.0123** | **0.4866** | | **1,545.2860** | **1,545.2860** | **0.0376** | | **1,546.2262** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 9.5233 | 45.9914 | 110.0422 | 0.4681 | 45.9592 | 0.3373 | 46.2965 | 12.2950 | 0.3132 | 12.6083 | | 47,917.8005 | 47,917.8005 | 2.1953 | | 47,972.6839 |
| Unmitigated | 9.5233 | 45.9914 | 110.0422 | 0.4681 | 45.9592 | 0.3373 | 46.2965 | 12.2950 | 0.3132 | 12.6083 | | 47,917.8005 | 47,917.8005 | 2.1953 | | 47,972.6839 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 145.75 | 154.25 | 154.00 | 506,227 | 506,227 |
| Apartments Mid Rise | 4,026.75 | 3,773.25 | 4075.50 | 13,660,065 | 13,660,065 |
| General Office Building | 288.45 | 62.55 | 31.05 | 706,812 | 706,812 |
| High Turnover (Sit Down Restaurant) | 2,368.80 | 2,873.52 | 2817.72 | 3,413,937 | 3,413,937 |
| Hotel | 192.00 | 187.50 | 160.00 | 445,703 | 445,703 |
| Quality Restaurant | 501.12 | 511.92 | 461.20 | 707,488 | 707,488 |
| Regional Shopping Center | 528.08 | 601.44 | 357.84 | 1,112,221 | 1,112,221 |
| Total | 8,050.95 | 8,164.43 | 8,057.31 | 20,552,452 | 20,552,452 |

## 4.3 Trip Type Information

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| General Office Building | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 77 | 19 | 4 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Hotel | 16.60 | 8.40 | 6.90 | 19.40 | 61.60 | 19.00 | 58 | 38 | 4 |
| Quality Restaurant | 16.60 | 8.40 | 6.90 | 12.00 | 69.00 | 19.00 | 38 | 18 | 44 |
| Regional Shopping Center | 16.60 | 8.40 | 6.90 | 16.30 | 64.70 | 19.00 | 54 | 35 | 11 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Apartments Mid Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| General Office Building | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| High Turnover (Sit Down Restaurant) | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Hotel | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Quality Restaurant | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Regional Shopping Center | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| NaturalGas Mitigated | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| NaturalGas Unmitigated | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 1119.16 | 0.0121 | 0.1031 | 0.0439 | 6.6000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | | 131.6662 | 131.6662 | 2.5200e-003 | 2.4100e-003 | 132.4486 |
| Apartments Mid Rise | 35784.3 | 0.3859 | 3.2978 | 1.4033 | 0.0211 | | 0.2666 | 0.2666 | | 0.2666 | 0.2666 | | 4,209.9164 | 4,209.9164 | 0.0807 | 0.0772 | 4,234.9339 |
| General Office Building | 1283.42 | 0.0138 | 0.1258 | 0.1057 | 7.5000e-004 | | 9.5600e-003 | 9.5600e-003 | | 9.5600e-003 | 9.5600e-003 | | 150.9911 | 150.9911 | 2.8900e-003 | 2.7700e-003 | 151.8884 |
| High Turnover (Sit Down Restaurant) | 22759.9 | 0.2455 | 2.2314 | 1.8743 | 0.0134 | | 0.1696 | 0.1696 | | 0.1696 | 0.1696 | | 2,677.6342 | 2,677.6342 | 0.0513 | 0.0491 | 2,693.5460 |
| Hotel | 4769.72 | 0.0514 | 0.4676 | 0.3928 | 2.8100e-003 | | 0.0355 | 0.0355 | | 0.0355 | 0.0355 | | 561.1436 | 561.1436 | 0.0108 | 0.0103 | 564.4782 |
| Quality Restaurant | 5057.75 | 0.0545 | 0.4959 | 0.4165 | 2.9800e-003 | | 0.0377 | 0.0377 | | 0.0377 | 0.0377 | | 595.0298 | 595.0298 | 0.0114 | 0.0109 | 598.5658 |
| Regional Shopping Center | 251.616 | 2.7100e-003 | 0.0247 | 0.0207 | 1.5000e-004 | | 1.8700e-003 | 1.8700e-003 | | 1.8700e-003 | 1.8700e-003 | | 29.6019 | 29.6019 | 5.7000e-004 | 5.4000e-004 | 29.7778 |
| **Total** | | **0.7660** | **6.7463** | **4.2573** | **0.0418** | | **0.5292** | **0.5292** | | **0.5292** | **0.5292** | | **8,355.9832** | **8,355.9832** | **0.1602** | **0.1532** | **8,405.6387** |

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 1.11916 | 0.0121 | 0.1031 | 0.0439 | 6.6000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | | 131.6662 | 131.6662 | 2.5200e-003 | 2.4100e-003 | 132.4486 |
| Apartments Mid Rise | 35.7843 | 0.3859 | 3.2978 | 1.4033 | 0.0211 | | 0.2666 | 0.2666 | | 0.2666 | 0.2666 | | 4,209.9164 | 4,209.9164 | 0.0807 | 0.0772 | 4,234.9339 |
| General Office Building | 1.28342 | 0.0138 | 0.1258 | 0.1057 | 7.5000e-004 | | 9.5600e-003 | 9.5600e-003 | | 9.5600e-003 | 9.5600e-003 | | 150.9911 | 150.9911 | 2.8900e-003 | 2.7700e-003 | 151.8884 |
| High Turnover (Sit Down Restaurant) | 22.7599 | 0.2455 | 2.2314 | 1.8743 | 0.0134 | | 0.1696 | 0.1696 | | 0.1696 | 0.1696 | | 2,677.6342 | 2,677.6342 | 0.0513 | 0.0491 | 2,693.5460 |
| Hotel | 4.76972 | 0.0514 | 0.4676 | 0.3928 | 2.8100e-003 | | 0.0355 | 0.0355 | | 0.0355 | 0.0355 | | 561.1436 | 561.1436 | 0.0108 | 0.0103 | 564.4782 |
| Quality Restaurant | 5.05775 | 0.0545 | 0.4959 | 0.4165 | 2.9800e-003 | | 0.0377 | 0.0377 | | 0.0377 | 0.0377 | | 595.0298 | 595.0298 | 0.0114 | 0.0109 | 598.5658 |
| Regional Shopping Center | 0.251616 | 2.7100e-003 | 0.0247 | 0.0207 | 1.5000e-004 | | 1.8700e-003 | 1.8700e-003 | | 1.8700e-003 | 1.8700e-003 | | 29.6019 | 29.6019 | 5.7000e-004 | 5.4000e-004 | 29.7778 |
| **Total** | | **0.7660** | **6.7463** | **4.2573** | **0.0418** | | **0.5292** | **0.5292** | | **0.5292** | **0.5292** | | **8,355.9832** | **8,355.9832** | **0.1602** | **0.1532** | **8,405.6387** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Unmitigated | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 2.2670 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 24.1085 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 1.6500 | 14.1000 | 6.0000 | 0.0900 | | 1.1400 | 1.1400 | | 1.1400 | 1.1400 | 0.0000 | 18,000.0000 | 18,000.0000 | 0.3450 | 0.3300 | 18,106.9650 |
| Landscaping | 2.4766 | 0.9496 | 82.4430 | 4.3600e-003 | | 0.4574 | 0.4574 | | 0.4574 | 0.4574 | | 148.5950 | 148.5950 | 0.1424 | | 152.1542 |
| **Total** | **30.5020** | **15.0496** | **88.4430** | **0.0944** | | **1.5974** | **1.5974** | | **1.5974** | **1.5974** | **0.0000** | **18,148.5950** | **18,148.5950** | **0.4874** | **0.3300** | **18,259.1192** |

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 2.2670 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 24.1085 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 1.6500 | 14.1000 | 6.0000 | 0.0900 | | 1.1400 | 1.1400 | | 1.1400 | 1.1400 | 0.0000 | 18,000.0000 | 18,000.0000 | 0.3450 | 0.3300 | 18,106.9650 |
| Landscaping | 2.4766 | 0.9496 | 82.4430 | 4.3600e-003 | | 0.4574 | 0.4574 | | 0.4574 | 0.4574 | | 148.5950 | 148.5950 | 0.1424 | | 152.1542 |
| **Total** | **30.5020** | **15.0496** | **88.4430** | **0.0944** | | **1.5974** | **1.5974** | | **1.5974** | **1.5974** | **0.0000** | **18,148.5950** | **18,148.5950** | **0.4874** | **0.3300** | **18,259.1192** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

# Village South Specific Plan (Proposed)

**Los Angeles-South Coast County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| General Office Building | 45.00 | 1000sqft | 1.03 | 45,000.00 | 0 |
| High Turnover (Sit Down Restaurant) | 36.00 | 1000sqft | 0.83 | 36,000.00 | 0 |
| Hotel | 50.00 | Room | 1.67 | 72,600.00 | 0 |
| Quality Restaurant | 8.00 | 1000sqft | 0.18 | 8,000.00 | 0 |
| Apartments Low Rise | 25.00 | Dwelling Unit | 1.56 | 25,000.00 | 72 |
| Apartments Mid Rise | 975.00 | Dwelling Unit | 25.66 | 975,000.00 | 2789 |
| Regional Shopping Center | 56.00 | 1000sqft | 1.29 | 56,000.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 9 | | | **Operational Year** | 2028 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 702.44 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | NumberWood | 1.25 | 0.00 |
| tblFireplaces | NumberWood | 48.75 | 0.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblVehicleTrips | ST_TR | 7.16 | 6.17 |
| tblVehicleTrips | ST_TR | 6.39 | 3.87 |
| tblVehicleTrips | ST_TR | 2.46 | 1.39 |
| tblVehicleTrips | ST_TR | 158.37 | 79.82 |

| | | | |
|---|---|---|---|
| tblVehicleTrips | ST_TR | 8.19 | 3.75 |
| tblVehicleTrips | ST_TR | 94.36 | 63.99 |
| tblVehicleTrips | ST_TR | 49.97 | 10.74 |
| tblVehicleTrips | SU_TR | 6.07 | 6.16 |
| tblVehicleTrips | SU_TR | 5.86 | 4.18 |
| tblVehicleTrips | SU_TR | 1.05 | 0.69 |
| tblVehicleTrips | SU_TR | 131.84 | 78.27 |
| tblVehicleTrips | SU_TR | 5.95 | 3.20 |
| tblVehicleTrips | SU_TR | 72.16 | 57.65 |
| tblVehicleTrips | SU_TR | 25.24 | 6.39 |
| tblVehicleTrips | WD_TR | 6.59 | 5.83 |
| tblVehicleTrips | WD_TR | 6.65 | 4.13 |
| tblVehicleTrips | WD_TR | 11.03 | 6.41 |
| tblVehicleTrips | WD_TR | 127.15 | 65.80 |
| tblVehicleTrips | WD_TR | 8.17 | 3.84 |
| tblVehicleTrips | WD_TR | 89.95 | 62.64 |
| tblVehicleTrips | WD_TR | 42.70 | 9.43 |
| tblWoodstoves | NumberCatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberCatalytic | 48.75 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 48.75 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |

## 2.0 Emissions Summary

## 2.1 Overall Construction

### Unmitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2021 | 0.1704 | 1.8234 | 1.1577 | 2.3800e-003 | 0.4141 | 0.0817 | 0.4958 | 0.1788 | 0.0754 | 0.2542 | 0.0000 | 210.7654 | 210.7654 | 0.0600 | 0.0000 | 212.2661 |
| 2022 | 0.5865 | 4.0240 | 5.1546 | 0.0155 | 0.9509 | 0.1175 | 1.0683 | 0.2518 | 0.1103 | 0.3621 | 0.0000 | 1,418.6554 | 1,418.6554 | 0.1215 | 0.0000 | 1,421.6925 |
| 2023 | 0.5190 | 3.2850 | 4.7678 | 0.0147 | 0.8497 | 0.0971 | 0.9468 | 0.2283 | 0.0912 | 0.3195 | 0.0000 | 1,342.4412 | 1,342.4412 | 0.1115 | 0.0000 | 1,345.2291 |
| 2024 | 4.1592 | 0.1313 | 0.2557 | 5.0000e-004 | 0.0221 | 6.3900e-003 | 0.0285 | 5.8700e-003 | 5.9700e-003 | 0.0118 | 0.0000 | 44.6355 | 44.6355 | 7.8300e-003 | 0.0000 | 44.8311 |
| **Maximum** | **4.1592** | **4.0240** | **5.1546** | **0.0155** | **0.9509** | **0.1175** | **1.0683** | **0.2518** | **0.1103** | **0.3621** | **0.0000** | **1,418.6554** | **1,418.6554** | **0.1215** | **0.0000** | **1,421.6925** |

## 2.1 Overall Construction

### Mitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2021 | 0.1704 | 1.8234 | 1.1577 | 2.3800e-003 | 0.4141 | 0.0817 | 0.4958 | 0.1788 | 0.0754 | 0.2542 | 0.0000 | 210.7651 | 210.7651 | 0.0600 | 0.0000 | 212.2658 |
| 2022 | 0.5865 | 4.0240 | 5.1546 | 0.0155 | 0.9509 | 0.1175 | 1.0683 | 0.2518 | 0.1103 | 0.3621 | 0.0000 | 1,418.6550 | 1,418.6550 | 0.1215 | 0.0000 | 1,421.6921 |
| 2023 | 0.5190 | 3.2850 | 4.7678 | 0.0147 | 0.8497 | 0.0971 | 0.9468 | 0.2283 | 0.0912 | 0.3195 | 0.0000 | 1,342.4409 | 1,342.4409 | 0.1115 | 0.0000 | 1,345.2287 |
| 2024 | 4.1592 | 0.1313 | 0.2557 | 5.0000e-004 | 0.0221 | 6.3900e-003 | 0.0285 | 5.8700e-003 | 5.9700e-003 | 0.0118 | 0.0000 | 44.6354 | 44.6354 | 7.8300e-003 | 0.0000 | 44.8311 |
| **Maximum** | **4.1592** | **4.0240** | **5.1546** | **0.0155** | **0.9509** | **0.1175** | **1.0683** | **0.2518** | **0.1103** | **0.3621** | **0.0000** | **1,418.6550** | **1,418.6550** | **0.1215** | **0.0000** | **1,421.6921** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| 1 | 9-1-2021 | 11-30-2021 | 1.4091 | 1.4091 |
| 2 | 12-1-2021 | 2-28-2022 | 1.3329 | 1.3329 |
| 3 | 3-1-2022 | 5-31-2022 | 1.1499 | 1.1499 |
| 4 | 6-1-2022 | 8-31-2022 | 1.1457 | 1.1457 |
| 5 | 9-1-2022 | 11-30-2022 | 1.1415 | 1.1415 |
| 6 | 12-1-2022 | 2-28-2023 | 1.0278 | 1.0278 |
| 7 | 3-1-2023 | 5-31-2023 | 0.9868 | 0.9868 |
| 8 | 6-1-2023 | 8-31-2023 | 0.9831 | 0.9831 |

| | | | | |
|---|---|---|---|---|
| **9** | **9-1-2023** | **11-30-2023** | 0.9798 | 0.9798 |
| **10** | **12-1-2023** | **2-29-2024** | 2.8757 | 2.8757 |
| **11** | **3-1-2024** | **5-31-2024** | 1.6188 | 1.6188 |
| | | **Highest** | 2.8757 | 2.8757 |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 5.1437 | 0.2950 | 10.3804 | 1.6700e-003 | | 0.0714 | 0.0714 | | 0.0714 | 0.0714 | 0.0000 | 220.9670 | 220.9670 | 0.0201 | 3.7400e-003 | 222.5835 |
| Energy | 0.1398 | 1.2312 | 0.7770 | 7.6200e-003 | | 0.0966 | 0.0966 | | 0.0966 | 0.0966 | 0.0000 | 3,896.0732 | 3,896.0732 | 0.1303 | 0.0468 | 3,913.2833 |
| Mobile | 1.5857 | 7.9962 | 19.1834 | 0.0821 | 7.7979 | 0.0580 | 7.8559 | 2.0895 | 0.0539 | 2.1434 | 0.0000 | 7,620.4986 | 7,620.4986 | 0.3407 | 0.0000 | 7,629.0162 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 207.8079 | 0.0000 | 207.8079 | 12.2811 | 0.0000 | 514.8354 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 29.1632 | 556.6420 | 585.8052 | 3.0183 | 0.0755 | 683.7567 |
| **Total** | **6.8692** | **9.5223** | **30.3407** | **0.0914** | **7.7979** | **0.2260** | **8.0240** | **2.0895** | **0.2219** | **2.3114** | **236.9712** | **12,294.1807** | **12,531.1519** | **15.7904** | **0.1260** | **12,963.4751** |

## 2.2 Overall Operational

### Mitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 5.1437 | 0.2950 | 10.3804 | 1.6700e-003 | | 0.0714 | 0.0714 | | 0.0714 | 0.0714 | 0.0000 | 220.9670 | 220.9670 | 0.0201 | 3.7400e-003 | 222.5835 |
| Energy | 0.1398 | 1.2312 | 0.7770 | 7.6200e-003 | | 0.0966 | 0.0966 | | 0.0966 | 0.0966 | 0.0000 | 3,896.0732 | 3,896.0732 | 0.1303 | 0.0468 | 3,913.2833 |
| Mobile | 1.5857 | 7.9962 | 19.1834 | 0.0821 | 7.7979 | 0.0580 | 7.8559 | 2.0895 | 0.0539 | 2.1434 | 0.0000 | 7,620.4986 | 7,620.4986 | 0.3407 | 0.0000 | 7,629.0162 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 207.8079 | 0.0000 | 207.8079 | 12.2811 | 0.0000 | 514.8354 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 29.1632 | 556.6420 | 585.8052 | 3.0183 | 0.0755 | 683.7567 |
| **Total** | **6.8692** | **9.5223** | **30.3407** | **0.0914** | **7.7979** | **0.2260** | **8.0240** | **2.0895** | **0.2219** | **2.3114** | **236.9712** | **12,294.1807** | **12,531.1519** | **15.7904** | **0.1260** | **12,963.4751** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 3.0 Construction Detail

### Construction Phase

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 9/1/2021 | 10/12/2021 | 5 | 30 | |
| 2 | Site Preparation | Site Preparation | 10/13/2021 | 11/9/2021 | 5 | 20 | |
| 3 | Grading | Grading | 11/10/2021 | 1/11/2022 | 5 | 45 | |
| 4 | Building Construction | Building Construction | 1/12/2022 | 12/12/2023 | 5 | 500 | |
| 5 | Paving | Paving | 12/13/2023 | 1/30/2024 | 5 | 35 | |
| 6 | Architectural Coating | Architectural Coating | 1/31/2024 | 3/19/2024 | 5 | 35 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 112.5**

**Acres of Paving: 0**

**Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 458.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 801.00 | 143.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 160.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.0496 | 0.0000 | 0.0496 | 7.5100e-003 | 0.0000 | 7.5100e-003 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0475 | 0.4716 | 0.3235 | 5.8000e-004 | | 0.0233 | 0.0233 | | 0.0216 | 0.0216 | 0.0000 | 51.0012 | 51.0012 | 0.0144 | 0.0000 | 51.3601 |
| **Total** | **0.0475** | **0.4716** | **0.3235** | **5.8000e-004** | **0.0496** | **0.0233** | **0.0729** | **7.5100e-003** | **0.0216** | **0.0291** | **0.0000** | **51.0012** | **51.0012** | **0.0144** | **0.0000** | **51.3601** |

## 3.2 Demolition - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 1.9300e-003 | 0.0634 | 0.0148 | 1.8000e-004 | 3.9400e-003 | 1.9000e-004 | 4.1300e-003 | 1.0800e-003 | 1.8000e-004 | 1.2600e-003 | 0.0000 | 17.4566 | 17.4566 | 1.2100e-003 | 0.0000 | 17.4869 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 7.2000e-004 | 5.3000e-004 | 6.0900e-003 | 2.0000e-005 | 1.6800e-003 | 1.0000e-005 | 1.6900e-003 | 4.5000e-004 | 1.0000e-005 | 4.6000e-004 | 0.0000 | 1.5281 | 1.5281 | 5.0000e-005 | 0.0000 | 1.5293 |
| **Total** | **2.6500e-003** | **0.0639** | **0.0209** | **2.0000e-004** | **5.6200e-003** | **2.0000e-004** | **5.8200e-003** | **1.5300e-003** | **1.9000e-004** | **1.7200e-003** | **0.0000** | **18.9847** | **18.9847** | **1.2600e-003** | **0.0000** | **19.0161** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.0496 | 0.0000 | 0.0496 | 7.5100e-003 | 0.0000 | 7.5100e-003 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0475 | 0.4716 | 0.3235 | 5.8000e-004 | | 0.0233 | 0.0233 | | 0.0216 | 0.0216 | 0.0000 | 51.0011 | 51.0011 | 0.0144 | 0.0000 | 51.3600 |
| **Total** | **0.0475** | **0.4716** | **0.3235** | **5.8000e-004** | **0.0496** | **0.0233** | **0.0729** | **7.5100e-003** | **0.0216** | **0.0291** | **0.0000** | **51.0011** | **51.0011** | **0.0144** | **0.0000** | **51.3600** |

## 3.2 Demolition - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 1.9300e-003 | 0.0634 | 0.0148 | 1.8000e-004 | 3.9400e-003 | 1.9000e-004 | 4.1300e-003 | 1.0800e-003 | 1.8000e-004 | 1.2600e-003 | 0.0000 | 17.4566 | 17.4566 | 1.2100e-003 | 0.0000 | 17.4869 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 7.2000e-004 | 5.3000e-004 | 6.0900e-003 | 2.0000e-005 | 1.6800e-003 | 1.0000e-005 | 1.6900e-003 | 4.5000e-004 | 1.0000e-005 | 4.6000e-004 | 0.0000 | 1.5281 | 1.5281 | 5.0000e-005 | 0.0000 | 1.5293 |
| **Total** | **2.6500e-003** | **0.0639** | **0.0209** | **2.0000e-004** | **5.6200e-003** | **2.0000e-004** | **5.8200e-003** | **1.5300e-003** | **1.9000e-004** | **1.7200e-003** | **0.0000** | **18.9847** | **18.9847** | **1.2600e-003** | **0.0000** | **19.0161** |

## 3.3 Site Preparation - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.1807 | 0.0000 | 0.1807 | 0.0993 | 0.0000 | 0.0993 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0389 | 0.4050 | 0.2115 | 3.8000e-004 | | 0.0204 | 0.0204 | | 0.0188 | 0.0188 | 0.0000 | 33.4357 | 33.4357 | 0.0108 | 0.0000 | 33.7061 |
| **Total** | **0.0389** | **0.4050** | **0.2115** | **3.8000e-004** | **0.1807** | **0.0204** | **0.2011** | **0.0993** | **0.0188** | **0.1181** | **0.0000** | **33.4357** | **33.4357** | **0.0108** | **0.0000** | **33.7061** |

## 3.3 Site Preparation - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 5.8000e-004 | 4.3000e-004 | 4.8700e-003 | 1.0000e-005 | 1.3400e-003 | 1.0000e-005 | 1.3500e-003 | 3.6000e-004 | 1.0000e-005 | 3.7000e-004 | 0.0000 | 1.2225 | 1.2225 | 4.0000e-005 | 0.0000 | 1.2234 |
| **Total** | **5.8000e-004** | **4.3000e-004** | **4.8700e-003** | **1.0000e-005** | **1.3400e-003** | **1.0000e-005** | **1.3500e-003** | **3.6000e-004** | **1.0000e-005** | **3.7000e-004** | **0.0000** | **1.2225** | **1.2225** | **4.0000e-005** | **0.0000** | **1.2234** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.1807 | 0.0000 | 0.1807 | 0.0993 | 0.0000 | 0.0993 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0389 | 0.4050 | 0.2115 | 3.8000e-004 | | 0.0204 | 0.0204 | | 0.0188 | 0.0188 | 0.0000 | 33.4357 | 33.4357 | 0.0108 | 0.0000 | 33.7060 |
| **Total** | **0.0389** | **0.4050** | **0.2115** | **3.8000e-004** | **0.1807** | **0.0204** | **0.2011** | **0.0993** | **0.0188** | **0.1181** | **0.0000** | **33.4357** | **33.4357** | **0.0108** | **0.0000** | **33.7060** |

## 3.3 Site Preparation - 2021

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 5.8000e-004 | 4.3000e-004 | 4.8700e-003 | 1.0000e-005 | 1.3400e-003 | 1.0000e-005 | 1.3500e-003 | 3.6000e-004 | 1.0000e-005 | 3.7000e-004 | 0.0000 | 1.2225 | 1.2225 | 4.0000e-005 | 0.0000 | 1.2234 |
| **Total** | **5.8000e-004** | **4.3000e-004** | **4.8700e-003** | **1.0000e-005** | **1.3400e-003** | **1.0000e-005** | **1.3500e-003** | **3.6000e-004** | **1.0000e-005** | **3.7000e-004** | **0.0000** | **1.2225** | **1.2225** | **4.0000e-005** | **0.0000** | **1.2234** |

## 3.4 Grading - 2021

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.1741 | 0.0000 | 0.1741 | 0.0693 | 0.0000 | 0.0693 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0796 | 0.8816 | 0.5867 | 1.1800e-003 | | 0.0377 | 0.0377 | | 0.0347 | 0.0347 | 0.0000 | 103.5405 | 103.5405 | 0.0335 | 0.0000 | 104.3776 |
| **Total** | **0.0796** | **0.8816** | **0.5867** | **1.1800e-003** | **0.1741** | **0.0377** | **0.2118** | **0.0693** | **0.0347** | **0.1040** | **0.0000** | **103.5405** | **103.5405** | **0.0335** | **0.0000** | **104.3776** |

## 3.4 Grading - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 1.2200e-003 | 9.0000e-004 | 0.0103 | 3.0000e-005 | 2.8300e-003 | 2.0000e-005 | 2.8600e-003 | 7.5000e-004 | 2.0000e-005 | 7.8000e-004 | 0.0000 | 2.5808 | 2.5808 | 8.0000e-005 | 0.0000 | 2.5828 |
| **Total** | **1.2200e-003** | **9.0000e-004** | **0.0103** | **3.0000e-005** | **2.8300e-003** | **2.0000e-005** | **2.8600e-003** | **7.5000e-004** | **2.0000e-005** | **7.8000e-004** | **0.0000** | **2.5808** | **2.5808** | **8.0000e-005** | **0.0000** | **2.5828** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.1741 | 0.0000 | 0.1741 | 0.0693 | 0.0000 | 0.0693 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0796 | 0.8816 | 0.5867 | 1.1800e-003 | | 0.0377 | 0.0377 | | 0.0347 | 0.0347 | 0.0000 | 103.5403 | 103.5403 | 0.0335 | 0.0000 | 104.3775 |
| **Total** | **0.0796** | **0.8816** | **0.5867** | **1.1800e-003** | **0.1741** | **0.0377** | **0.2118** | **0.0693** | **0.0347** | **0.1040** | **0.0000** | **103.5403** | **103.5403** | **0.0335** | **0.0000** | **104.3775** |

## 3.4 Grading - 2021

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 1.2200e-003 | 9.0000e-004 | 0.0103 | 3.0000e-005 | 2.8300e-003 | 2.0000e-005 | 2.8600e-003 | 7.5000e-004 | 2.0000e-005 | 7.8000e-004 | 0.0000 | 2.5808 | 2.5808 | 8.0000e-005 | 0.0000 | 2.5828 |
| **Total** | **1.2200e-003** | **9.0000e-004** | **0.0103** | **3.0000e-005** | **2.8300e-003** | **2.0000e-005** | **2.8600e-003** | **7.5000e-004** | **2.0000e-005** | **7.8000e-004** | **0.0000** | **2.5808** | **2.5808** | **8.0000e-005** | **0.0000** | **2.5828** |

## 3.4 Grading - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.0807 | 0.0000 | 0.0807 | 0.0180 | 0.0000 | 0.0180 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0127 | 0.1360 | 0.1017 | 2.2000e-004 | | 5.7200e-003 | 5.7200e-003 | | 5.2600e-003 | 5.2600e-003 | 0.0000 | 19.0871 | 19.0871 | 6.1700e-003 | 0.0000 | 19.2414 |
| **Total** | **0.0127** | **0.1360** | **0.1017** | **2.2000e-004** | **0.0807** | **5.7200e-003** | **0.0865** | **0.0180** | **5.2600e-003** | **0.0233** | **0.0000** | **19.0871** | **19.0871** | **6.1700e-003** | **0.0000** | **19.2414** |

## 3.4 Grading - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 2.1000e-004 | 1.5000e-004 | 1.7400e-003 | 1.0000e-005 | 5.2000e-004 | 0.0000 | 5.3000e-004 | 1.4000e-004 | 0.0000 | 1.4000e-004 | 0.0000 | 0.4587 | 0.4587 | 1.0000e-005 | 0.0000 | 0.4590 |
| **Total** | **2.1000e-004** | **1.5000e-004** | **1.7400e-003** | **1.0000e-005** | **5.2000e-004** | **0.0000** | **5.3000e-004** | **1.4000e-004** | **0.0000** | **1.4000e-004** | **0.0000** | **0.4587** | **0.4587** | **1.0000e-005** | **0.0000** | **0.4590** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.0807 | 0.0000 | 0.0807 | 0.0180 | 0.0000 | 0.0180 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0127 | 0.1360 | 0.1017 | 2.2000e-004 | | 5.7200e-003 | 5.7200e-003 | | 5.2600e-003 | 5.2600e-003 | 0.0000 | 19.0871 | 19.0871 | 6.1700e-003 | 0.0000 | 19.2414 |
| **Total** | **0.0127** | **0.1360** | **0.1017** | **2.2000e-004** | **0.0807** | **5.7200e-003** | **0.0865** | **0.0180** | **5.2600e-003** | **0.0233** | **0.0000** | **19.0871** | **19.0871** | **6.1700e-003** | **0.0000** | **19.2414** |

## 3.4 Grading - 2022

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 2.1000e-004 | 1.5000e-004 | 1.7400e-003 | 1.0000e-005 | 5.2000e-004 | 0.0000 | 5.3000e-004 | 1.4000e-004 | 0.0000 | 1.4000e-004 | 0.0000 | 0.4587 | 0.4587 | 1.0000e-005 | 0.0000 | 0.4590 |
| **Total** | **2.1000e-004** | **1.5000e-004** | **1.7400e-003** | **1.0000e-005** | **5.2000e-004** | **0.0000** | **5.3000e-004** | **1.4000e-004** | **0.0000** | **1.4000e-004** | **0.0000** | **0.4587** | **0.4587** | **1.0000e-005** | **0.0000** | **0.4590** |

## 3.5 Building Construction - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.2158 | 1.9754 | 2.0700 | 3.4100e-003 | | 0.1023 | 0.1023 | | 0.0963 | 0.0963 | 0.0000 | 293.1324 | 293.1324 | 0.0702 | 0.0000 | 294.8881 |
| **Total** | **0.2158** | **1.9754** | **2.0700** | **3.4100e-003** | | **0.1023** | **0.1023** | | **0.0963** | **0.0963** | **0.0000** | **293.1324** | **293.1324** | **0.0702** | **0.0000** | **294.8881** |

## 3.5 Building Construction - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0527 | 1.6961 | 0.4580 | 4.5500e-003 | 0.1140 | 3.1800e-003 | 0.1171 | 0.0329 | 3.0400e-003 | 0.0359 | 0.0000 | 441.9835 | 441.9835 | 0.0264 | 0.0000 | 442.6435 |
| Worker | 0.3051 | 0.2164 | 2.5233 | 7.3500e-003 | 0.7557 | 6.2300e-003 | 0.7619 | 0.2007 | 5.7400e-003 | 0.2065 | 0.0000 | 663.9936 | 663.9936 | 0.0187 | 0.0000 | 664.4604 |
| **Total** | **0.3578** | **1.9125** | **2.9812** | **0.0119** | **0.8696** | **9.4100e-003** | **0.8790** | **0.2336** | **8.7800e-003** | **0.2424** | **0.0000** | **1,105.9771** | **1,105.9771** | **0.0451** | **0.0000** | **1,107.1039** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.2158 | 1.9754 | 2.0700 | 3.4100e-003 | | 0.1023 | 0.1023 | | 0.0963 | 0.0963 | 0.0000 | 293.1321 | 293.1321 | 0.0702 | 0.0000 | 294.8877 |
| **Total** | **0.2158** | **1.9754** | **2.0700** | **3.4100e-003** | | **0.1023** | **0.1023** | | **0.0963** | **0.0963** | **0.0000** | **293.1321** | **293.1321** | **0.0702** | **0.0000** | **294.8877** |

## 3.5 Building Construction - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0527 | 1.6961 | 0.4580 | 4.5500e-003 | 0.1140 | 3.1800e-003 | 0.1171 | 0.0329 | 3.0400e-003 | 0.0359 | 0.0000 | 441.9835 | 441.9835 | 0.0264 | 0.0000 | 442.6435 |
| Worker | 0.3051 | 0.2164 | 2.5233 | 7.3500e-003 | 0.7557 | 6.2300e-003 | 0.7619 | 0.2007 | 5.7400e-003 | 0.2065 | 0.0000 | 663.9936 | 663.9936 | 0.0187 | 0.0000 | 664.4604 |
| **Total** | **0.3578** | **1.9125** | **2.9812** | **0.0119** | **0.8696** | **9.4100e-003** | **0.8790** | **0.2336** | **8.7800e-003** | **0.2424** | **0.0000** | **1,105.9771** | **1,105.9771** | **0.0451** | **0.0000** | **1,107.1039** |

## 3.5 Building Construction - 2023

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.1942 | 1.7765 | 2.0061 | 3.3300e-003 | | 0.0864 | 0.0864 | | 0.0813 | 0.0813 | 0.0000 | 286.2789 | 286.2789 | 0.0681 | 0.0000 | 287.9814 |
| **Total** | **0.1942** | **1.7765** | **2.0061** | **3.3300e-003** | | **0.0864** | **0.0864** | | **0.0813** | **0.0813** | **0.0000** | **286.2789** | **286.2789** | **0.0681** | **0.0000** | **287.9814** |

## 3.5 Building Construction - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0382 | 1.2511 | 0.4011 | 4.3000e-003 | 0.1113 | 1.4600e-003 | 0.1127 | 0.0321 | 1.4000e-003 | 0.0335 | 0.0000 | 417.9930 | 417.9930 | 0.0228 | 0.0000 | 418.5624 |
| Worker | 0.2795 | 0.1910 | 2.2635 | 6.9100e-003 | 0.7377 | 5.9100e-003 | 0.7436 | 0.1960 | 5.4500e-003 | 0.2014 | 0.0000 | 624.5363 | 624.5363 | 0.0164 | 0.0000 | 624.9466 |
| **Total** | **0.3177** | **1.4420** | **2.6646** | **0.0112** | **0.8490** | **7.3700e-003** | **0.8564** | **0.2281** | **6.8500e-003** | **0.2349** | **0.0000** | **1,042.5294** | **1,042.5294** | **0.0392** | **0.0000** | **1,043.5090** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.1942 | 1.7765 | 2.0061 | 3.3300e-003 | | 0.0864 | 0.0864 | | 0.0813 | 0.0813 | 0.0000 | 286.2785 | 286.2785 | 0.0681 | 0.0000 | 287.9811 |
| **Total** | **0.1942** | **1.7765** | **2.0061** | **3.3300e-003** | | **0.0864** | **0.0864** | | **0.0813** | **0.0813** | **0.0000** | **286.2785** | **286.2785** | **0.0681** | **0.0000** | **287.9811** |

## 3.5 Building Construction - 2023

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0382 | 1.2511 | 0.4011 | 4.3000e-003 | 0.1113 | 1.4600e-003 | 0.1127 | 0.0321 | 1.4000e-003 | 0.0335 | 0.0000 | 417.9930 | 417.9930 | 0.0228 | 0.0000 | 418.5624 |
| Worker | 0.2795 | 0.1910 | 2.2635 | 6.9100e-003 | 0.7377 | 5.9100e-003 | 0.7436 | 0.1960 | 5.4500e-003 | 0.2014 | 0.0000 | 624.5363 | 624.5363 | 0.0164 | 0.0000 | 624.9466 |
| **Total** | **0.3177** | **1.4420** | **2.6646** | **0.0112** | **0.8490** | **7.3700e-003** | **0.8564** | **0.2281** | **6.8500e-003** | **0.2349** | **0.0000** | **1,042.5294** | **1,042.5294** | **0.0392** | **0.0000** | **1,043.5090** |

## 3.6 Paving - 2023

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 6.7100e-003 | 0.0663 | 0.0948 | 1.5000e-004 | | 3.3200e-003 | 3.3200e-003 | | 3.0500e-003 | 3.0500e-003 | 0.0000 | 13.0175 | 13.0175 | 4.2100e-003 | 0.0000 | 13.1227 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **6.7100e-003** | **0.0663** | **0.0948** | **1.5000e-004** | | **3.3200e-003** | **3.3200e-003** | | **3.0500e-003** | **3.0500e-003** | **0.0000** | **13.0175** | **13.0175** | **4.2100e-003** | **0.0000** | **13.1227** |

## 3.6 Paving - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 2.8000e-004 | 1.9000e-004 | 2.2300e-003 | 1.0000e-005 | 7.3000e-004 | 1.0000e-005 | 7.3000e-004 | 1.9000e-004 | 1.0000e-005 | 2.0000e-004 | 0.0000 | 0.6156 | 0.6156 | 2.0000e-005 | 0.0000 | 0.6160 |
| **Total** | **2.8000e-004** | **1.9000e-004** | **2.2300e-003** | **1.0000e-005** | **7.3000e-004** | **1.0000e-005** | **7.3000e-004** | **1.9000e-004** | **1.0000e-005** | **2.0000e-004** | **0.0000** | **0.6156** | **0.6156** | **2.0000e-005** | **0.0000** | **0.6160** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 6.7100e-003 | 0.0663 | 0.0948 | 1.5000e-004 | | 3.3200e-003 | 3.3200e-003 | | 3.0500e-003 | 3.0500e-003 | 0.0000 | 13.0175 | 13.0175 | 4.2100e-003 | 0.0000 | 13.1227 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **6.7100e-003** | **0.0663** | **0.0948** | **1.5000e-004** | | **3.3200e-003** | **3.3200e-003** | | **3.0500e-003** | **3.0500e-003** | **0.0000** | **13.0175** | **13.0175** | **4.2100e-003** | **0.0000** | **13.1227** |

## 3.6 Paving - 2023

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 2.8000e-004 | 1.9000e-004 | 2.2300e-003 | 1.0000e-005 | 7.3000e-004 | 1.0000e-005 | 7.3000e-004 | 1.9000e-004 | 1.0000e-005 | 2.0000e-004 | 0.0000 | 0.6156 | 0.6156 | 2.0000e-005 | 0.0000 | 0.6160 |
| **Total** | **2.8000e-004** | **1.9000e-004** | **2.2300e-003** | **1.0000e-005** | **7.3000e-004** | **1.0000e-005** | **7.3000e-004** | **1.9000e-004** | **1.0000e-005** | **2.0000e-004** | **0.0000** | **0.6156** | **0.6156** | **2.0000e-005** | **0.0000** | **0.6160** |

## 3.6 Paving - 2024

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0109 | 0.1048 | 0.1609 | 2.5000e-004 | | 5.1500e-003 | 5.1500e-003 | | 4.7400e-003 | 4.7400e-003 | 0.0000 | 22.0292 | 22.0292 | 7.1200e-003 | 0.0000 | 22.2073 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0109** | **0.1048** | **0.1609** | **2.5000e-004** | | **5.1500e-003** | **5.1500e-003** | | **4.7400e-003** | **4.7400e-003** | **0.0000** | **22.0292** | **22.0292** | **7.1200e-003** | **0.0000** | **22.2073** |

## 3.6 Paving - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 4.4000e-004 | 2.9000e-004 | 3.5100e-003 | 1.0000e-005 | 1.2300e-003 | 1.0000e-005 | 1.2400e-003 | 3.3000e-004 | 1.0000e-005 | 3.4000e-004 | 0.0000 | 1.0094 | 1.0094 | 3.0000e-005 | 0.0000 | 1.0100 |
| **Total** | **4.4000e-004** | **2.9000e-004** | **3.5100e-003** | **1.0000e-005** | **1.2300e-003** | **1.0000e-005** | **1.2400e-003** | **3.3000e-004** | **1.0000e-005** | **3.4000e-004** | **0.0000** | **1.0094** | **1.0094** | **3.0000e-005** | **0.0000** | **1.0100** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0109 | 0.1048 | 0.1609 | 2.5000e-004 | | 5.1500e-003 | 5.1500e-003 | | 4.7400e-003 | 4.7400e-003 | 0.0000 | 22.0292 | 22.0292 | 7.1200e-003 | 0.0000 | 22.2073 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0109** | **0.1048** | **0.1609** | **2.5000e-004** | | **5.1500e-003** | **5.1500e-003** | | **4.7400e-003** | **4.7400e-003** | **0.0000** | **22.0292** | **22.0292** | **7.1200e-003** | **0.0000** | **22.2073** |

## 3.6 Paving - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 4.4000e-004 | 2.9000e-004 | 3.5100e-003 | 1.0000e-005 | 1.2300e-003 | 1.0000e-005 | 1.2400e-003 | 3.3000e-004 | 1.0000e-005 | 3.4000e-004 | 0.0000 | 1.0094 | 1.0094 | 3.0000e-005 | 0.0000 | 1.0100 |
| **Total** | **4.4000e-004** | **2.9000e-004** | **3.5100e-003** | **1.0000e-005** | **1.2300e-003** | **1.0000e-005** | **1.2400e-003** | **3.3000e-004** | **1.0000e-005** | **3.4000e-004** | **0.0000** | **1.0094** | **1.0094** | **3.0000e-005** | **0.0000** | **1.0100** |

## 3.7 Architectural Coating - 2024

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 4.1372 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 3.1600e-003 | 0.0213 | 0.0317 | 5.0000e-005 | | 1.0700e-003 | 1.0700e-003 | | 1.0700e-003 | 1.0700e-003 | 0.0000 | 4.4682 | 4.4682 | 2.5000e-004 | 0.0000 | 4.4745 |
| **Total** | **4.1404** | **0.0213** | **0.0317** | **5.0000e-005** | | **1.0700e-003** | **1.0700e-003** | | **1.0700e-003** | **1.0700e-003** | **0.0000** | **4.4682** | **4.4682** | **2.5000e-004** | **0.0000** | **4.4745** |

## 3.7 Architectural Coating - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 7.4800e-003 | 4.9300e-003 | 0.0596 | 1.9000e-004 | 0.0209 | 1.6000e-004 | 0.0211 | 5.5500e-003 | 1.5000e-004 | 5.7000e-003 | 0.0000 | 17.1287 | 17.1287 | 4.3000e-004 | 0.0000 | 17.1394 |
| **Total** | **7.4800e-003** | **4.9300e-003** | **0.0596** | **1.9000e-004** | **0.0209** | **1.6000e-004** | **0.0211** | **5.5500e-003** | **1.5000e-004** | **5.7000e-003** | **0.0000** | **17.1287** | **17.1287** | **4.3000e-004** | **0.0000** | **17.1394** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 4.1372 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 3.1600e-003 | 0.0213 | 0.0317 | 5.0000e-005 | | 1.0700e-003 | 1.0700e-003 | | 1.0700e-003 | 1.0700e-003 | 0.0000 | 4.4682 | 4.4682 | 2.5000e-004 | 0.0000 | 4.4745 |
| **Total** | **4.1404** | **0.0213** | **0.0317** | **5.0000e-005** | | **1.0700e-003** | **1.0700e-003** | | **1.0700e-003** | **1.0700e-003** | **0.0000** | **4.4682** | **4.4682** | **2.5000e-004** | **0.0000** | **4.4745** |

### 3.7 Architectural Coating - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 7.4800e-003 | 4.9300e-003 | 0.0596 | 1.9000e-004 | 0.0209 | 1.6000e-004 | 0.0211 | 5.5500e-003 | 1.5000e-004 | 5.7000e-003 | 0.0000 | 17.1287 | 17.1287 | 4.3000e-004 | 0.0000 | 17.1394 |
| **Total** | **7.4800e-003** | **4.9300e-003** | **0.0596** | **1.9000e-004** | **0.0209** | **1.6000e-004** | **0.0211** | **5.5500e-003** | **1.5000e-004** | **5.7000e-003** | **0.0000** | **17.1287** | **17.1287** | **4.3000e-004** | **0.0000** | **17.1394** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 1.5857 | 7.9962 | 19.1834 | 0.0821 | 7.7979 | 0.0580 | 7.8559 | 2.0895 | 0.0539 | 2.1434 | 0.0000 | 7,620.4986 | 7,620.4986 | 0.3407 | 0.0000 | 7,629.0162 |
| Unmitigated | 1.5857 | 7.9962 | 19.1834 | 0.0821 | 7.7979 | 0.0580 | 7.8559 | 2.0895 | 0.0539 | 2.1434 | 0.0000 | 7,620.4986 | 7,620.4986 | 0.3407 | 0.0000 | 7,629.0162 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 145.75 | 154.25 | 154.00 | 506,227 | 506,227 |
| Apartments Mid Rise | 4,026.75 | 3,773.25 | 4075.50 | 13,660,065 | 13,660,065 |
| General Office Building | 288.45 | 62.55 | 31.05 | 706,812 | 706,812 |
| High Turnover (Sit Down Restaurant) | 2,368.80 | 2,873.52 | 2817.72 | 3,413,937 | 3,413,937 |
| Hotel | 192.00 | 187.50 | 160.00 | 445,703 | 445,703 |
| Quality Restaurant | 501.12 | 511.92 | 461.20 | 707,488 | 707,488 |
| Regional Shopping Center | 528.08 | 601.44 | 357.84 | 1,112,221 | 1,112,221 |
| Total | 8,050.95 | 8,164.43 | 8,057.31 | 20,552,452 | 20,552,452 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| General Office Building | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 77 | 19 | 4 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Hotel | 16.60 | 8.40 | 6.90 | 19.40 | 61.60 | 19.00 | 58 | 38 | 4 |
| Quality Restaurant | 16.60 | 8.40 | 6.90 | 12.00 | 69.00 | 19.00 | 38 | 18 | 44 |
| Regional Shopping Center | 16.60 | 8.40 | 6.90 | 16.30 | 64.70 | 19.00 | 54 | 35 | 11 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Apartments Mid Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| General Office Building | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| High Turnover (Sit Down Restaurant) | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Hotel | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Quality Restaurant | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Regional Shopping Center | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 2,512.6465 | 2,512.6465 | 0.1037 | 0.0215 | 2,521.6356 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 2,512.6465 | 2,512.6465 | 0.1037 | 0.0215 | 2,521.6356 |
| NaturalGas Mitigated | 0.1398 | 1.2312 | 0.7770 | 7.6200e-003 | | 0.0966 | 0.0966 | | 0.0966 | 0.0966 | 0.0000 | 1,383.4267 | 1,383.4267 | 0.0265 | 0.0254 | 1,391.6478 |
| NaturalGas Unmitigated | 0.1398 | 1.2312 | 0.7770 | 7.6200e-003 | | 0.0966 | 0.0966 | | 0.0966 | 0.0966 | 0.0000 | 1,383.4267 | 1,383.4267 | 0.0265 | 0.0254 | 1,391.6478 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Low Rise | 408494 | 2.2000e-003 | 0.0188 | 8.0100e-003 | 1.2000e-004 | | 1.5200e-003 | 1.5200e-003 | | 1.5200e-003 | 1.5200e-003 | 0.0000 | 21.7988 | 21.7988 | 4.2000e-004 | 4.0000e-004 | 21.9284 |
| Apartments Mid Rise | 1.30613e+007 | 0.0704 | 0.6018 | 0.2561 | 3.8400e-003 | | 0.0487 | 0.0487 | | 0.0487 | 0.0487 | 0.0000 | 696.9989 | 696.9989 | 0.0134 | 0.0128 | 701.1408 |
| General Office Building | 468450 | 2.5300e-003 | 0.0230 | 0.0193 | 1.4000e-004 | | 1.7500e-003 | 1.7500e-003 | | 1.7500e-003 | 1.7500e-003 | 0.0000 | 24.9983 | 24.9983 | 4.8000e-004 | 4.6000e-004 | 25.1468 |
| High Turnover (Sit Down Restaurant) | 8.30736e+006 | 0.0448 | 0.4072 | 0.3421 | 2.4400e-003 | | 0.0310 | 0.0310 | | 0.0310 | 0.0310 | 0.0000 | 443.3124 | 443.3124 | 8.5000e-003 | 8.1300e-003 | 445.9468 |
| Hotel | 1.74095e+006 | 9.3900e-003 | 0.0853 | 0.0717 | 5.1000e-004 | | 6.4900e-003 | 6.4900e-003 | | 6.4900e-003 | 6.4900e-003 | 0.0000 | 92.9036 | 92.9036 | 1.7800e-003 | 1.7000e-003 | 93.4557 |
| Quality Restaurant | 1.84608e+006 | 9.9500e-003 | 0.0905 | 0.0760 | 5.4000e-004 | | 6.8800e-003 | 6.8800e-003 | | 6.8800e-003 | 6.8800e-003 | 0.0000 | 98.5139 | 98.5139 | 1.8900e-003 | 1.8100e-003 | 99.0993 |
| Regional Shopping Center | 91840 | 5.0000e-004 | 4.5000e-003 | 3.7800e-003 | 3.0000e-005 | | 3.4000e-004 | 3.4000e-004 | | 3.4000e-004 | 3.4000e-004 | 0.0000 | 4.9009 | 4.9009 | 9.0000e-005 | 9.0000e-005 | 4.9301 |
| **Total** | | **0.1398** | **1.2312** | **0.7770** | **7.6200e-003** | | **0.0966** | **0.0966** | | **0.0966** | **0.0966** | **0.0000** | **1,383.4268** | **1,383.4268** | **0.0265** | **0.0254** | **1,391.6478** |

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Low Rise | 408494 | 2.2000e-003 | 0.0188 | 8.0100e-003 | 1.2000e-004 | | 1.5200e-003 | 1.5200e-003 | | 1.5200e-003 | 1.5200e-003 | 0.0000 | 21.7988 | 21.7988 | 4.2000e-004 | 4.0000e-004 | 21.9284 |
| Apartments Mid Rise | 1.30613e+007 | 0.0704 | 0.6018 | 0.2561 | 3.8400e-003 | | 0.0487 | 0.0487 | | 0.0487 | 0.0487 | 0.0000 | 696.9989 | 696.9989 | 0.0134 | 0.0128 | 701.1408 |
| General Office Building | 468450 | 2.5300e-003 | 0.0230 | 0.0193 | 1.4000e-004 | | 1.7500e-003 | 1.7500e-003 | | 1.7500e-003 | 1.7500e-003 | 0.0000 | 24.9983 | 24.9983 | 4.8000e-004 | 4.6000e-004 | 25.1468 |
| High Turnover (Sit Down Restaurant) | 8.30736e+006 | 0.0448 | 0.4072 | 0.3421 | 2.4400e-003 | | 0.0310 | 0.0310 | | 0.0310 | 0.0310 | 0.0000 | 443.3124 | 443.3124 | 8.5000e-003 | 8.1300e-003 | 445.9468 |
| Hotel | 1.74095e+006 | 9.3900e-003 | 0.0853 | 0.0717 | 5.1000e-004 | | 6.4900e-003 | 6.4900e-003 | | 6.4900e-003 | 6.4900e-003 | 0.0000 | 92.9036 | 92.9036 | 1.7800e-003 | 1.7000e-003 | 93.4557 |
| Quality Restaurant | 1.84608e+006 | 9.9500e-003 | 0.0905 | 0.0760 | 5.4000e-004 | | 6.8800e-003 | 6.8800e-003 | | 6.8800e-003 | 6.8800e-003 | 0.0000 | 98.5139 | 98.5139 | 1.8900e-003 | 1.8100e-003 | 99.0993 |
| Regional Shopping Center | 91840 | 5.0000e-004 | 4.5000e-003 | 3.7800e-003 | 3.0000e-005 | | 3.4000e-004 | 3.4000e-004 | | 3.4000e-004 | 3.4000e-004 | 0.0000 | 4.9009 | 4.9009 | 9.0000e-005 | 9.0000e-005 | 4.9301 |
| **Total** | | **0.1398** | **1.2312** | **0.7770** | **7.6200e-003** | | **0.0966** | **0.0966** | | **0.0966** | **0.0966** | **0.0000** | **1,383.4268** | **1,383.4268** | **0.0265** | **0.0254** | **1,391.6478** |

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Low Rise | 106010 | 33.7770 | 1.3900e-003 | 2.9000e-004 | 33.8978 |
| Apartments Mid Rise | 3.94697e+006 | 1,257.5879 | 0.0519 | 0.0107 | 1,262.0869 |
| General Office Building | 584550 | 186.2502 | 7.6900e-003 | 1.5900e-003 | 186.9165 |
| High Turnover (Sit Down Restaurant) | 1.58904e+006 | 506.3022 | 0.0209 | 4.3200e-003 | 508.1135 |
| Hotel | 550308 | 175.3399 | 7.2400e-003 | 1.5000e-003 | 175.9672 |
| Quality Restaurant | 353120 | 112.5116 | 4.6500e-003 | 9.6000e-004 | 112.9141 |
| Regional Shopping Center | 756000 | 240.8778 | 9.9400e-003 | 2.0600e-003 | 241.7395 |
| **Total** | | **2,512.6465** | **0.1037** | **0.0215** | **2,521.6356** |

## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Low Rise | 106010 | 33.7770 | 1.3900e-003 | 2.9000e-004 | 33.8978 |
| Apartments Mid Rise | 3.94697e+006 | 1,257.5879 | 0.0519 | 0.0107 | 1,262.0869 |
| General Office Building | 584550 | 186.2502 | 7.6900e-003 | 1.5900e-003 | 186.9165 |
| High Turnover (Sit Down Restaurant) | 1.58904e+006 | 506.3022 | 0.0209 | 4.3200e-003 | 508.1135 |
| Hotel | 550308 | 175.3399 | 7.2400e-003 | 1.5000e-003 | 175.9672 |
| Quality Restaurant | 353120 | 112.5116 | 4.6500e-003 | 9.6000e-004 | 112.9141 |
| Regional Shopping Center | 756000 | 240.8778 | 9.9400e-003 | 2.0600e-003 | 241.7395 |
| **Total** | | **2,512.6465** | **0.1037** | **0.0215** | **2,521.6356** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 5.1437 | 0.2950 | 10.3804 | 1.6700e-003 | | 0.0714 | 0.0714 | | 0.0714 | 0.0714 | 0.0000 | 220.9670 | 220.9670 | 0.0201 | 3.7400e-003 | 222.5835 |
| Unmitigated | 5.1437 | 0.2950 | 10.3804 | 1.6700e-003 | | 0.0714 | 0.0714 | | 0.0714 | 0.0714 | 0.0000 | 220.9670 | 220.9670 | 0.0201 | 3.7400e-003 | 222.5835 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.4137 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 4.3998 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0206 | 0.1763 | 0.0750 | 1.1200e-003 | | 0.0143 | 0.0143 | | 0.0143 | 0.0143 | 0.0000 | 204.1166 | 204.1166 | 3.9100e-003 | 3.7400e-003 | 205.3295 |
| Landscaping | 0.3096 | 0.1187 | 10.3054 | 5.4000e-004 | | 0.0572 | 0.0572 | | 0.0572 | 0.0572 | 0.0000 | 16.8504 | 16.8504 | 0.0161 | 0.0000 | 17.2540 |
| **Total** | **5.1437** | **0.2950** | **10.3804** | **1.6600e-003** | | **0.0714** | **0.0714** | | **0.0714** | **0.0714** | **0.0000** | **220.9670** | **220.9670** | **0.0201** | **3.7400e-003** | **222.5835** |

## 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.4137 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 4.3998 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0206 | 0.1763 | 0.0750 | 1.1200e-003 | | 0.0143 | 0.0143 | | 0.0143 | 0.0143 | 0.0000 | 204.1166 | 204.1166 | 3.9100e-003 | 3.7400e-003 | 205.3295 |
| Landscaping | 0.3096 | 0.1187 | 10.3054 | 5.4000e-004 | | 0.0572 | 0.0572 | | 0.0572 | 0.0572 | 0.0000 | 16.8504 | 16.8504 | 0.0161 | 0.0000 | 17.2540 |
| **Total** | **5.1437** | **0.2950** | **10.3804** | **1.6600e-003** | | **0.0714** | **0.0714** | | **0.0714** | **0.0714** | **0.0000** | **220.9670** | **220.9670** | **0.0201** | **3.7400e-003** | **222.5835** |

# 7.0 Water Detail

## 7.1 Mitigation Measures Water

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 585.8052 | 3.0183 | 0.0755 | 683.7567 |
| Unmitigated | 585.8052 | 3.0183 | 0.0755 | 683.7567 |

## 7.2 Water by Land Use

### Unmitigated

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Low Rise | 1.62885 / 1.02688 | 10.9095 | 0.0535 | 1.3400e-003 | 12.6471 |
| Apartments Mid Rise | 63.5252 / 40.0485 | 425.4719 | 2.0867 | 0.0523 | 493.2363 |
| General Office Building | 7.99802 / 4.90201 | 53.0719 | 0.2627 | 6.5900e-003 | 61.6019 |
| High Turnover (Sit Down Restaurant) | 10.9272 / 0.697482 | 51.2702 | 0.3580 | 8.8200e-003 | 62.8482 |
| Hotel | 1.26834 / 0.140927 | 6.1633 | 0.0416 | 1.0300e-003 | 7.5079 |
| Quality Restaurant | 2.42827 / 0.154996 | 11.3934 | 0.0796 | 1.9600e-003 | 13.9663 |
| Regional Shopping Center | 4.14806 / 2.54236 | 27.5250 | 0.1363 | 3.4200e-003 | 31.9490 |
| **Total** | | **585.8052** | **3.0183** | **0.0755** | **683.7567** |

## 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Low Rise | 1.62885 / 1.02688 | 10.9095 | 0.0535 | 1.3400e-003 | 12.6471 |
| Apartments Mid Rise | 63.5252 / 40.0485 | 425.4719 | 2.0867 | 0.0523 | 493.2363 |
| General Office Building | 7.99802 / 4.90201 | 53.0719 | 0.2627 | 6.5900e-003 | 61.6019 |
| High Turnover (Sit Down Restaurant) | 10.9272 / 0.697482 | 51.2702 | 0.3580 | 8.8200e-003 | 62.8482 |
| Hotel | 1.26834 / 0.140927 | 6.1633 | 0.0416 | 1.0300e-003 | 7.5079 |
| Quality Restaurant | 2.42827 / 0.154996 | 11.3934 | 0.0796 | 1.9600e-003 | 13.9663 |
| Regional Shopping Center | 4.14806 / 2.54236 | 27.5250 | 0.1363 | 3.4200e-003 | 31.9490 |
| **Total** | | **585.8052** | **3.0183** | **0.0755** | **683.7567** |

# 8.0 Waste Detail

## 8.1 Mitigation Measures Waste

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 207.8079 | 12.2811 | 0.0000 | 514.8354 |
| Unmitigated | 207.8079 | 12.2811 | 0.0000 | 514.8354 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Low Rise | 11.5 | 2.3344 | 0.1380 | 0.0000 | 5.7834 |
| Apartments Mid Rise | 448.5 | 91.0415 | 5.3804 | 0.0000 | 225.5513 |
| General Office Building | 41.85 | 8.4952 | 0.5021 | 0.0000 | 21.0464 |
| High Turnover (Sit Down Restaurant) | 428.4 | 86.9613 | 5.1393 | 0.0000 | 215.4430 |
| Hotel | 27.38 | 5.5579 | 0.3285 | 0.0000 | 13.7694 |
| Quality Restaurant | 7.3 | 1.4818 | 0.0876 | 0.0000 | 3.6712 |
| Regional Shopping Center | 58.8 | 11.9359 | 0.7054 | 0.0000 | 29.5706 |
| **Total** | | **207.8079** | **12.2811** | **0.0000** | **514.8354** |

## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Low Rise | 11.5 | 2.3344 | 0.1380 | 0.0000 | 5.7834 |
| Apartments Mid Rise | 448.5 | 91.0415 | 5.3804 | 0.0000 | 225.5513 |
| General Office Building | 41.85 | 8.4952 | 0.5021 | 0.0000 | 21.0464 |
| High Turnover (Sit Down Restaurant) | 428.4 | 86.9613 | 5.1393 | 0.0000 | 215.4430 |
| Hotel | 27.38 | 5.5579 | 0.3285 | 0.0000 | 13.7694 |
| Quality Restaurant | 7.3 | 1.4818 | 0.0876 | 0.0000 | 3.6712 |
| Regional Shopping Center | 58.8 | 11.9359 | 0.7054 | 0.0000 | 29.5706 |
| **Total** | | **207.8079** | **12.2811** | **0.0000** | **514.8354** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

# Village South Specific Plan (Proposed)

**Los Angeles-South Coast County, Summer**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| General Office Building | 45.00 | 1000sqft | 1.03 | 45,000.00 | 0 |
| High Turnover (Sit Down Restaurant) | 36.00 | 1000sqft | 0.83 | 36,000.00 | 0 |
| Hotel | 50.00 | Room | 1.67 | 72,600.00 | 0 |
| Quality Restaurant | 8.00 | 1000sqft | 0.18 | 8,000.00 | 0 |
| Apartments Low Rise | 25.00 | Dwelling Unit | 1.56 | 25,000.00 | 72 |
| Apartments Mid Rise | 975.00 | Dwelling Unit | 25.66 | 975,000.00 | 2789 |
| Regional Shopping Center | 56.00 | 1000sqft | 1.29 | 56,000.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 9 | | | **Operational Year** | 2028 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 702.44 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | NumberWood | 1.25 | 0.00 |
| tblFireplaces | NumberWood | 48.75 | 0.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblVehicleTrips | ST_TR | 7.16 | 6.17 |
| tblVehicleTrips | ST_TR | 6.39 | 3.87 |
| tblVehicleTrips | ST_TR | 2.46 | 1.39 |
| tblVehicleTrips | ST_TR | 158.37 | 79.82 |

| | | | |
|---|---|---|---|
| tblVehicleTrips | ST_TR | 8.19 | 3.75 |
| tblVehicleTrips | ST_TR | 94.36 | 63.99 |
| tblVehicleTrips | ST_TR | 49.97 | 10.74 |
| tblVehicleTrips | SU_TR | 6.07 | 6.16 |
| tblVehicleTrips | SU_TR | 5.86 | 4.18 |
| tblVehicleTrips | SU_TR | 1.05 | 0.69 |
| tblVehicleTrips | SU_TR | 131.84 | 78.27 |
| tblVehicleTrips | SU_TR | 5.95 | 3.20 |
| tblVehicleTrips | SU_TR | 72.16 | 57.65 |
| tblVehicleTrips | SU_TR | 25.24 | 6.39 |
| tblVehicleTrips | WD_TR | 6.59 | 5.83 |
| tblVehicleTrips | WD_TR | 6.65 | 4.13 |
| tblVehicleTrips | WD_TR | 11.03 | 6.41 |
| tblVehicleTrips | WD_TR | 127.15 | 65.80 |
| tblVehicleTrips | WD_TR | 8.17 | 3.84 |
| tblVehicleTrips | WD_TR | 89.95 | 62.64 |
| tblVehicleTrips | WD_TR | 42.70 | 9.43 |
| tblWoodstoves | NumberCatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberCatalytic | 48.75 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 48.75 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |

## 2.0 Emissions Summary

## 2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2021 | 4.2561 | 46.4415 | 31.4494 | 0.0636 | 18.2032 | 2.0456 | 20.2488 | 9.9670 | 1.8820 | 11.8490 | 0.0000 | 6,163.4166 | 6,163.4166 | 1.9475 | 0.0000 | 6,212.1039 |
| 2022 | 4.5441 | 38.8811 | 40.8776 | 0.1240 | 8.8255 | 1.6361 | 10.4616 | 3.6369 | 1.5052 | 5.1421 | 0.0000 | 12,493.4403 | 12,493.4403 | 1.9485 | 0.0000 | 12,518.5707 |
| 2023 | 4.1534 | 25.7658 | 38.7457 | 0.1206 | 7.0088 | 0.7592 | 7.7679 | 1.8799 | 0.7136 | 2.5935 | 0.0000 | 12,150.4890 | 12,150.4890 | 0.9589 | 0.0000 | 12,174.4615 |
| 2024 | 237.0219 | 9.5478 | 14.9642 | 0.0239 | 1.2171 | 0.4694 | 1.2875 | 0.3229 | 0.4319 | 0.4621 | 0.0000 | 2,313.1808 | 2,313.1808 | 0.7166 | 0.0000 | 2,331.0956 |
| **Maximum** | **237.0219** | **46.4415** | **40.8776** | **0.1240** | **18.2032** | **2.0456** | **20.2488** | **9.9670** | **1.8820** | **11.8490** | **0.0000** | **12,493.4403** | **12,493.4403** | **1.9485** | **0.0000** | **12,518.5707** |

## 2.1 Overall Construction (Maximum Daily Emission)

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2021 | 4.2561 | 46.4415 | 31.4494 | 0.0636 | 18.2032 | 2.0456 | 20.2488 | 9.9670 | 1.8820 | 11.8490 | 0.0000 | 6,163.4166 | 6,163.4166 | 1.9475 | 0.0000 | 6,212.1039 |
| 2022 | 4.5441 | 38.8811 | 40.8776 | 0.1240 | 8.8255 | 1.6361 | 10.4616 | 3.6369 | 1.5052 | 5.1421 | 0.0000 | 12,493.4403 | 12,493.4403 | 1.9485 | 0.0000 | 12,518.5707 |
| 2023 | 4.1534 | 25.7658 | 38.7457 | 0.1206 | 7.0088 | 0.7592 | 7.7679 | 1.8799 | 0.7136 | 2.5935 | 0.0000 | 12,150.4890 | 12,150.4890 | 0.9589 | 0.0000 | 12,174.4615 |
| 2024 | 237.0219 | 9.5478 | 14.9642 | 0.0239 | 1.2171 | 0.4694 | 1.2875 | 0.3229 | 0.4319 | 0.4621 | 0.0000 | 2,313.1808 | 2,313.1808 | 0.7166 | 0.0000 | 2,331.0955 |
| **Maximum** | **237.0219** | **46.4415** | **40.8776** | **0.1240** | **18.2032** | **2.0456** | **20.2488** | **9.9670** | **1.8820** | **11.8490** | **0.0000** | **12,493.4403** | **12,493.4403** | **1.9485** | **0.0000** | **12,518.5707** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Energy | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| Mobile | 9.8489 | 45.4304 | 114.8495 | 0.4917 | 45.9592 | 0.3360 | 46.2951 | 12.2950 | 0.3119 | 12.6070 | | 50,306.6034 | 50,306.6034 | 2.1807 | | 50,361.1208 |
| **Total** | **41.1168** | **67.2262** | **207.5497** | **0.6278** | **45.9592** | **2.4626** | **48.4217** | **12.2950** | **2.4385** | **14.7336** | **0.0000** | **76,811.1816** | **76,811.1816** | **2.8282** | **0.4832** | **77,025.8786** |

### Mitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Energy | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| Mobile | 9.8489 | 45.4304 | 114.8495 | 0.4917 | 45.9592 | 0.3360 | 46.2951 | 12.2950 | 0.3119 | 12.6070 | | 50,306.6034 | 50,306.6034 | 2.1807 | | 50,361.1208 |
| **Total** | **41.1168** | **67.2262** | **207.5497** | **0.6278** | **45.9592** | **2.4626** | **48.4217** | **12.2950** | **2.4385** | **14.7336** | **0.0000** | **76,811.1816** | **76,811.1816** | **2.8282** | **0.4832** | **77,025.8786** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 9/1/2021 | 10/12/2021 | 5 | 30 | |
| 2 | Site Preparation | Site Preparation | 10/13/2021 | 11/9/2021 | 5 | 20 | |
| 3 | Grading | Grading | 11/10/2021 | 1/11/2022 | 5 | 45 | |
| 4 | Building Construction | Building Construction | 1/12/2022 | 12/12/2023 | 5 | 500 | |
| 5 | Paving | Paving | 12/13/2023 | 1/30/2024 | 5 | 35 | |
| 6 | Architectural Coating | Architectural Coating | 1/31/2024 | 3/19/2024 | 5 | 35 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 112.5**

**Acres of Paving: 0**

**Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 458.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 801.00 | 143.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 160.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 3.3074 | 0.0000 | 3.3074 | 0.5008 | 0.0000 | 0.5008 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1651 | 31.4407 | 21.5650 | 0.0388 | | 1.5513 | 1.5513 | | 1.4411 | 1.4411 | | 3,747.9449 | 3,747.9449 | 1.0549 | | 3,774.3174 |
| **Total** | **3.1651** | **31.4407** | **21.5650** | **0.0388** | **3.3074** | **1.5513** | **4.8588** | **0.5008** | **1.4411** | **1.9419** | | **3,747.9449** | **3,747.9449** | **1.0549** | | **3,774.3174** |

## 3.2 Demolition - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.1273 | 4.0952 | 0.9602 | 0.0119 | 0.2669 | 0.0126 | 0.2795 | 0.0732 | 0.0120 | 0.0852 | | 1,292.2413 | 1,292.2413 | 0.0877 | | 1,294.4337 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0487 | 0.0313 | 0.4282 | 1.1800e-003 | 0.1141 | 9.5000e-004 | 0.1151 | 0.0303 | 8.8000e-004 | 0.0311 | | 117.2799 | 117.2799 | 3.5200e-003 | | 117.3678 |
| **Total** | **0.1760** | **4.1265** | **1.3884** | **0.0131** | **0.3810** | **0.0135** | **0.3946** | **0.1034** | **0.0129** | **0.1163** | | **1,409.5212** | **1,409.5212** | **0.0912** | | **1,411.8015** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 3.3074 | 0.0000 | 3.3074 | 0.5008 | 0.0000 | 0.5008 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1651 | 31.4407 | 21.5650 | 0.0388 | | 1.5513 | 1.5513 | | 1.4411 | 1.4411 | 0.0000 | 3,747.9449 | 3,747.9449 | 1.0549 | | 3,774.3174 |
| **Total** | **3.1651** | **31.4407** | **21.5650** | **0.0388** | **3.3074** | **1.5513** | **4.8588** | **0.5008** | **1.4411** | **1.9419** | **0.0000** | **3,747.9449** | **3,747.9449** | **1.0549** | | **3,774.3174** |

## 3.2 Demolition - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.1273 | 4.0952 | 0.9602 | 0.0119 | 0.2669 | 0.0126 | 0.2795 | 0.0732 | 0.0120 | 0.0852 | | 1,292.2413 | 1,292.2413 | 0.0877 | | 1,294.4337 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0487 | 0.0313 | 0.4282 | 1.1800e-003 | 0.1141 | 9.5000e-004 | 0.1151 | 0.0303 | 8.8000e-004 | 0.0311 | | 117.2799 | 117.2799 | 3.5200e-003 | | 117.3678 |
| **Total** | **0.1760** | **4.1265** | **1.3884** | **0.0131** | **0.3810** | **0.0135** | **0.3946** | **0.1034** | **0.0129** | **0.1163** | | **1,409.5212** | **1,409.5212** | **0.0912** | | **1,411.8015** |

## 3.3 Site Preparation - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.8882 | 40.4971 | 21.1543 | 0.0380 | | 2.0445 | 2.0445 | | 1.8809 | 1.8809 | | 3,685.6569 | 3,685.6569 | 1.1920 | | 3,715.4573 |
| **Total** | **3.8882** | **40.4971** | **21.1543** | **0.0380** | **18.0663** | **2.0445** | **20.1107** | **9.9307** | **1.8809** | **11.8116** | | **3,685.6569** | **3,685.6569** | **1.1920** | | **3,715.4573** |

## 3.3 Site Preparation - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0584 | 0.0375 | 0.5139 | 1.4100e-003 | 0.1369 | 1.1400e-003 | 0.1381 | 0.0363 | 1.0500e-003 | 0.0374 | | 140.7359 | 140.7359 | 4.2200e-003 | | 140.8414 |
| **Total** | **0.0584** | **0.0375** | **0.5139** | **1.4100e-003** | **0.1369** | **1.1400e-003** | **0.1381** | **0.0363** | **1.0500e-003** | **0.0374** | | **140.7359** | **140.7359** | **4.2200e-003** | | **140.8414** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.8882 | 40.4971 | 21.1543 | 0.0380 | | 2.0445 | 2.0445 | | 1.8809 | 1.8809 | 0.0000 | 3,685.6569 | 3,685.6569 | 1.1920 | | 3,715.4573 |
| **Total** | **3.8882** | **40.4971** | **21.1543** | **0.0380** | **18.0663** | **2.0445** | **20.1107** | **9.9307** | **1.8809** | **11.8116** | **0.0000** | **3,685.6569** | **3,685.6569** | **1.1920** | | **3,715.4573** |

## 3.3 Site Preparation - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0584 | 0.0375 | 0.5139 | 1.4100e-003 | 0.1369 | 1.1400e-003 | 0.1381 | 0.0363 | 1.0500e-003 | 0.0374 | | 140.7359 | 140.7359 | 4.2200e-003 | | 140.8414 |
| **Total** | **0.0584** | **0.0375** | **0.5139** | **1.4100e-003** | **0.1369** | **1.1400e-003** | **0.1381** | **0.0363** | **1.0500e-003** | **0.0374** | | **140.7359** | **140.7359** | **4.2200e-003** | | **140.8414** |

## 3.4 Grading - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.1912 | 46.3998 | 30.8785 | 0.0620 | | 1.9853 | 1.9853 | | 1.8265 | 1.8265 | | 6,007.0434 | 6,007.0434 | 1.9428 | | 6,055.6134 |
| **Total** | **4.1912** | **46.3998** | **30.8785** | **0.0620** | **8.6733** | **1.9853** | **10.6587** | **3.5965** | **1.8265** | **5.4230** | | **6,007.0434** | **6,007.0434** | **1.9428** | | **6,055.6134** |

## 3.4 Grading - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0649 | 0.0417 | 0.5710 | 1.5700e-003 | 0.1521 | 1.2700e-003 | 0.1534 | 0.0404 | 1.1700e-003 | 0.0415 | | 156.3732 | 156.3732 | 4.6900e-003 | | 156.4904 |
| **Total** | **0.0649** | **0.0417** | **0.5710** | **1.5700e-003** | **0.1521** | **1.2700e-003** | **0.1534** | **0.0404** | **1.1700e-003** | **0.0415** | | **156.3732** | **156.3732** | **4.6900e-003** | | **156.4904** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.1912 | 46.3998 | 30.8785 | 0.0620 | | 1.9853 | 1.9853 | | 1.8265 | 1.8265 | 0.0000 | 6,007.0434 | 6,007.0434 | 1.9428 | | 6,055.6134 |
| **Total** | **4.1912** | **46.3998** | **30.8785** | **0.0620** | **8.6733** | **1.9853** | **10.6587** | **3.5965** | **1.8265** | **5.4230** | **0.0000** | **6,007.0434** | **6,007.0434** | **1.9428** | | **6,055.6134** |

## 3.4 Grading - 2021

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0649 | 0.0417 | 0.5710 | 1.5700e-003 | 0.1521 | 1.2700e-003 | 0.1534 | 0.0404 | 1.1700e-003 | 0.0415 | | 156.3732 | 156.3732 | 4.6900e-003 | | 156.4904 |
| **Total** | **0.0649** | **0.0417** | **0.5710** | **1.5700e-003** | **0.1521** | **1.2700e-003** | **0.1534** | **0.0404** | **1.1700e-003** | **0.0415** | | **156.3732** | **156.3732** | **4.6900e-003** | | **156.4904** |

## 3.4 Grading - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **8.6733** | **1.6349** | **10.3082** | **3.5965** | **1.5041** | **5.1006** | | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

## 3.4 Grading - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0607 | 0.0376 | 0.5263 | 1.5100e-003 | 0.1521 | 1.2300e-003 | 0.1534 | 0.0404 | 1.1300e-003 | 0.0415 | | 150.8754 | 150.8754 | 4.2400e-003 | | 150.9813 |
| **Total** | **0.0607** | **0.0376** | **0.5263** | **1.5100e-003** | **0.1521** | **1.2300e-003** | **0.1534** | **0.0404** | **1.1300e-003** | **0.0415** | | **150.8754** | **150.8754** | **4.2400e-003** | | **150.9813** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | 0.0000 | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **8.6733** | **1.6349** | **10.3082** | **3.5965** | **1.5041** | **5.1006** | **0.0000** | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

## 3.4 Grading - 2022

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0607 | 0.0376 | 0.5263 | 1.5100e-003 | 0.1521 | 1.2300e-003 | 0.1534 | 0.0404 | 1.1300e-003 | 0.0415 | | 150.8754 | 150.8754 | 4.2400e-003 | | 150.9813 |
| **Total** | **0.0607** | **0.0376** | **0.5263** | **1.5100e-003** | **0.1521** | **1.2300e-003** | **0.1534** | **0.0404** | **1.1300e-003** | **0.0415** | | **150.8754** | **150.8754** | **4.2400e-003** | | **150.9813** |

## 3.5 Building Construction - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

## 3.5 Building Construction - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.4079 | 13.2032 | 3.4341 | 0.0364 | 0.9155 | 0.0248 | 0.9404 | 0.2636 | 0.0237 | 0.2873 | | 3,896.5482 | 3,896.5482 | 0.2236 | | 3,902.1384 |
| Worker | 2.4299 | 1.5074 | 21.0801 | 0.0607 | 6.0932 | 0.0493 | 6.1425 | 1.6163 | 0.0454 | 1.6617 | | 6,042.5585 | 6,042.5585 | 0.1697 | | 6,046.8000 |
| **Total** | **2.8378** | **14.7106** | **24.5142** | **0.0971** | **7.0087** | **0.0741** | **7.0828** | **1.8799** | **0.0691** | **1.9490** | | **9,939.1067** | **9,939.1067** | **0.3933** | | **9,948.9384** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | 0.0000 | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | **0.0000** | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

## 3.5 Building Construction - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.4079 | 13.2032 | 3.4341 | 0.0364 | 0.9155 | 0.0248 | 0.9404 | 0.2636 | 0.0237 | 0.2873 | | 3,896.5482 | 3,896.5482 | 0.2236 | | 3,902.1384 |
| Worker | 2.4299 | 1.5074 | 21.0801 | 0.0607 | 6.0932 | 0.0493 | 6.1425 | 1.6163 | 0.0454 | 1.6617 | | 6,042.5585 | 6,042.5585 | 0.1697 | | 6,046.8000 |
| **Total** | **2.8378** | **14.7106** | **24.5142** | **0.0971** | **7.0087** | **0.0741** | **7.0828** | **1.8799** | **0.0691** | **1.9490** | | **9,939.1067** | **9,939.1067** | **0.3933** | | **9,948.9384** |

## 3.5 Building Construction - 2023

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.5728 | 14.3849 | 16.2440 | 0.0269 | | 0.6997 | 0.6997 | | 0.6584 | 0.6584 | | 2,555.2099 | 2,555.2099 | 0.6079 | | 2,570.4061 |
| **Total** | **1.5728** | **14.3849** | **16.2440** | **0.0269** | | **0.6997** | **0.6997** | | **0.6584** | **0.6584** | | **2,555.2099** | **2,555.2099** | **0.6079** | | **2,570.4061** |

## 3.5 Building Construction - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.3027 | 10.0181 | 3.1014 | 0.0352 | 0.9156 | 0.0116 | 0.9271 | 0.2636 | 0.0111 | 0.2747 | | 3,773.8762 | 3,773.8762 | 0.1982 | | 3,778.8300 |
| Worker | 2.2780 | 1.3628 | 19.4002 | 0.0584 | 6.0932 | 0.0479 | 6.1411 | 1.6163 | 0.0441 | 1.6604 | | 5,821.4028 | 5,821.4028 | 0.1529 | | 5,825.2254 |
| **Total** | **2.5807** | **11.3809** | **22.5017** | **0.0936** | **7.0088** | **0.0595** | **7.0682** | **1.8799** | **0.0552** | **1.9350** | | **9,595.2790** | **9,595.2790** | **0.3511** | | **9,604.0554** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.5728 | 14.3849 | 16.2440 | 0.0269 | | 0.6997 | 0.6997 | | 0.6584 | 0.6584 | 0.0000 | 2,555.2099 | 2,555.2099 | 0.6079 | | 2,570.4061 |
| **Total** | **1.5728** | **14.3849** | **16.2440** | **0.0269** | | **0.6997** | **0.6997** | | **0.6584** | **0.6584** | **0.0000** | **2,555.2099** | **2,555.2099** | **0.6079** | | **2,570.4061** |

## 3.5 Building Construction - 2023

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.3027 | 10.0181 | 3.1014 | 0.0352 | 0.9156 | 0.0116 | 0.9271 | 0.2636 | 0.0111 | 0.2747 | | 3,773.8762 | 3,773.8762 | 0.1982 | | 3,778.8300 |
| Worker | 2.2780 | 1.3628 | 19.4002 | 0.0584 | 6.0932 | 0.0479 | 6.1411 | 1.6163 | 0.0441 | 1.6604 | | 5,821.4028 | 5,821.4028 | 0.1529 | | 5,825.2254 |
| **Total** | **2.5807** | **11.3809** | **22.5017** | **0.0936** | **7.0088** | **0.0595** | **7.0682** | **1.8799** | **0.0552** | **1.9350** | | **9,595.2790** | **9,595.2790** | **0.3511** | | **9,604.0554** |

## 3.6 Paving - 2023

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.0327 | 10.1917 | 14.5842 | 0.0228 | | 0.5102 | 0.5102 | | 0.4694 | 0.4694 | | 2,207.5841 | 2,207.5841 | 0.7140 | | 2,225.4336 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.0327** | **10.1917** | **14.5842** | **0.0228** | | **0.5102** | **0.5102** | | **0.4694** | **0.4694** | | **2,207.5841** | **2,207.5841** | **0.7140** | | **2,225.4336** |

## 3.6 Paving - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0427 | 0.0255 | 0.3633 | 1.0900e-003 | 0.1141 | 9.0000e-004 | 0.1150 | 0.0303 | 8.3000e-004 | 0.0311 | | 109.0150 | 109.0150 | 2.8600e-003 | | 109.0866 |
| **Total** | **0.0427** | **0.0255** | **0.3633** | **1.0900e-003** | **0.1141** | **9.0000e-004** | **0.1150** | **0.0303** | **8.3000e-004** | **0.0311** | | **109.0150** | **109.0150** | **2.8600e-003** | | **109.0866** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.0327 | 10.1917 | 14.5842 | 0.0228 | | 0.5102 | 0.5102 | | 0.4694 | 0.4694 | 0.0000 | 2,207.5841 | 2,207.5841 | 0.7140 | | 2,225.4336 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.0327** | **10.1917** | **14.5842** | **0.0228** | | **0.5102** | **0.5102** | | **0.4694** | **0.4694** | **0.0000** | **2,207.5841** | **2,207.5841** | **0.7140** | | **2,225.4336** |

## 3.6 Paving - 2023

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0427 | 0.0255 | 0.3633 | 1.0900e-003 | 0.1141 | 9.0000e-004 | 0.1150 | 0.0303 | 8.3000e-004 | 0.0311 | | 109.0150 | 109.0150 | 2.8600e-003 | | 109.0866 |
| **Total** | **0.0427** | **0.0255** | **0.3633** | **1.0900e-003** | **0.1141** | **9.0000e-004** | **0.1150** | **0.0303** | **8.3000e-004** | **0.0311** | | **109.0150** | **109.0150** | **2.8600e-003** | | **109.0866** |

## 3.6 Paving - 2024

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.9882 | 9.5246 | 14.6258 | 0.0228 | | 0.4685 | 0.4685 | | 0.4310 | 0.4310 | | 2,207.5472 | 2,207.5472 | 0.7140 | | 2,225.3963 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.9882** | **9.5246** | **14.6258** | **0.0228** | | **0.4685** | **0.4685** | | **0.4310** | **0.4310** | | **2,207.5472** | **2,207.5472** | **0.7140** | | **2,225.3963** |

## 3.6 Paving - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0403 | 0.0233 | 0.3384 | 1.0600e-003 | 0.1141 | 8.8000e-004 | 0.1150 | 0.0303 | 8.1000e-004 | 0.0311 | | 105.6336 | 105.6336 | 2.6300e-003 | | 105.6992 |
| **Total** | **0.0403** | **0.0233** | **0.3384** | **1.0600e-003** | **0.1141** | **8.8000e-004** | **0.1150** | **0.0303** | **8.1000e-004** | **0.0311** | | **105.6336** | **105.6336** | **2.6300e-003** | | **105.6992** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.9882 | 9.5246 | 14.6258 | 0.0228 | | 0.4685 | 0.4685 | | 0.4310 | 0.4310 | 0.0000 | 2,207.5472 | 2,207.5472 | 0.7140 | | 2,225.3963 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.9882** | **9.5246** | **14.6258** | **0.0228** | | **0.4685** | **0.4685** | | **0.4310** | **0.4310** | **0.0000** | **2,207.5472** | **2,207.5472** | **0.7140** | | **2,225.3963** |

## 3.6 Paving - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0403 | 0.0233 | 0.3384 | 1.0600e-003 | 0.1141 | 8.8000e-004 | 0.1150 | 0.0303 | 8.1000e-004 | 0.0311 | | 105.6336 | 105.6336 | 2.6300e-003 | | 105.6992 |
| **Total** | **0.0403** | **0.0233** | **0.3384** | **1.0600e-003** | **0.1141** | **8.8000e-004** | **0.1150** | **0.0303** | **8.1000e-004** | **0.0311** | | **105.6336** | **105.6336** | **2.6300e-003** | | **105.6992** |

## 3.7 Architectural Coating - 2024

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 236.4115 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.1808 | 1.2188 | 1.8101 | 2.9700e-003 | | 0.0609 | 0.0609 | | 0.0609 | 0.0609 | | 281.4481 | 281.4481 | 0.0159 | | 281.8443 |
| **Total** | **236.5923** | **1.2188** | **1.8101** | **2.9700e-003** | | **0.0609** | **0.0609** | | **0.0609** | **0.0609** | | **281.4481** | **281.4481** | **0.0159** | | **281.8443** |

## 3.7 Architectural Coating - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.4296 | 0.2481 | 3.6098 | 0.0113 | 1.2171 | 9.4300e-003 | 1.2266 | 0.3229 | 8.6800e-003 | 0.3315 | | 1,126.7583 | 1,126.7583 | 0.0280 | | 1,127.4583 |
| **Total** | **0.4296** | **0.2481** | **3.6098** | **0.0113** | **1.2171** | **9.4300e-003** | **1.2266** | **0.3229** | **8.6800e-003** | **0.3315** | | **1,126.7583** | **1,126.7583** | **0.0280** | | **1,127.4583** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 236.4115 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.1808 | 1.2188 | 1.8101 | 2.9700e-003 | | 0.0609 | 0.0609 | | 0.0609 | 0.0609 | 0.0000 | 281.4481 | 281.4481 | 0.0159 | | 281.8443 |
| **Total** | **236.5923** | **1.2188** | **1.8101** | **2.9700e-003** | | **0.0609** | **0.0609** | | **0.0609** | **0.0609** | **0.0000** | **281.4481** | **281.4481** | **0.0159** | | **281.8443** |

### 3.7 Architectural Coating - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.4296 | 0.2481 | 3.6098 | 0.0113 | 1.2171 | 9.4300e-003 | 1.2266 | 0.3229 | 8.6800e-003 | 0.3315 | | 1,126.7583 | 1,126.7583 | 0.0280 | | 1,127.4583 |
| **Total** | **0.4296** | **0.2481** | **3.6098** | **0.0113** | **1.2171** | **9.4300e-003** | **1.2266** | **0.3229** | **8.6800e-003** | **0.3315** | | **1,126.7583** | **1,126.7583** | **0.0280** | | **1,127.4583** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 9.8489 | 45.4304 | 114.8495 | 0.4917 | 45.9592 | 0.3360 | 46.2951 | 12.2950 | 0.3119 | 12.6070 | | 50,306.6034 | 50,306.6034 | 2.1807 | | 50,361.1208 |
| Unmitigated | 9.8489 | 45.4304 | 114.8495 | 0.4917 | 45.9592 | 0.3360 | 46.2951 | 12.2950 | 0.3119 | 12.6070 | | 50,306.6034 | 50,306.6034 | 2.1807 | | 50,361.1208 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 145.75 | 154.25 | 154.00 | 506,227 | 506,227 |
| Apartments Mid Rise | 4,026.75 | 3,773.25 | 4075.50 | 13,660,065 | 13,660,065 |
| General Office Building | 288.45 | 62.55 | 31.05 | 706,812 | 706,812 |
| High Turnover (Sit Down Restaurant) | 2,368.80 | 2,873.52 | 2817.72 | 3,413,937 | 3,413,937 |
| Hotel | 192.00 | 187.50 | 160.00 | 445,703 | 445,703 |
| Quality Restaurant | 501.12 | 511.92 | 461.20 | 707,488 | 707,488 |
| Regional Shopping Center | 528.08 | 601.44 | 357.84 | 1,112,221 | 1,112,221 |
| Total | 8,050.95 | 8,164.43 | 8,057.31 | 20,552,452 | 20,552,452 |

## 4.3 Trip Type Information

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| General Office Building | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 77 | 19 | 4 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Hotel | 16.60 | 8.40 | 6.90 | 19.40 | 61.60 | 19.00 | 58 | 38 | 4 |
| Quality Restaurant | 16.60 | 8.40 | 6.90 | 12.00 | 69.00 | 19.00 | 38 | 18 | 44 |
| Regional Shopping Center | 16.60 | 8.40 | 6.90 | 16.30 | 64.70 | 19.00 | 54 | 35 | 11 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Apartments Mid Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| General Office Building | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| High Turnover (Sit Down Restaurant) | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Hotel | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Quality Restaurant | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Regional Shopping Center | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| NaturalGas Mitigated | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| NaturalGas Unmitigated | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 1119.16 | 0.0121 | 0.1031 | 0.0439 | 6.6000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | | 131.6662 | 131.6662 | 2.5200e-003 | 2.4100e-003 | 132.4486 |
| Apartments Mid Rise | 35784.3 | 0.3859 | 3.2978 | 1.4033 | 0.0211 | | 0.2666 | 0.2666 | | 0.2666 | 0.2666 | | 4,209.9164 | 4,209.9164 | 0.0807 | 0.0772 | 4,234.9339 |
| General Office Building | 1283.42 | 0.0138 | 0.1258 | 0.1057 | 7.5000e-004 | | 9.5600e-003 | 9.5600e-003 | | 9.5600e-003 | 9.5600e-003 | | 150.9911 | 150.9911 | 2.8900e-003 | 2.7700e-003 | 151.8884 |
| High Turnover (Sit Down Restaurant) | 22759.9 | 0.2455 | 2.2314 | 1.8743 | 0.0134 | | 0.1696 | 0.1696 | | 0.1696 | 0.1696 | | 2,677.6342 | 2,677.6342 | 0.0513 | 0.0491 | 2,693.5460 |
| Hotel | 4769.72 | 0.0514 | 0.4676 | 0.3928 | 2.8100e-003 | | 0.0355 | 0.0355 | | 0.0355 | 0.0355 | | 561.1436 | 561.1436 | 0.0108 | 0.0103 | 564.4782 |
| Quality Restaurant | 5057.75 | 0.0545 | 0.4959 | 0.4165 | 2.9800e-003 | | 0.0377 | 0.0377 | | 0.0377 | 0.0377 | | 595.0298 | 595.0298 | 0.0114 | 0.0109 | 598.5658 |
| Regional Shopping Center | 251.616 | 2.7100e-003 | 0.0247 | 0.0207 | 1.5000e-004 | | 1.8700e-003 | 1.8700e-003 | | 1.8700e-003 | 1.8700e-003 | | 29.6019 | 29.6019 | 5.7000e-004 | 5.4000e-004 | 29.7778 |
| **Total** | | **0.7660** | **6.7463** | **4.2573** | **0.0418** | | **0.5292** | **0.5292** | | **0.5292** | **0.5292** | | **8,355.9832** | **8,355.9832** | **0.1602** | **0.1532** | **8,405.6387** |

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 1.11916 | 0.0121 | 0.1031 | 0.0439 | 6.6000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | | 131.6662 | 131.6662 | 2.5200e-003 | 2.4100e-003 | 132.4486 |
| Apartments Mid Rise | 35.7843 | 0.3859 | 3.2978 | 1.4033 | 0.0211 | | 0.2666 | 0.2666 | | 0.2666 | 0.2666 | | 4,209.9164 | 4,209.9164 | 0.0807 | 0.0772 | 4,234.9339 |
| General Office Building | 1.28342 | 0.0138 | 0.1258 | 0.1057 | 7.5000e-004 | | 9.5600e-003 | 9.5600e-003 | | 9.5600e-003 | 9.5600e-003 | | 150.9911 | 150.9911 | 2.8900e-003 | 2.7700e-003 | 151.8884 |
| High Turnover (Sit Down Restaurant) | 22.7599 | 0.2455 | 2.2314 | 1.8743 | 0.0134 | | 0.1696 | 0.1696 | | 0.1696 | 0.1696 | | 2,677.6342 | 2,677.6342 | 0.0513 | 0.0491 | 2,693.5460 |
| Hotel | 4.76972 | 0.0514 | 0.4676 | 0.3928 | 2.8100e-003 | | 0.0355 | 0.0355 | | 0.0355 | 0.0355 | | 561.1436 | 561.1436 | 0.0108 | 0.0103 | 564.4782 |
| Quality Restaurant | 5.05775 | 0.0545 | 0.4959 | 0.4165 | 2.9800e-003 | | 0.0377 | 0.0377 | | 0.0377 | 0.0377 | | 595.0298 | 595.0298 | 0.0114 | 0.0109 | 598.5658 |
| Regional Shopping Center | 0.251616 | 2.7100e-003 | 0.0247 | 0.0207 | 1.5000e-004 | | 1.8700e-003 | 1.8700e-003 | | 1.8700e-003 | 1.8700e-003 | | 29.6019 | 29.6019 | 5.7000e-004 | 5.4000e-004 | 29.7778 |
| **Total** | | **0.7660** | **6.7463** | **4.2573** | **0.0418** | | **0.5292** | **0.5292** | | **0.5292** | **0.5292** | | **8,355.9832** | **8,355.9832** | **0.1602** | **0.1532** | **8,405.6387** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Unmitigated | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 2.2670 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 24.1085 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 1.6500 | 14.1000 | 6.0000 | 0.0900 | | 1.1400 | 1.1400 | | 1.1400 | 1.1400 | 0.0000 | 18,000.0000 | 18,000.0000 | 0.3450 | 0.3300 | 18,106.9650 |
| Landscaping | 2.4766 | 0.9496 | 82.4430 | 4.3600e-003 | | 0.4574 | 0.4574 | | 0.4574 | 0.4574 | | 148.5950 | 148.5950 | 0.1424 | | 152.1542 |
| **Total** | **30.5020** | **15.0496** | **88.4430** | **0.0944** | | **1.5974** | **1.5974** | | **1.5974** | **1.5974** | **0.0000** | **18,148.5950** | **18,148.5950** | **0.4874** | **0.3300** | **18,259.1192** |

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 2.2670 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 24.1085 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 1.6500 | 14.1000 | 6.0000 | 0.0900 | | 1.1400 | 1.1400 | | 1.1400 | 1.1400 | 0.0000 | 18,000.0000 | 18,000.0000 | 0.3450 | 0.3300 | 18,106.9650 |
| Landscaping | 2.4766 | 0.9496 | 82.4430 | 4.3600e-003 | | 0.4574 | 0.4574 | | 0.4574 | 0.4574 | | 148.5950 | 148.5950 | 0.1424 | | 152.1542 |
| **Total** | **30.5020** | **15.0496** | **88.4430** | **0.0944** | | **1.5974** | **1.5974** | | **1.5974** | **1.5974** | **0.0000** | **18,148.5950** | **18,148.5950** | **0.4874** | **0.3300** | **18,259.1192** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

# Village South Specific Plan (Proposed)

**Los Angeles-South Coast County, Winter**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| General Office Building | 45.00 | 1000sqft | 1.03 | 45,000.00 | 0 |
| High Turnover (Sit Down Restaurant) | 36.00 | 1000sqft | 0.83 | 36,000.00 | 0 |
| Hotel | 50.00 | Room | 1.67 | 72,600.00 | 0 |
| Quality Restaurant | 8.00 | 1000sqft | 0.18 | 8,000.00 | 0 |
| Apartments Low Rise | 25.00 | Dwelling Unit | 1.56 | 25,000.00 | 72 |
| Apartments Mid Rise | 975.00 | Dwelling Unit | 25.66 | 975,000.00 | 2789 |
| Regional Shopping Center | 56.00 | 1000sqft | 1.29 | 56,000.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 9 | | | **Operational Year** | 2028 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 702.44 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | FireplaceWoodMass | 1,019.20 | 0.00 |
| tblFireplaces | NumberWood | 1.25 | 0.00 |
| tblFireplaces | NumberWood | 48.75 | 0.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblTripsAndVMT | WorkerTripLength | 14.70 | 10.00 |
| tblVehicleTrips | ST_TR | 7.16 | 6.17 |
| tblVehicleTrips | ST_TR | 6.39 | 3.87 |
| tblVehicleTrips | ST_TR | 2.46 | 1.39 |
| tblVehicleTrips | ST_TR | 158.37 | 79.82 |

| | | | |
|---|---|---|---|
| tblVehicleTrips | ST_TR | 8.19 | 3.75 |
| tblVehicleTrips | ST_TR | 94.36 | 63.99 |
| tblVehicleTrips | ST_TR | 49.97 | 10.74 |
| tblVehicleTrips | SU_TR | 6.07 | 6.16 |
| tblVehicleTrips | SU_TR | 5.86 | 4.18 |
| tblVehicleTrips | SU_TR | 1.05 | 0.69 |
| tblVehicleTrips | SU_TR | 131.84 | 78.27 |
| tblVehicleTrips | SU_TR | 5.95 | 3.20 |
| tblVehicleTrips | SU_TR | 72.16 | 57.65 |
| tblVehicleTrips | SU_TR | 25.24 | 6.39 |
| tblVehicleTrips | WD_TR | 6.59 | 5.83 |
| tblVehicleTrips | WD_TR | 6.65 | 4.13 |
| tblVehicleTrips | WD_TR | 11.03 | 6.41 |
| tblVehicleTrips | WD_TR | 127.15 | 65.80 |
| tblVehicleTrips | WD_TR | 8.17 | 3.84 |
| tblVehicleTrips | WD_TR | 89.95 | 62.64 |
| tblVehicleTrips | WD_TR | 42.70 | 9.43 |
| tblWoodstoves | NumberCatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberCatalytic | 48.75 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 1.25 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 48.75 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveDayYear | 25.00 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |
| tblWoodstoves | WoodstoveWoodMass | 999.60 | 0.00 |

## 2.0 Emissions Summary

## 2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2021 | 4.2621 | 46.4460 | 31.4068 | 0.0635 | 18.2032 | 2.0456 | 20.2488 | 9.9670 | 1.8820 | 11.8490 | 0.0000 | 6,154.3377 | 6,154.3377 | 1.9472 | 0.0000 | 6,203.0186 |
| 2022 | 4.7966 | 38.8851 | 39.6338 | 0.1195 | 8.8255 | 1.6361 | 10.4616 | 3.6369 | 1.5052 | 5.1421 | 0.0000 | 12,035.3440 | 12,035.3440 | 1.9482 | 0.0000 | 12,060.6013 |
| 2023 | 4.3939 | 25.8648 | 37.5031 | 0.1162 | 7.0088 | 0.7598 | 7.7685 | 1.8799 | 0.7142 | 2.5940 | 0.0000 | 11,710.4080 | 11,710.4080 | 0.9617 | 0.0000 | 11,734.4497 |
| 2024 | 237.0656 | 9.5503 | 14.9372 | 0.0238 | 1.2171 | 0.4694 | 1.2875 | 0.3229 | 0.4319 | 0.4621 | 0.0000 | 2,307.0517 | 2,307.0517 | 0.7164 | 0.0000 | 2,324.9627 |
| **Maximum** | **237.0656** | **46.4460** | **39.6338** | **0.1195** | **18.2032** | **2.0456** | **20.2488** | **9.9670** | **1.8820** | **11.8490** | **0.0000** | **12,035.3440** | **12,035.3440** | **1.9482** | **0.0000** | **12,060.6013** |

## 2.1 Overall Construction (Maximum Daily Emission)

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2021 | 4.2621 | 46.4460 | 31.4068 | 0.0635 | 18.2032 | 2.0456 | 20.2488 | 9.9670 | 1.8820 | 11.8490 | 0.0000 | 6,154.3377 | 6,154.3377 | 1.9472 | 0.0000 | 6,203.0186 |
| 2022 | 4.7966 | 38.8851 | 39.6338 | 0.1195 | 8.8255 | 1.6361 | 10.4616 | 3.6369 | 1.5052 | 5.1421 | 0.0000 | 12,035.3440 | 12,035.3440 | 1.9482 | 0.0000 | 12,060.6013 |
| 2023 | 4.3939 | 25.8648 | 37.5031 | 0.1162 | 7.0088 | 0.7598 | 7.7685 | 1.8799 | 0.7142 | 2.5940 | 0.0000 | 11,710.4080 | 11,710.4080 | 0.9617 | 0.0000 | 11,734.4497 |
| 2024 | 237.0656 | 9.5503 | 14.9372 | 0.0238 | 1.2171 | 0.4694 | 1.2875 | 0.3229 | 0.4319 | 0.4621 | 0.0000 | 2,307.0517 | 2,307.0517 | 0.7164 | 0.0000 | 2,324.9627 |
| **Maximum** | **237.0656** | **46.4460** | **39.6338** | **0.1195** | **18.2032** | **2.0456** | **20.2488** | **9.9670** | **1.8820** | **11.8490** | **0.0000** | **12,035.3440** | **12,035.3440** | **1.9482** | **0.0000** | **12,060.6013** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Energy | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| Mobile | 9.5233 | 45.9914 | 110.0422 | 0.4681 | 45.9592 | 0.3373 | 46.2965 | 12.2950 | 0.3132 | 12.6083 | | 47,917.8005 | 47,917.8005 | 2.1953 | | 47,972.6839 |
| **Total** | **40.7912** | **67.7872** | **202.7424** | **0.6043** | **45.9592** | **2.4640** | **48.4231** | **12.2950** | **2.4399** | **14.7349** | **0.0000** | **74,422.3787** | **74,422.3787** | **2.8429** | **0.4832** | **74,637.4417** |

### Mitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Energy | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| Mobile | 9.5233 | 45.9914 | 110.0422 | 0.4681 | 45.9592 | 0.3373 | 46.2965 | 12.2950 | 0.3132 | 12.6083 | | 47,917.8005 | 47,917.8005 | 2.1953 | | 47,972.6839 |
| **Total** | **40.7912** | **67.7872** | **202.7424** | **0.6043** | **45.9592** | **2.4640** | **48.4231** | **12.2950** | **2.4399** | **14.7349** | **0.0000** | **74,422.3787** | **74,422.3787** | **2.8429** | **0.4832** | **74,637.4417** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 9/1/2021 | 10/12/2021 | 5 | 30 | |
| 2 | Site Preparation | Site Preparation | 10/13/2021 | 11/9/2021 | 5 | 20 | |
| 3 | Grading | Grading | 11/10/2021 | 1/11/2022 | 5 | 45 | |
| 4 | Building Construction | Building Construction | 1/12/2022 | 12/12/2023 | 5 | 500 | |
| 5 | Paving | Paving | 12/13/2023 | 1/30/2024 | 5 | 35 | |
| 6 | Architectural Coating | Architectural Coating | 1/31/2024 | 3/19/2024 | 5 | 35 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 112.5**

**Acres of Paving: 0**

**Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 458.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 801.00 | 143.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 160.00 | 0.00 | 0.00 | 10.00 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 3.3074 | 0.0000 | 3.3074 | 0.5008 | 0.0000 | 0.5008 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1651 | 31.4407 | 21.5650 | 0.0388 | | 1.5513 | 1.5513 | | 1.4411 | 1.4411 | | 3,747.9449 | 3,747.9449 | 1.0549 | | 3,774.3174 |
| **Total** | **3.1651** | **31.4407** | **21.5650** | **0.0388** | **3.3074** | **1.5513** | **4.8588** | **0.5008** | **1.4411** | **1.9419** | | **3,747.9449** | **3,747.9449** | **1.0549** | | **3,774.3174** |

## 3.2 Demolition - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.1304 | 4.1454 | 1.0182 | 0.0117 | 0.2669 | 0.0128 | 0.2797 | 0.0732 | 0.0122 | 0.0854 | | 1,269.8555 | 1,269.8555 | 0.0908 | | 1,272.1252 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0532 | 0.0346 | 0.3963 | 1.1100e-003 | 0.1141 | 9.5000e-004 | 0.1151 | 0.0303 | 8.8000e-004 | 0.0311 | | 110.4707 | 110.4707 | 3.3300e-003 | | 110.5539 |
| **Total** | **0.1835** | **4.1800** | **1.4144** | **0.0128** | **0.3810** | **0.0137** | **0.3948** | **0.1034** | **0.0131** | **0.1165** | | **1,380.3262** | **1,380.3262** | **0.0941** | | **1,382.6791** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 3.3074 | 0.0000 | 3.3074 | 0.5008 | 0.0000 | 0.5008 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1651 | 31.4407 | 21.5650 | 0.0388 | | 1.5513 | 1.5513 | | 1.4411 | 1.4411 | 0.0000 | 3,747.9449 | 3,747.9449 | 1.0549 | | 3,774.3174 |
| **Total** | **3.1651** | **31.4407** | **21.5650** | **0.0388** | **3.3074** | **1.5513** | **4.8588** | **0.5008** | **1.4411** | **1.9419** | **0.0000** | **3,747.9449** | **3,747.9449** | **1.0549** | | **3,774.3174** |

## 3.2 Demolition - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.1304 | 4.1454 | 1.0182 | 0.0117 | 0.2669 | 0.0128 | 0.2797 | 0.0732 | 0.0122 | 0.0854 | | 1,269.8555 | 1,269.8555 | 0.0908 | | 1,272.1252 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0532 | 0.0346 | 0.3963 | 1.1100e-003 | 0.1141 | 9.5000e-004 | 0.1151 | 0.0303 | 8.8000e-004 | 0.0311 | | 110.4707 | 110.4707 | 3.3300e-003 | | 110.5539 |
| **Total** | **0.1835** | **4.1800** | **1.4144** | **0.0128** | **0.3810** | **0.0137** | **0.3948** | **0.1034** | **0.0131** | **0.1165** | | **1,380.3262** | **1,380.3262** | **0.0941** | | **1,382.6791** |

## 3.3 Site Preparation - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.8882 | 40.4971 | 21.1543 | 0.0380 | | 2.0445 | 2.0445 | | 1.8809 | 1.8809 | | 3,685.6569 | 3,685.6569 | 1.1920 | | 3,715.4573 |
| **Total** | **3.8882** | **40.4971** | **21.1543** | **0.0380** | **18.0663** | **2.0445** | **20.1107** | **9.9307** | **1.8809** | **11.8116** | | **3,685.6569** | **3,685.6569** | **1.1920** | | **3,715.4573** |

## 3.3 Site Preparation - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0638 | 0.0415 | 0.4755 | 1.3300e-003 | 0.1369 | 1.1400e-003 | 0.1381 | 0.0363 | 1.0500e-003 | 0.0374 | | 132.5649 | 132.5649 | 3.9900e-003 | | 132.6646 |
| **Total** | **0.0638** | **0.0415** | **0.4755** | **1.3300e-003** | **0.1369** | **1.1400e-003** | **0.1381** | **0.0363** | **1.0500e-003** | **0.0374** | | **132.5649** | **132.5649** | **3.9900e-003** | | **132.6646** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.8882 | 40.4971 | 21.1543 | 0.0380 | | 2.0445 | 2.0445 | | 1.8809 | 1.8809 | 0.0000 | 3,685.6569 | 3,685.6569 | 1.1920 | | 3,715.4573 |
| **Total** | **3.8882** | **40.4971** | **21.1543** | **0.0380** | **18.0663** | **2.0445** | **20.1107** | **9.9307** | **1.8809** | **11.8116** | **0.0000** | **3,685.6569** | **3,685.6569** | **1.1920** | | **3,715.4573** |

## 3.3 Site Preparation - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0638 | 0.0415 | 0.4755 | 1.3300e-003 | 0.1369 | 1.1400e-003 | 0.1381 | 0.0363 | 1.0500e-003 | 0.0374 | | 132.5649 | 132.5649 | 3.9900e-003 | | 132.6646 |
| **Total** | **0.0638** | **0.0415** | **0.4755** | **1.3300e-003** | **0.1369** | **1.1400e-003** | **0.1381** | **0.0363** | **1.0500e-003** | **0.0374** | | **132.5649** | **132.5649** | **3.9900e-003** | | **132.6646** |

## 3.4 Grading - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.1912 | 46.3998 | 30.8785 | 0.0620 | | 1.9853 | 1.9853 | | 1.8265 | 1.8265 | | 6,007.0434 | 6,007.0434 | 1.9428 | | 6,055.6134 |
| **Total** | **4.1912** | **46.3998** | **30.8785** | **0.0620** | **8.6733** | **1.9853** | **10.6587** | **3.5965** | **1.8265** | **5.4230** | | **6,007.0434** | **6,007.0434** | **1.9428** | | **6,055.6134** |

## 3.4 Grading - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0709 | 0.0462 | 0.5284 | 1.4800e-003 | 0.1521 | 1.2700e-003 | 0.1534 | 0.0404 | 1.1700e-003 | 0.0415 | | 147.2943 | 147.2943 | 4.4300e-003 | | 147.4051 |
| **Total** | **0.0709** | **0.0462** | **0.5284** | **1.4800e-003** | **0.1521** | **1.2700e-003** | **0.1534** | **0.0404** | **1.1700e-003** | **0.0415** | | **147.2943** | **147.2943** | **4.4300e-003** | | **147.4051** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.1912 | 46.3998 | 30.8785 | 0.0620 | | 1.9853 | 1.9853 | | 1.8265 | 1.8265 | 0.0000 | 6,007.0434 | 6,007.0434 | 1.9428 | | 6,055.6134 |
| **Total** | **4.1912** | **46.3998** | **30.8785** | **0.0620** | **8.6733** | **1.9853** | **10.6587** | **3.5965** | **1.8265** | **5.4230** | **0.0000** | **6,007.0434** | **6,007.0434** | **1.9428** | | **6,055.6134** |

## 3.4 Grading - 2021

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0709 | 0.0462 | 0.5284 | 1.4800e-003 | 0.1521 | 1.2700e-003 | 0.1534 | 0.0404 | 1.1700e-003 | 0.0415 | | 147.2943 | 147.2943 | 4.4300e-003 | | 147.4051 |
| **Total** | **0.0709** | **0.0462** | **0.5284** | **1.4800e-003** | **0.1521** | **1.2700e-003** | **0.1534** | **0.0404** | **1.1700e-003** | **0.0415** | | **147.2943** | **147.2943** | **4.4300e-003** | | **147.4051** |

## 3.4 Grading - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **8.6733** | **1.6349** | **10.3082** | **3.5965** | **1.5041** | **5.1006** | | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

## 3.4 Grading - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0665 | 0.0416 | 0.4861 | 1.4300e-003 | 0.1521 | 1.2300e-003 | 0.1534 | 0.0404 | 1.1300e-003 | 0.0415 | | 142.1207 | 142.1207 | 4.0000e-003 | | 142.2207 |
| **Total** | **0.0665** | **0.0416** | **0.4861** | **1.4300e-003** | **0.1521** | **1.2300e-003** | **0.1534** | **0.0404** | **1.1300e-003** | **0.0415** | | **142.1207** | **142.1207** | **4.0000e-003** | | **142.2207** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.6733 | 0.0000 | 8.6733 | 3.5965 | 0.0000 | 3.5965 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | 0.0000 | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **8.6733** | **1.6349** | **10.3082** | **3.5965** | **1.5041** | **5.1006** | **0.0000** | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

## 3.4 Grading - 2022

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0665 | 0.0416 | 0.4861 | 1.4300e-003 | 0.1521 | 1.2300e-003 | 0.1534 | 0.0404 | 1.1300e-003 | 0.0415 | | 142.1207 | 142.1207 | 4.0000e-003 | | 142.2207 |
| **Total** | **0.0665** | **0.0416** | **0.4861** | **1.4300e-003** | **0.1521** | **1.2300e-003** | **0.1534** | **0.0404** | **1.1300e-003** | **0.0415** | | **142.1207** | **142.1207** | **4.0000e-003** | | **142.2207** |

## 3.5 Building Construction - 2022

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

## 3.5 Building Construction - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.4284 | 13.1673 | 3.8005 | 0.0354 | 0.9155 | 0.0256 | 0.9412 | 0.2636 | 0.0245 | 0.2881 | | 3,789.0750 | 3,789.0750 | 0.2381 | | 3,795.0283 |
| Worker | 2.6620 | 1.6677 | 19.4699 | 0.0571 | 6.0932 | 0.0493 | 6.1425 | 1.6163 | 0.0454 | 1.6617 | | 5,691.9354 | 5,691.9354 | 0.1602 | | 5,695.9408 |
| **Total** | **3.0904** | **14.8350** | **23.2704** | **0.0926** | **7.0087** | **0.0749** | **7.0836** | **1.8799** | **0.0699** | **1.9498** | | **9,481.0104** | **9,481.0104** | **0.3984** | | **9,490.9691** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | 0.0000 | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | **0.0000** | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

## 3.5 Building Construction - 2022

### Mitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.4284 | 13.1673 | 3.8005 | 0.0354 | 0.9155 | 0.0256 | 0.9412 | 0.2636 | 0.0245 | 0.2881 | | 3,789.0750 | 3,789.0750 | 0.2381 | | 3,795.0283 |
| Worker | 2.6620 | 1.6677 | 19.4699 | 0.0571 | 6.0932 | 0.0493 | 6.1425 | 1.6163 | 0.0454 | 1.6617 | | 5,691.9354 | 5,691.9354 | 0.1602 | | 5,695.9408 |
| **Total** | **3.0904** | **14.8350** | **23.2704** | **0.0926** | **7.0087** | **0.0749** | **7.0836** | **1.8799** | **0.0699** | **1.9498** | | **9,481.0104** | **9,481.0104** | **0.3984** | | **9,490.9691** |

## 3.5 Building Construction - 2023

### Unmitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.5728 | 14.3849 | 16.2440 | 0.0269 | | 0.6997 | 0.6997 | | 0.6584 | 0.6584 | | 2,555.2099 | 2,555.2099 | 0.6079 | | 2,570.4061 |
| **Total** | **1.5728** | **14.3849** | **16.2440** | **0.0269** | | **0.6997** | **0.6997** | | **0.6584** | **0.6584** | | **2,555.2099** | **2,555.2099** | **0.6079** | | **2,570.4061** |

## 3.5 Building Construction - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.3183 | 9.9726 | 3.3771 | 0.0343 | 0.9156 | 0.0122 | 0.9277 | 0.2636 | 0.0116 | 0.2752 | | 3,671.4007 | 3,671.4007 | 0.2096 | | 3,676.6417 |
| Worker | 2.5029 | 1.5073 | 17.8820 | 0.0550 | 6.0932 | 0.0479 | 6.1411 | 1.6163 | 0.0441 | 1.6604 | | 5,483.7974 | 5,483.7974 | 0.1442 | | 5,487.4020 |
| **Total** | **2.8211** | **11.4799** | **21.2591** | **0.0893** | **7.0088** | **0.0601** | **7.0688** | **1.8799** | **0.0557** | **1.9356** | | **9,155.1981** | **9,155.1981** | **0.3538** | | **9,164.0437** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.5728 | 14.3849 | 16.2440 | 0.0269 | | 0.6997 | 0.6997 | | 0.6584 | 0.6584 | 0.0000 | 2,555.2099 | 2,555.2099 | 0.6079 | | 2,570.4061 |
| **Total** | **1.5728** | **14.3849** | **16.2440** | **0.0269** | | **0.6997** | **0.6997** | | **0.6584** | **0.6584** | **0.0000** | **2,555.2099** | **2,555.2099** | **0.6079** | | **2,570.4061** |

## 3.5 Building Construction - 2023

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.3183 | 9.9726 | 3.3771 | 0.0343 | 0.9156 | 0.0122 | 0.9277 | 0.2636 | 0.0116 | 0.2752 | | 3,671.4007 | 3,671.4007 | 0.2096 | | 3,676.6417 |
| Worker | 2.5029 | 1.5073 | 17.8820 | 0.0550 | 6.0932 | 0.0479 | 6.1411 | 1.6163 | 0.0441 | 1.6604 | | 5,483.7974 | 5,483.7974 | 0.1442 | | 5,487.4020 |
| **Total** | **2.8211** | **11.4799** | **21.2591** | **0.0893** | **7.0088** | **0.0601** | **7.0688** | **1.8799** | **0.0557** | **1.9356** | | **9,155.1981** | **9,155.1981** | **0.3538** | | **9,164.0437** |

## 3.6 Paving - 2023

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.0327 | 10.1917 | 14.5842 | 0.0228 | | 0.5102 | 0.5102 | | 0.4694 | 0.4694 | | 2,207.5841 | 2,207.5841 | 0.7140 | | 2,225.4336 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.0327** | **10.1917** | **14.5842** | **0.0228** | | **0.5102** | **0.5102** | | **0.4694** | **0.4694** | | **2,207.5841** | **2,207.5841** | **0.7140** | | **2,225.4336** |

## 3.6 Paving - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0469 | 0.0282 | 0.3349 | 1.0300e-003 | 0.1141 | 9.0000e-004 | 0.1150 | 0.0303 | 8.3000e-004 | 0.0311 | | 102.6928 | 102.6928 | 2.7000e-003 | | 102.7603 |
| **Total** | **0.0469** | **0.0282** | **0.3349** | **1.0300e-003** | **0.1141** | **9.0000e-004** | **0.1150** | **0.0303** | **8.3000e-004** | **0.0311** | | **102.6928** | **102.6928** | **2.7000e-003** | | **102.7603** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.0327 | 10.1917 | 14.5842 | 0.0228 | | 0.5102 | 0.5102 | | 0.4694 | 0.4694 | 0.0000 | 2,207.5841 | 2,207.5841 | 0.7140 | | 2,225.4336 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.0327** | **10.1917** | **14.5842** | **0.0228** | | **0.5102** | **0.5102** | | **0.4694** | **0.4694** | **0.0000** | **2,207.5841** | **2,207.5841** | **0.7140** | | **2,225.4336** |

## 3.6 Paving - 2023

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0469 | 0.0282 | 0.3349 | 1.0300e-003 | 0.1141 | 9.0000e-004 | 0.1150 | 0.0303 | 8.3000e-004 | 0.0311 | | 102.6928 | 102.6928 | 2.7000e-003 | | 102.7603 |
| **Total** | **0.0469** | **0.0282** | **0.3349** | **1.0300e-003** | **0.1141** | **9.0000e-004** | **0.1150** | **0.0303** | **8.3000e-004** | **0.0311** | | **102.6928** | **102.6928** | **2.7000e-003** | | **102.7603** |

## 3.6 Paving - 2024

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.9882 | 9.5246 | 14.6258 | 0.0228 | | 0.4685 | 0.4685 | | 0.4310 | 0.4310 | | 2,207.5472 | 2,207.5472 | 0.7140 | | 2,225.3963 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.9882** | **9.5246** | **14.6258** | **0.0228** | | **0.4685** | **0.4685** | | **0.4310** | **0.4310** | | **2,207.5472** | **2,207.5472** | **0.7140** | | **2,225.3963** |

## 3.6 Paving - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0444 | 0.0257 | 0.3114 | 1.0000e-003 | 0.1141 | 8.8000e-004 | 0.1150 | 0.0303 | 8.1000e-004 | 0.0311 | | 99.5045 | 99.5045 | 2.4700e-003 | | 99.5663 |
| **Total** | **0.0444** | **0.0257** | **0.3114** | **1.0000e-003** | **0.1141** | **8.8000e-004** | **0.1150** | **0.0303** | **8.1000e-004** | **0.0311** | | **99.5045** | **99.5045** | **2.4700e-003** | | **99.5663** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.9882 | 9.5246 | 14.6258 | 0.0228 | | 0.4685 | 0.4685 | | 0.4310 | 0.4310 | 0.0000 | 2,207.5472 | 2,207.5472 | 0.7140 | | 2,225.3963 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.9882** | **9.5246** | **14.6258** | **0.0228** | | **0.4685** | **0.4685** | | **0.4310** | **0.4310** | **0.0000** | **2,207.5472** | **2,207.5472** | **0.7140** | | **2,225.3963** |

## 3.6 Paving - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0444 | 0.0257 | 0.3114 | 1.0000e-003 | 0.1141 | 8.8000e-004 | 0.1150 | 0.0303 | 8.1000e-004 | 0.0311 | | 99.5045 | 99.5045 | 2.4700e-003 | | 99.5663 |
| **Total** | **0.0444** | **0.0257** | **0.3114** | **1.0000e-003** | **0.1141** | **8.8000e-004** | **0.1150** | **0.0303** | **8.1000e-004** | **0.0311** | | **99.5045** | **99.5045** | **2.4700e-003** | | **99.5663** |

## 3.7 Architectural Coating - 2024

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 236.4115 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.1808 | 1.2188 | 1.8101 | 2.9700e-003 | | 0.0609 | 0.0609 | | 0.0609 | 0.0609 | | 281.4481 | 281.4481 | 0.0159 | | 281.8443 |
| **Total** | **236.5923** | **1.2188** | **1.8101** | **2.9700e-003** | | **0.0609** | **0.0609** | | **0.0609** | **0.0609** | | **281.4481** | **281.4481** | **0.0159** | | **281.8443** |

## 3.7 Architectural Coating - 2024

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.4734 | 0.2743 | 3.3220 | 0.0107 | 1.2171 | 9.4300e-003 | 1.2266 | 0.3229 | 8.6800e-003 | 0.3315 | | 1,061.3818 | 1,061.3818 | 0.0264 | | 1,062.0410 |
| **Total** | **0.4734** | **0.2743** | **3.3220** | **0.0107** | **1.2171** | **9.4300e-003** | **1.2266** | **0.3229** | **8.6800e-003** | **0.3315** | | **1,061.3818** | **1,061.3818** | **0.0264** | | **1,062.0410** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 236.4115 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.1808 | 1.2188 | 1.8101 | 2.9700e-003 | | 0.0609 | 0.0609 | | 0.0609 | 0.0609 | 0.0000 | 281.4481 | 281.4481 | 0.0159 | | 281.8443 |
| **Total** | **236.5923** | **1.2188** | **1.8101** | **2.9700e-003** | | **0.0609** | **0.0609** | | **0.0609** | **0.0609** | **0.0000** | **281.4481** | **281.4481** | **0.0159** | | **281.8443** |

### 3.7 Architectural Coating - 2024

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.4734 | 0.2743 | 3.3220 | 0.0107 | 1.2171 | 9.4300e-003 | 1.2266 | 0.3229 | 8.6800e-003 | 0.3315 | | 1,061.3818 | 1,061.3818 | 0.0264 | | 1,062.0410 |
| **Total** | **0.4734** | **0.2743** | **3.3220** | **0.0107** | **1.2171** | **9.4300e-003** | **1.2266** | **0.3229** | **8.6800e-003** | **0.3315** | | **1,061.3818** | **1,061.3818** | **0.0264** | | **1,062.0410** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 9.5233 | 45.9914 | 110.0422 | 0.4681 | 45.9592 | 0.3373 | 46.2965 | 12.2950 | 0.3132 | 12.6083 | | 47,917.8005 | 47,917.8005 | 2.1953 | | 47,972.6839 |
| Unmitigated | 9.5233 | 45.9914 | 110.0422 | 0.4681 | 45.9592 | 0.3373 | 46.2965 | 12.2950 | 0.3132 | 12.6083 | | 47,917.8005 | 47,917.8005 | 2.1953 | | 47,972.6839 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 145.75 | 154.25 | 154.00 | 506,227 | 506,227 |
| Apartments Mid Rise | 4,026.75 | 3,773.25 | 4075.50 | 13,660,065 | 13,660,065 |
| General Office Building | 288.45 | 62.55 | 31.05 | 706,812 | 706,812 |
| High Turnover (Sit Down Restaurant) | 2,368.80 | 2,873.52 | 2817.72 | 3,413,937 | 3,413,937 |
| Hotel | 192.00 | 187.50 | 160.00 | 445,703 | 445,703 |
| Quality Restaurant | 501.12 | 511.92 | 461.20 | 707,488 | 707,488 |
| Regional Shopping Center | 528.08 | 601.44 | 357.84 | 1,112,221 | 1,112,221 |
| Total | 8,050.95 | 8,164.43 | 8,057.31 | 20,552,452 | 20,552,452 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| General Office Building | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 77 | 19 | 4 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Hotel | 16.60 | 8.40 | 6.90 | 19.40 | 61.60 | 19.00 | 58 | 38 | 4 |
| Quality Restaurant | 16.60 | 8.40 | 6.90 | 12.00 | 69.00 | 19.00 | 38 | 18 | 44 |
| Regional Shopping Center | 16.60 | 8.40 | 6.90 | 16.30 | 64.70 | 19.00 | 54 | 35 | 11 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Apartments Mid Rise | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| General Office Building | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| High Turnover (Sit Down Restaurant) | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Hotel | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Quality Restaurant | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |
| Regional Shopping Center | 0.543088 | 0.044216 | 0.209971 | 0.116369 | 0.014033 | 0.006332 | 0.021166 | 0.033577 | 0.002613 | 0.001817 | 0.005285 | 0.000712 | 0.000821 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| NaturalGas Mitigated | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |
| NaturalGas Unmitigated | 0.7660 | 6.7462 | 4.2573 | 0.0418 | | 0.5292 | 0.5292 | | 0.5292 | 0.5292 | | 8,355.9832 | 8,355.9832 | 0.1602 | 0.1532 | 8,405.6387 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 1119.16 | 0.0121 | 0.1031 | 0.0439 | 6.6000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | | 131.6662 | 131.6662 | 2.5200e-003 | 2.4100e-003 | 132.4486 |
| Apartments Mid Rise | 35784.3 | 0.3859 | 3.2978 | 1.4033 | 0.0211 | | 0.2666 | 0.2666 | | 0.2666 | 0.2666 | | 4,209.9164 | 4,209.9164 | 0.0807 | 0.0772 | 4,234.9339 |
| General Office Building | 1283.42 | 0.0138 | 0.1258 | 0.1057 | 7.5000e-004 | | 9.5600e-003 | 9.5600e-003 | | 9.5600e-003 | 9.5600e-003 | | 150.9911 | 150.9911 | 2.8900e-003 | 2.7700e-003 | 151.8884 |
| High Turnover (Sit Down Restaurant) | 22759.9 | 0.2455 | 2.2314 | 1.8743 | 0.0134 | | 0.1696 | 0.1696 | | 0.1696 | 0.1696 | | 2,677.6342 | 2,677.6342 | 0.0513 | 0.0491 | 2,693.5460 |
| Hotel | 4769.72 | 0.0514 | 0.4676 | 0.3928 | 2.8100e-003 | | 0.0355 | 0.0355 | | 0.0355 | 0.0355 | | 561.1436 | 561.1436 | 0.0108 | 0.0103 | 564.4782 |
| Quality Restaurant | 5057.75 | 0.0545 | 0.4959 | 0.4165 | 2.9800e-003 | | 0.0377 | 0.0377 | | 0.0377 | 0.0377 | | 595.0298 | 595.0298 | 0.0114 | 0.0109 | 598.5658 |
| Regional Shopping Center | 251.616 | 2.7100e-003 | 0.0247 | 0.0207 | 1.5000e-004 | | 1.8700e-003 | 1.8700e-003 | | 1.8700e-003 | 1.8700e-003 | | 29.6019 | 29.6019 | 5.7000e-004 | 5.4000e-004 | 29.7778 |
| **Total** | | **0.7660** | **6.7463** | **4.2573** | **0.0418** | | **0.5292** | **0.5292** | | **0.5292** | **0.5292** | | **8,355.9832** | **8,355.9832** | **0.1602** | **0.1532** | **8,405.6387** |

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 1.11916 | 0.0121 | 0.1031 | 0.0439 | 6.6000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | | 131.6662 | 131.6662 | 2.5200e-003 | 2.4100e-003 | 132.4486 |
| Apartments Mid Rise | 35.7843 | 0.3859 | 3.2978 | 1.4033 | 0.0211 | | 0.2666 | 0.2666 | | 0.2666 | 0.2666 | | 4,209.9164 | 4,209.9164 | 0.0807 | 0.0772 | 4,234.9339 |
| General Office Building | 1.28342 | 0.0138 | 0.1258 | 0.1057 | 7.5000e-004 | | 9.5600e-003 | 9.5600e-003 | | 9.5600e-003 | 9.5600e-003 | | 150.9911 | 150.9911 | 2.8900e-003 | 2.7700e-003 | 151.8884 |
| High Turnover (Sit Down Restaurant) | 22.7599 | 0.2455 | 2.2314 | 1.8743 | 0.0134 | | 0.1696 | 0.1696 | | 0.1696 | 0.1696 | | 2,677.6342 | 2,677.6342 | 0.0513 | 0.0491 | 2,693.5460 |
| Hotel | 4.76972 | 0.0514 | 0.4676 | 0.3928 | 2.8100e-003 | | 0.0355 | 0.0355 | | 0.0355 | 0.0355 | | 561.1436 | 561.1436 | 0.0108 | 0.0103 | 564.4782 |
| Quality Restaurant | 5.05775 | 0.0545 | 0.4959 | 0.4165 | 2.9800e-003 | | 0.0377 | 0.0377 | | 0.0377 | 0.0377 | | 595.0298 | 595.0298 | 0.0114 | 0.0109 | 598.5658 |
| Regional Shopping Center | 0.251616 | 2.7100e-003 | 0.0247 | 0.0207 | 1.5000e-004 | | 1.8700e-003 | 1.8700e-003 | | 1.8700e-003 | 1.8700e-003 | | 29.6019 | 29.6019 | 5.7000e-004 | 5.4000e-004 | 29.7778 |
| **Total** | | **0.7660** | **6.7463** | **4.2573** | **0.0418** | | **0.5292** | **0.5292** | | **0.5292** | **0.5292** | | **8,355.9832** | **8,355.9832** | **0.1602** | **0.1532** | **8,405.6387** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |
| Unmitigated | 30.5020 | 15.0496 | 88.4430 | 0.0944 | | 1.5974 | 1.5974 | | 1.5974 | 1.5974 | 0.0000 | 18,148.5950 | 18,148.5950 | 0.4874 | 0.3300 | 18,259.1192 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 2.2670 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 24.1085 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 1.6500 | 14.1000 | 6.0000 | 0.0900 | | 1.1400 | 1.1400 | | 1.1400 | 1.1400 | 0.0000 | 18,000.0000 | 18,000.0000 | 0.3450 | 0.3300 | 18,106.9650 |
| Landscaping | 2.4766 | 0.9496 | 82.4430 | 4.3600e-003 | | 0.4574 | 0.4574 | | 0.4574 | 0.4574 | | 148.5950 | 148.5950 | 0.1424 | | 152.1542 |
| **Total** | **30.5020** | **15.0496** | **88.4430** | **0.0944** | | **1.5974** | **1.5974** | | **1.5974** | **1.5974** | **0.0000** | **18,148.5950** | **18,148.5950** | **0.4874** | **0.3300** | **18,259.1192** |

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 2.2670 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 24.1085 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 1.6500 | 14.1000 | 6.0000 | 0.0900 | | 1.1400 | 1.1400 | | 1.1400 | 1.1400 | 0.0000 | 18,000.0000 | 18,000.0000 | 0.3450 | 0.3300 | 18,106.9650 |
| Landscaping | 2.4766 | 0.9496 | 82.4430 | 4.3600e-003 | | 0.4574 | 0.4574 | | 0.4574 | 0.4574 | | 148.5950 | 148.5950 | 0.1424 | | 152.1542 |
| **Total** | **30.5020** | **15.0496** | **88.4430** | **0.0944** | | **1.5974** | **1.5974** | | **1.5974** | **1.5974** | **0.0000** | **18,148.5950** | **18,148.5950** | **0.4874** | **0.3300** | **18,259.1192** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

| Local Hire Provision Net Change | |
|---|---|
| **Without Local Hire Provision** | |
| Total Construction GHG Emissions (MT CO2e) | 3,623 |
| Amortized (MT CO2e/year) | 120.77 |
| **With Local Hire Provision** | |
| Total Construction GHG Emissions (MT CO2e) | 3,024 |
| Amortized (MT CO2e/year) | 100.80 |
| ***% Decrease in Construction-related GHG Emissions*** | ***17%*** |

# EXHIBIT B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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# *Paul Rosenfeld, Ph.D.*

**Chemical Fate and Transport & Air Dispersion Modeling**

*Principal Environmental Chemist*

**Risk Assessment & Remediation Specialist**

## Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

## Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

## Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex $H_2O$ Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

## Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

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**Rosenfeld, P.E.,** and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

**Rosenfeld P. E.,** J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

**Rosenfeld, P.E.,** and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

**Rosenfeld, P.E.,** and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49( 9), 171-178.

**Rosenfeld, P. E**., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

**Rosenfeld, P.E.,** Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

**Rosenfeld, P.E**., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

**Rosenfeld, P.E.,** and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

**Rosenfeld, P.E.,** C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

**Rosenfeld, P.E.,** and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

**Rosenfeld, P.E.,** and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

**Rosenfeld, P. E.** (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

**Rosenfeld, P. E.** (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

**Rosenfeld, P. E. (**1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

**Rosenfeld, P. E.** (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

**Rosenfeld, P. E. (**1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

## Presentations:

**Rosenfeld, P.E.,** Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

**Rosenfeld, P.E**. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

**Rosenfeld, P.E.** (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

**Rosenfeld, P. E.** (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld P. E.** (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

**Rosenfeld P. E.** (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

**Paul Rosenfeld Ph.D**. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

**Paul Rosenfeld Ph.D**. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

**Paul Rosenfeld Ph.D**. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

**Paul Rosenfeld Ph.D**. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

**Paul Rosenfeld Ph.D**. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

**Paul Rosenfeld Ph.D**. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld Ph.D**. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

**Paul Rosenfeld, Ph.D.** (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

**Paul Rosenfeld, Ph.D.** (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

**Rosenfeld, P. E**., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

**Paul Rosenfeld, Ph.D.** (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

**Paul Rosenfeld, Ph.D**. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E**. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E**. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

**Rosenfeld, P.E**. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

**Rosenfeld. P.E.** (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

**Rosenfeld. P.E. (**October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

**Rosenfeld, P.E. (**2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E**., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.**, and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

**Rosenfeld, P.E.**, C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

**Rosenfeld, P.E.**, C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

**Rosenfeld, P.E,** C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.**, C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

## Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

## Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

## Deposition and/or Trial Testimony:

In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs,* vs. United States Metals Refining Company et. al. *Defendant.*
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs,* vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant.*
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs,* vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al.,, et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

# EXHIBIT C

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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## Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

**Geologic and Hydrogeologic Characterization**
**Industrial Stormwater Compliance**
**Investigation and Remediation Strategies**
**Litigation Support and Testifying Expert**
**CEQA Review**

**Education:**

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

**Professional Certifications:**

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

**Professional Experience:**

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

**Senior Regulatory and Litigation Support Analyst:**

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

**Executive Director:**

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

**Hydrogeology:**

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

**Policy:**

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

**Geology:**

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

**Teaching:**

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

**Invited Testimony, Reports, Papers and Presentations:**

**Hagemann, M.F**., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

**Hagemann, M.F**., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

**Hagemann, M.F.,** 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

**Hagemann, M.F.,** 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

**Hagemann, M.F.**, 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

**Hagemann, M.F.,** 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

**Hagemann, M.F.,** 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

**Hagemann, M.F**., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

**Hagemann, M.F**., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

**Hagemann, M.F**., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

**Hagemann, M.F**., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

**Hagemann, M.F**., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

**Hagemann, M.F**., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F**., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F**., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

**Hagemann, M.F**., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F**., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

**Hagemann, M.F**., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

**Hagemann, M.F**., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

**Hagemann, M.F**., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

**Hagemann, M.F**., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

**Hagemann, M.F**., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

**Hagemann, M.F**., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

**Hagemann, M.F**., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

**Hagemann, M.F**., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

**Hagemann, M. F**., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

**Hagemann, M.F**., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

**Hagemann, M.**F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

**Hagemann, M.F**., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

**Hagemann, M.F**., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

**Other Experience:**

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

## Response to Letter D-7

Western States Regional Council of Carpenters
Represented by Mitchell Tsai Law Firm
Matt Hagemann and Paul Rosenfeld
January 30, 2024

**Response to Comment D-7-1**

The commenter identifies that he is submitting comments on behalf of the Western States Regional Council of Carpenters (WSRCC), stating the WSRCC has a "strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects", and provides a broad summary of the Development Project. The City will consider this comment letter before taking future action on the Project. This comment does not raise any issue regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment D-7-1-A**

The commenter states that WSRCC members live, work, and recreate in the City and surrounding communities and would be directly affected by environmental impacts resulting from development permitted under the (Sunset Crossroads) Specific Plan. The comment is noted. This comment does not raise any issue regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment D-7-1-B**

The commenter states the WSRCC reserves the right to supplement these comments at or prior to hearings regarding the Specific Plan and incorporates by reference all comments regarding the Environmental Impact Report submitted prior to certification. This comment does not raise any issue regarding the adequacy of the analysis in the Draft EIR, and no further response is necessary.

**Response to Comment D-7-1-C**

The commenter requests to be provided with any and all notices issued pursuant to the California Environmental Quality Act (CEQA) and the California Planning and Zoning Code referring or related to the Specific Plan project. The City acknowledges this comment and will provide WSRCC with all requested notices. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment D-7-1-D**

The commenter requests the City incorporate language that requires the use of local workforce to benefit the community's economic development and environment. The commenter's request will be considered by the City; however, the City has no control over who is hired to build the Project. See also response to Comment D-7-3. Furthermore, the comment does not raise any issues regarding the adequacy of the environmental analysis contained in the EIR, as the type of workers used is not relevant to any potential impacts on the environment. Because the comment does not raise any issues related to the adequacy of the environmental analysis in Draft EIR, no further response is required.

**Response to Comment D-7-2**

The commenter restates its request that the City incorporate language in the Specific Plan stating that, "local workers who have graduated from a Joint-Labor Management Apprenticeship Program approved by the State of California, have at least as many house of on-the-job experience in the applicable craft which would be required to graduate from such a state-approved apprenticeship training program, or who are registered apprentices in a state-approved apprenticeship training program." There is no CEQA provision nor any City code that mandates the City's requirement for the hiring or use of individual local construction labor. The comments regarding community benefits from use of a local workforce are noted and will be provided to City decision-makers for consideration prior to any future action on the Project. This comment does not raise any issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.

**Response to Comment D-7-3**

The commenter states, without substantiation and without presenting the feasibility of such a requirement, that imposing a local hire requirement mandating a certain percentage of workers reside within 10 miles or less of the Specific Plan area would reduce environmental impacts such as vendor trip lengths and GHG emissions and provide localized economic benefits. The commenter cites the attached letter from SWAPE regarding the potential to reduce GHG construction emissions from local hire requirements. Please refer to the responses to Comments D-3-18, D-7-8 through D-7-21. The commenter does not raise any issues related to the adequacy of the environmental analysis in the Draft EIR; therefore, no further response is necessary.

**Response to Comment D-7-3-A**

The commenter makes a general statement regarding the economic and other benefits of local workforce hiring requirements including climate mitigation efforts. This comment is noted. This comment does not raise any issues related to the adequacy of the environmental analysis in Draft EIR, and no further response is required.

**Response to Comment D-7-3-B**

The commenter states, without specific page reference to the lengthy document cited in the footnote, that the use of local labor can have significant environmental benefits as such policies may improve an area's jobs/housing balance, decrease the number and length of job commutes, and reduce associated greenhouse gas emissions. Please refer to the response to Comment D-3-18, D-7-8 through D-7-21. This general statement does not raise any issues concerning the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment D-7-3-C**

Citing a 2008 California Planning Roundtable policy note, the commenter reiterates the general policy statements regarding the environmental benefits of locating jobs closer to residential areas without showing direct applicability to the City area. Please refer to the responses to Comments D-3-218, D-7-8 through D-7-21. This general statement does not raise any issues concerning the adequacy of the environmental analysis in the Draft EIR. No further response is necessary.

**Response to Comment D-7-3-D**

The commenter quotes an American Planning Association article regarding the participation by the nearly built out City of Berkeley in a program encouraging local hiring for entry and intermediate level jobs and vocational training, stating such programs can reduce vehicle miles traveled. Please refer to the responses to Comments D-3-18, D-7-8 through D-7-21. The City notes that the City and surrounding areas are less urbanized than the City of Berkeley and do not readily lend themselves to the programs adopted there. This comment does not raise any issues concerning the adequacy of the environmental analysis in the Draft EIR. No further response is necessary.

**Response to Comment D-7-3-E**

The commenter references the Affordable Housing and High Road Jobs Act of 2022 (AB 2011) which aims to streamline approval of multifamily housing projects meeting specified criteria including location within a zone with principal permitted uses of retail, office and parking. This reference does not provide any information regarding how this statute relates to the Development Project. It also does not raise any issues concerning the adequacy of the environmental analysis in the Draft EIR; therefore, no further response is required.

**Response to Comment D-7-3-F**

The commenter states that the City should consider utilizing local workforce policies stating, without substantiation, that such policies would mitigate greenhouse impacts, improve local air quality, and reduce transportation-related impacts. Please refer to the responses to Comments D-3-18, D-7-8 through D-7-21. This comment does not raise any issues concerning the adequacy of the environmental analysis in the Draft EIR. No further response is necessary.

**Response to Comment D-7-3-G**

The commenter states that the City should incorporate language imposing training requirements for construction activities to prevent community spread of COVID-19 and other infectious diseases into the SP. As discussed in Section 4.9.4.2 of the Draft EIR, Cal/OSHA requirements applicable to the Development Project include requirements to prepare injury and illness prevention plans. The federal, State, and local governments implement the regulation and enforcement of safe working conditions for construction sites including OSHA, CalOSHA, and additional safe working conditions for construction sites during a public health emergency such as COVID-19 pandemic. The COVID-19 public health emergency in California was terminated by proclamation of Governor Newsom on February 28, 2023. To the extent that Cal/OSHA Prevention Non-Emergency Regulations which terminate on February 3, 2025, apply to the Project and are in effect when construction commences, the Project would comply with those and all other applicable safety regulations required by law. Regarding COVID-19, the Draft EIR is required to identify and focus on the significant effect of the proposed project on the environment. Specifically, as defined in CEQA Guidelines 15360 and California Public Resources Code 21060.5 for the “physical conditions which exist within the area which will be affected by a proposed project”. COVID-19 is not a physical condition as outlined and is outside of the purview of CEQA. This comment does not raise any issues concerning the adequacy of the environmental analysis in the Draft EIR. No further response is necessary.

**Response to Comment D-7-4**

The commenter states the City should incorporate additional requirements to mitigate public health risks from various residential, commercial, and mixed-use construction activities. The Project would be required to adhere to all relevant federal, State, and local protocols and safety practices related to public health from the time of commencement of construction throughout the construction process. Please refer to Response to Comment D-7-3-G. This comment does not raise any issues concerning the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment D-7-5**

The commenter recommends various COVID-19 related workplace practices that would ensure worker safety during construction. Please refer to the response to Comments D-7-3-G and D-7-4. This comment does not raise any issues concerning the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment D-7-6**

The commenter states the City should require construction workers to undergo COVID-19 Training and Certification including an Infection Control Risk Assessment training pursuant to programs it developed before engaging in Development Project-related construction activities. Please refer to the response to Comment D-7-4. This comment does not raise any issues concerning the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment D-7-7**

The commenter states that the City should require that residential developments related to the Specific Plan be built by a workforce trained in Infection Control Risk Assessment protocols. Please refer to the response to Comments D-7-3 and D-7-4. This comment does not raise any issues concerning the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

***Comments D-7-8 through D-7-21 were provided by Soil Water Air Protection Enterprise (SWAPE) in a March 2021 letter. SWAPE comments include Attachments A-C, which detail composite and average urban and rural trip lengths in various air basins (Attachment A), CalEEMod for an "example" project cited by the commenter (Attachment B), and a summary of potential greenhouse gas reductions achievable from a reduction in the length of worker vehicle trips (Attachment C)***

**Response to Comment D-7-8**

The commenter provides a general summary of the CalEEMod program and an explanation of its use and what it measures but raises no issues regarding the adequacy of the analysis in the Draft EIR, and no further response is required.

**Response to Comments D-7-9 through D-7-12**

The commenter provides a general summary of how CalEEMod uses vehicle trip characteristics to calculate vehicle miles traveled by construction workers during construction, and how this data is used to calculate vehicle emissions from construction employees' commuting trips. The summary is

generally correct, except that throughout the comments, the commenter refers to outdated versions of the CalEEMod documentation. The commenter further provides a general statement that there is a direct relationship between trip length and VMT and VMT and vehicle emissions. The commenter suggests that, "vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise." The comments are noted, however, these comments do not raise issues regarding the adequacy of the analysis in the Draft EIR or provide specific information quantifying emissions reductions from implementing the commenter's proposal. No further response is required.

**Response to Comments D-7-13 through D-7-16**

The commenter provides general information describing the CalEEMod worker trip default parameters (D-7-13) and points out that the default worker trip parameters can be changed to include project-specific values if more specific project information is known and justified by substantial evidence (D-7-14), again citing outdated versions of the CalEEMod documentation. The commenter continues to provide information specific to CalEEMod default worker trip lengths for rural and urban worker trips by air basin as outlined in the comment letter in the Worker Trip Length by Air Basin table (D-7-15.[64]) The commenter concludes with a discussion of the differences in default worker trip lengths and states an assumption that a local hire requirement will reduce worker trip lengths (D-7-16.) The Project is located in the South Coast Air Basin, which has an estimated daily average urban trip length of 14.7 miles and an estimated daily average rural trip length of 19.8 miles per construction worker traveling to and from the Project. These averages are the highest in the State and exceed the 10 mile hiring requirement requested by the commenter. As noted in Appendix C-1 of the Draft EIR, the CalEEMod worksheets assumes a 14.7-mile worker trip length for the Project's construction analysis. The information provided will be presented to City decision-makers prior to any future action related to the Project. These comments do not raise any issue regarding the adequacy of the analysis in the Draft EIR, and no further response is required.

**Response to Comments D-7-17 and D-7-18**

The commenter identifies an "example" project (the Village South Specific Plan) located in the City of Claremont (D-7-17) which has a default worker trip length of 14.7 miles. This example project consists of 1,000 residential units, 100,000 sf of retail, 45,000 sf of office space, and a 50-room hotel on a 24-acre site. It will utilize 15 worker trips per day and 458 total hauling trips during demolition; 20 worker trips per day during grading; 796 worker trips per day and 140 vendor trips per day during building construction; 15 worker trips per day during paving; and 159 worker trips per day during architectural coating (Village South Specific Plan EIR, 2021). In contrast, the Development Project consists of 47.9 acres of commercial development, 392 acres of industrial development, and 65.6 acres of open space across the 533.8-acre Development Site. The remaining 28.3 acres of the Development Site are for street dedication/circulation. According to the CalEEMod outputs in Appendix C-1 of the DEIR, the Development Project would require as many as 4,242 construction worker trips for the different phases of construction. For its example, the commenter adjusted the default worker trip length downward to 10 miles to reflect a local hire requirement, concluding the reduction in worker trip length would reduce greenhouse gas emissions by approximately 17 percent (D-7-18.) The commenter provides data in Attachment B and C of its comment letter that it states supports its

64 The commenter provides this information as Attachment A of its comment letter.

conclusions. The commenter does not explain why this example project demonstrates that enough construction workers living within 10 miles of that project site could be hired for that project when the SCAQMD average construction worker commuting distance is 14.7 miles. As discussed in response to Comment D-3-20, it is unlikely that sufficient construction workers for this Project could be hired within 10 miles of the Project site, making such a mitigation requirement infeasible for the Project. Nevertheless, the information the commenter provided is noted and will be provided to the City decision-makers for consideration. These comments do not raise any issues with adequacy of the analysis in the Draft EIR, and no further response is required.

**Response to Comments D-7-19 and D-7-20**

The commenter restates that implementing a local hiring provision requiring a 10-mile vehicle trip for workers could reduce potential greenhouse gas emissions associated with construction worker trips (D-7-19). The commenter then states, "…This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, *though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects*." [emphasis added]. As further stated by the commenter, the level of reduction would vary based on the location and level of urbanization of the project. (D-7-20). The commenter has not provided information showing that this example would apply to the City and this Project and would result in a quantifiable decrease in greenhouse gas emissions. This example is flawed as the City of Claremont is significantly more urban than the City of Banning. Claremont is approximately 25% larger than Banning with a 2020 population of 37,266 (US Census Bureau, 2020). Claremont is also immediately surrounded by the cities of Montclair, Pomona, and La Verne, making the regional population notably larger than the San Gorgonio Pass region. Further, the commenter does not provide any specific evidence that local hire provisions would reduce impacts in the City of Banning.

Refer to the response to Comment D-3-18 for the discussion regarding the local workforce in the City. As stated in responses to D-7-15 and D-7-16, the air quality analysis prepared for the Project utilized the 14.7-mile trip length for urban uses, which is the same average trip length that the commenter cited for the urban areas in the South Coast Air Basin. The default input values in CalEEMod are continually updated and represent the most applicable and appropriate data sources. The commenter does not provide evidence to the contrary to show that sufficient percentage of construction workers for a project of this size would be available within the 10-mile radius it proposes. Therefore, the substantial evidence the commenter stated that would be needed to change the Draft EIR or the CalEEMod parameters is lacking. These comments do not raise any issues with adequacy of the analysis in the Draft EIR, and no further response is required.

**Response to Comment D-7-21**

The commenter provides disclaimer remarks about the limited information available for the basis of the conclusions in the SWAPE comment letter and disclaims the accuracy and completeness of its findings. This comment does not raise any issues regarding the adequacy of the analysis in the Draft EIR, and no further response is required.

## E. INDIVIDUALS

E-1: Gary and Jan Wilhelmson (December 12, 2023)

E-2: Steve and Raelene Kretchman (January 5, 2024)

E-3: Michael Volz (January 5, 2024)

E-4: Steve and Raelene Kretchman (January 8, 2024)

E-5: Carl and Tara Pueschel (January 8, 2024)

E-6: Janet and Martin Sherman (January 11, 2024)

E-7: Mary Ann Melleby (January 15, 2024)

E-8: Charles Friese (January 19, 2024)

E-9: Patrica Naylor (January 20, 2024)

E-10: Barbara Elness (January 21, 2024)

E-11: Frances Valenzuela (January 21, 2024)

E-12: Nick and Mary Goralsky (January 22, 2024)

E-13: Dorrie Gartzke (January 23, 2024)

E-14: Rick and Lori Kaminsky (January 23, 2024)

E-15: Bernet Roth (January 24, 2024)

E-16: Timothy and Francisca Hanratty (January 25, 2024)

E-17: David and Ruth Madon (January 27, 2024)

E-18: John and Shirley Creviston (January 28, 2024)

E-19: Armando Aranda (January 29, 2024)

E-20: Kathleen Aranda (January 29, 2024)

E-21: Andrea Arthurholtz (January 29, 2024)

E-22: Julie Austin (January 29, 2024)

E-23: Gary Burkel (January 29, 2024)

E-24: Nora Burkel (January 29, 2024)

E-25: Randy Robbins, Jim Corrigan, and Diane Berley, Concerned Citizens (January 29, 2024)

E-26: Ginny June (January 29, 2024)

E-27: Tennie Boggs and Jack Marty (January 29, 2024)

E-28: Richard McHard (January 29, 2024)

E-29: Michael Volz (January 29, 2024)

E-30: Susan Walsh (January 29, 2024)

E-31: Kathleen Dale (January 30, 2024)

E-32: Cindy Medley (January 30, 2024)

E-33: T. Gae Rusk (January 31, 2024)

E-34: Robert Messier (January 30, 2024)

E-35: Diane Nethercott (January 30, 2024)

E-36: Ron Roy (January 30, 2024)

E-37: Winoa Williams (January 30, 2024)

E-38: Ron Roy (January 30, 2024)

## Sunset Crossroads

gary_jan4@verizon.net <gary_jan4@verizon.net>
Sun 12/17/2023 7:45 PM
To:Adam Rush <arush@banningca.gov>

**********

RE: Sunset Crossroads

We are Banning residents , we are opposed to the development of this massive warehouse project. We are shocked with the decisions made by our “representatives”. We wonder where the benefit to the citizens are? Who actually does benefit from this atrocity?

We hoped our property values would increase
Not decrease! Our way of life to be enhanced and protected, not endangered.

Please consider your constituents over the moneygrubbing developers. We have to live here. We’re Not going to get any younger. And we were hoping to have a nice retirement, not having to worry about our safety on the streets

I don’t think you’ll find one person in Banning the disagrees with me on this subject. We do want growth but growth that will enhance the community and support the community and keep the community safe. Thank you for your consideration please reconsider this horrible idea

**E-1-1**

Sincerely.

Gary and Jan Wilhelmson

Sent from the all new AOL app for iOS

## Response to Letter E-1

Gary and Jan Wilhelmson
December 12, 2023

### Response to Comment E-1-1

The comment states opposition to the proposed Project and questions the benefits of the project to the citizens residing in Banning, including potential decreases on property values. CEQA Guidelines Section 15131(a) states "Economic or social effects of a project shall not be treated as significant effects on the environment…The focus on the analysis [in the EIR] shall be on the physical changes." Notwithstanding these requirements, the Draft EIR analyzes potential impacts to Public Services (Section 4.15) as it relates to police and fire services and concludes the Development Project would result in less than significant impacts. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

## Sun Set Crossings

Raelene Kretchman Thornton <kretch48@gmail.com>

Fri 1/5/2024 4:15 PM

To:Adam Rush <arush@banningca.gov>
Cc:Doug Schulze <dschulze@banningca.gov>;Colleen Wallace <cwallace@banningca.gov>;Rick Minjares <rminjares@banningca.gov>;Reuben Gonzales <rgonzales@banningca.gov>;Sheri Flynn <sflynn@banningca.gov>

Dear Adam Rush, Director of Banning Community Development,

I am writing to vehemently oppose the proposed Sunset Crossroads project in Banning. It is of utmost importance that we address the severe negative consequences and significant impacts this ill-conceived project will impose upon our community. **E-2-1**

The environmental impact study you provided does not merely highlight concerns; it unequivocally identifies unavoidable significant impacts in critical areas such as Air Quality, Greenhouse Gas Emissions, Noise, and Vehicle Miles Traveled. These are not trivial matters; they are existential threats to the well-being of our residents. We cannot afford to disregard these risks, and it is imperative that we prioritize the health and safety of the people of Banning over any potential benefits this project may offer. **E-2-2**

Furthermore, the proposed project site is already beleaguered by a multitude of warehouses in the outlying areas, leading to chronic traffic congestion. The inexplicable decision to approve a warehouse across from Sun Lakes Country Club, a senior housing development, and adjacent to The Lakes, an assisted living facility, raises profound questions about the city's judgment. These facilities cater to our most vulnerable populations, and it is our solemn duty to safeguard their quality of life and overall well-being. Allowing further industrial development in such close proximity to these sensitive areas is not only irresponsible but also shows a shocking disregard for the daily lives of our residents. **E-2-3**

In summary, moving forward with the Sunset Crossroads project would be nothing short of catastrophic for the residents of Banning. The potential environmental, health, and safety hazards are not to be taken lightly, and I implore you to reconsider this proposal in light of the grave concerns raised. Our community demands and deserves development that is both responsible and considerate of the well-being and interests of its residents. **E-2-4**

Sincerely,

Steve Kretchman & Raelene Kretcman

Warmest Regards,

Raelene Kretchman
714-815-6990

## Response to Letter E-2

Steve and Raelene Kretchman
January 5, 2024

**Response to Comment E-2-1**

The comment states opposition to the proposed Project and the importance of addressing the perceived negative consequences and significant impacts that the project would impose on the community. These comments are noted. The Draft EIR analyzes the potential project impacts to all of the environmental resource topics specified in Appendix G of the CEQA Guidelines. The Draft EIR discussed potential environmental impacts, and analyzed why the impacts may occur, and whether the impacts are significant. State CEQA Guidelines Section 15204(a) states that those commenting on a Draft EIR should focus comments on the sufficiency of the document in identifying and analyzing possible project environmental impacts and ways in which significant impacts might be avoided or mitigated. Additionally, CEQA Guidelines Section 15204(c) states that commenters should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. The comments did not raise any specific concerns related to the significance of environmental impacts or the adequacy of the Draft EIR. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-2-2**

The comment states that the Draft EIR identified unavoidable significant impacts on Air Quality, Greenhouse Gas Emissions, Noise, and Vehicle Miles Traveled which substantially affect the health and safety of Banning residents. The comment is noted. The Draft EIR provides appropriate analysis by technical experts in the resource fields of air quality, GHG emissions, Noise, and VMT and for example, concludes that the Project's air quality emissions do not pose significant health risks to Banning residents, and will not have significant noise impacts. Please refer to the responses to Comments E-5-2, E-8-1, E-9-2, A-3-23-A, D-3-15 (regarding traffic analysis and safety), D-6-15, and D-6-29 (regarding noise). It is the responsibility of the lead agency to balance, as applicable, the economic, legal, social, technological, or other benefits of the proposed Development Project against its significant unavoidable environmental impacts before approving the project. Findings and a Statement of Overriding Considerations must be made in writing with specific reasons to support approval of a project that has unavoidable significant effects, and these must be supported by substantial evidence in the record prior to approval. Refer to CEQA Guidelines Sections 15092 and 15093. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-2-3**

The comment states general concern about adding to traffic congestion due to the existing warehouses in the outlying areas and placing a warehouse project near a senior housing development and an assisted living facility. The comment is noted and will be provided to the City staff and elected

officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

**Response to Comment E-2-4**

The comment states general concerns regarding the merits of the project. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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## Sunset Crossroads

Michael Volz <vmv1950@aol.com>

Fri 1/5/2024 3:52 PM

To:Adam Rush <arush@banningca.gov>

I am a Banning resident and I oppose the Sunset Crossroads project. **E-3-1**

Sent from Michael Volz

## Response to Letter E-3

Michael Volz
January 5, 2024

### Response to Comment E-3-1

The comment states opposition to the proposed Project. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

To: Adam Rush, M.A. , AICP
Community Development Director
99 E. Ramsey Street, Banning CA 9220

RECEIVED
CITY OF BANNING
JAN - 8 2024
CITY MANAGER'S OFFICE
BY:

From: Steve & Raelene Kretchman
950 S Bay Hill Rd
Banning, CA 9220

Dear Adam Rush, Director of Banning Community Development,

I am writing to vehemently oppose the proposed Sunset Crossroads project in Banning. It is of utmost importance that we address the severe negative consequences and significant impacts this ill-conceived project will impose upon our community. E-4-1

The environmental impact study you provided does not merely highlight concerns; it unequivocally identifies unavoidable significant impacts in critical areas such as Air Quality, Greenhouse Gas Emissions, Noise, and Vehicle Miles Traveled. These are not trivial matters; they are existential threats to the well-being of our residents. We cannot afford to disregard these risks, and it is imperative that we prioritize the health and safety of the people of Banning over any potential benefits this project may offer. E-4-2

Furthermore, the proposed project site is already beleaguered by a multitude of warehouses in the outlying areas, leading to chronic traffic congestion. The inexplicable decision to approve a warehouse across from Sun Lakes Country Club, a senior housing development, and adjacent to The Lakes, an assisted living facility, raises profound questions about the city's judgment. These facilities cater to our most vulnerable populations, and it is our solemn duty to safeguard their quality of life and overall well-being. Allowing further industrial development in such close proximity to these sensitive areas is not only irresponsible but also shows a shocking disregard for the daily lives of our residents. E-4-3

In summary, moving forward with the Sunset Crossroads project, would be nothing short of catastrophic for the residents of Banning. The potential environmental, health, and safety hazards are not to be taken lightly, and I implore you to reconsider this proposal in light of the grave concerns raised. Our community demands and deserves development that is both responsible and considerate of the well-being and interests of its residents. E-4-4

Sincerely,

Steve Kretchman & Raelene Kretchman

CC: City Manager Doug Shulze. Mayor Alberto Sanchez, Mator Pro-Tem Colleen Wallace

## Response to Letter E-4

Steve and Raelene Kretchman
January 8, 2024

**Response to Comments E-4-1 through E-4-4**

This letter is identical to the letter provided to the City via email (Letter E-2). Refer to responses to Comments E-2-1 through E-2-4. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

## Comments on Sunset Crossroads Specific Plan

Tara Pueschel <4pueschels@gmail.com>

Mon 1/8/2024 11:33 AM

To:Adam Rush <arush@banningca.gov>

TO: Adam Rush
Community Development Director, City of Banning

We are writing to strongly oppose the Sunset Crossroads Specific Plan SCH: 2021020011.

We are new residents of Sun Lakes in Banning. One of the reasons we purchased our home is because of the peaceful and quiet neighborhood as well as the beauty of the area surrounding Sun Lakes. We cannot fathom what this project will potentially do to the area. We were already surprised by the current amount of traffic experienced daily along Highland Springs Avenue. While the extension of First Street towards Sunset Avenue would help alleviate traffic in the short term, with all the new construction planned it will only become worse. The area is sadly beginning to look like it did in Temecula with all the traffic issues. **E-5-1**

Building any type of warehouses and industrial buildings are of particular concern. We don't want hundreds of trucks passing by our gates. The noise and traffic alone would be an unbearable nuisance, but the real concern is the negative impact to our community due to the greenhouse gas emissions. The poor air quality this will cause will greatly affect those living in and near Sun Lakes. **E-5-2**

There are already numerous, empty warehouses and buildings in Moreno Valley, Perris, and Calimesa (just to name a few areas). Why make more? We strongly encourage the city to consider project alternatives to lessen the negative impacts. **E-5-3**

We are so happy in our new community and would hate to be forced to move due to the negative impacts this projects will create as it stands.

Thank you for your consideration.

Carl & Tara Pueschel
1452 Riviera Ave.
Banning, CA 92220

## Response to Letter E-5

Carl and Tara Pueschel
January 8, 2024

**Response to Comment E-5-1**

The comment states that the residents of the Sun Lakes community are concerned about existing traffic and the increase in traffic, especially truck traffic that the Development Project could cause. Traffic impacts are analyzed in Chapter 4.17, Transportation based on the Transportation Analysis prepared by experts in the field of transportation analyses (refer to Draft EIR, Appendix J-2). Please refer to the responses to Comments E-31-12, and E-34-15 regarding construction of Sun Lakes Boulevard and the responses to Comment E-31-12 regarding CEQA requirements with respect to traffic and level of service impacts. Please refer to response to Comment D-6-1-A regarding the Truck Route Management Plan (PDF T-4) for the Development Site. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-5-2**

The comment states that the noise and traffic generated by the Development Project would be a nuisance and that there would be a negative impact to the community due to greenhouse gas emissions and poor air quality. The Draft EIR analyzes Project impacts in each of these areas and indicates that air quality emissions will not have a significant localized or health risk impact on the Banning community (refer to responses to Comments A-3-2, A-3-18, B-2-13, and B-2-14). Project greenhouse gas emission impacts have been identified in the Draft EIR as cumulatively significant (refer to responses to Comments D-3-8, D-6-13-A, and D-6-14). Based on public comment, design changes have been included in the Development Project that would eliminate the significant operational (traffic and stationary source) noise impacts identified in the Draft EIR (see the response to Comment D-6-29). While not considered significant under CEQA, level of service impacts resulting from implementation of the Development Project are addressed by Conditions of Approval (see the response to Comment E-31-12). To address community concerns regarding truck traffic, Project Design Feature PDF T-4 requires the applicant to prepare (and receive approval of) a Truck Route Management Plan (see the response to Comment D-6-1-A). The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-5-3**

The comment states without support that numerous empty warehouses are located in surrounding towns and questions the need for more warehouses. The comment further encourages the City to consider project alternative to lessen negative impacts. The Draft EIR in Chapter 8.0, Alternatives considered and fully evaluated four project alternatives and analyzed each in light of its impacts compared to the Development Project and the City's objectives. The Draft EIR initially considered and rejected as infeasible an additional six alternatives either because they would exceed or not substantially lessen environmental impacts, are repetitive of alternatives considered in greater detail,

or would not meet most of the City's basic objectives and requirements (see section 8.2). Please refer to the responses to Comments D-6-47 through D-6-49. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**From:** Adam Rush
**To:** Carl Winter; Theresa Wallace
**Cc:** JJ Jenkins
**Subject:** FW: Sunset Crossroads Project Comments

Sincerely,

Adam B. Rush, AICP
Community Development Director
Community Development
City of Banning
Direct Line: (951) 922-3131
Cell: (760) 219-2791
E: arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

The information contained in this email message is intended only for the use of the individual or entity to which it is addressed and may contain information that is legally privileged and/or confidential. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, if you have received this communication in error, please notify us immediately by telephone. Thank you.

-----Original Message-----
From: Janet Sherman <jlsherman@yahoo.com>
Sent: Thursday, January 11, 2024 6:09 PM
To: Adam Rush <arush@banningca.gov>
Subject: Sunset Crossroads Project Comments

> TO: Adam Rush, Community Development Director, City of Banning Why is
> Banning even considering approval of over 5.5 million square feet for industrial use adjacent to residential areas? That is totally irresponsible. In our opinion. Certainly there will be warehouses that will bring heavy semi-trucks along with their diesel pollution to our neighborhoods as well as worsening traffic and noise in an area that already has a severe traffic problem and creating more wear and tear on our streets and roads. We are calling on you and the City to act responsibly and deny this type of use.
> Janet and Martin Sherman

**E-6-1**

> 1846 Fairway Oaks Ave
> Banning, CA 92220

## Response to Letter E-6

Janet and Martin Sherman
January 11, 2024

### Response to Comment E-6-1

The comment states opposition to the City's approval of the Project's industrial uses adjacent to residential areas due to the heavy semi-trucks and diesel pollution, worsening traffic, and noise, and creating more wear and tear on the streets and roads. While the Project does result in significant and unavoidable regional air quality impacts (as established in Section 4.3 of the Draft EIR), the Health Risk Assessment (HRA) analyzed potential health impacts to nearby sensitive receptors including residences and the nearby school and found no significant health risks to any sensitive receptors. The response to Comment A-3-2 provides a detailed account of the localized significance threshold (LTS) analysis and HRA prepared for the Project. The HRA was supplemented to address public comments (refer to Supplemental Memorandum Regarding Operational Emissions from Transport Refrigeration Units (TRUs) and updated Health Risk Assessment for the Proposed Sunset Crossroads Specific Plan Project, which is included in the Final EIR as Appendix C-4). Also refer to the responses to Comments A-3-4 and B-2-5. The response to Comment D-6-29 discusses the minor modifications to the Project which reduces noise impacts to less than significant. All significant impacts have been mitigated to the extent feasible. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**MARY ANN MELLEBY**
**6308 PONTE VERDE CIRCLE**
**BANNING, CA 92220**
**(909) 974-8008**

RECEIVED
JAN 18 2024
Initial: _____

**JANUARY 15, 2024**

**Adam Rush**
**Community Development**
**City of Banning**
**99 E. Ramsey Street**
**Banning, CA 92220**

**Dear Mr. Rush:**

**The purpose of this letter is to provide comments on the Sunset Crossroads Project Draft EIR.**

**I am very concerned about the size and scope of this project and the effects it would have on our community.**

**Extending Sun Lakes Boulevard from Homeward to Sunset would certainly help with easing the current congestion on Highland Springs at the 10 freeway, but the increased traffic that would be generated to and from the Sunset Crossroads Project from Highland Springs would exacerbate the traffic nightmare that is already in existence. Would having Sun Lakes Blvd. a no truck" zone, except for deliveries to Sun Lakes Country Club be an option? Would trucks going to and from the warehouses be only directed to Sunset Blvd.? How could that be possible?** E-7-1

**There also would be a need for traffic lights on Sun Lakes Blvd. at certain locations – Main Gate, Gate 2, Gate 3 and 4, and at the RV lot – for the safety of Sun Lakes residents, especially those in golf carts.**

**The project will certainly increase noise and pollution from trucks going to and from the warehouses. Increased traffic is also a major concern for an already traffic-impacted area.** E-7-2

**I am very against having this type of development, especially warehouses, so near residential communities, especially senior communities, in this case, Sun Lakes Country Club, Rancho Serrano, and The Lakes.** E-7-3

**Sincerely,**

Maryann Melleby

**Mary Ann Melleby**

## Response to Letter E-7

Mary Ann Melleby
January 15, 2024

### Response to Comment E-7-1

The comment states concerns related to the size and scope of the Project and the effects on the community, and that traffic from the Project site would exacerbate the existing traffic congestion. The comment requests that Sun Lakes Boulevard, be designated as a no truck zone except for truck deliveries to Sun Lakes Country Club and questions whether truck access to the Project site could be directed only to Sunset Avenue. The comment states there should be traffic lights at several Project driveways on Sun Lakes Boulevard, for the safety of Sun Lakes residents and golf carts. The Draft EIR analysis of traffic impacts in Section 4.17, Transportation are supported by a Traffic Analysis (Draft EIR, Appendix J-2). While the Sun Lakes Boulevard Extension Project will provide substantial access through the Development Site, it must be noted the Sun Lakes Boulevard Extension Project is a City-sponsored project. The City's General Plan Circulation Element identifies this future Arterial Highway to connect Sunset Avenue to Highland Home Road, bisecting the Development Site in an east-west direction. Planned as a four-lane divided roadway with two travel lanes in each direction and separated by a landscaped median, the Sun Lakes Boulevard extension is consistent with the City's General Plan Circulation Element. A Truck Route Management Plan to restrict or discourage truck traffic moving west on Sun Lakes Boulevard will be submitted by the Project Applicant and approved by the City prior to the issuance of the first building permit for any on-site uses. See the response to Comment D-6-1-A. Additionally, as outlined in Section 4.17 of the Draft EIR and found within the City's General Plan Policy 7, new development will pay the fair share for improvements of streets within and surrounding the Development Site, including roadways and traffic signals (refer to response to Comment E-31-12). The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-7-2

The comment states that a certain increase in noise and pollution from trucks going to or coming from the warehouses, and that increased traffic in an already traffic-impacted areas is a concern. The Draft EIR analyzes traffic impacts in Section 4.17 and the analysis is supported by a Traffic Analysis (Draft EIR, Appendix J-2). See the response to Comment D-6-1-A. Also, please refer to responses to Comments A-3-2, A-3-4, B-2-5, and D-6-29 (with minor Project modifications, noise impacts are now less than significant). The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-7-3

The comment states opposition to locating a warehouse development near residential and senior communities such as Sun Lakes Country Club, Rancho Serrano, and The Lakes (Assisted Living). Please refer to responses to Comments A-3-2 and E-8-1 regarding less than significant health impacts on City residents, including sensitive receptors, and D-6-29 regarding noise impacts. By providing minor modifications to the Project, noise impacts are now less than significant. The comment is noted and

will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**From:** Serita R. Young
**To:** Adam Rush
**Cc:** Steven L. Flower; Sandra Calderon; Arturo Vela
**Subject:** RE: BANNING City Government - Please Register My Vote AGAINST Sunset Crissing
**Date:** Friday, January 19, 2024 9:48:46 AM
**Attachments:** image001.png

Good morning Adam,

I suggest including Mr. Friese's email in the project file as a written comment received on the project and sharing the communication with the PC once this project comes before them for recommendation to the Council.

Serita

**Serita R. Young**
*City Attorney, City of Banning*

RWG Law Logo

**RICHARDS WATSON GERSHON**
350 South Grand Avenue, 37th Floor
Los Angeles, CA 90071
**T:** 213.626.8484
**D:** 213.253.0223
**F:** 213.626.0078
**E:** syoung@rwglaw.com
**W:** rwglaw.com

-----Original Message-----
From: Charlie Friese <charlie.friese@gmail.com>
Sent: Friday, January 19, 2024 9:17 AM
To: asanchez@banningca.gov; rminjares@banningca.gov; Sheri Flynn <sflynn@banningca.gov>; cwallace@banningca.gov; dschulze@banning.gov; arush@banningca.gov; Serita R. Young <SYoung@rwglaw.com>
Subject: BANNING City Government - Please Register My Vote AGAINST Sunset Crissing

> 01-19-2024
> Banning City Council - and - Other Important People . . .
>
> We moved to Banning in October of 2000, into SLCC. We moved from Adrian, MI, a Small City Of 25,000 or so, just above Toledo Ohio.
>
> When we told our Pastor, who had lived in CA for years where we were relocating, he asked . . . Why Banning ? ? ? "At one time this was considered the "summer home" of some HELL's Angles" . . . Anyway, upon moving in, we were enthralled.

E-8-1

>
> Anyway, I was still working, but, Russie was retired. We both got involved with Sun Lakes, serving on various SLCC committees and volunteer activities, in the community. Russie played quite a bit of golf, I not so much. I retired in 2005 at 60 after Russie's Breast Cancer. We both became Involved with RELAY FOR LIFE and were significant contributors as individuals and later Combined SLCC TEAMS.
>
> When I volunteered for The PASS Area Habitat For Humanity, I was introduced to the "best and worst" of BANNING. That began my struggle to understand the aspect of "the - - - hatfield and mccoy's - - - BANNING STYLE . . . There were NO ZONING RULES OR REGULATIONS That Were In Force, Let Alone Enforced . . .
>
> The Highway 10 that traversed through Banning Did NOT Kill Banning . . . Banning Killed Banning . . . Let's Move 25 to 30 years Forward. Not To Be Deterred With Destroying A City, We have had a plethora of simply AWFUL City Councils, many members from right here in SLCC. WAIT, Sacramento Got Involved To Form DISTRICTS, State Wide . . . WAIT Even More, Banning Had A H. R. Department which did not do their due diligence in NOT Preventing The Hiring Of Doug Schulze nor Adam Rush. WAIT Even More, Our Citizens Elect Incompetent, and Illiterate City Council Persons - one, illiterate / one, a bully / one, a milk toast, and then there Is Sheri Flynn who is trying to bring BANNING Forward, in my never to be humble opinion. Sheri tries to ask the " tough questions" only to be "shut down" by a biased City Council and a Bully Of A City Manager . . . Last, a member of SLCC who serves on the Planning Committee even voted to approve the Proposed Facility right next to The LAKES, and across from SLCC. I cannot imaging what he was thinking ! ! !
>
> NOW To My Reason For Writing - Some Time Ago I Invited "interesting persons" to take a "ride along" to view the "high points" of our downtrodden city. We met at the office of Doug Schulze. Mary Hamlin DID NOT SHOW UP. A SLCC Resident DID NOT SHOW UP. We met at Doug Schulze's Office - Doug / Charlie / Frank Diaz.
>
> We introduced ourselves and had a "pleasant" introduction - but then - I said that I did NOT like STUPID or LAZY, and asked DOUG, I Do Not Know How You Spell STUPID - but - HOW DOES ANYONE SUGGEST TO BUILD A "truck stop" / warehouse facility / right next to a SENIOR LIVING FACILITY, even if they have a great HVAC / Filtration System ? ? ? "Someone" even has suggested that it would not bother "them" as "they" don't have to open their windows.
>
> Then we got into my car and traveled around our delightfully distraught city. There were excuses after excuses as to what the STATE And Cal Trans Were NOT Doing. However, there was never an explanation of what BANNING IS NOT DOING . . .
>
> My question for Banning's City Council Is . . .
>
> We Get AIR QUALITY ALERTS ALMOST EVERY WEEK ABOUT POOR AIR QUALITY Here In The Pass Area. What Is Adam Rush Thinking When He Proposes These Potentially Carcinogenic FACILITIES For The RESIDENTS Living In Banning, Left To Deal With These Facilities For The Forceable Future ? ? ? This "individual" doesn't even live in Banning. Did he think of the ramifications for the current

residents of the area whatsoever?
>
> CITY COUNCIL / City Manager, please consider Doing Something with our CHP who simply is doing NOTHING To Slow Down The Traffic through the PASS AREA, especially all the truck traffic. Trucks routinely drive in improper lanes but seem immune to any potential consequence, since CHP Does Not Seem To Care. I even had a CHP Officer say to me - Mr. Friese, "Can You Imaging The Traffic Jams We Would Have On Highway 10 If We Were To Enforce The 55 MPH Speed Limit" ? ? ? What the heck, I Said, Don't Do Me Any Favors, PLEASE Just Enforce The Law ! ! !

> Finally, Get CAL TRANS To Clean Up The Highway Corridor through the PASS AREA.
> We are treated like stepchildren here. After the Road Construction Project, we are left with so much filth and left over materials, between the SUNSET EXIT and The 8th Street Exit, on the berm areas South of the highway that it is simply rude and disrespectful. What business would want to move into such a terribly maintained area anyway?

> I Vote NO ON SUNSET CROSSING ! ! ! Charles Friese . . .

>
>
>
> Sent from my iPad

(If this message is spam, please report it to IT Dept. Thank you.)

NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient of this communication, or an employee or agent responsible for delivering this communication to the intended recipient, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

## Response to Letter E-8

Charles Friese
January 19, 2024

**Response to Comment E-8-1**

The comment states opposition to the Project due to potential increases in carcinogens and the ramifications for current residents in the area. Air quality impacts on residents' health is discussed in Section 4.3, Air Quality pages 48-51 of the Draft EIR and the analysis concludes that the Project will not have a significant impact on residents' health taking into account existing air quality emissions. Please refer to the responses to Comments A-3-2, B-2-13, B-2-15, E-2-2, and E-6-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

RECEIVED
CITY OF BANNING
JAN 24 2024
CITY MANAGER'S OFFICE
BY:

January 20, 2024

Dear Mr. Rush and Mr. Schwartz:

From what I understand the two of you are the perpetrators of vast development in Banning, despite the terrible effects this so called development will result. I am a resident of Banning and have been since I purchased my home in Sun Lakes in 2005 after retiring as an educator in Los Angeles. Thrilled to move from a huge city with multitudes of issues with traffic, greenhouse gases, hazardous materials, poor land use, noise that never abated, etc., Sun Lakes was to be my lovely last home that was safe and free of all the horrible problems seen in LA. Banning was, and hopefully, will remain a small, safe, quiet almost rural new home. E-9-1

However, the two of you are now attempting to take this lovely environment away from us by making Banning "**Warehouse City**." The proposed construction at Banning Pointe and Sunset Crossroads will result in the immediate environmental destruction of this city. Pollution, traffic, extreme truck noises and emissions will make it a totally undesirable place to live. Sun Lakes will be destroyed as will be Senior/Memory Center at the Lakes. E-9-2

Please rethink these proposals that are filled with misinformation and inconsistencies. Allow us to live our lives without trucks, pollution and traffic. Our lives do depend upon your actions! I am in total disagreement with your proposals and ask that my remarks be placed into review by the Planning Commission. Thank you. E-9-3

Sincerely,
Patricia Naylor
Sun Lakes
Banning, CA

Patricia Naylor

cc: Banning City Council



Patricia L Vanderbeke Naylor
1740 Carnoustie Dr.
Banning, CA 92220

SN BERNARDINO CA 923
22 JAN 2024 PM 6 L

USA
FOREVER

Doug Schultz
99 East Ramsey
Banning, CA
92220

92220-483799

## Response to Letter E-9

Patricia Naylor
January 20, 2024

**Response to Comment E-9-1**

The comment states that the Project will change the character of Banning. The comment is noted and will be provided to the City staff and elected officials for consideration. Please refer to responses to Comments E-2-1 and E-25-13. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-9-2**

The comment states that the pollution, traffic and truck noise from the proposed Project will impact the City, the Sun Lakes community, and the senior/memory care center, resulting in an undesirable place to live. Please refer to responses to Comments E-8-1 and A-3-2 (regarding less than significant health impacts on City residents) and D-6-29 (with Project modifications, noise impacts are now less than significant). Please refer to responses to Comments A-3-23-A, D-3-15, E-5-2, E-8-1, E-9-2, and E-31-12. Please further refer to responses to Comments E-1-1 and E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-9-3**

The comment states opposition to the Project and requests that the comments be placed into review by the Planning Commission. Please further refer to response to Comment E-2-1.The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**From:** Adam Rush
**To:** Carl Winter; Theresa Wallace
**Subject:** Fwd: Sunset Crossroads Project
**Date:** Sunday, January 21, 2024 3:54:56 PM

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line: 951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

**From:** Barbara Elness <Barbed1951@aol.com>
**Sent:** Sunday, January 21, 2024 3:02:23 PM
**To:** Adam Rush <arush@banningca.gov>
**Subject:** Sunset Crossroads Project

To: Adam Rush, M.A., AICP
Community Development Director
99 E. Ramsey Street
Banning CA 9220

From: Barbara Elness
6187 Inverness Drive
Banning, CA 9220

Dear Adam Rush, Director of Banning Community Development,

I am writing to vehemently oppose the proposed Sunset Crossroads project in Banning. It is of utmost importance that we address the severe negative consequences and significant impacts this ill-conceived project will impose upon our community. **E-10-1**

The environmental impact study you provided does not merely highlight concerns, it unequivocally identifies unavoidable significant impacts in critical areas such as Air Quality, Greenhouse Gas Emissions, Noise, and Vehicle Miles Traveled. These are not trivial matters, they are existential threats to the well-being of our residents. We cannot afford to disregard these risks, and it is imperative that we prioritize the health and safety of the people of Banning over any potential benefits this project may offer. **E-10-2**

Furthermore, the proposed project site is already beleaguered by a multitude of warehouses in the outlying areas, leading to chronic traffic congestion. The inexplicable decision to approve a warehouse across from Sun Lakes Country Club, a senior housing development, and near The **E-10-3**

Lakes, an assisted living/memory care facility, raises profound questions about the city's judgment. These facilities cater to our most vulnerable populations, and it is our solemn duty to safeguard their quality of life and overall well-being. Allowing further industrial development in such close proximity to these sensitive areas is not only irresponsible but also shows a shocking disregard for the daily lives of our residents.

**E-10-3 Cont**

In summary, moving forward with the Sunset Crossroads project, would be nothing short of catastrophic for the residents of Banning. The potential environmental, health, and safety hazards are not to be taken lightly, and I implore you to reconsider this proposal in light of the grave concerns raised. Our community demands and deserves development that is both responsible and considerate of the well-being and interests of its residents.

**E-10-4**

Sincerely,

Barbara Elness

## Response to Letter E-10

Barbara Elness
January 21, 2024

**Response to Comment E-10-1**

The comment states opposition to the Project and requests the City to address the negative consequences and significant impacts of the Project. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-10-2**

The comment states that the Draft EIR identifies air quality, greenhouse gas emissions, noise and VMT as unavoidable significant impacts and asks that the health and safety of the people of Banning be prioritized over potential benefits of the Project. Please refer to the responses to Comments A-3-14, A-3-18, A-3-23-A, B-2-13, B-2-14, D-3-15 and E-31-12 (regarding traffic analysis and safety), D-3-8, D-6-1-A, D-6-13-A, D-6-15, D-6-29, E-5-2, E-8-1, and E-9-2. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-10-3**

The comment states that the Project site is impacted by chronic traffic congestion from existing warehouses in outlying areas and questions approving the Project near residential areas with vulnerable populations. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-10-4**

The comment summarizes previous statements regarding potential environmental, health, and safety hazards of the Project and requests that the City reconsider the Project. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**Adam Rush**

**From:** Frances Valenzuela <frances1valenzuela@yahoo.com>
**Sent:** Sunday, January 21, 2024 11:40 AM
**To:** Adam Rush
**Subject:** Sunset Crossroads Project
**Attachments:** Banning Community Developmnt Dpt for NOA_Final_12.15 23..pdf

Dear Mr. Adam Rush,

My name is Frances Valenzuela and I have been a Banning resident all my life for 66 years and I live 3 blocks from Sunset on Williams Street.

I am responding to the Sunset Crossroads Specific Plan, including up to 268,400 square feet of medical office, professional office, education, recreation, and commercial uses, a travel center with refueling uses, and a 125-room hotel on 47.9-acres (please see the attached document). **E-11-1**

I would like to recommend the medical facility for Kaiser Permanente. I believe Kaiser would be interested in the development since it would be cheaper to build in Banning rather than Beaumont.

I would also like to recommend the widening of Sunset from a 2-lane street to a 6-lane street with 3 lanes on both sides of the street to allow the increase of traffic due to the additional development. The street on Highland is a 4-lane street that is very crowded and was not planned very well for the increase of traffic. **E-11-2**

Sincerely,

Frances Valenzuela
frances1valenzuela@yhaoo.com
Cell #619-701-6250

## Response to Letter E-11

Frances Valenzuela
January 21, 2024

### Response to Comment E-11-1

The comment provides general comments on the Project. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-11-2

The comment states that the medical facility components be used for Kaiser Permanente and that it would be cheaper to build in Banning instead of in Beaumont. Further the comment requests the widening of Sunset Avenue from a 2-lane street to a 6-lane street and highlights that Highland (Springs Avenue) is very crowded. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

RECEIVED
JAN 25 2024
Initial: _____

January 22, 2024

Adam Rush, M.A., AICP
Community Development Director
99 E Ramsey Street
Banning, CA 92220

Ref: Sunset Crossing Project Draft Environmental Impact Report (DEIR)

Dear Mr. Rush,

Our home is located in the area highly affected by the referenced report. We live in Sun Lakes. We are the fifth home South of Sun Lakes Boulevard and our backyard faces Highland Home Road. From the Sunset Crossroads Project Location, it looks as if Bobcat Road will be built out and the entrance will be very close to our home. As it is, Highland Home Road is a very small two-lane road. It is used by heavy trucks and cars, who are often going at a high rate of speed. E-12-1

Could you please elaborate on the plans for Highland Home Road.

We are also very concerned about the "unavoidable" significant impacts such as: NOISE, AIR QUALITY, and GREENHOUSE GAS EMISSIONS. E-12-2

Sincerely,

Nick Goralsky Mary E Goralsky

Nick and Mary E. Goralsky
896 S Bay Hill Rd
Banning, CA 92220

## Response to Letter E-12

Nick and Mary Goralsky
January 22, 2024

### Response to Comment E-12-1

The comment makes statements regarding the future condition of Bobcat Road, the current condition of Highland Home Road, and requests information "on the plans for Highland Home Road." Proposed improvements to Highland Home Road are provided in Section 3.5.3.2 (page 3-46 of the Draft EIR) which states, "The Development Project Applicant would construct Highland Home Road to its ultimate half-width as a Secondary Highway (88-foot right-of-way) with a 12-foot-wide buffer and 44 feet of paving to accommodate two-way traffic from the northern boundary to the southern boundary of the Development Project." The commenters' residence backs onto the Highland Home Road south of the Sun Lake Boulevard (SLB) extension, adjacent to Planning Area 12 which is designated for Open Spece Resource uses. The Development Project does not include a connection between Highland Home Road and Bobcat Road; therefore, truck traffic cannot use this portion of Highland Home Road to access industrial uses located on the southern portion of the Development Site. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-12-2

The comment states concern about the significant and unavoidable noise, air quality, and greenhouse gas emission impacts associated with the Project. Please refer to the responses to Comments A-3-23-A, A-3-14, A-3-18, A-3-23-A, B-2-13, B-2-14, D-3-1, D-6-13-A, E-5-2, E-8-1, E-9-2, E-31-12, D-6-15, and D-6-29. Also refer to the responses to Comments E-2-1 and E-2-2. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**From:** Dorrie Gartzke
**To:** Adam Rush
**Subject:** Sunset Crossroads Project
**Date:** Tuesday, January 23, 2024 1:47:45 PM

Mr. Rush,
As a resident of Banning, I would like to express my displeasure at the possible development of the Sunset CrossI will not support any development that results in adverse environmental effects that its citizens will have to suffer.

I also will not support any future efforts by the City Planning Commission or the City Council to change the character of Banning from what is described in the official website under Fast Facts as; "Banning is a friendly and wholesome place to work and raise a family. Desirable executive housing is available, as well as moderate and lower income housing. Clean air, ample water supplies and the memorable and inspiring scenic vistas of both Mt. San Gorgonio and Mt. San Jacinto." **E-13-1**

You are moving in the wrong direction by thinking you are offering your citizens what they need and want through the development of industrial sights that are within the confines of well established residential communities. **E-13-2**

Large plots of land need to be broken down into smaller plots of land and developed into residential and commercial establishments providing the citizens with the types of businesses that meet their needs and maintain the character of Banning. **E-13-3**

Respectfully yours,
Dorrie Gartzke

## Response to Letter E-13

Dorrie Gartzke
January 23, 2024

**Response to Comment E-13-1**

The comment states opposition to the Development Project due to unspecified adverse environmental effects. The comment further opposes changes to the character of Banning as described on the City's website. Please refer to the responses to Comments E-1-1 and E-2-2. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-13-2**

The comment states opposition to industrial development within the confines of established residential communities. Please refer to the responses to Comments E-1-1 and E-2-2. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-13-3**

The comment states that large plots of land need to be divided to provide residential and commercial establishments for citizen needs and to maintain the character of Banning. Please refer to the response to Comment E-2-2. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

RECEIVED
JAN 25 2024
Initial:

January 23, 2024

City of Banning
Community Development Director Adam Rush
99 E Ramsey St.
Banning, CA 92220

Re: Public Comment on the Sunset Crossroads Plan

We favor Alternative 1 – No Project/No Build. There are too many significant unavoidable, non-mitigatable, and irreversible impacts associated with this project. This is our preferred alternative to protect the natural areas, the environment, and disadvantaged areas within this project.

However, we would like to comment on development in the area in general. The city of Banning is not laid out very well. The city was developed without very much thought to future commerce and home sites. Therefore, we feel it would be best for our planners, manager, and council members to take a step back and really put deep thought into your decisions.

Every city in the basin is filling up with logistic warehouses and gas stations. Look at our Beaumont neighbor (whose land mass and layouts tend to support this type of development).

When reviewing the Beaumont Pointe plan (to be located very close to the 60 & 10 interchange), it has virtually the same description as the Sunset Crossroads plan as a community recreation center for all ages. Both will include a 125-room hotel. The only difference is Beaumont will be putting their 18-pump gas station, convenience store, car wash, and restaurant closer to the city of Banning at Oak Valley Pwky (Beaumont Landing). We question - does our city really need to duplicate this? E-14-1

We are not sure where land exists or if our city could handle it, but retail seems the way to go. Retail, especially large retail businesses, are job creators too. Logistic warehouses have begun to move away from manual labor. The industry is moving quickly towards robotics and drones. Also, the city of Banning's unemployment rate is very low right now. New people moving into our area are not looking for work, they are commuting to their higher paying jobs as far away as Los Angeles. Every other city in our basin is creating the same type of developments as mentioned above in the Beaumont example. Therefore, if we all are going to be inundated with tons of traffic and pollution anyhow, don't you think the entire pass area could benefit from a Costco with a gas station, a Target, freeway access restaurants (not just fast food); and, our local area benefits might include neighborhood strip malls that can house dance studios, karate classes, hair stylists, etc. We understand that more retail will bring more emissions and other problems. However, the tradeoff would

at least make life easier by locating these amenities closer to our homes for shopping and dining and would, at least, reduce those types of VMT for several cities in the pass area. E-14-1 Cont

We truly feel that logistic warehouses belong on the outskirts of towns. The only thing our planners are managing to do is filter these developments in between housing, schools, and congested retail locations. That is not responsible and may come back to bite. People may choose to live in one of the other cities in the basin using responsible development patterns. Or the city of Banning could start to look like a mini-Fontana, or a mini-Ontario and people might consider any open land surrounding them when choosing a homesite and choose elsewhere by not trusting the decisions our city has made. E-14-2

In closing we hope that you do not proceed. Thank you for reading our comments. E-14-3

Rick & Lori Kaminsky
Sun Lakes, Banning

## Response to Letter E-14

Rick and Lori Kaminsky
January 23, 2024

### Response to Comment E-14-1

The comment states support for Alternative 1 (No Project/No Build Alternative) because there would be fewer significant unavoidable impacts compared to the Project. The comment suggests creating retail space in-lieu of industrial development to provide shopping and dining amenities suggesting a VMT reduction as a result. Please refer to the responses to Comments E-2-2 and D-6-36-A regarding discussion of the alternatives identified in the Draft EIR and CEQA's requirements for consideration of alternatives. CEQA guidelines encourage reviewers to examine the sufficiency of the environmental document, particularly regarding significant effects, and to suggest specific mitigation measures and project alternatives. While the comment favors Alternative 1 (No Project/No Build), this alternative does not support any of the Project objectives. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-14-2

The comment states that logistic warehouses belong on the outskirts of towns and requests that the development patterns in Banning not reflect other nearby cities; that the placement of such uses in proximity to housing, schools, and congested retail uses is not appropriate; and that these uses may influence persons when selecting a homesite. Please refer to the responses to Comments E-1-1 and E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-14-3

The comment expresses general opposition to the Project. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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E-15-1

I do not approve
off another
Warehouse going
in so close to
Sunlake senior
Center

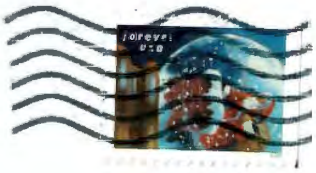
Mrs Bernet
Roth

RECEIVED
JAN 24 2024
Initial: _____

E-15-1

Bernet Roth
5011 Singing Hills Dr.
Banning, CA 92220-6659

SN BERNARDINO CA 923
22 JAN 2024 PM 4 L



RECEIVED
JAN 24 2024
Initial: _____

Adam Rush, MA, AICP
Community Development
99 E Ramsey St.
Banning, Ca 92220

92220-4899

## Response to Letter E-15

Bernet Roth
January 24, 2024

### Response to Comment E-15-1

The comment states opposition to the Development Project due to proximity to Sun Lakes Senior Center. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**From:** Adam Rush
**To:** Carl Winter
**Cc:** Theresa Wallace
**Subject:** Fwd: Response to Sunset Crossing DEIR
**Date:** Friday, January 26, 2024 9:01:13 AM

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I have not uploaded this email.

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

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**From:** Tim & Fran <tim_fran.hanratty@yahoo.com>
**Sent:** Thursday, January 25, 2024 9:06:11 PM
**To:** Adam Rush <arush@banningca.gov>
**Cc:** Alberto Sanchez <asanchez@banningca.gov>; Colleen Wallace <cwallace@banningca.gov>; Sheri Flynn <sflynn@banningca.gov>; Rick Minjares <rminjares@banningca.gov>; Doug Schulze <dschulze@banningca.gov>; cityclerks <cityclerks@banningca.gov>
**Subject:** Response to Sunset Crossing DEIR

Mr. Rush,

Over the years the Planning Commission and City Council have not done an effective job of planning for the future of Banning. Parcels of land were sold and developed with no foresight of the future. Buildings went up or were torn down with no plan to consider future use. Consequently, the city is left with vacant land situated in and around residential developments and downtown. Land that is no longer suitable for rezoning for industrial use. Now the Community Development Department expects the residents around these vacant lots to accept a proposal to place not one but several medium to mega warehouses within just a few hundred feet of their homes. Give us a break! It's NOT going to happen!

E-16-1

When you drive around the city, the area North of the I-10 is mostly residential and commercial along Ramsey Street. Especially the downtown core between 8th Street and Hargrave. Looking at the area South of the I-10, it appears that the southern portion of the city, between Sunset and Hargrave was to be rural with small housing developments and 1 - 2 acre lots placed on former ranch land. Lincoln Avenue,

similar to Ramsey Street, is commercial and light industrial.

The Sun Lakes Country Club development and the Atwell development took advantage of large available land to the West of the city. Unfortunately, either the SLCC developer decided not to continue the development or ran into resistance from the then city officials. Whatever took place back in the late 1980's is as they say is, "water under the bridge". However, the only viable alternative is to keep or rezone the parcels as residential and/or commercial.

E-16-1 Cont

Therefore, of the four alternatives suggested, our preference is alternative 2 – No Project/Existing General Plan and Zoning as documented in the Project Overview:

E-16-2

> This alternative assumes that the Development Site would remain undeveloped in the short term, but that future development could occur pursuant to existing City commercial and residential and County residential land use and zoning standards. Total residential development under this alternative would be comprised of 1,630 units. Similar to the Project, an approximately 90,000-square-foot hotel with 125 rooms, a 7,500-square-foot travel center, and 260,900 square feet of commercial/retail uses could also be developed on the Development Site. As there would be no net loss in residential capacity under this Alternative, the MSJC Site would also not be rezoned for residential development.

E-16-3

Thank you for the opportunity to respond and comment on the Sunset Crossing Draft Environmental Impact Report. We hope the Banning Planning Commission will seriously consider what is best for the citizens in the southwest corner of Banning and follow the current commercial and residential land use as zoned.

E-16-4

Timothy and Francisca Hanratty

4806 W. Glenn Abbey Way

Banning, CA 92220

## Response to Letter E-16

Timothy and Francisca Hanratty
January 25, 2024

### Response to Comment E-16-1

This comment provides commentary related the City's past and current planning efforts; questions if the Development Site is appropriate for the proposed uses within close proximity to existing homes; theorizes on the intended planning pattern of the City; and cites circumstances related to past development of large residential communities in the city. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comments E-16-2 and E-16-3

The comment states a preference for Alternative 2 (No Project/Existing General Plan and Zoning/Residential and Commercial Development), citing Alternative 2's description. Please refer to the responses to Comments E-2-1 and E-14-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-16-4

This concluding comment states that the City should consider what is best for the citizens in the southwest corner of Banning and follow the current commercial and residential land use as zoned. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**From:** Adam Rush
**To:** Doc Madon
**Cc:** Carl Winter; Theresa Wallace
**Subject:** Re: Sunset Crossroads Draft E I R
**Date:** Saturday, January 27, 2024 6:47:46 PM

Dear Mr. & Mrs.
David and Ruth Madon,

Thank you for your email. It has been received and will be replied to as part of the Final EIR.

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

**From:** Doc Madon <docmadon@gmail.com>
**Sent:** Saturday, January 27, 2024 3:34:35 PM
**To:** Adam Rush <arush@banningca.gov>
**Subject:** Sunset Crossroads Draft E I R

As a resident of SunLakes , please note that my wife and i would be opposed to any plans regarding a warehouse facility on this property. If it were to transpire, we would like it to be further removed from the western side of the site that abuts the SunLakes area. E-17-1
We are not really thrilled with a travel center either but at least the placement of it on the site is more logical . We recognize that this area needs to be developed and trust that proper consideration be given to current land owners in the area .
Regards,
David and Ruth Madon
529 Sandpiper Street
Banning,Ca.92220

E-17-1

## Response to Letter E-17

David and Ruth Madon
January 27, 2024

**Response to Comment E-17-1**

The commenter states opposition to the proposed Project. The comment states that the Project should be moved further away from the Sun Lakes community, which abuts the Development Site to the west. Residences in the Sun Lakes Community are located more than 700 feet from the nearest proposed industrial building. As detailed in Figures 3-5 and 3-7 of the Draft EIR, to provide clarity, the Sunset Crossroads Specific Plan identifies Planning Areas 11 and 12 as Open Space and Open Space – Parks, respectively. The two planning areas collectively provide 25.1 acres of open space or passive park uses, buffering industrial uses from residential uses located in the Sun Lakes community west of the Development Site. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**From:** Adam Rush
**To:** Carl Winter
**Cc:** Theresa Wallace; Sandra Calderon
**Subject:** Fwd: sunset crossroads
**Date:** Sunday, January 28, 2024 3:43:58 PM

This letter has not been filed.

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

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**From:** John Creviston <jrcreviston@yahoo.com>
**Sent:** Sunday, January 28, 2024 3:21:07 PM
**To:** Adam Rush <arush@banningca.gov>
**Subject:** sunset crossroads

The people who approved this project should be fired for being complete idiots. Who in there right mind would approve something of this scale next to senior homes and an assisted living facility. You are going to ruin the property values of the area and force long time residents to move if these decisions become a reality. **E-18-1**

The traffic, noise and pollution will be killing this community. The traffic at this point is so bad trying to out of here out of here without your TWO bad moves trying to incorporate thousands and thousands of SQ FT of industrial warehouses is bad enough **E-18-2**

My wife and I oppose this project and the Banning warehouse project **E-18-3**

John & Shirley Creviston
19516 Breckenridge Ave
Banning, CA 92220

## Response to Letter E-18

John and Shirley Creviston
January 28, 2024

### Response to Comment E-18-1

The comment states general opposition to the Project due to perceived decreases in property values. Please refer to the responses to Comments E-2-1 and E-2-4. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-18-2

The comment states general concerns related to traffic, noise, and pollution generated by industrial warehouse uses. Please refer to the responses to Comments A-3-23-A, B-2-5, D-3-15, D-6-29, and E-31-12. Should the City elect to approve the Project and certify the EIR, Findings and a Statement of Overriding Consideration(s) would be required. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-18-3

The comment states opposition to the Project. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**From:** Adam Rush
**To:** Carl Winter
**Cc:** Theresa Wallace; Sandra Calderon
**Subject:** Fwd: Sunset Crossroads. EIR opposition.
**Date:** Monday, January 29, 2024 1:21:17 PM

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

**From:** Armando Aranda <aaranda59@gmail.com>
**Sent:** Monday, January 29, 2024 1:17:13 PM
**To:** Adam Rush <arush@banningca.gov>
**Cc:** Doug Schulze <dschulze@banningca.gov>
**Subject:** Sunset Crossroads. EIR opposition.

Dear Adam Rush,
I am writing to formally express my opposition to the Sunset Crossroads project. Each day as I commute to and from work, I witness the pollution from lights and the glow of the Beaumont warehouses as I navigate through a multitude of warehouse trucks rushing through the area. The Sunset Crossroads projects inclusion of warehouses and truck refueling stations in the heart of the city's marginalized communities of seniors is neglectful. **E-19-1**

As an indigenous descendent, the blatant disregard for our environment, and the land and air, deeply concerns me. The proposed Sunset Crossroads, project with its associated light, noise and air pollution will undoubtedly be a significant detriment to the city. I believe it will create a lasting negative impact that future generations will struggle to overcome. **E-19-2**

I implore you to consider the well-being of the community and the environment in your decision making process. This project , if approved, could serve as a black eye for the city, affecting the quality of life for residence. Let us prioritize a substantial and considerate approach that safeguards our environment and insures a healthier future for generations to come. Please take these considerations to heart as you make decisions for our community. It is crucial that both the city and representatives strive to do better for the well-being of its residence. **E-19-3**

UC Berkeley recently did a study of warehouse and warehouse workers. The report indicates that these warehouses are notoriously placed in disadvantage and marginalized communities of brown and black people. The work is backbreaking. Warehouses usually employee men

under 45 years. The employment for warehouses (usually offering temporary employment through employment agencies) are notoriously targeting the disadvantage people of color to work these jobs. The jobs tend to be backbreaking, long hours, all hours, and short term employment. Please stop perpetuating the racial injustices of the warehousing industry throughout the Inland Empire, and provide businesses that offer real long lasting job solutions.

**E-19-3 Cont**

Sincerely,
Armando Aranda
Banning Resident

## Response to Letter E-19

Armando Aranda
January 29, 2024

### Response to Comment E-19-1

The comment states general opposition to the Project and cites personal experience and concerns related to warehouse uses, particularly in proximity to senior communities. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-19-2

The comment states general concerns regarding the Project's impacts to the environment. The comment provides unsubstantiated claims that the Project will create lasting adverse impacts. Please refer to responses to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-19-3

The comment requests that the well-being of the community and the environment be considered in the decision-making process. The comment further discusses a University of California, Berkeley (UC Berkeley) study discussing warehouse placement in disadvantage and marginalized communities. See the responses to Comments D-3-4 and D-3-44-A regarding environmental justice concerns, and D-3-18 regarding job opportunities. Also, refer to the responses to Comments A-3-4, E-2-1, and E-2-4. The comment did not provide an adequate citation to the referenced UC Berkeley study; therefore, it cannot be reviewed or substantiated. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**From:** Adam Rush
**To:** Carl Winter
**Cc:** Theresa Wallace; Sandra Calderon
**Subject:** Fwd: Sunset Crossroads Projects
**Date:** Monday, January 29, 2024 12:43:20 PM

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

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**From:** K kdi <karanda2011@gmail.com>
**Sent:** Monday, January 29, 2024 12:04:40 PM
**To:** Adam Rush <arush@banningca.gov>
**Cc:** Doug Schulze <dschulze@banningca.gov>
**Subject:** Sunset Crossroads Projects

Dear Adam Rush,

I am writing to formally express my strong opposition to the Sunset Crossroads project, including the extension of Sun Lakes Boulevard as a designatied truck route. As outlined in recent responses to the city with regards to the anticipated Environmental Impact Report (EIR) from the City of Banning, numerous entities, including the federal Fish and Wildlife branch, have highlighted significant concerns including wildlife concerns. **E-20-1**

Beyond the ecological impact, I want to underscore the harm to the Banning community, to include light pollution, air pollution, and ground pollution. Especially to the residents of senior communities situated on both sides of the the Sunset Crossroads Project. **E-20-2**

It is crucial for our city and for you as a representative, to pursue projects that prioritize inclusivity and environmental responsibility. Unfortunately the sunset Crossroads project will be an environmental disaster, reflective of what I perceive as a trend of complacent thinking in 2024.

I implore you to consider alternative solutions that foster community unity and prioritize the well-being of both current and future generations. The proposed Sunset Crossroads Projects seems emblematic of a “this is the best we can get” mentality, lacking a deeper understanding and foresight into the long-term consequences and environmental pollution for a city like Banning. It is disheartening to think that this project could be the legacy we leave for the children of Banning-a city compromised by environmental hazards and daily pollutants. **E-20-3**

Reflecting on a recent event in my backyard, where I witnessed a beautiful migration of birds flying overhead, I am reminded of the need to cherish and preserve the natural world around us. Instead of

succumbing to short-sighted development choices, as stated in the cities own EIR, there will be significant environmental adverse effects on our communities. Let us strive for better outcomes that protect the air, land and wildlife treasures that make our city unique.
I urge you to reconsider and advocate for projects that enhance rather that compromise, the environment for the citizens of Banning. Our City deserves better, not just for current generations but for the generations to come.

**E-20-3 Cont**

Sincerely,

Kathleen Aranda
Banning Resident

## Response to Letter E-20

Kathleen Aranda
January 29, 2024

**Response to Comment E-20-1**

The comment states opposition to the Project including the extension of Sun Lakes Boulevard as a designated truck route. The comment claims that the U.S. Fish and Wildlife Service has raised significant concerns regarding impact to wildlife. The City has responded to comments from the California Department of Fish and Wildlife (refer to responses to Comment Letters A-2 and A-4). While the Sun Lakes Boulevard Extension Project will provide substantial access through the Development Site, it must be noted the Sun Lakes Boulevard Extension Project is a City-sponsored project. The City's General Plan Circulation Element identifies this future Arterial Highway to connect Sunset Avenue to Highland Home Road, bisecting the Development Site in an east-west direction. Planned as a four-lane divided roadway with two travel lanes in each direction, separated by a landscaped median, the Sun Lakes Boulevard extension is consistent with the City's General Plan Circulation Element. A Truck Management Plan to restrict or discourage truck traffic moving west on Sun Lakes Boulevard will be submitted by the Project Applicant and approved by the City prior to the issuance of the first building permit. See the response to Comment D-6-1-A. Also refer to response to Comment E-7-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-20-2**

The comment states that the Banning community could be harmed by light pollution, air pollution, and ground pollution, especially to the residents of senior communities situated on both sides of the Development Site. The issues raised by the comment has been analyzed and discussed within the Draft EIR, including in Sections 4.1, Aesthetics, 4.3, Air Quality, and 4.9, Hazards and Hazardous Materials. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-20-3**

The comment states that impacts to the community and the long-term environmental consequences of the Project should be considered, particularly in light of the significant impacts identified in the Draft EIR. Please refer to the responses to Comments E-2-1 and E-14-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**From:** Andrea Arthurholtz
**To:** Adam Rush
**Subject:** Sunset Crossroads Project
**Date:** Monday, January 29, 2024 3:46:39 PM

As a Banning resident, I am opposed to the Sunset Crossroads Project. Warehouses in a residential area is not an appropriate use of property. Please do your due diligence in similar areas that have place warehouses in a residential area. I would support warehouses in a non-residential area. I am for other commercial projects, such as a bowling alley, youth arcade, restaurant, Target, fire station, Trader Joe's. Please, please, do not support warehouses in residential areas.

**E-21-1**

Thank you,
Andrea Arthurholtz
Sent from my iPhone

## Response to Letter E-21

Andrea Arthurholtz
January 29, 2024

### Response to Comment E-21-1

The comment states opposition to the Project and expresses support for warehouse uses in non-residential areas and suggests a variety of preferred commercial uses for the site. The comment requests that the City not support warehouses in residential areas. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**From:** Adam Rush
**To:** Julie
**Subject:** Re: Sunset Crossroads Project
**Date:** Monday, January 29, 2024 9:24:29 AM

Good Morning Julie,

Thank you for your email. I am confirming receipt.

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

**From:** Julie <desertjoule@aol.com>
**Sent:** Monday, January 29, 2024 6:31:13 AM
**To:** Adam Rush <arush@banningca.gov>
**Subject:** Sunset Crossroads Project

Dear Mr. Rush,

RE: Sunset Crossroads Project

As relatively new residents to Banning, I am vehemently opposed to the development of this massive warehouse project. I am so often very disappointed with the decisions made by our representatives.

Myself and many others want to see development of the Banning area, but not with warehouses. We want our property values to increase and our way of life to be enhanced and protected.

E-22-1

As representatives of our communities, I implore and remind each of you that you serve the people of each community and not the developers!

You must recognize the strong opposition to this type of development overall, and see that the people of our town want other types of business development that will add value to each community. Not warehouses!

Julie Austin

Banning, CA

Sent from AOL on Android

## Response to Letter E-22

Julie Austin
January 29, 2024

### Response to Comment E-22-1

The comment states opposition to the Project and prefers development that will increase property values and enhance a better way of life. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**From:** Adam Rush
**To:** Carl Winter
**Cc:** Theresa Wallace; Sandra Calderon
**Subject:** Fwd: Sunset crossing project
**Date:** Monday, January 29, 2024 9:00:33 AM

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
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**From:** Gary Burkel <gnburkel@gmail.com>
**Sent:** Monday, January 29, 2024 8:41:50 AM
**To:** Adam Rush <arush@banningca.gov>
**Cc:** Nora Burkel <onthecuspnora@yahoo.com>
**Subject:** Sunset crossing project

Mr. Rush,

I live in Sun Lakes Country Club. I am a retired CPA with experience in real estate development. I have witnessed the long term effects of bad city planning decisions. Specifically how traffic congestion can have a long term effect on the quality of life of local residents. I cannot imagine a worse decision than to allow a large warehouse facility to be built adjacent to a residential community. **E-23-1**

It also does not make sense financially for the city of Banning. A primary source of revenue for a city is sales tax, how much sales tax does a warehouse generate? The only logical reason for this development is to allow land speculators to make long term profit at the expense of local residents. Please stop this development, it will be a disaster for the community. **E-23-2**

Gary Burkel
980 Laguna Seca Ct, Banning, Ca
707 478-4239

## Response to Letter E-23

Gary Burkel
January 29, 2024

### Response to Comment E-23-1

The comment states general concerns related to traffic congestion and long-term effects on the quality-of-life on local residents and general opposition to the location of a warehouse facility adjacent to a residential community. Please refer to the responses to Comments E-2-1 and E-2-4. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-23-2

The comment expresses concerns related to financial costs and sales taxes and questions whether the revenues to the City are appropriate when considering the impacts to the community. Please refer to the responses to Comments E-2-1 and E-2-4. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**From:** Adam Rush
**To:** Carl Winter
**Cc:** Theresa Wallace; Sandra Calderon
**Subject:** Fwd: Sunset crossing project
**Date:** Monday, January 29, 2024 11:33:19 AM

FYI

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
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**From:** Nora <onthecuspnora@yahoo.com>
**Sent:** Monday, January 29, 2024 10:37:27 AM
**To:** Adam Rush <arush@banningca.gov>
**Subject:** Sunset crossing project

Mr. Rush:

I live in Sun Lakes Country Club. Obviously, I am a senior citizen and I am very much opposed to this project. The city of Banning does not need more warehouses. We need more restaurants and other retail establishments, not polution from trucks, and not more accidents with trucks. It is also an awful idea when there are so many adult communities in the area. Sell the land to another developer for another adult community, NOT another warehouse! Please stop this development, it will be nothing but a disaster for the area.

E-24-1

E-24-2

Sincerely,
Nora Burkel
980 Laguna Seca Ct.
Banning, Ca
707 486-6672

## Response to Letter E-24

Nora Burkel
January 29, 2024

**Response to Comment E-24-1**

The comment states general opposition to the Project. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E--24-2**

The comment suggest that the site should be developed with an adult community development. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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'24 JAN 29 1:41PM

**CONCERNED CITIZENS, ET AL., OPPOSED TO THE SUNSET CROSSROADS DEVELOPMENT**

January 29, 2024

City of Banning
Department of Community Development
99 Ramsey Street
Banning, CA 92220
(951) 922-3131 / arush@banningca.gov

RECEIVED
JAN 29 2024
Initial:

Attn: Adam Rush, M.A., AICP
Community Development Director

Re: Sunset Crossroads Project Draft Environmental Impact Report
Public Notice Date: December 15, 2023

Dear Mr. Rush:

We are City of Banning residents concerned about the Sunset Crossroads warehouse development. This letter is submitted pursuant to the California Environmental Quality Act (CEQA), (Pub. Resources Code, §21001.1, subdivision (a)) and Guideline 15085(d)(4)). The City of Banning (the City) as lead agency on this project is required to consider the information contained in the Draft Environmental Impact Report (DEIR)[1] prior to taking any discretionary action on the Project.

We have reviewed the DEIR for the Sunset Crossroads Project and appreciate the opportunity to submit our comments and concerns. The DEIR is incomplete and falls short of its objective of addressing mitigation measures for the proposed Project's potential individual and cumulative-level environmental impacts, in that the Project would not comply with the City's General Plan, Noise Element, Circulation Element, Air Quality Element, and South Coast Air Quality Management District (SCAQMD) Standards in Pollutant Thresholds and is in conflict with the 2022 Air Quality Management Plan (AQMP). E-25-1

Because of these deficiencies, the Development Project would negatively affect the character of surrounding residential neighborhoods, and in many cases its inconsistency with Land Use Planning standards would result in underlying physical impacts that are significant, adverse and harmful. We respectfully request that our comments and concerns about the DEIR be addressed and mitigated in

accordance with all federal, state and local environmental laws. Our concerns include, but are not limited to, the following issues: E-25-1 Cont

The City's decisionmakers, as the Lead Agency and per the Executive Summary of the DEIR, must demonstrate based on substantial evidence in the record that the agency's action on the project complies with environmental requirements, if its decision is later challenged in court. Under CEQA Guidelines Section 15123, this Executive Summary describes the Development Project's potentially significant impacts that could result from its implementation, and avoidance, minimization and mitigation measures. While the information in the EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and if necessary, by making a statement of overriding considerations under Section 15093. E-25-2

In each section of this letter, we have quoted extensively from the DEIR and then submitted our comments which we believe require the City to address.

4.0 Environmental Impact Analysis

**Sections 4.1 through 4.20**

4.3 Air Quality

**4.3.1.2 National and State Ambient Air Quality Standards**

The DEIR (page 4.3-7) states:

"Both State and federal governments have established health-based ambient air quality standards (AAQS) for criteria air pollutants. Criteria pollutants are defined as those pollutants for which the federal and State governments have established AAQS, or criteria, for outdoor concentrations in order to protect public health. Both the EPA and CARB have established AAQS for the following common pollutants: CO, O3, NO2, SO2, Pb, and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. These AAQS are levels of contaminants that avoid specific adverse health effects associated with each pollutant. Federal standards include both primary and secondary standards. Primary standards establish limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility and E-25-3

damage to animals, crops, vegetation, and buildings.12 State and federal standards for the criteria air pollutants are listed in Table 4.3.B: Federal and State Ambient Air Quality Standards."

#### 4.3.1.3 Sensitive Receptors

The DEIR (page 4.3-11) as well as Appendix C-1[1] (page 8) state:

"West of the Project, there is an age-restricted residential development in the Sun Lakes Community, a sensitive receptor, and recreational vehicle storage. The closest homes to the west are approximately 50 feet from the Project site."

E-25-3 Cont

However, the DEIR and Appendix C-1 fail to mention the proximity of The Lakes Assisted Living and Memory Care, and the Serrano del Vista community, both of which are sensitive receptors and must be included in sensitive receptors identification. The Lakes Assisted Living and Memory Care, a long term and assisted living and adult care facility, at 5801 Sun Lakes Blvd., is approximately one-half mile west of the Project site boundary, and Serrano del Vista community, fronts the eastside of Sunset Avenue, between Westwood and Jefferson, and both will be adversely impacted by the Development.

Therefore, the DEIR must be amended, revised / updated to reflect these changes.

#### 4.3.5 Thresholds of Significance

The DEIR (page 4.3-29) and Appendix C-1 (page 30) state:

"The following thresholds of significance are from Appendix G of the CEQA Guidelines, which provide that, where available, the significance criteria established by the applicable AQMD may be relied on to make the determinations of whether or not a project would have a significant impact related to air quality. The Development Project would result in a significant impact to air quality if the Development Project or any Development Project-related component would:"

E-25-4

"Threshold 4.3.1: Conflict with or obstruct implementation of the applicable air quality plan."

[1]See Appendix C-1, "Air Quality Impact Analysis

"Threshold 4.3.2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard."

"Threshold 4.3.3: Expose sensitive receptors to substantial pollutant concentrations."

"Threshold 4.3.4: Create objectionable odors affecting a substantial number of people."

**4.3.5.4 Thresholds for Determining Impacts to Sensitive Receptors**

The DEIR (pages 4.3-31 & 4.3-32) states:

"The localized significance for project emissions of NOX and CO are the AAQS listed in Table 4.3.B. Since both PM10 and PM2.5 are in non-attainment, their thresholds are not based on AAQS exceedance, but rather a violation of SCAQMD Rules 403 and 1301. The Rule 403 threshold of 10.4 ug/m3 applies to construction activities. The rule 1301 threshold of 2.5 ug/ms applies to nonaggregate handling operational activities."

E-25-4
Cont

**4.3.6.1 Air Quality Management Plan Consistency**

The DEIR (page 4.3-32) states:

"The AQMP control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with the AQMP for development projects is determined by demonstrating compliance with local land use plans and/or population projections. The AQMP uses the assumptions and projections of local planning agencies in effect at the time it is drafted to determine control strategies for regional compliance status. Since the AQMP is based on local land use plans, projects that are deemed consistent with local land use plans are found to be consistent with the AQMP."

The DEIR (page 4.3-33 and 4.3-34) further states:

"CEQA requires that Specific Plans be evaluated for consistency with the AQMP. SCAQMD's CEQA Air Quality Handbook provides the

following two criteria to determine whether a project would be consistent or in conflict with the AQMP:

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

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

The DEIR (page 4.3-36), states:

"**Level of Significance After Mitigation:** The proposed Development would not be consistent with the 2022 AQMP because the employment projections for the Development Site would increase with implementation of the Project, and the Development Project would result in VOC, NOX, CO, $PM_{10}$, and $PM_{2.5}$ emissions that would exceed SCAQMD thresholds without mitigation. Implementation of Mitigation Measure AIR-1 would reduce construction emission associated with the Development to a less than significant level. However, emissions associated with operation of the Development Project would remain significant and unavoidable, even with the implementation of the planned project design features and Mitigation Measure AIR-2. No additional feasible mitigation measures are available that can reduce impacts to less than significant. As such the Project would not be consistent with the attainment of the AAQS or emission reductions assumptions indicated in the AQMP. Therefore, based on the requirements for consistency with emission control strategies in the AQMP, the Development Project would conflict with or obstruct the implementation of the AQMP and other applicable portions of the SIP. Therefore, the impacts would be significant and unavoidable after mitigation measures are implemented."

E-25-4 Cont

#### 4.3.6.2 Increase in Criteria Pollutants (Regional Construction and Operation)

The DEIR (page 4.3-38) states:

"Construction-related emissions are presented as a summary in Table 4.3.H: Project Construction Emissions." (Table 4.3.H Project Construction Emissions (page 4.3-43)).

The DEIR (page 4.3-45) further states:

> "As shown in Tables 4.3.J through 4.3.M, [2] even with implementation of the designated project design features, the proposed Development Project would result in a significant and unavoidable impact for VOCs, NOx, CO, $PM_{10}$, and $PM_{2.5}$, and mitigation would be required. Note that Table 4.3.M shows that even at full buildout when construction has completed the operational Project emissions alone exceed thresholds of all pollutants except SOX."
>
> "Therefore, implementation of Mitigation Measure AIR-2 would be required to reduce criteria pollutant emissions from the proposed Development Project to the extent feasible. Mitigation Measure AIR-2 includes measures to reduce truck and other operational emissions to the extent feasible. Mitigated emissions are shown in Table 4.3.N: Regional Mitigated Combined Construction and Operational Emissions."

E-25-4 Cont

We submit that the Project and the Sunset Crossroads Specific Plan No. 20-20000002, would conflict with or obstruct implementation of the Basin's applicable air quality management plan AQMP, and would exceed, per DEIR Section 4.3.5, the Thresholds of Significance as referenced, in Ambient Air Quality Standards (AAQS), and combined short term construction and long term operational emissions, even after mitigation measures are implemented; and would have a significant impact on local, regional air quality and expose sensitive receptors to substantial pollutant concentrations.

In sum, the Development Project would result in **Significant and Unavoidable impacts** and would result negatively in underlying physical impacts that are adverse and harmful, especially to sensitive receptors and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding consideration under Section 15093 explaining why the Development Project benefits outweigh the unavoidable environmental impacts.

E-25-5

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[2]See Table 4.3.J. Regional Combined Construction and Operational Emissions – Opening Year Phase 1; Table 4.3.K. – Phase 2; Table 4.3.L. – Phase 3; 4.3.M – Phase 4 – Table 4.3.N Regional Mitigated Combined Construction and Operational Emissions

#### 4.3.6.3 Exposure of Sensitive Receptors

Figure 4.3-3 and Appendix C-1 Figure 5 depict, in an aerial view, Sensitive Receptors within a bordered area near the Project Site. The figures' mapped bordered area omits The Lakes Assisted Living Facility, a Sensitive Receptor near the Project Site. E-25-6

**Therefore, the DEIR Figure 4.3.3 and Appendix C-1 Figure 5 must be amended, revised / updated to include the long-term adult care facility within the bordered area.**

4.8 Greenhouse Gas (GHG)

#### 4.8.3.3 Regional and Local Regulations

The DEIR (page 4.8-12) and Appendix C-1 (page 25 & 26) state:

"South Coast Air Quality Management District. SCAQMD and SCAG are responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the Basin. The main purpose of an AQMP is to bring the area into compliance with federal and State air quality standards. SCAQMD prepares a new AQMP every 3 years, updating the previous plan and 20-year horizon."

"The latest plan is the 2022 AQMP, which was adopted on December 2, 2022 and incorporates the latest scientific and technological information and planning assumptions, including the 2020 Regional Transportation Plan/Sustainable Communities Strategy and updated emission inventory methodologies for various source categories which also result in the reduction of GHG emissions." E-25-7

#### 4.8.4 Thresholds of Significance

The DEIR (page 4.8-17) states:

"The City has not established local CEQA significance thresholds as described in Sec. 15064.7 of the CEQA Guidelines. Therefore, significance determinations utilized in this section are from Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, the Development Project would result in a significant impact related to greenhouse gas emissions if the Development Project or and Development Project-related component would:"

"Threshold 4.8.1: Generate GHG emissions either directly or indirectly that may have a significant impact on the environment."

"Threshold 4.8.2: Conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs."

The DEIR (page 4.8-18) states:

"As is consistent with the City of Banning General Plan and related air quality policies."

"Consistent with the foregoing, the City of Banning has selected the interim 3,000 MT CO2e per year threshold based on the research and analysis underlying the recommendations by SCAQMD staff for residential and commercial sector projects against which to compare project related GHG emissions."

The second threshold of significance, in the DEIR Sec. 4.8.4 (page 4.8-17):

"Threshold 4.8.2 pertains to whether the Project would conflict with an applicable GHG reducing plan or policy. Due to the annual volume of CO2e emitted in excess of the City's 3,000 MT CO2e per year threshold, and the infeasibility of additional mitigation measures to reduce the impacts of the Development Project to less than significant, the Development Project's contribution of GHG is cumulatively considerable. The GHG analyses conducted for various cumulative projects each identified significant and unavoidable emissions of GHGs in excess of established thresholds and concluded the projects' contribution of GHG emissions would be cumulatively significant. As such, the Project would result in a significant cumulative impact with respect to GHG emissions."

E-25-7 Cont

4.8.5 Impact Analysis

### 4.8.5.1 Greenhouse Gas Emissions

The DEIR (page 4.8-30) indicates:

"As shown in Table 4.8.J, even with all feasible mitigation, emissions would exceed the City's threshold of 3,000 MT CO2e at Development Project Buildout. No additional feasible mitigation measures are available that can reduce impacts to less than significant. As explained below, the Development Project incorporates all feasible mitigation measures that could be implemented to further reduce the Project's GHG emissions, but emissions cannot be further

reduced below the 3,000 MT CO2e threshold. There are no additional measures available that would further reduce emissions because the majority of the Development Project's emissions come from mobile sources that are regulated by the State and not the City of Banning."

"Table 4.8-J Mitigated 2027 Long Term Greenhouse Gas Emissions at Buildout (page 4.8-30) and greenhouse gas reducing practices have been identified in Mitigation Measures AIR-2 and GHG-1 through GHG-6, which would reduce emissions to 38,726.25 MT CO2e per year at Project build out, which would still exceed the City's threshold of 3,000 MT CO2e. The majority of these are generated from mobile sources that are regulated by the State and not the City. Therefore, under CEQA Appendix G threshold VIII a), the Project's GHG emissions are significant."

"As shown in Tables P through S, even with implementation of the designed project design features, the proposed Development Project would result in a significant and unavoidable impact for VOCs, NOx, CO, PM10, and PM2.5 and mitigation would be required. Note that Table S shows that even at full build out when construction is completed the operational emissions alone would exceed the thresholds of all pollutants except SOX."

E-25-7
Cont

Appendix C-1 (page 59 & 60) also discloses:

"CEQA requires that projects evaluated for consistency with the AQMP, SCAQMD's CEQA Handbook provides the following two criteria to determine whether a project would be consistent or in conflict with the AQMP:"

"1. The project would not generate population and employment growth that would be inconsistent with the Southern California Association of Government's (SCAG) growth forecasts."

"2. The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emission Reductions specified in the AQMP."

Appendix C-1 (page 60) further states:

"Based on the emissions modeling prepared for the Development Project shown in table T, even with implementation of all feasible mitigation emissions under the future with project conditions would exceed SCAQMD

thresholds for VOCs, NOX, CO, PM10 and PM2.5, which could potentially result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the AAQS or emission reduction in the AQMP. Therefore, the proposed Development Project would result in a potentially significant impact associated with consistency with the applicable AQMP and would not be consistent with the AQMP."

**CUMULATIVE IMPACTS**

Appendix C-1 (page 61) states:

"Currently, the Basin is in nonattainment for $PM_{10}$, $PM_{2.5}$, and O3. Construction of the Development Project, in conjunction with other planned developments within the cumulative study area, would contribute to the existing nonattainment status. Therefore, the Development Project would exacerbate nonattainment of air quality standards within the Basin and contribute to adverse cumulative air quality impacts."

Appendix C-1 (page 61) states:

"The Development Project's long term operational emissions would exceed SCAQMD's criteria pollutant thresholds for all pollutants except SOX. Again, app projects would be required to comply with SCAQMD's operational emissions thresholds, which are designed to accomplish regional emissions goals. Implementation of the projects design features, and Mitigation Measures AIR-1 would reduce emissions to the extent feasible; however, project emissions would remain significant and unavoidable for VOC, NOx, CO and $PM_{10}$. Thus, the Development Project operations would result in a significant and unavoidable cumulative increase in long-term regional emissions."

E-25-7
Cont

The foregoing is unacceptable because Phase 1[3] would result in operational emissions of 15,633.70 metric tons of CO2 per year, approximately five times the threshold limit under the City's General Plan. Phase 2[4] would result in 30,966.81 metric tons of CO2 per year. Phase 3[5] would result in 36,376.92 metric tons of CO2 per year. Phase 4[6] would result in 38,726.25 metric tons of CO2 per year, exceeding the City's air quality policy by tenfold. The impact on sensitive receptors will be significant in underlying physical impacts that are adverse and harmful. E-25-7 Cont

#### 4.8.5.2 Greenhouse Gas Plan, Policy, Regulation Consistency

The DEIR (page 4.8-33) states:

"**City of Banning General Plan.** The Air Quality Element of the City of Banning General Plan identify goals, policies, and programs meant to balance the City's actions regarding land use, circulation, and other regulatory actions and their associated potential effects on local and regional air quality. Some of the goals and policies in this element also reduce GHG emissions. **Table 4.8.L: Project Consistency with Banning General Plan Air Quality Element** provides a summary of the Development Project's consistency with relevant goals and policies within the Banning General Plan that reduce GHG emissions. Table 4.8.L: Project Consistency with Banning General Plan Air Quality Element."

E-25-8

The DEIR (page 4.8-36) further states:

"**Air Quality Management Plan.** A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality and climate concerns are addressed. The Development Project would not conflict with applicable control measures within the 2022 AQMP. The Development Project's consistency with the AQMP goals is analyzed in detail in **Table 4.8.O: Project Consistency with Applicable 2022 AQMP Control Strategies.**"

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[3]Table 4.8.G.

[4]Table 4.8.H.
[5]Table 4.8.I.
[6]Table 4.8.J

**Table 4.8.L: Project Consistency with Banning General Plan Air Quality Element**

The DEIR states:

"Table 4.8.L AQ Policy 4:"

"Development proposals brought before the City shall be reviewed for potential adverse local and regional air quality impacts and shall be required to mitigate any significant impacts."

E-25-8 Cont

We submit that consistency, as outlined, falls short of adequately mitigating GHG's emissions, resulting in significant impacts to local and regional air quality and the DEIR project consistency falls short in mitigation measures of the proposed project's potential individual and cumulative level environmental impacts, in that the Project would not comply and is therefore, **inconsistent** with the City's General Plan, in Air Quality Element, SCAQMD Standards and 2022 AQMP Air Quality Management Plan.

Additionally, the DEIR and Appendix C-1, show air quality and greenhouse gas generated from operational omissions are significantly higher and do not comply with the Air Quality Element within the City's General Plan, even after mitigation measures are implemented. Thus, contributing to adverse cumulative air quality impacts on sensitive receptors which will be significant in underlying physical impacts that are adverse and harmful.

E-25-9

Lastly, the DEIR (page 4.8-36) states:

"**Impact Conclusion**. As shown in **Tables 4.8.K** through **4.8.O**, the Development Project would not conflict with any of the local, regional, and Statewide plans, polices, programs, and regulations discussed above that are adopted for the purposes of reducing GHG emissions. Therefore, with respect to this threshold, the Development Project does not have a significant impact. However, despite plan consistency, the Development Project's long-term operational impacts would exceed the City's threshold of 3,000 MT CO2e per year despite implementing PDFs and all feasible mitigation. Thus, the Development Project may impede long-term GHG reduction goals of various plans (e.g., for 2030 and 2050), and a potentially significant impact may occur as a result of the Development Project. Level of Significance Prior to Mitigation: Potentially Significant Impact. Regulatory Compliance Measures and Mitigation Measures: Implement Mitigation Measures AIR-2 and GHG-1 through GHG-6.

E-25-10

Level of Significance After Mitigation: Significant and Unavoidable Impact."

In sum, the Development Project would result in **Significant and Unavoidable impacts.** The proposed Project's potential individual and cumulative-level environmental underlying impacts are adverse and harmful, and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding considerations under Section 15093, explaining why the Development Project benefits outweigh the unavoidable environmental impacts. E-25-10 Cont

4.11 Land Use

### 4.11.3 Existing Environmental Setting

The DEIR (page 4.11-2 & 4.11-3) identifies the existing pattern of land use adjacent to the Development Site as follows:

"South: Large-lot residential uses and agricultural operations (ranching/grazing) are located south of Bobcat Road. The Southern Portion of the Development Site is designated in the County General Plan as Low Density Residential Land Use and is zoned as A-1, Light Agriculture."

"South: The properties located within unincorporated Riverside County south of Bobcat Road are assigned a Riverside County General Plan designation of Agricultural (AG) and are zoned A-1 (Light Agriculture)."

"As the Southern Portion of the Development Site is within the City's SOI, the City has given this area the following advisory General Plan designation: Low Density Residential, Medium Density Residential, High Density Residential, Open Space – Parks, Open Space – Resources, and Public Facilities – Government." E-25-11

"East: North of Lincoln Street, a business park, light industrial, and storage uses intermingled with larger lot residential uses are located east of Sunset Avenue. Several single-family neighborhoods have developed east of Sunset Avenue, south of Lincoln Street. The MSJC San Gorgonio Campus is located east of Sunset Avenue, south of Westward Avenue. Current development on the MSJC campus includes an administration building, two classroom buildings, a facilities building, and an ancillary surface parking lot. Scattered rural residential uses are located farther west of the MSJC property. The Rancho San Gorgonio Specific Plan (RSGSP), an approximately 831-

acre master-planned community, is located east of Sunset Avenue across from the Southern Portion of the Development Site."

The DEIR fails to disclose, and lacks Land Use Planning description of, residential neighborhoods in Land Use Planning identification, of the approximate 255 rooftops of the 55+ gated Community of Serrano del Vista, fronting Sunset Ave. east of the Project, which are sensitive receptors that are located between Westwood and Jefferson. E-25-11 Cont

**Therefore, the DEIR must be amended, revised / updated.**

Furthermore, we respectfully object to the proposed annexation, and taking of historically compatible Low Density Residential – Agricultural Land Use, of the proposed undeveloped southern portion of the developed site, historically used for agricultural practices (dry land farming and grazing), of approximately 253.7 acres within the City of Banning Sphere of Influence (SOI) in the unincorporated area of Riverside County, resulting in the proposed Project's impact and loss of the existing large-lot residential uses and agricultural operations, located south of Bobcat Road. E-25-12

Therefore, we submit that the Development Project would negatively affect the character of surrounding residential neighborhoods, and in many cases, have an inconsistency in Land Use Planning that result in underlying physical impacts that are significant, adverse and harmful. E-25-13

### 4.11.6.2 Conflict with Land Use Plans, Policies or Regulations

The DEIR (page 4.11-11) states:

"As detailed in Table 4.11.A, identifying relevant City Land Use policies, through current design, implementation of project design features, conditions of approval, mitigation measures, and ongoing consultation with the City of Banning and applicable agencies, the Development Project would be consistent with goals and policies from the City of Banning General Plan. The current land use designation of the Development Site includes portions of the Development Site that are designated open space. These portions would be retained as open space and/or a public park under current design. The remaining portions of the Development Site are currently for residential land uses and would need to be re-zoned for industrial uses. This change would be consistent with the City of Banning General Plan goals and would not conflict with existing adjacent land uses." E-25-14

"As referenced in Table 4.11.A, the Development Project would implement Conditions of Approval (COA) to maintain consistency with the City of Banning General Plan (Circulation Element Policy 6),

which states, "The City shall maintain peak hour Level of services C or better on all local intersections, except those on Ramsey Street and at I-10 interchanges, where Level of Service D or better shall be maintained." While level of service (LOS) is no longer the standard by which transportation impacts are evaluated pursuant to the California Environmental Quality Act (CEWA), the LOS analysis determines whether the Development Project traffic would result in an intersection's LOS to worsen and exceed the City's LOS thresholds or result either in the average delay or average critical delay to exceed the City's intersection delay thresholds under existing and cumulative conditions. These thresholds vary depending on the street classifications as well as whether or not the intersection is on a State route."

More importantly, the DEIR (page 4.11-28) states:

"Urban Crossroads prepared a traffic analysis[7]that evaluated Development Project study area roadway and intersection operations under existing, opening year, and future condition scenarios with and without the Development Project. The traffic analysis, which is included as Appendix J-2 [2] *9* to this EIR, also identified recommended COA TRA-1 through TRA-35 that the City can adopt to ensure the Development Project would be consistent with the City of Banning General Plan Policy 6 and the LOS C and LOS D requirements for intersections in the City. These COAs are also included below. By adopting these COAs or the equivalent, the City would ensure that the Development Project would be consistent with the City's General Plan Policy 6."

E-25-14 Cont

Table 4.11.A: Development Project Consistency Analysis subject to the City of Banning's General Plan as found under the Circulation Element (page 4.11-14), of which Table 4.11.A, clearly is **Not Consistent with the Circulation Element**, Policy 6, stating:

"The City shall maintain peak hour Level of Service C or better on all local intersections, except those on Ramsey Street and at I-10 interchanges, where Level of Service D or better shall be maintained."

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[7]Urban Crossroads 2022. Sunset Crossroads Traffic Analysis, City of Banning. June 28

And as disclosed in the Traffic Study Appendix J-2,[8] where it is found that I-10 Interchanges at Sunset Ave. as well as Sunset Ave. and Lincoln and Sunset Ave and Westward intersections, where with the addition of Project traffic, the following study area intersections are anticipated to operate at an **Unacceptable LOS F during the peak hours under Opening Year Cumulative (2027) With Project traffic conditions.** E-25-15

Additionally, **Table 4.11.A: Development Project Consistency Analysis** subject to the City of Banning General Plan as found under the Air Quality Element (page 4.11-19). Table 4.11.A, is clearly **Not Consistent with the Air Quality Element** Policy 1, Policy 2, Policy 3 and Policy 4, as found in Sec.4.3 (page #'s 2, 3 & 4) of our response to the DEIR. And as we have outlined in our comments and concerns, which clearly address the fact that the DEIR is incomplete and falls short in mitigation measures of the proposed project's potential individual and cumulative level environmental impacts, in that the Project would not comply and is therefore, **Inconsistent** with the City's General Plan, in Air Quality Element, SCAQMD Standards and 2022 AQMP Air Quality Management Plan. E-25-16

**Table 4.11.A: Development Project Consistency Analysis** subject to the City of Banning General Plan as found in (Noise Element page 4.11-20 & 21). Table 4.11.A, is clearly **Not Consistent with Noise Element**, Policy 1, Policy 2 and Policy 3, as found in Sec. 4.13 (pages 10 - 21) of our response to the DEIR, and as we have outlined in our comments and concerns. We have found the DEIR falls short of mitigation measures of the proposed project's potential individual-and cumulative-level environmental impacts, in that the Project would not comply and is therefore **Inconsistent** with the City's General Plan, Noise Element. E-25-17

**Therefore, the Consistency Analysis must be amended, revised/ updated in response to our comments and concerns.**

4.13 Noise and Vibration

**4.13.3 Existing Setting**

**4.13.3.2 Sensitive Land Uses in the Project Vicinity** E-25-18 Cont

The DEIR (page 4.13-2) states:

" West of the Project, there [are] age-restricted residences in the Sun Lakes Community, and recreational vehicle storage."

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[8]See (pages 44 through 46). Response comments to Appendix J-2 TA Report_6-2023.

"East of the Project, there is a community of single family homes, storage facility and the MSJC school."

Appendix C-1 (page 8) states:

"West: Age-restricted residential development in the Sun Lakes Community and recreational vehicle storage. The closest homes to the west are approximately 50 feet from the project site boundary."

Appendix C-1 (page 8) states:

"East: Community of single-family homes, a storage facility, and the Mount San Jacinto College satellite campus. The closest is the college, the closest building is approximately 115 feet east of the Development Site, across Sunset Avenue."

E-25-18 Cont

However, the DEIR and Appendix C-1 omit The Lakes Assisted Living and Memory Care, and the Serrano del Vista community, both of which are sensitive receptors and must be included in land use description. The Lakes Assisted Living and Memory Care, a long term and assisted living and adult care facility, at 5801 Sun Lakes Blvd., is approximately one-half mile west of the Project site boundary, and the Serrano del Vista community, which fronts the eastside of Sunset Avenue, between Westwood and Jefferson, and will be adversely impacted by the Development.

**Therefore, the DEIR and Appendix C-1 must be amended, revised/ updated.**

The DEIR (page 4.13-12) states:

"City of Banning Municipal Code. Sections 8.44.070 and 8.44.080 of the City's Municipal Code have established exterior maximum noise levels for residential and non-residential (commercial and industrial) uses. Table 4.13.G: City of Banning Maximum Noise Level Standards shows the City's exterior maximum noise levels."

Table 4.13.G. City of Banning Maximum Noise Level Standards, indicates that the maximum Residential Instantaneous Nighttime (10:00 PM to 7:00 AM) noise level is 65 dBA. **

E-25-19

#### 4.13.3.3 Ambient Noise Measurements

The DEIR (page 4.13-3) states:

"Long-Term Noise Measurements. The long-term (24-hour) noise level measurements were conducted from November 22 to November 23, 2021, using five Larson Davis Spark 706RC Dosimeters. It should be noted that the long-term noise level measurements were conducted during near normal COVID_19 pre-pandemic conditions with students back to school and normal business operations. **Table 4.13.B: Long-Term Ambient Noise Monitoring Results** summarizes the results of the long-term noise level measurements along with a description of the measurement locations and noise sources that occurred during the measurements. As shown in **Table 4.13.B**, the calculated CNEL noise levels range from 59.5 to 72.7 dBA. The hourly Leq results from the long-term noise level measurements are provided in the Sunset Crossroads Project Noise and Vibration Impact Analysis Report in Appendix I of this EIR. Figure 4.13-1 shows the long-term monitoring locations."

### 4.13.4.2 Local Regulations

The DEIR (page 4.13-10) states:

"Chapter V, Environmental Hazards, of the City's General Plan (7) contains the Noise Element, which has established maximum outdoor noise levels in residential areas, the allowable exterior ambient noise levels for various land uses, and contains policies and actions required to meet the City's noise-related goals. The maximum outdoor noise level in residential areas is 65 dBA CNEL. The allowable exterior ambient noise levels for each land use are summarized in the City's land use compatibility categories for community noise environments as shown **in Table 4.13.F: Land Use Compatibility for Community Noise Environments**. Applicable goals, policies, and programs for the Development Project are listed below."

E-25-19 Cont

- "Goal: A noise environment that complements the community's residential character and its land uses."

"Policy 1: The City shall protect noise sensitive land uses, including residential neighborhoods, schools, hospitals, libraries, churches, resorts, and community open space, from potentially significant sources of community noise."

Thus, the Project would not comply with the City's General Plan Noise Element. The Development Project would negatively affect the character of surrounding residential neighborhoods, and in many cases, have an inconsistency in Land Use Planning that result in underlying physical impacts that are significant, adverse and harmful.

The Development Project would result in **Significant and Unavoidable impacts** and would result negatively in underlying physical impacts that are adverse and harmful, and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding consideration under Section 15093 explaining why the Development Project benefits outweigh the unavoidable environmental impacts. E-25-20

### 4.13.6 Project Impacts

#### 4.13.6.1 Temporary or Permanent Noise Increase in Ambient Noise Levels in Excess of Established Standards

The DEIR (page 4.13-21) states:

"**Operational Traffic Noise Impacts.** The FHWA Highway Traffic Noise Prediction Model (FHWA RD-77- 108) 16 was used to evaluate traffic-related noise conditions along street segments in the Development Project vicinity. This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry, to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resulting noise levels are weighted and summed over 24-hour periods to determine the CNEL values. The Existing (2021), Opening Year (2027), and Horizon Year (2045) ADT volumes were obtained from the Sunset Crossroads Traffic Analysis. 17 The standard vehicle mix for Southern California roadways was used for roadways in the Development Project vicinity under the no project scenario. Under the with project scenarios, the vehicle mix was adjusted based on the project's vehicle mix. Table 4.13.N through Table 4.13.S list the traffic noise levels for the Existing (2021) Without and With Project Phase 1a, Phase 1b, Phase 1, Phase 1+2, Phase 1+2+3, and Phase 1+2+3+4, respectively. Also, Table 4.13.T and Table 4.13.U show the Opening Year (2027) and Horizon Year (2045) Without and With Project scenarios, respectively. These noise levels represent the worst case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. The specific assumptions used in developing these noise levels and the model printouts are provided in the Sunset Crossroads Project Noise and Vibration Impact Analysis Report in Appendix I of this EIR." E-25-21

Appendix I (page 31 & 32) states:

"Operational Traffic Noise Impacts The FHWA Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used to evaluate traffic[1]related noise conditions along street segments in the project

vicinity. This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry, to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resulting noise levels are weighted and summed over 24-hour periods to determine the CNEL values. The Existing (2021), Opening Year (2027), and Horizon Year (2045) ADT volumes were obtained from the Sunset Crossroads Traffic Analysis (Urban Crossroads 2023). The standard vehicle mix for Southern California roadways was used for roadways in the project vicinity under the no project scenario. Under the project with scenarios, the vehicle mix was adjusted based on the project's vehicle mix. Tables T, U, V, W, X, and Y (provided later) list the traffic noise levels for the Existing (2021) Without and With Project Phase 1a, Phase 1b, Phase 1, Phase 1+2, Phase 1+2+3, and Phase 1+2+3+4, respectively. Also, Tables Z and AA (provided later) show the Opening Year (2027) and Horizon Year (2045) Without and With Project scenarios, respectively. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. The specific assumptions used in developing these noise levels and the model printouts are provided in Appendix C. The following is a summary of the Existing (2021), Opening Year (2027), and Horizon Year (2045) traffic noise analysis results."

E-25-21
Cont

The DEIR (page 4.13-39) and Appendix I (page 45) state:

"**Opening Year (2027) Traffic Noise Levels**." "As shown in "Table 4.13.T" and "As shown in Table Z" (respectively), "the Opening Year (2027) with project traffic noise conditions would result in a project-related traffic noise increase of up to 3.0 dBA along Highland Home Road where noise-sensitive land uses are present, 17.5 dBA along Sunset Avenue where noise-sensitive land uses are present, and 9.7 dBA along Sun Lakes Boulevard where noise-sensitive land uses are present. The following is a detailed discussion of the specific roadway segments where potential impacts may occur at noise-sensitive land uses:"

• "Sunset Avenue between the I-10 Westbound Ramps and Bobcat Road. Noise-sensitive land uses in this area include residences located along the east side of Sunset Avenue between Lincoln Street and Westward Avenue and the MSJC campus" "Mount San Jacinto College San Gorgonio Pass campus" (respectively) "located on the southeast corner of Sunset Avenue and Westward Avenue. Residences are located approximately 35 ft from Sunset Avenue centerline and would be exposed to traffic noise levels of 74.3 dBA CNEL without the

existing 5 ft to 7.5 ft high private property walls. The existing 5 to 7.5 ft high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 69.3 and 66.3 dBA CNEL, respectively. Therefore, the Development Project would have a significant impact on off-site residential uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Opening Year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL."

E-25-21 Cont

Therefore, the Development Project would have a significant impact on off-site residential uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Opening Year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL.

The DEIR (page 4.13-39) and Appendix I (page 45) further state:

"For the MSJC campus," ... "Mount San Jacinto College San Gorgonio Pass campus," [respectively], "the school is located approximately 75 ft from Sunset Avenue centerline and would be exposed to a traffic noise level of 65.9 dBA CNEL. Therefore, the Development Project would have a significant impact on off-site noise-sensitive land uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Opening Year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL."

E-25-22

Therefore, the Development Project would have a significant impact on off-site noise-sensitive land uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Opening Year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL. For the MSJC campus, the school is located approximately 75 feet from Sunset Avenue centerline and would be exposed to a traffic noise level of up to 65.9 dBA CNEL.

The DEIR (page 4.13-40) and Appendix I (page 48) state:

"Horizon Year (2045) Traffic Noise Levels." As shown in Table 4.13.U" ... and "As shown in Table AA" [respectively], "Horizon Year (2045)" with project traffic noise conditions would result in a project-related traffic noise increase of up to 11.8 dBA along Sunset Avenue where noise-sensitive land uses are present, and 5.3 dBA along Sun Lakes Boulevard where noise-sensitive land uses are present. The following is a detailed discussion of the specific roadway segments where potential impacts may occur at noise-sensitive land uses:"

E-25-23

- "Sunset Avenue between the I-10 Westbound Ramps and Bobcat Road. Noise-sensitive land uses in this area include residences

located along the east side of Sunset Avenue between Lincoln Street and Westward Avenue and the MSJC campus located on the southeast corner of Sunset Avenue and Westward Avenue. Residences are located approximately 35 ft from Sunset Avenue centerline and would be exposed to traffic noise levels of 74.6 dBA CNEL without the existing 5 ft to 7.5 ft high private property walls. The existing 5 to 7.5 ft high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 69.6 and 66.6 dBA CNEL, respectively. Therefore, the Development Project would have a significant impact on off-site residential uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Horizon Year (2045) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL."

"For the MSJC campus," ... "Mount San Jacinto College San Gorgonio Pass campus," [respectively] "the school is located approximately 75 ft from Sunset Avenue centerline and would be exposed to a traffic noise level of 66.7 dBA CNEL. Therefore, the Development Project would have a significant impact on off-site noise-sensitive land uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Horizon Year (2045) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL."

E-25-23 Cont

Therefore, the Development Project would have a significant impact on off-site residential and sensitive receptor uses, for residences located approximately 35 ft from Sunset Avenue centerline and would be exposed to traffic noise levels of 74.6 dBA CNEL without the existing private property walls. The existing 5 to 7.5 ft high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 69.6 and 66.6 dBA CNEL, respectively. Therefore, the Development Project would have a significant impact on off-site residential uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Horizon Year (2045) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL.

The DEIR (page 4.13-40) and Appendix I (page 48) state:

"For the MSJC campus" ... "Mount San Jacinto College San Gorgonio Pass campus," (respectively) "the school is located approximately 75 ft from Sunset Avenue centerline and would be exposed to a traffic noise level of 66.7 dBA CNEL. Therefore, the Development Project would have a significant impact on off-site noise-sensitive land uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Horizon Year (2045) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL."

E-25-24

Therefore, the Development Project would have a significant impact on off-site noise sensitive land uses because project related traffic would increase ambient noise levels by 3dBA or more and the Opening Year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL. For the MSJC campus, the school is located approximately 75 ft from Sunset Avenue centerline and would be exposed to traffic noise level of up to 65.9 dBA CNEL.

E-25-24 Cont

The DEIR (page 4.13-40) and Appendix I (page 48) state:

"**Horizon Year (2045) Traffic Noise Levels.** "As shown in Table 4.13.U the Horizon year 2045" ... "As shown in Table AA the Horizon year 2045" (respectively), "with project traffic noise conditions would result in a project-related traffic noise increase of up to 11.8 dBA along Sunset Avenue where noise-sensitive land uses are present, and 5.3 dBA along Sun Lakes Boulevard where noise-sensitive land uses are present. The following is a detailed discussion of the specific roadway segments where potential impacts may occur at noise-sensitive land uses:"

• "Sun Lakes Boulevard West of Highland Home Road. Noise-sensitive land uses in this area include residences located along the north and south side of Sun Lakes Boulevard west of Highland Home Road. Residences are located approximately 50 ft from Sun Lakes Boulevard centerline and would be exposed to traffic noise levels of 66.0 dBA CNEL without the existing 5 ft high private property walls. The existing 5 ft high private property wall along Sun Lakes Boulevard would provide a noise reduction of 5 dBA, which would reduce traffic noise levels to 61.0 dBA CNEL. Although project-related traffic could increase ambient noise levels by 3 dBA or more, the Horizon Year (2045) with project traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Therefore, the Development Project would have a less than significant impact on off-site noise-sensitive land uses."

E-25-25

**The DEIR and Appendix I fail to disclose** that on the north side of Sun Lakes Blvd. West of Highland Home Rd. from the RV Storage immediately west of the RV storage entry to approximately ½ mile westerly to the Sun Lakes entry gate #2, that there are no existing 5 ft. masonry wall sound barriers, resulting in an exposed to traffic noise level of 66.0 dBA CNEL, to residential sensitive receptors.

**Therefore, the DEIR and Appendix I Traffic Noise Levels must be amended, revised/updated in response to our comments and concerns.**

The DEIR (page 4,13-40 and 4.13-41) states:

"For the residences located along Sunset Avenue between Lincoln Street and south of Westward Avenue, additional off-site noise barriers would not be feasible because there are already walls in place and additional heights to those walls would provide minimal noise reduction and would not achieve the noise level reduction needed to reduce impacts to less than significant. Also, obtaining consent from all property owners to construct off-site noise barriers would not be possible because the viewpoints of property owners would differ. Classroom buildings at the MSJC campus located along Sunset Avenue south of Westward Avenue are also sensitive receptors and would experience potentially significant noise impacts from traffic noise. Construction of a minimum 6 ft high wall adjacent to the existing school buildings along the Sunset Avenue frontage (see Mitigation Measure NOI-2) would provide a 5 dBA CNEL noise reduction, reducing traffic noise levels to below the City's noise standard of 65 dBA CNE and therefore less than significant. However, because construction of the wall would require approval of the property owner, which is outside of the control of the Development Project and the City, and because there is uncertainty if the wall could be constructed, the off-site traffic noise impact remains significant. In addition, rubberized asphalt could be installed but it is not an effective long-term mitigation measure because it degrades over time. Therefore, off-site traffic noise impacts from operation of the Development Project would be significant and unavoidable because the Development Project would result in a substantial permanent increase in ambient noise levels and traffic noise levels would exceed the City's exterior noise standard of 65 dBA CNEL along Sunset Avenue between Lincoln Street and south of Westward Avenue."

E-25-26

As well, Appendix I (page 51) states:

"There are no feasible mitigation measures that would reduce off-site traffic noise levels along Sunset Avenue between Lincoln Street and south of Westward Avenue because off-site noise barriers and rubberized asphalt would not achieve the noise level reduction needed to reduce impacts to less than significant. In addition, obtaining consent from all property owners to construct off-site noise barriers would not be possible because the viewpoints of property owners would differ. Rubberized asphalt is not an effective long-term mitigation measure because it degrades over time. Therefore, off-site traffic noise impacts from operation of the Development Project would be significant and unavoidable because the Development Project would

result in a substantial permanent increase in ambient noise levels and traffic noise levels would exceed the City's exterior noise standard of 65 dBA CNEL along Sunset Avenue between Lincoln Street and south of Westward Avenue."

Lastly, Appendix I (page 57 & 58) states:

"**Operational Traffic Noise Impacts"**

"There are no feasible mitigation measures that would reduce off-site traffic noise levels along Sunset Avenue between Lincoln Street and south of Westward Avenue because off-site noise barriers and rubberized asphalt would not achieve the noise level reduction needed to reduce impacts to less than significant. In addition, obtaining consent from all property owners to construct off-site noise barriers would not be possible because the viewpoint of the property owners would differ. Rubberized asphalt is not an effective long-term mitigation measure because it degrades over time. Off-site traffic noise impacts would be significant and unavoidable."

E-25-26 Cont

The Development Project would result in **Significant and Unavoidable impacts** and would result negatively in underlying physical impacts that are adverse and harmful, and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding consideration under Section 15093 explaining why the Development Project benefits outweigh the unavoidable environmental impacts.

The Project would not comply with the City's General Plan Noise Element. Therefore, the Development Project would negatively affect the character of surrounding residential neighborhoods, and in many cases, have an inconsistency in Land Use Planning that result in underlying physical impacts that are significant, adverse and harmful.

E-25-27

The DEIR (page 4.13-41) and Appendix I (page 51) also state:

"**Operational Stationary Source Noise Impacts**: Truck delivery and truck loading and unloading activities; heating, ventilation, refrigeration equipment, and air conditioning (HVAC) equipment; drive-through speakerphones; parking lot activities, fueling activities, and outdoor eating activities associated with the Development Project could affect the existing off-site sensitive land uses. The following provides a detailed noise analysis and discussion of each stationary noise source at the closest residences and MSJC school in the project vicinity:"

E-25-28

• "Truck Delivery and Truck Loading/Unloading Activities: Truck delivery and truck loading/ unloading activities for the Development Project would occur at the loading docks of the warehouse buildings and at the commercial areas near the retail/restaurant buildings, hotel, and fueling station. These loading docks would be located on one side or both sides of each building and noise-sensitive receptors are predominately shielded by the proposed warehouse building itself. Truck delivery and truck loading/unloading activities at the commercial areas would occur near each of the buildings and near the underground storage tanks for the fueling station. Noise levels generated from these activities include truck movement, backup alarms, air brakes, idling, and loading/unloading activities. The maximum noise level generated from these activities is 75 dBA Lmax at 50 ft."

"Although a typical truck loading/unloading process takes an average of 15 to 20 minutes, this maximum noise level occurs in a much shorter period of time (less than 5 minutes)."

Also, it is estimated that warehouse buildings would have a maximum of 15 truck deliveries per hour during daytime hours (7:00 a.m. to 10:00 p.m.) and 11 truck deliveries per hour during nighttime hours (10:00 p.m. to 7:00 a.m.), loading / unloading at each side of the warehouse buildings where there are truck loading docks based on the project trip generation in the Sunset Crossroads Traffic Analysis (Urban Crossroads 2021)[9]. E-25-28 Cont

Assuming each truck delivery and truck loading/unloading would generate the maximum noise level of 75 dBA Lmax at 50 ft for up to 5 minutes, truck delivery and truck loading/unloading activities would generate a noise level of 76.0 dBA at 50 ft during daytime hours and 74.6 dBA Leq at 50 ft during nighttime hours at each side of the proposed warehouse buildings where there are truck loading docks.

We respectfully disagree with the Operational Stationary Source Noise narrative and assumption, erroneously stating truck loading/unloading processing at (less than 5 minutes) time, and/or the average loading/unloading of 15 to 20 minutes. At the very minimum, an average maximum noise level should be established at 20 minutes; when the process can take as long as 1.5 hours, depending on the shift hour arrival, number of dock employees etc. as an Industry

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[9]Urban Crossroads 2022. Sunset Crossroads Traffic Analysis, City of Banning. June 28

Standard. Furthermore, with 11 nighttime arrivals/departures per hour, the loading/unloading process on both sides of warehouse buildings would effectively be non-stop and a continuous source of operational noise. E-25-28 Cont

Additionally, we submit that per **Table 4.13.F and Appendix I Table F: Land Use Compatibility for Community Noise Environments** that the noise levels of truck traffic loading and unloading in a continuous nighttime operation at 74.6 dBA, far exceeds the tables referenced as **Conditionally Acceptable** of residential noise levels at a maximum 65 dBA CNEL. The projected truck delivery and truck loading/unloading activities would generate a noise level of **76.0 dBA** at 50 ft during daytime hours and **74.6 dBA Leq** at 50 ft during nighttime hours at either side of the proposed warehouse buildings where there are truck loading docks, which would qualify as **Clearly Unacceptable** and **Normally Unacceptable** respectively. E-25-29

Therefore, the Development Project would negatively affect the character of surrounding residential neighborhoods, and in many cases, have an inconsistency in Land Use Planning, likely resulting in a **Significant and Unavoidable**, operational noise impacts affecting sensitive receptors resulting in underlying physical impacts that are significant, adverse and harmful. E-25-30

We further submit that the operational noise level analysis is ambiguous, inconsistent and calls into question the results of the less than significant impact on noise sensitive land uses. E-25-31

Lastly, we find that the DEIR and Appendix I, Operational Stationary Source Noise analysis must be **amended, revised / updated**, once justifying the analysis findings as outlined in our comments and concerns, and clarifying the methodology of the purported, projected dBA noise levels, as for a cumulative impact analysis. E-25-32

**Table 4.13.V: Operational Noise Levels**

The DEIR (page 4.13-43) states:

"**Table 4.13.V: Operational Noise Levels** shows the combined calculated daytime and nighttime noise levels at the closest residences and MSJC property lines surrounding the Development Site using Sound PLAN from the individual stationary noise sources discussed above, which include truck delivery and truck loading/unloading activities, HVAC equipment, refrigeration equipment, drive-through speakerphones, parking activities, fueling activities, and outdoor eating activities. The modeled receptor locations are shown in **Figure 4.13-2: Modeled Receptor Locations**, and the Sound PLAN printouts are provided in the Sunset Crossroads Project Noise and Vibration Impact Analysis Report in Appendix I of this EIR." E-25-33

"As shown in **Table 4.13.V**, noise levels generated from project operations would not exceed the City's exterior daytime noise standard of 55 dBA Leq for residences and the MSJC campus located in the City. The school property line was evaluated using the City's noise standards for residences for a conservative analysis because the City does not have noise standards for schools. Also, noise levels generated from project operations would not exceed the City's exterior nighttime noise standard of 45 dBA Leq for residences located in the City except for residences represented by Receptors R-1 through R-6 and the school represented by Receptor R-7. The Development Project would increase ambient noise levels by up to 1.1 dBA at residences represented by Receptors R-1 through R-6 and the school represented by Receptor R-7. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, noise levels generated from project operations at these receptors would be less than significant."

APPENDIX I (page 56) states: "As shown in Table AB, noise levels generated from project operations would not exceed the City's exterior daytime noise standard of 55 dBA Leq for residences and the school (Mount San Jacinto College San Gorgonio Pass campus) located in the City. The school was evaluated using the City's noise standards for residences for a conservative analysis because the City does not have noise standards for schools. Also, noise levels generated from project operations would not exceed the City's exterior nighttime noise standard of 45 dBA Leq for residences located in the City except for residences represented by Receptors R-1 through R-6 and the school represented by Receptor R-7. The Development Project would increase ambient noise levels by up to 1.1 dBA at residences represented by Receptors R-1 through R-6 and the school represented by Receptor R-7. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, noise levels generated from project operations at these receptors would be less than significant."

E-25-33
Cont

The DEIR (page 4.13-47) states: "In addition, as shown in Table 4.13.V, noise levels generated from operations of the Development Project would not exceed the County's exterior daytime 10-minute noise standard of 65 dBA Leq for residences located in the unincorporated County. Also, noise levels generated from operations of the Development Project would not exceed the County's exterior nighttime 10-minute noise standard of 45 dBA Leq for residences located in the unincorporated County except for residences represented

by Receptors R-8, R-10, R-11, and R-12, which would exceed the County's exterior nighttime 10-minute noise standard of 45 dBA Leq. The Development Project would increase ambient noise levels by up to 2.9 dBA at the residence represented by Receptor R-10. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, noise levels at these receptors would be less than significant. However, the Development Project would increase ambient noise levels by up to 4.1 dBA for residences represented by Receptors R-8, R-11, and R-12. Therefore, noise generated from operations of the Development Project would be significant. As the Development Project and residences at Receptors R-8, R-11, and R-12 have driveway access onto Bobcat Road, mitigation measures such as noise barriers would not be feasible because they would not be effective. Therefore, noise impacts from operations of the Development Project would be significant and unavoidable. Level of Significance Prior to Mitigation: Project construction activities and operations of the Development Project from traffic noise and stationary noise would be Potentially Significant Impacts."

E-25-33 Cont

The Development Project would increase ambient noise levels by up to 4.1 dBA, greater than 3 dBA, for residences represented by Receptors R-8, R-11, and R-12 (As shown in Figure 4.13-2 Modeled Receptor Locations of the DEIR). Therefore, noise generated from operations of the Development Project would be significant. As the Development Project and residences at Receptors R-8, R-11, and R-12 have driveway access onto Bobcat Road, mitigation measures such as noise barriers would not be feasible because they would not be effective. Therefore, noise impacts from operations of the Development Project would be Significant and Unavoidable.

In contrast, Appendix I, Table AB shows that noise levels generated from operations of the Development Project would not exceed the County's exterior daytime 10-minute noise standard of 65 dBA Leq for residences located in the unincorporated County. Also, noise levels generated from operations of the Development Project would not exceed the County's exterior nighttime 10-minute noise standard of 45 dBA Leq for residences located in the unincorporated County except for residences represented by Receptors R-8, R-10, R-11, and R-12, which would exceed the County's exterior nighttime 10-minute noise standard of 45 dBA Leq. The Development Project would increase ambient noise levels by up to 2.9 dBA at the residence represented by Receptor R-10. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, noise levels at these receptors would be less than significant.

E-25-34

We submit that the Operational Stationary Source Noise Impacts statement is ambiguous, wherein the Projected Nighttime Noise Levels already exceed the City's Nighttime Noise Standard level of 45 dBA by as much as 7.8 dBA or, actually

E-25-35

52.8 dBA; and that in Table 4.13.V, an Average Ambient Noise Level of 58dBA Leq is used to establish an increase ambient noise levels to 1.1 dBA at residences represented by Receptors R-1 through R-6 and the school represented by Receptor R-7, as well as R-8, R10 through R-12.

The Modeled Receptor Locations, as shown in Figure 4.13-2 of the DEIR Operational Noise Levels Table 4.13.V, and Figure 4 of Appendix I, noise levels generated from project operations would exceed the City's exterior nighttime noise standard of 45 dBA Leq for sensitive receptor residence's and the MSJC campus located in the City.

E-25-35 Cont

The City Standard Maximum Noise Levels when described in Table 4.13.V: Operational Noise Levels clearly shows that calculated nighttime noise levels at the closest residences and MSJC property lines surrounding the Development Site, which include truck delivery and truck loading/unloading activities, HVAC equipment, refrigeration equipment, drive-through speakerphones, parking activities, fueling activities, and outdoor eating activities, far exceeds maximum sensitive receptor locations, R-1 through R-8, and R-10 through R-12, and are as high as 7.8 dBA, in a (Leq truck loading and unloading as we've presented in our response comments to Operational Stationary Noise Impacts) continual process of operation throughout the nighttime, are in fact Significant and Unavoidable.

E-25-36

Furthermore, in the attempt to make sense of the Operational Stationary Source Noise Impacts statement's arbitrary findings and summation of a 1.1 dBA increase to ambient noise levels, with the result of a less than significant impact; we endeavored to find, as outlined in: THE DEIR, Table 4.13.V: Operational Noise Levels stating that the Sound PLAN printouts are provided in the Sunset Crossroads Project Noise and Vibration Impact Analysis Report in Appendix I of this EIR, we found no such printouts present or, any semblance of explanation of the summation.

E-25-37

More specifically, the DEIR must clarify the methodology of actual Projected dBA Noise levels vs. the resulting Ambient Noise Level Increase used to justify a less than significant impact, in the referenced stated Operational Noise Levels and conflicting language of Appendix I.

E-25-38

**Therefore, the DEIR, as well as the referenced Appendix I must be reconciled, amended, revised / updated, bringing clarification and justification of operational noise impacts.**

E-25-38-A

### 4.17.2 Methodology

The DEIR (page 4.7-2) states:

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

"In order for a land use development project to result in a less than significant VMT impact, the project need only meet one of the above screening methods. The Traffic Analysis determined that the TPA Screening, Map-Based Screening based on Low VMT Area, Local-Serving Retail Screening, and Small Project Screening criteria would be applicable to the Development Project; however, after evaluating whether the Development Project satisfied the criteria, it was determined the Development Project did not meet the applicable screening criteria. The screening evaluations are discussed in more detail in Appendix J to this EIR." **

E-25-39

### 4.17.6.3 VMT Impacts

The DEIR (page 4.17-13) states:

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

generated VMT per employee to exceed the City's significance threshold of 25.9."

The DEIR (page 4.17-14) further states:

"Consistent with the City's VMT Guidelines, RIVCOM was used to calculate the Development Project[1]generated VMT for the non-retail land uses and that value was then divided by the Development Project's employment estimate to derive project-generated VMT per employee. Table 4.17.C: Non[1]Retail VMT per Employee presents home-based work (HBW) VMT as calculated from RIVCOM for the Development Project's non-retail land uses, the number of Development Project non-retail employees, and Development Project non-retail VMT per employee. The Development Project's non retail VMT per employee would exceed the City's significance threshold of 25.9 by 4.9, an increase in per employee VMT of 18.9 percent. Table 4.17.C: Non-Retail VMT per Employee."

**Table 4.17.C: Non-Retail VMT per Employee**

Project Non-Retail VMT results found in Table 4.17.C are as follows:

"[VMT 165,615], [Employment 5,383], [VMT per Employee[1] 30.8], [City Threshold 25.9] [Difference +4.9], [Percent Change +18.9%]" E-25-39 Cont

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

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

"HBW = home-based work"
"OPR = Office of Planning and Research"
"VMT = vehicle miles traveled"

The Development Project would exceed the City's adopted thresholds of 25.9 VMT per employee for the industrial and hotel uses. This would result in a potentially significant impact.

As referenced previously in 4.17.2 Methodology Appendix J VMT Analysis:

**REF: Appendix J**

"Mr. JJ Jenkins NP Banning Industrial, LLC August 25, 2023 Urban Crossroads"

"13534-05 VMT"

"CONCLUSION. Based on the results of this analysis the following findings are made:"

• "The Project was evaluated against screening criteria as outlined in the City Guidelines. The Project was not found to meet any applicable screening criteria, and a project level VMT analysis was performed."

• "An evaluation of net change in regional VMT with and without the Project's proposed retail land use component resulted in a slight decrease in regional VMT of 0.9%. The Project is determined to have a less than significant transportation impact for the retail component.

• The Project's non-retail land uses were found to exceed the City's VMT per employee threshold by 18.9% and a reduction of 15.9% of project generated HBW VMT is required."

• "Project design features that would contribute to an 8.4% reduction in VMT were considered.

E-25-39
Cont

• Project generated VMT per employee was found to exceed adopted VMT impact thresholds even with an 8.4% reduction to VMT related to Project design features. The Project's VMT impact is considered significant and unavoidable."

**The Development Project would exceed the City's adopted thresholds of 25.9 VMT per employee for the industrial and hotel uses.**

This would result in a potentially significant impact. With implementation of the measures identified in MM TRA-1, a project can realize a maximum reduction of 45 percent in commute VMT. The Development Project would require a minimum reduction of 18.9 percent to achieve a less than significant impact.

Level of Significance Prior to Mitigation: Potentially Significant Impact

**Regulatory Compliance Measures and Mitigation Measures:**

The DEIR (page 4.17-14) states:

"The following mitigation measure would require the preparation of a Transportation Demand Management (TDM) strategy report to reduce employee VMT. The TDM measures included in MM TRA-1 below were derived from the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality.1 Since future tenants on the Development Site are unknown at this time, implementation of the feasible TDM measures identified in MM TRA-1 cannot be guaranteed to reduce the industrial and service component's VMT per employee to a level of less than significant. With the implementation of MM TRA-1, Impact 4.17.2 would remain significant and unavoidable."

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

E-25-39 Cont

We submit that the VMT for the non-commercial hotel and industrial warehouse buildings result in Significant and Unavoidable VMT impacts, which based on the Appendix J Conclusion, and that after design features were considered, but not implemented, only resulted in a 8.4% reduction of commute VMT, and therefore does not comply with the City of Banning VMT Analysis Implementation Guidelines and significance thresholds.

We also submit that the Project Condition of Approval (Prior to Occupancy Permits), item referencing a "future" TDM strategy report, is arbitrary in nature and unsubstantiated in the stated reduction potential of up to 45% in commute VMT, in as much as the design features were not identified in the DEIR, or Appendix J and are of no comparison to a "future" TDM.

E-25-40

We further submit that the less than adequate 8.4% reduction in project generated HBW VMT Project design features should be outlined specifically and referenced in the DEIR and per Appendix J.

E-25-41

The results remain the same: The VMT Impacts are **significant and unavoidable**, making the Mitigation Measures of no effect.

Thus, the Development Project would result in a **Significant and Unavoidable impact** and would result negatively in underlying physical impacts that are adverse and harmful, and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding consideration under Section 15093 explaining why the Development Project benefits outweigh the unavoidable environmental impacts. E-25-42

6.0 Cumulative Impact

### 6.5.3.2 Regional Emissions for Concurrent Construction and Operation

As previously addressed in 4.3 Air Quality and 4.17.6.3 VMT Impacts

The DEIR (page 6-24 and 6-25) states:

"Under a conservative analysis where concurrent construction and operation of each phase of the proposed Development Project (**Tables 4.3.J through 4.3.M**) occurs, emissions would exceed the SCAQMD thresholds for all pollutants except for sulfur oxides. Despite implementation of the planned Project Design Features (PDFs) and mitigation measures identified in **Mitigation Measure AIR-2** (which requires the implementation of all feasible measures to reduce operational impacts associated with the Development Project) and the measures identified in **Section 4.17** of this EIR to reduce vehicle miles traveled (VMT) (which do not result in quantifiable emissions reductions) for the Development Project, emissions associated with operation of the Development Project would remain significant and unavoidable." E-25-43

"...as shown in **Tables 4.3.J through 4.3.M** of this EIR, with implementation of the designated project design features. The proposed Development Project would result in a significant and unavoidable impact for VOCs, NOx, CO, PM10, and PM2.5, and mitigation would be required. With the implementation of this mitigation, emissions of these pollutants would still exceed SCAQMD standards, prompting a significant and unavoidable impact (**see Table 4.3.N**). Due to the Project's exceedance of SCAQMD thresholds, the infeasibility of mitigation to reduce operational air quality impacts to below SCAQMD significance standards, and in combination with other inability to show that other cumulative projects could implement feasible mitigation to reduce their similar impacts, air quality impacts

would cumulatively and significantly contribute to the nonattainment designation in the South Coast Air Basin"

"Combined, the significant and unavoidable emission impacts from other cumulative projects and the emissions resulting from operation of the Project would contribute to a cumulatively considerable air quality impact and would be significant and unavoidable."

### 6.5.3.3 AQMP Consistency

As previously addressed in Sec. 4.3 Air Quality

The DEIR (page 6-25) states:

"As stated in Section 4.3, the Development Project was determined to be inconsistent with the AQMP. A similar condition was identified for the larger cumulative projects in the project area (e.g., RSG, SLVN and BSP). Consistency with the applicable AQMP is based on two criteria: (1) whether a project is consistent with the SCAG growth forecasts, which is based, in part, on the planned land uses in general plans of cities located within the SCAG region; and (2) whether a project would increase the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. The Development Project along with many of the projects on the cumulative project list entail a General Plan amendment and/or zone change and therefore are not consistent with SCAG's growth forecasts, and the impact is cumulatively considerable. The MSJC Entitlements would not result in a significant increase in the inventory of residential units or population growth in the City, and standing alone, would be consistent with SCAG forecasts and the first criterion identified in the SCAQMD's CEQA Handbook. Because the Project consists of the Development Project and the MSJC Entitlements, the Project as a whole is not consistent with SCAG forecasts and the first criterion under the AQMP. The Development Project also contributes to a cumulatively considerable impact under the second criterion because the regional operational-source emissions are anticipated to exceed the regional thresholds of significance for VOC, NOX, CO, PM10, and PM2.5 emissions. The RSG, BSP, SLVN, and BPSP projects also each exceed regional emission thresholds and were determined to be inconsistent with the AQMP. For the MSJC Site, specific data are not yet available to determine consistency with the second criteria and this would be speculative. Relative to AQMP

E-25-43 Cont

consistency, the exceedance of regional thresholds by the Project and cumulative projects results in a cumulatively considerable and significant impact."

As previously addressed in 4.3.6.1 Air Quality Management Plan Consistency:

"Consistency with the applicable AQMP is based on two criteria:"

"(1) whether a project is consistent with the SCAG growth forecasts, which is based, in part, on the planned land uses in general plans of cities located within the SCAG region; and"

E-25-43 Cont

"(2) whether a project would increase the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP."

The Development Project also contributes to a cumulatively considerable impact under the second criterion because the regional operational-source emissions are anticipated to exceed the regional thresholds of significance for VOC, NOX, CO, PM10, and PM2.5 emissions. The RSG, BSP, SLVN, and BPSP projects also each exceed regional emission thresholds and were determined to be inconsistent with the AQMP.

### 6.5.8 Greenhouse Gas Emissions

As previously addressed in Sec. 4.5.8.1 Greenhouse Gas Emissions:

Greenhouse gas reducing practices have been identified in Mitigation Measures AIR-2 and GHG-1 through GHG-6, which would reduce emissions to 38,726.25 MT CO2e per year at Project buildout, which would still exceed the City's threshold of 3,000 MT CO2e. Again, the majority of these are generated from mobile sources that are regulated by the State and not the City. Therefore, under CEQA Appendix G threshold VIII a), the Project's GHG emissions are significant.

The DEIR (page 6-35 and 6-36) states:

"The second threshold of significance pertains to whether the Project would conflict with an applicable GHG reducing plan or policy. As indicated in **Section 4.8** of this EIR, the Development Project gains over 500 points in the County of Riverside Climate Action Plan (CAP) Screening Tables and implements PDFs and Mitigation **Measures AIR-2, GHG-1, GHG-2, GHG-4, GHG-5,** and **GHG-6** to reduce GHG emissions. Furthermore, as demonstrated in **Tables 4.8.L through 4.8.O** of this EIR, the Development Project is

E-25-43-A

generally consistent with and/or would not conflict with the GHG emission reduction policies, measures, goals, or strategies identified in the City's General Plan, applicable Scoping Plan(s), Regional Transportation Plan, or Air Quality Management Plan. However due to the annual volume of CO2e emitted in excess of the City's 3,000 MT CO2e per year threshold, and the infeasibility of additional mitigation measures to reduce the impacts of the Development Project to less than significant, the Development Project's contribution of GHG is cumulatively considerable. The GHG analyses conducted for various cumulative projects each identified significant and unavoidable emissions of GHGs in excess of established thresholds and concluded the projects' contribution of GHG emissions would be cumulatively significant. As such, the Project would result in a significant cumulative impact with respect to GHG emissions."

E-25-43-A Cont

### 6.5.13.3 Off-Site Operational Noise Impacts (page 6-46 and 6-47)

As previously addressed (page 16 of this report) in Sec. 4.13 Noise and Vibration:

"With respect to long-term operational noise which would primarily be caused by traffic, this EIR analyzed the cumulative impacts of the Project and cumulative project sites as described in Section 4.13 of this EIR and Appendix I... The standard vehicle mix for Southern California roadways was used for roadways in the Project vicinity under the no project scenario and the cumulative long-term noise impacts on off-site land uses were determined to be significant. Based on this review, as analyzed in Section 4.13 of this EIR, Horizon Year (2045) with Development Project traffic would result in a traffic noise increase of up to 13.5 dBA along Sunset Avenue between the I-10 westbound ramps and Bobcat Road. Increases in ambient noise levels for residential uses along Sunset Avenue and MSJC campus uses would be up to 10.7 and 11.8 dBA, respectively. Therefore, the Development Project, MSJC Site development and cumulative projects would collectively have a significant noise impact on off-site residential uses because Project-related traffic would increase ambient noise levels by 3 dBA or more and the horizon year (2045) and Project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL ...

E-25-43-B

In the absence of other feasible noise reduction measures (for either project), the traffic related cumulative noise impacts resulting from implementation of the Project remain significant and

unavoidable; therefore, impacts related to traffic noise would be cumulatively considerable and significant."

E-25-43-B Cont

### 6.5.17 Transportation and Traffic

As previously addressed in Sec. 4.17.6.3 VMT Impacts:

The Development Project's VMT net change for retail uses and VMT per non-retail worker exceeds the City's respective thresholds of no net increase in regional VMT for retail and 25.9 VMT per nonretail worker. This cumulative impact would be Significant and Unavoidable.

E-25-43-C

Additionally, as outlined (page 15 of this response letter) in Section 4.11 Land Use and specifically, Sec. 4.11.6.2 as follows:

> "**Table 4.11.A: Development Project Consistency Analysis with the City of Banning's General Plan**" as found under the Circulation Element (page 4.11-14), of which Table 4.11.A, is clearly **Not Consistent with the Circulation Element**, Policy 6, stating: "The City shall maintain peak hour Level of Service C or better on all local intersections, except those on Ramsey Street and at I-10 interchanges, where Level of Service D or better shall be maintained."

E-25-44

And as disclosed in the Traffic Study Appendix J-2,[10] where it is found that I-10 Interchanges at Sunset Ave. as well as Sunset Ave. and Lincoln and Sunset Ave and Westward intersections, where with the addition of Project traffic, the following study area intersections are anticipated to operate at an **Unacceptable LOS F during the peak hours under Opening Year Cumulative (2027) With Project traffic conditions.**

Appendix J-2 (page 29) further states:

> "The City's 2013 Circulation Element Amendment (Policy 6) indicates the City shall maintain peak hour Level of Service D or better on all local roadways and intersections. The intersections will be analyzed based Highway Capacity Manual (6th Edition) methodology."

E-25-45

Lastly, Appendix J-2, Table 3-1 (page 49) indicates the Intersection Analysis for the Existing (2021) Conditions and Level Of Service (LOS) at Peak Hour

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[10]Appendix J-2 TA Report_6-2023 (Traffic Study)

Queuing in the AM and PM, for Highland Springs Ave. & both I-10 WB and EB Ramps are currently an F rated LOS, **without Cumulative and Project Impacts**.

We submit that the Appendix J-2 Traffic Study is incomplete.[11] It lacks a cumulative analysis of the Highland Springs Ave. and I-10 westbound and east bound ramps intersections, and to include the addition of Project traffic, beginning with the Existing Year (2021) where the area intersections are found to operate for both AM and PM conditions at Peak Hour (LOS), at the current and **Unacceptable LOS F during the peak hours under Opening Year Cumulative (2027) and (2045), With Project traffic conditions.**

E-25-45 Cont

7.0 Other CEQA Topics

## 7.1 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

**Table 7.A: Significant Environmental Effects That Cannot Be Avoided with details of Impact:**

**"Air Quality (4.3.6.1)"**

Implementation of the Development Project would conflict with implementation of the applicable air quality plan. The Development Project results in an excess of criteria pollutants. Furthermore, the Development Project is not consistent with the land use assumptions cited in the 2022 AQMP. Due to this inconsistency and level of criteria pollutants, the Development Project is inconsistent with the 2022 AQMP and impacts would be Significant and Unavoidable as mitigation is not available to reduce emissions to SCAQMD thresholds.

E-25-45-A

**"Air Quality (4.3.6.2)"**

Implementation of the Development Project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under an applicable federal or State ambient air quality standard. Emissions associated with operation of the Development Project would exceed established SCAQMD thresholds. Despite the incorporation of operational practices and design features cited in Mitigation Measure AIR-2, operation of the

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[11]See Appendices Response Comments Traffic Study Appendix J-2 TA Report_6-2023.

Development Project would result in Significant and Unavoidable impacts for VOCs, NOX, CO, PM10, and PM2.5."

"**Air Quality (6.5.3.2)**"

Operation of the Development Project would result in a cumulative excess of SCAQMD emission thresholds. The Development Project's long-term operational emissions would exceed SCAQMD's criteria pollutant thresholds for all pollutants except SOX. SCAQMD's operational emissions thresholds are designed to accomplish regional emissions goals. While Mitigation Measure AIR-2 would reduce emissions to the extent feasible, project emissions would remain significant and unavoidable. Therefore, the Development Project's operations would result in a significant and unavoidable cumulative increase in long-term regional emissions.

"**Greenhouse Gas Emissions (4.8.5.1)**"

Implementation of the Development Project would generate GHG emissions that may have a significant impact on the environment. Project-related GHG emissions would exceed the City's 3,000 MTCO2e per year threshold. While the implementation of Mitigation Measures GHG-1 through GHG-6 would reduce GHG emissions to 38,726.25 MTCO2e/year, the majority of the GHG emissions (66 percent of unmitigated emissions) are associated with non-construction mobile sources that are either federally or State regulated. Neither the City of Banning nor the Development Project has control over these standards, and no additional feasible measures are available that would further reduce GHG emissions.

E-25-45-A Cont

"**Greenhouse Gas Emissions (4.8.5.2)**"

Implementation of the Development Project would conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emission of GHGs. The Development Project would not conflict with applicable local, regional, and Statewide plans, policies, programs, and regulations that have been adopted for the purpose of reducing GHG emissions. Despite this consistency, the Development Project's long-term operational impacts would exceed the City's threshold of 3,000 MTCO2e per year despite implementing project design features and all feasible mitigation. Thus, the Development Project may impede various plans' long-term GHG reduction goals (e.g., for 2030 and 2050), and a potentially significant impact may occur as a result of the Development Project.

"**Noise and Vibration (4.13.6.1)**"

Implementation of the Development Project would generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance. Existing private

walls are located adjacent to residential uses along Sunset Avenue between Lincoln Street and Westward Avenue. Additional noise barriers at this location would not be feasible as walls are already in-place and adding height to these walls would provide minimal noise reduction and would not achieve the noise reduction needed to reduce impacts to a less than significant level. Also, obtaining consent from all property owners would not be possible. A minimum 6-foot-high wall adjacent to the existing MSJC buildings along Sunset Avenue would provide a noise reduction of 5 dBA and reduce traffic noise levels to below the City's noise standard of 65 dBA CNEL to 63.6 dBA CNEL; however, the off-site traffic noise impact at the MSJC campus uses remains significant because the construction of the wall would require approval of the property owner, which is outside of the control of the Project Applicant and the City. Due to the uncertainty if the wall would be constructed, a significant off-site noise impact to MSJC uses would occur. The Development Project would result in a significant permanent increase in ambient noise levels, and traffic noise levels would exceed the City's exterior noise standard of 65 dBA CNEL. In the absence of feasible or certain new mitigation measures that would reduce long-term off-site traffic noise levels along Sunset Avenue between Lincoln Street and Westward Avenue and at MSJC uses south of Westward Avenue, off-site traffic noise impacts from operation of the Development Project would be significant and unavoidable.

"**Noise and Vibration (4.13.6.1)**"

E-25-45-A Cont

Nighttime noise levels at receptors would exceed the County's exterior nighttime 10- minute noise standard of 45 dBA Leq. The Development Project would increase ambient noise levels by up to 3.8 dBA for residences at Receptors R-11 and R-12. Therefore, noise generated from operations of the Development Project would be significant. As the Development Project and residences at Receptors R-11 and R-12 have direct driveway access onto Bobcat Road, mitigation measures such as unbroken noise barriers would not be feasible. Therefore, noise impacts from operations of the Development Project would be significant and unavoidable.

"**Transportation (4.17.6.2)**"

Implementation of the Development Project would conflict with CEQA Guidelines Section 15064.3, subdivision (b). A significant impact to VMT would occur if the addition of the Development Project's industrial or hotel component would result in Development Project-generated VMT per employee that exceeds the City's significance threshold of 25.9. The Development Project's non-retail VMT per employee would exceed the City's significance threshold of 25.9 by 4.95, which is an increase of 18.9 percent in VMT per employee. While the Transportation Demand Measures implemented pursuant to Mitigation Measure TRA-1 would realize a maximum 45 percent reduction in commute VMT, implementation of the feasible TDM measures cannot be guaranteed to reduce the industrial and service

component's VMT per employee or the retail component's total VMT to a level of less than significant.

E-25-45-A Cont

8.0 ALTERNATIVES

### 8.1.3 Significant and Unavoidable Impacts

Tables 8.A (pages 8-5): Significant and Unavoidable impacts have been addressed in Ch. 7 and will not be repeated, as well as all previously addressed element impacts of Ch. 4 ,of the DEIR.

### 8.3 ALTERNATIVE 1: NO PROJECT/NO BUILD

The following provides a description of Alternative 1 and its anticipated environmental impacts. The emphasis of the analysis is based on comparing the anticipated environmental impacts of this alternative to the environmental impacts associated with the Project. The discussion includes a determination of whether or not the Alternative 1 would substantially lessen, eliminate, or create new significant environmental impacts and would or would not meet most of the basic objectives of the Project. 8.3.1 Alternative 1 Characteristic.

We submit that under this Alternative, that all elements, Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise and Vibration, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems and Wildfire, would have no impact.

E-25-45-B

The No Project/No Build alternative would result in the continuation of existing conditions on the Project Sites and would not result in significant and unavoidable environmental impacts that would result negatively in underlying physical impacts that are adverse and harmful.

**Appendix J-2 TA Report _6-2023 (Traffic Study)**

Appendix J-2 (page 25) states:

"2 METHODOLOGIES"

"This section of the report presents the methodologies used to perform the traffic analyses summarized in this report. The methodologies described are generally consistent with the City of Banning traffic study guidelines."

E-25-46

"2.1 LEVEL OF SERVICE. Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow."

Appendix J-2 (page 29) Sec. 2.5.1 states:

"2.5.1 CITY OF BANNING"

"The City's 2013 Circulation Element Amendment (Policy 6) indicates the City shall maintain peak hour Level of Service D or better on all local roadways and intersections. The intersections will be analyzed based Highway Capacity Manual (6th Edition) methodology."

Appendix J-2 (page 48) states:

**3.7 EXISTING (2021) INTERSECTION OPERATIONS ANALYSIS**

E-25-46
Cont

"Existing peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2.2 Intersection Capacity Analysis of this report. The intersection operations analysis results are summarized in Table 3-1, which indicates that the study area intersections are currently operating at an acceptable LOS during the peak hours with the exception of the Highland Springs Avenue interchange at the I-10 Freeway."

"It should be noted, based on field observations, the intersections of I-10 Westbound Ramps & Highland Springs Avenue (#3) and I-10 Eastbound Ramps & Highland Springs Avenue (#4) experienced queuing issues along Highland Springs Avenue during the peak hours. The northbound and southbound left turns onto the I-10 Freeway experienced heavy queues on Highland Springs Avenue only (not on the off-ramps). However, the entire length of the northbound and southbound left turn queues cleared each cycle. As such, the intersection operations analysis results shown in Table 3-1 reflect the field conditions at the time the 2019 traffic counts were collected the I-10 Freeway/Highland Springs Avenue interchange ramp-to arterial

intersections and based on recent field observations, many of the queuing issues still exist in 2021."

### 1.5 DEFICIENCIES:

Appendix J-2 (page 10) states:

"This section provides a summary of deficiencies by analysis scenario. Section 2 Methodologies provides information on the methodologies used in the analysis and Section 5 E+P Traffic Conditions, Section 6 Opening Year Cumulative (2027) Traffic Conditions, and Section 7 Horizon Year (2045) Traffic Conditions includes the detailed analysis. A summary of LOS results for all analysis scenarios is presented on Table 1-2."

"TABLE 1-2: SUMMARY OF DEFICIENT INTERSECTIONS BY ANALYSIS SCENARIO"

As disclosed (page 11) in the Traffic Study Appendix J-2, Table 1-2, where it is found that Highland Springs Ave. and the I-10 West bound and East bound ramp Interchanges are already at an Existing year 2021, LOS for both AM and PM are currently at an **Unacceptable LOS F.**

Appendix J-2 (page 12) Section 1.5.2 states:

E-25-46
Cont

"**OPENING YEAR CUMULATIVE (2027) CONDITIONS**"

"Intersections"

Appendix Section 1.5.2 (page 12) states:

"The study area intersections are anticipated to operate at an acceptable LOS during the Opening Year Cumulative (2027) Without Project peak hours, consistent with Existing (2021) traffic conditions."

"With the addition of Project traffic, the following study area intersections are anticipated to operate at an unacceptable LOS during the peak hours under Opening Year Cumulative (2027) With Project traffic conditions."

- "Highland Home Rd. & Ramsey St. (#7) – LOS E PM peak hour only"
- "Sunset Av. & I-10 WB Ramps (#29) – LOS E PM peak hour only"
- "Sunset Av. & I-10 EB Ramps(#30) – LOS F AM and PM peak hours"

• "Sunset Av. & Lincoln St. (#32) – LOS F PM peak hour only"

• "Sunset Av. & Westward Av. (#33) – LOS F PM peak hour traffic conditions:"

Sec. 1.5.2 clearly indicates that Levels of Service (LOS) at Highland Home Rd. & Ramsey St. (#7) and Sunset Ave. & I-10 WB Ramps (#29) are at a LOS of E, resulting in Operations with high delay values, poor progression, long cycle lengths, high V/C ratios of which are considered to be the limits of acceptable delay.

Additionally, Sunset Ave. & I-10 EB Ramps (#30), Sunset Ave. & Lincoln St. (#32) and Sunset Ave. & Westward Ave. (#33) would perform at an LOS F, with unacceptable delays, poor progression, or very long cycle lengths. E-25-46 Cont

Lastly, Appendix J-2, Table 3-1 (page 49) indicates the Intersection Analysis for the Existing (2021) Conditions and Level Of Service (LOS) at Peak Hour Queuing in the AM and PM, for Highland Springs Ave. & both I-10 WB and EB Ramps are currently an F rated LOS, without Cumulative and Project Impacts.

Therefore, we submit that the Development Project is in non-compliance with the City of Banning General Plan, Circulation Element Policy 6, stating that "The City's 2013 Circulation Element Amendment (Policy 6) indicates the City shall maintain peak hour Level of Service D or better on all local roadways and intersections", including those on Ramsey Street and at I-10 interchanges, where Level of Service D or better shall be maintained".

And as disclosed in the Traffic Study Appendix J-2, where it is found that I-10 Interchanges and other Sunset Ave. and Lincoln as well as Sunset Ave and Westward intersections, with the addition of Project traffic, are anticipated to operate at an **Unacceptable LOS during the peak hours under Opening Year Cumulative (2027) With Project traffic conditions.** E-25-47

In sum, the Development Project would result in **Significant and Unavoidable impacts** and would result negatively in underlying physical impacts that are adverse and harmful, especially to sensitive receptors and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding consideration under Section 15093 explaining why the Development Project benefits outweigh the unavoidable environmental impacts. E-25-47-A

**Appendices Project Alternatives**

**"Appendix L-1 Air Qualities Alternatives Memo" Subsequent Comments / Concerns:**

"Appendix L-1 Air Quality Alternatives Analysis Summary for Air Quality" states:

"PROJECT ALTERNATIVE SUMMARY" (page 1 & 2) states:

"The Project consists of four alternatives as described in this section"

"Alternative 1: No Project, No Build Alternative"

"Alternative 2: No Project, Existing General Plan/Zoning Alternative"

"Alternative 3: Reduced Commercial Alternative"

"Alternative 4: Reduced Industrial Alternative"

"LONG TERM OPERATIONAL EMISSIONS"

E-25-48

Long Term Operational Period Emissions, (pages 10 through 14) Tables A, B, C, D, E, F, G, H and I, for Year 2027 Buildout Regional Operational Emissions with Project Design features(PDFs), for the outlined Project Alternatives 2, 3, & 4, would not be consistent with the 2022 Air Quality Management Plan (AQMP). The Project would result in VOC, Nox, CO, Pm10, and Pm2.5 emissions that would exceed Southern California Air Quality Management District (SCAQMD) thresholds, even after Mitigation Measures AIR-2 and Mitigation Measures GHG-4 through GHG-6 are implemented."

The Project would conflict with or obstruct the implementation of the AQMP and other applicable portions of the State Implementation Plan (SIP). Therefore, the impacts would be **Significant and Unavoidable**.

In sum, the Development Project Alternative 2, 3 and 4, would result in a **Significant and Unavoidable impacts** and would result negatively in underlying physical impacts that are adverse and harmful, and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding consideration under Section 15093 explaining why the Development Project benefits outweigh the unavoidable environmental impacts.

**"Appendix L-2 GHG Alternatives Memo" Subsequent Comments / Concerns:**

App L-2 GHG Alternative Memo states:

"Appendix L-2 Alternatives Analysis Summery of Greenhouse Gas Emissions"

"Sec. 3.4" (page 11 and 12) "Long Term Operational Period Emissions" states:

"Table B shows the GHG emissions associated with the Proposed Project in order to provide a comparison to each of the alternatives."

"Note that the Unmitigated 2027 Scenario shown in Table B includes PDFs as described in Section 2.1 of this Technical Memorandum but does not include the mitigation measures. The Mitigated 2027 Scenario includes both the PDFs and Mitigation Measures described in Section 2.2 of this Technical Memorandum. Finally, the Mitigated 2040 Scenario includes the PDFs, Mitigation Measures, and expected additional reductions from State Regulations as described above." E-25-48-A

"In Alternative 1, no development occurs, and the result is no additional emissions."

"Tables C through Table E shows Alternative 2, Alternative 3, and Alternative 4 respectively. Note that identical to how the Proposed Project was modeled, the Unmitigated 2027 Scenario shown in each of the Tables includes PDFs as described in Section 2.1 of this Technical Memorandum but does not include the mitigation measures. The Mitigated 2027 Scenario includes both the PDFs and Mitigation Measures described in Section 2.2 of this Technical Memorandum. Finally, the Mitigated 2040 Scenario includes the PDFs, Mitigation Measures, and expected additional reductions from State Regulations as described above. The analysis was done in this format in order to more precisely compare the alternatives with the Proposed Project."

Tables B, C, D & E, Proposed Project Long-Term Greenhouse Gas Emissions at Buildout Year 2027 Build out Regional Operational Emissions with Project Design Features (PDFs), for the outlined Project Alternatives 2, 3, & 4, would not be consistent with the 2022 Air Quality Management Plan (AQMP). The Project would result in VOC, Nox, CO, $Pm_{10}$, and $Pm_{2.5}$ emissions that would exceed Southern E-25-48-B

California Air Quality Management District (SCAQMD) thresholds, even after Mitigation Measures AIR-2 and Mitigation Measures GHG-1 through GHG-6 are implemented. E-25-48-B Cont

Additionally, as outlined previously in Sec.4.8, even after mitigation measures are implemented, the DEIR, Appendix C-1 and Appendix L-1 & L-2, show air quality and greenhouse gas generated from operational omissions are significantly higher and do not comply with the Air Quality Element within the City's General Plan. The Project would not be consistent with SCAQMD Standards and conflicts with the Basin's 2022 AQMP. E-25-49

The Project would conflict with or obstruct the implementation of the AQMP and other applicable portions of State Implementation Plan (SIP). Therefore, the impacts would be **Significant and Unavoidable.** E-25-50

In sum, the Development Project would result in a **Significant and Unavoidable impacts** and would result negatively in underlying physical impacts that are adverse and harmful, and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding consideration under Section 15093 explaining why the Development Project benefits outweigh the unavoidable environmental impacts. E-25-51

**"Appendix L-3 Noise Alternatives Memo" Subsequent Comments / Concerns:**

App L-3 Noise Alternatives Memo (page 1) states:

**INTRODUCTION**

"This memorandum describes the three Alternatives identified for the Sunset Crossroads Project, summarizes the traffic noise analysis and results for each Alternative, and compares each Alternative to the Development Project." E-25-52

"ALTERNATIVES ANALYSIS"

"Alternative 2"

"Alternative 2 assumes that no annexation will take place."

REF: Opening Year (2027) and Horizon Year (2045) Traffic Noise Levels

REF: Table A in Attachment A (all tables are provided in Attachment A) list the traffic noise levels for Existing (2021) without and with Project conditions under Alternative 2.

REF: Table B, the opening year (2027) traffic noise conditions under Alternative 2

REF: Table C in Attachment A list the traffic noise levels for the Horizon Year (2045) without and with Project conditions under Alternative 2.

**Alternative 2**

Alternative 2 Appendix L-3 (page 3) states:

**"Opening Year (2027) Traffic Noise Levels"**

"Table B in Attachment A list the traffic noise levels for Opening Year (2027) without and with Project Conditions under Alternative 2. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. The specific assumptions used in developing these noise levels and the model printouts are provided in Attachment B."

E-25-52
Cont

"**Table B Alternative 2 - Opening Year (2027) Traffic Noise Levels Without and With Project**" indicates:

"Sunset between Lincoln Street and Westward Without and With Project Traffic Conditions," will result in traffic noise levels with Project, established at 61 dBA CNEL.

The Alternative 2 (No Annexation), Appendix L-3 (pages 3 & 4) states a different result:

"Sunset Avenue between the I-10 Westbound Ramps and Westward Avenue. Noise-sensitive land uses in this area include residences located along the east side of Sunset Avenue between Lincoln Street and Westward Avenue. Residences are located approximately 35 ft from Sunset Avenue centerline and would be exposed to traffic noise levels of 64.0 dBA CNEL without the existing 5

ft to 7.5 ft high private property walls. The existing 5 to 7.5 ft high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 59.0 and 56.0 dBA CNEL, respectively. Although project-related traffic would increase ambient noise levels by 3 dBA or more, the opening year (2027) with project traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL. Therefore, the Development Project under Alternative 2 would have a less than significant impact on off-site noise-sensitive land uses."

Additionally, as outlined previously in Sec. **4.13.6.1 Temporary or Permanent Noise Increase in Ambient Noise Levels in Excess of Established Standards.**

E-25-52 Cont

Table 4.13.T: Opening Year (2027) Traffic Noise Levels Without and With Project as previously outlined in Sec. 4.13.6.1 and Table 4.13.T, and Appendix I Table Z, with correlating noise levels, both state yet another inconsistent established base level dBA:

Sunset between Lincoln Street and Westward With Project Traffic Conditions, will result in a 71.4 dBA CNEL. Sunset Avenue between Lincoln Street and Westward Avenue. This is inconsistent with the narrative of 64.0 dBA CNEL, narrative (pages 3 and 4) of Appendix L-3.

Additionally, The Alternative 2 (No Annexation), Appendix L-3 (page 4) further states:

"**Horizon Year (2045) Traffic Noise Levels**"

"Table C in Attachment A list the traffic noise levels for the Horizon Year (2045) without and with Project conditions under Alternative 2. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. The specific assumptions used in developing these noise levels and the model printouts are provided in Attachment B. As shown in Table C, the horizon year (2045) traffic noise conditions under Alternative 2 would not result in a project-related traffic noise increase of 3 dBA or more where noise-sensitive land uses are present. Therefore, the Development Project under Alternative 2 would have a less than significant impact on off-site noise-sensitive land uses."

E-25-53

"The project-related traffic noise increase under Alternative 2 would be lower than the Development Project. Also, there are no traffic noise impacts on roadways within the project vicinity under

Alternative 2. Therefore, traffic noise generated under Alternative 2 would have a less than significant impact on off-site noise-sensitive land uses."

**E-25-53 Cont**

"Appendix L-3 Table C: Alternative 2 – Horizon Year (2045)"

Traffic Noise Levels Without and With Project, indicates: Sunset between Lincoln Street and Westward With Project Traffic Conditions, will result in Traffic Noise Levels With Project being established at 63 dBA.

Table 4.13.U: Horizon Year (2045) Traffic Noise Levels Without and With Project as previously outlined in Sec. 4.13.6.1 states yet another inconsistent result:

Sunset between Lincoln Street and Westward With Project Traffic Conditions, will result in a 71.6 dBA CNEL, at Sunset Avenue between Lincoln Street and Westward Avenue.

E-25-53 Cont

There appears to be significant difference and / or error(s) in correlation between Alternative 2 (No Annexation), Appendix L-3 (pages 3 & 4) narrative, Table B Alternative 2 - Opening Year (2027) Traffic Noise Levels Without and With Project; and as previously outlined in Sec. 4.13.6.1 and Table 4.13.T, and Appendix I Table Z.

(Repeated for reference from page 17 of this response letter)

REF: The DEIR (page 4.13-39) and Appendix I (page 45) further states:

"Opening Year (2027) Traffic Noise Levels. As shown in Table 4.13.T" and "As shown in Table Z" (respectively) the Opening Year (2027)."

E-25-54

Further significant difference and/or error(s) exist in correlation between Table C, Alternative 2 – Horizon Year (2045) Traffic Noise Levels Without and With Project narrative (page 4) of Appendix L-3, Table C: Alternative 2 – Horizon Year (2045) of Appendix L-3, Table 4.13.U of Sec. 4.13.6.1 of the DEIR and Appendix I, Table Z.

(Repeated for reference from page 18 of this response letter).

REF: The DEIR (page 4.13-40) and Appendix I (page 48) states:

"Horizon Year (2045) Traffic Noise Levels." As shown in Table 4.13.U, and as shown in Table AA (respectively), "Horizon Year (2045)"

E-25-55

The DEIR & Appendix L-3, must clarify and reconcile actual Projected dBA Noise levels outlined in the previously referenced Sec. 4.13.6.1 and Traffic Noise Levels Table B Alternative 2 - Opening Year (2027) and Table 4.13.T, conflicting language of Appendix L-3 (pages 3 & 4), as well as Sec. 4.13.6.1.

And Traffic Noise Levels Table C Alternative 2 - Horizon Year (2045) and Table 4.13.U, conflicting language of Appendix L-3 (page 4), and Appendix I (page 48) narrative as well as Table AA, prior to the lead agencies acceptance, to justify a less than significant impact for Alternative 2.

E-25-56

**Therefore, the DEIR, Appendix I and Appendix L-3 must be reconciled, amended, revised / updated, bringing clarification and justification of traffic noise impacts of the Alternative 2, less than significant impact.**

Appendix L-3 Noise Alternatives Memo additionally states:

REF: Sunset Crossroads - Alternatives Analysis for Traffic Noise

REF: Opening Year (2027) and Horizon Year (2045) Traffic Noise Levels

**Alternative 3**

"Alternative 3 assumes that the annexation of the Southern Portion of the Development Site proceeds and that the Development Project proceeds with the following changes: Commercial uses are removed from the Development Project with the exception of the hotel (approximately 90,000 square feet and 125 rooms) and travel center (7,500 square feet), resulting in removal of 260,900 square feet of commercial development. The area identified currently for those commercial uses would be replaced with 260,900 square feet of 'warehousing' uses (ITE LU 150). Other industrial uses will remain the same throughout the Development Site (same location, size, use, and ITE rates.) As with the Development Project, there is the potential under this alternative to use an industrial portion of the Development Site for energy storage (such as battery storage.) Because the Development Project would result in a net loss in allowable residential capacity, the MSJC Entitlements are required under this alternative. As separate and ongoing City projects, the SLB Extension would be extended through the Development Site, and the potable water reservoir, reverse osmosis facility, and electrical substation, and Sunset Avenue Bridge over Pershing Creek would be expected to proceed."

E-25-57

**"Opening Year (2027) Traffic Noise Levels"**

"Table E in Attachment A list the traffic noise levels for the Opening Year (2027) without and with Project conditions under Alternative 3. These noise levels represent the worst-case scenario,

which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. The specific assumptions used in developing these noise levels and the model printouts are provided in Attachment B. As shown in Table E, the Opening Year (2027) traffic noise conditions under Alternative 3 would result in a project-related traffic noise increase of up to 3.0 dBA along Highland Home Road where noise-sensitive land uses are present, 16.9 dBA along Sunset Avenue where noise-sensitive land uses are present, and 9.4 dBA along Sun Lakes Boulevard where noise-sensitive land uses are present. The following is a detailed discussion of the specific roadway segments where potential impacts may occur at noise-sensitive land uses:"

"Table E Alternative 3 - Opening Year (2027) Traffic Noise Levels Without and With Project" states:

"Sunset between Lincoln Street and Westward Without and With Project Traffic Conditions," will result in Traffic Noise Levels With Project, establish a 71.3 dBA CNEL.

The Alternative 3 Appendix L-3 (page 7) states a different result, due to the analysis reporting with traffic conditions along Sunset from the I-10 intersection at Sunset southerly to Bobcat Rd.:

E-25-57 Cont

"Sunset Avenue between the I-10 Westbound Ramps and Bobcat Road. Noise-sensitive land uses in this area include residences located along the east side of Sunset Avenue between Lincoln Street and Westward Avenue and the MSJC school located on the southeast corner of Sunset Avenue and Westward Avenue. Residences are located approximately 35 ft from Sunset Avenue centerline and would be exposed to traffic noise levels of 74.3 dBA CNEL without the existing 5 ft to 7.5 ft high private property walls. The existing 5 to 7.5 ft high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 69.3 and 66.3 dBA CNEL, respectively."

For the MSJC school, the school is located approximately 75 ft from Sunset Avenue centerline and would be exposed to a traffic noise level of 65.9 dBA CNEL. Therefore, traffic noise generated under Alternative 3 would have a significant impact on off-site noise-sensitive land uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Opening Year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL.

Therefore, the Development Project under Alternative 3 would have a significant impact on off-site residential uses because project- related traffic would increase ambient noise levels by 3 dBA or more and the Opening Year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL.

E-25-57 Cont

Alternative 3 Appendix L-3 (page 7) states:

"**Horizon Year (2045) Traffic Noise Levels**"

"Table F in Attachment A list the traffic noise levels for the Horizon Year (2045) without and with Project conditions under Alternative 3. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. The specific assumptions used in developing these noise levels and the model printouts are provided in Attachment B. As shown in Table F, the Horizon Year (2045) traffic noise conditions under Alternative 3 would result in a project-related traffic noise increase of up to 16.9 dBA along Sunset Avenue where noise- sensitive land uses are present and 9.4 dBA along Sun Lakes Boulevard where noise-sensitive land uses are present. The following is a detailed discussion of the specific roadway segments where potential impacts may occur at noise-sensitive land uses."

"Table F in Attachment A lists the traffic noise levels for the Horizon Year (2045) Without and With Project conditions under Alternative 3" states:

E-25-57-A

"Sunset between Lincoln Street and Westward Without and With Project Traffic Conditions," will result in Traffic Noise Levels With Project, establish a 71.5 dBA CNEL."

Alternative 3 Appendix L-3 (page 8) further states:

"Sunset Avenue between the I-10 Westbound Ramps and Bobcat Road. Noise-sensitive land uses in this area include residences located along the east side of Sunset Avenue between Lincoln Street and Westward Avenue and the MSJC school located on the southeast corner of Sunset Avenue and Westward Avenue. Residences are located approximately 35 ft from Sunset Avenue centerline and would be exposed to traffic noise levels of 74.5 dBA CNEL without the existing 5 ft to 7.5 ft high private property walls. The existing 5 to 7.5 ft high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 69.5 and 66.5 dBA CNEL, respectively. Therefore, the Development

Project under Alternative 3 would have a significant impact on off-site residential uses because project- related traffic would increase ambient noise levels by 3 dBA or more and the horizon year (2045) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL."

"For the MSJC school, the school is located approximately 75 ft from Sunset Avenue centerline and would be exposed to a traffic noise level of 66.1 dBA CNEL. Therefore, the Development Project under Alternative 3 would have a significant impact on off-site noise-sensitive land uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the horizon year (2045) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL"

E-25-57-A Cont

Therefore, the Development Project under Alternative 3 would have a significant impact on off-site residential uses because project- related traffic would increase ambient noise levels by 3 dBA or more and the Horizon Year (2045) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL.

In sum, the Development Project Alternative 3, would result in a **Significant and Unavoidable impacts** and would result negatively in underlying physical impacts that are adverse and harmful, and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding consideration under Section 15093 explaining why the Development Project benefits outweigh the unavoidable environmental impacts.

E-25-57-B

App L-3 Noise Alternatives Memo additionally states:

REF: Sunset Crossroads - Alternatives Analysis for Traffic Noise

REF: Existing (2021) Opening Year (2027) and Horizon Year (2045) Traffic Noise Levels

**Alternative 4**

The Alternative 4 Appendix L-3 (page 9) states:

E-25-58

"Alternative 4 assumes that the annexation of the Southern Portion of the Development Site proceeds and that the Development Project proceeds with the following changes: this alternative eliminates Building 9 (274,000 square feet of warehousing uses) and foregoes the extension of Lincoln Street over the Smith Creek drainage. Additionally, this alternative removes 105,500 square feet of

warehousing use and 42,500 square feet of general light industrial use from Buildings 5 and 6, respectively. Building 5 will include 330,000 square feet of high-cube cold storage uses. Overall, this alternative includes a reduction of 422,000 square feet of industrial uses, (approximately 7.6 percent). This alternative does not require the extension of Lincoln Street beyond Planning Area 6, results in one less drainage crossing at Lincoln Street, and eliminates fire access to Highland Home Road at the Northern Portion of the Development Site as well as eliminating the buildout of Highland Home Road north of Sun Lakes Boulevard. As with the Development Project, there is the potential under this alternative to use an industrial portion of the Development Site for energy storage (such as battery storage). Because the Development Project would result in a net loss in allowable residential capacity, this alternative would require the avoidance of that net loss and for that reason includes the MSJC Entitlements. As separate and ongoing City projects, the SLB Extension would be extended through the Development Site, and the potable water reservoir, reverse osmosis facility, electrical substation, and Sunset Avenue Bridge over Pershing Creek would be expected to proceed."

Alternative 4 Appendix L-3 (page 9 and 10) further states:

"**Existing (2021) Traffic Noise Levels**"

E-25-58 Cont

"Table G in Attachment A list the traffic noise levels for Existing (2021) without and with Project conditions under Alternative 4. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. The specific assumptions used in developing these noise levels and the model printouts are provided in Attachment B. As shown in Table G, the Existing (2021) traffic noise conditions under Alternative 4 would result in a project-related increase of up to 3.0 dBA along Highland Home Road where noise-sensitive land uses are present, 19.0 dBA along Sunset Avenue where noise-sensitive land uses are present, and 16.2 dBA along Sun Lakes Boulevard where noise-sensitive land uses are present. The following is a detailed discussion of the specific roadway segments where potential impacts may occur at noise- sensitive land uses:

"Sunset Avenue between I-10 Westbound Ramps and Bobcat Road. Noise-sensitive land uses in this area include residences and the MSJC school. Residences located east of Sunset Avenue between Lincoln Street and Westward Avenue are approximately 35 ft from Sunset Avenue centerline and would be exposed to traffic noise levels

of 73.7 dBA CNEL without the existing 5 ft to 7.5 ft high private property walls. The existing 5 to 7.5 ft high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 68.7 and 65.7 dBA CNEL, respectively. Therefore, the Development Project under Alternative 4 would have a significant impact on off-site residential uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the existing (2021) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL."

"For the MSJC school, the school is located approximately 75 ft from Sunset Avenue centerline and would be exposed to a traffic noise level of 65.3 dBA CNEL. Therefore, the Development Project under Alternative 4 would have a significant impact on off-site noise-sensitive land uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the existing (2021) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL."

Table G in Attachment A lists the traffic noise levels for the Existing Year (2021) without and with Project conditions under Alternative 4 states:

"Sunset between Lincoln Street and Westward Without and With Project Traffic Conditions," will result in Traffic Noise Levels With Project establish a 71.5 dBA CNEL."

E-25-58 Cont

Alternative 4 Appendix L-3 (page 10 and 11) states:

"Opening Year (2027) Traffic Noise Levels"

"Table H in Attachment A list the traffic noise levels for the Opening Year (2027) without and with Project conditions under Alternative 4. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. The specific assumptions used in developing these noise levels and the model printouts are provided in Attachment B. As shown in Table H, the Opening Year (2027) traffic noise conditions under Alternative 4 would result in a project-related increase of up to 3.0 dBA along Highland Home Road where noise-sensitive land uses are present, 16.2 dBA along Sunset Avenue where noise-sensitive land uses are present and Bobcat Road, and 8.8 dBA along Sun Lakes Boulevard where noise-sensitive land uses are present. The following is a detailed discussion

of the specific roadway segments where potential impacts may occur at noise-sensitive land uses:"

Alternative 4 Appendix L-3 (page 11) further states:

"Sunset Avenue between I-10 Westbound Ramps and Bobcat Road. Noise-sensitive land uses in this area include residences and MSJC school. Residences located east of Sunset Avenue between Lincoln Street and Westward Avenue are approximately 35 ft from Sunset Avenue centerline and would be exposed to traffic noise levels of 73.7 dBA CNEL without the existing 5 ft to 7.5 ft high private property walls. The existing 5 to 7.5 ft high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 68.7 and 65.7 dBA CNEL, respectively. Therefore, the Development Project under Alternative 4 would have a significant impact on off-site residential uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the opening year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL."

E-25-58 Cont

"For the MSJC school, the school is located approximately 75 ft from Sunset Avenue centerline and would be exposed to a traffic noise level of 65.3 dBA CNEL. Therefore, the Development Project under Alternative 4 would have a significant impact on off-site noise-sensitive land uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the opening year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL."

Table H in Attachment A lists the traffic noise levels for the Opening Year (2027) With Project conditions under Alternative 4 states:

"Sunset between Lincoln Street and Westward Without and With Project Traffic Conditions," will result in Traffic Noise Levels With Project, establish a 70.7 dBA CNEL.

We submit that Alternative 4 Appendix L-3 Existing (2021) (page 10) narrative and Opening Year (2027) (page 11) narrative are the exact same dBA levels.

Furthermore, the traffic noise levels (referenced above) for the Sunset between Lincoln Street and Westward Without and With Project Traffic Conditions, of Table G Existing (2021) at 71.5 dBA CNEL and Table H Opening Year (2027) at 70.7 dBA CNEL levels, do not correlate with The Alternative 4 Appendix L-3 narratives.

E-25-59

Therefore, the Alternative 4 Appendix L-3 appears blatantly incorrect, calling into question the Table H levels and resultant (page 11) Opening Year (2027) With Project dBA CNEL narrative language, regarding Alternative 4 results.

This would also cause concern with the results outlined in the Horizon Year (2045) narrative (page 12) and Table I in Attachment A list the traffic noise levels for the Horizon Year (2045) without and with Project conditions under Alternative 4.

E-25-59 Cont

Appendix L-3, must clarify the methodology of actual Projected dBA Noise levels used, resulting in exactly the same traffic noise levels as the previously referenced Existing (2021) Traffic Noise Levels (page 10) as established in Table G in Attachment A and the same results found in Traffic Noise Levels (page 11) as established in Table H in Attachment A, traffic noise levels for the Opening Year (2027), as well as Year 2045 With Project conditions under Alternative 4, results, prior to the lead agencies acceptance.

E-25-60

**Therefore, Appendix L-3 must be reconciled, amended, revised / updated, causing clarification of traffic noise impacts of the Alternative 4 findings and conclusions.**

We find the Alternative 3 (Non-Commercial) and Alternative 4 (Reduced Industrial) Project would result in significant noise impacts to Sunset Ave. adjacent residential and MSJC sensitive receptors at the Opening Year (2027) and Horizon Year (2045) with project traffic noise levels that would exceed the City's noise standard of 65 dBA CNEL.

In sum and irrespective of, the Alternatives 2, 3 & 4 results, we find the Development Project would result in **Significant and Unavoidable Impacts** and would result negatively in underlying physical impacts that are adverse and harmful, and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding consideration under Section 15093 explaining why the Development Project benefits outweigh the unavoidable environmental impacts.

E-25-61

**"Appendix L-4 VMT Alternatives Memo" Subsequent Comments and Concerns:**

App L-4 VMT Alternatives Memo (Non-Commercial Alternative 3) as previously outlined in 4.17.6.3 VMT Impacts, Table 4.17.C: Non-Retail VMT per Employee and as referenced in Appendix J:

- "Project design features that would contribute to an 8.4% reduction in VMT were considered."

- "Project generated VMT per employee was found to exceed adopted VMT impact thresholds even with an 8.4% reduction to VMT related to Project design features. The Project's VMT impact is considered significant and unavoidable."

"Level of Significance After Mitigation: Significant and Unavoidable Impact."

E-25-62

In sum, the (Non-Commercial Alternative 3) Development Project would result in a **Significant and Unavoidable impacts** and would result negatively in underlying physical impacts that are adverse and harmful, and the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and, by making a statement of overriding consideration under Section 15093 explaining why the Development Project benefits outweigh the unavoidable environmental impacts.

## CONCLUSION

Thank you for your attention to the foregoing comments and concerns. We expect all cumulative direct and indirect impacts to be fully addressed in the EIR, including, but not limited to, the comments in this letter and all other submissions by interested parties. We look forward to working with the City to assure that the EIR conforms to the requirements of CEQA to assure that all significant impacts to the environment are fully analyzed, mitigated or avoided.

We wish to be placed on the mailing list for all future notices and documents regarding this project. Please mail all notices to the undersigned:

Respectfully submitted,

Randy Robbins
5972 Indian Canyon Drive
Banning, CA 92220

Jim Corrigan
579 La Costa Drive
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Diane Berley
753 Torrey Pines Road
Banning, CA 92220

## Response to Letter E-25

Randy Robbins, Jim Corrigan, and Diane Berley
Concerned Citizens
January 29, 2024

**Response to Comment E-25-1**

> ***Note: The commenter excerpts significant portions of Draft EIR text throughout this comment letter. Rather than summarize the Draft EIR text provided, the response below will cite the referenced Draft EIR section followed by a summary of the specific issue raised by the commenter.***

The commenter provides introductory remarks stating concern about the Development Project. The commenter states the opinion that the Draft EIR is incomplete and does not adequately address mitigation measures for the Project's potential project level and cumulative environmental impacts, because it does not comply with the City's General Plan Air Quality, Noise, Land Use, and Transportation elements; the South Coast Air Quality Management District (SCAQMD) 'Standards in Pollutant Thresholds'; and conflicts with the 2022 Air Quality Management Plan. The commenter states that because of the perceived deficiencies, the Development Project would negatively affect the character of the surrounding neighborhoods and would result in significant impacts. The commenter requests their comments and concerns regarding the Draft EIR be addressed and mitigated in accordance with federal, State, and local environmental laws. The commenter's summary statement is noted. The specific issues raised by the commenter are addressed in the Response E-25-2 through E-25-62 which follow. No further response is required.

**Response to Comment E-25-2**

The commenter states the City's actions on the Project comply with environmental requirements and are based on substantial evidence in the record. The commenter notes that Section 1.0 of the Draft EIR (Executive Summary) describes potential significant impacts that would result from implementation of the Project and mitigation that would avoid or lessen those impacts. The commenter then states that the City must make findings for each significant impact and, if necessary, prepare a statement of overriding considerations. The commenter correctly notes the City's obligations under CEQA where a project has significant impacts that cannot be mitigated to less than significant and the City decides to approve the project. The City will comply with its obligations under CEQA, specifically, under CEQA Guidelines Sections 15091 and 15093 if pursuant to any future action regarding the Draft EIR and the Project or the adoption of any alternative to the Project, it decides to certify the Final EIR and approve the Project or an alternative to the Project. No further response is required.

**Response to Comment E-25-3**

The commenter references Draft EIR Section 4.3.1.2 (page 4.7-7) regarding national and State ambient air quality standards and 4.3.1.3 (page 4.3-11) regarding sensitive receptors. The commenter states the Draft EIR, and the Air Quality Impact Analysis (Draft EIR, Appendix C-1) fail to mention the proximity of the Lakes Assisted Living and Memory Care and the Serrano del Vista Community, both of which must be identified as sensitive receptors. The commenter correctly identifies the location of

both sites approximately 0.5 miles west and directly east of Sunset Avenue, respectively, stating that both will be adversely impacts by the Development and that the Draft EIR must be revised to reflect this change.

The air quality and health risk assessment identified the nearest sensitive receptors to the Development Site according to established methodology and agency guidelines. See Draft EIR, Sections 4.3.1.3 and 4.3.3, and the responses to Comments A-3-42 and B-2-6 regarding modeling methodology. The Lakes Assisted Living and Memory Care facility (5801 Sun Lakes Boulevard) was not specifically mentioned in the Draft EIR. Buildings at this facility are located more than 100 feet from the centerline of Sun Lakes Boulevard and approximately 2,700 feet west of the Project Site boundary. This assisted living facility was not specifically identified in the Health Risk Assessment (included as Appendix C-2 to the Draft EIR) because it is not located immediately adjacent to the Development Project; based on its location and distance from the Development Site (approximately 0.5 miles west of the Development Site), it is well beyond the location of the closest sensitive receptors to the west as measured from the Development Site. Accordingly, no significant localized air quality impacts are anticipated to occur at this location, and no significant health risk impacts would occur at this facility. See Draft EIR, Section 4.3.6, Tables 4.3.O and 4.3.P.

While the Serrano del Vista residential community was not specifically named, the sensitive receptors (residential uses) located within the community were identified in the original and revised air quality analysis health risk assessment prepared for the project (see Final EIR, Appendices C-4 and C-5). The Sun Lakes Community is identified as a sensitive receptor in Section 4.3.1.3 (Air Quality). The Draft EIR and revised health risk assessment accurately identify the nearest sensitive receptors in the Project area and identify the less than significant health and localized air quality impacts that would result from construction and operation of the Development Project. In response to public comment, the emissions totals for the Development Project were updated based on the updated CalEEMod run for truck trip lengths and the updated calculations for TRU emissions (see Final EIR Appendices C-4 and C-5). The results of the updated emissions for the Development Project are summarized in revised Tables 4.3.M, 4.3.N, and 4.3.Q of the Final EIR (also see Tables 5 and 6 in Appendix C-5). CEQA requires that analyses be conducted based on location of receptors to the Project Site but does not require that specific communities be identified by name. No revision to the Draft EIR is required, and no further response is necessary.

**Response to Comment E-25-4**

The commenter references and excerpts page 4.3-29 and Appendix C-1 of the Draft EIR; and Section 4.3.5.4 (pages 4.3-31 and 4.3-32); Section 4.3.6.1 (pages 4.3-32 through -34); pages 4.3-36 and 4.3-38; and page 4.3-43 of the Draft EIR. Citing significance thresholds and levels of pollutants generated during the construction and operation of the proposed uses, the commenter states the Development Project would conflict with or obstruct the South Coast Air Bain (SCAB) Air Quality Management Plan (AQMP), and would exceed the established air quality standards, resulting in short-term construction and long-term operational emissions and would expose sensitive receptors to substantial pollution concentrations, even with the implementation of mitigation. The Draft EIR already identifies the significant short-term construction and long-term operation Basin air quality impacts associated with implementation of the Development Project. Regarding the exposure of sensitive receptors to substantial pollution concentrations, the Health Risk Assessment (HRA) (original and revised (Final

EIR, revised Table 4.3.Q and Final EIR, Appendix C-4) found no significant impact to sensitive receptors. Please refer to the response to Comment A-3-2. Regarding the commenter's statement that there is a significant impact related to AQMP consistency, please refer to Section 4.3.6.1 of Draft EIR which identifies the Development Project's inconsistency with the AQMP and the response to Comment D-3-13.. As the significant impacts identified by the commenter have been addressed in the Draft EIR in compliance with CEQA, no revision of the Draft EIR and no further response is required.

**Response to Comment E-25-5**

The commenter states the Development Project would result in significant and unavoidable impacts and in physical impacts that are adverse and harmful, especially to sensitive receptors, and that the City must respond to each significant effect by making findings and by making a statement of overriding considerations explaining why the Development Project benefits outweigh the significant and unavoidable environmental impacts identified in the Draft EIR. Please refer to the response to Comment E-25-2. As mandated under CEQA, the City will make appropriate findings for each significant and unavoidable impact if it approves the Project. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-6**

The commenter states that Figure 4.4-3 of the Draft EIR and Figure 5 in the Air Quality Impact Analysis (Draft EIR Appendix C-1) omits The Lakes Assisted Living facility. The methodology for assessing air quality impacts to sensitive receptors is based on, among other factors, distance from the Project Site, and there is no requirement to specifically identify names of residential communities. The air quality impacts assessment was performed in compliance with CEQA. Please refer to the responses to Comments E-25-3 and A-3-2. Accordingly, the suggested additions to the Draft EIR figures are not needed to demonstrate level of impact and no further response is required.

**Response to Comment E-25-7**

The commenter references and excerpts pages 4.8-12, -17 and -18, -30, of the Draft EIR and Appendix C-1 of the Draft EIR (pages 25-26, 59-61), regarding air quality and greenhouse gas (GHG) regulations and significance thresholds and identifies that mitigated greenhouse gas emissions and air quality emissions that exceed significance thresholds, and the cumulative significant and unavoidable air quality and GHG of the of the Project. The commenter states the impact on sensitive receptors would be significant, adverse, and harmful. These comments are noted. While the Draft EIR includes Mitigation Measures GHG-1 through GHG-7 and Mitigation Measures AIR-1 and AIR-2 to reduce the emission of GHGs and pollutants generated during implementation of the Project, the air quality and GHG impact of the Project remain significant and unavoidable.

Please refer to the response to Comment A-3-2 regarding health impacts at sensitive receptors; the responses to Comments A-3-25, A-3-26, and A-3-49 regarding additional mitigation to further reduce impacts from diesel emissions; responses to Comments D-6-4 and D-6-10 regarding features to facilitate use of electric trucks and equipment, CARB's Advanced Clean Fleets Rule, and SCAQMD's WAIRE program to reduce air pollutant and GHG emissions; and the responses to Comments D-3-56 through D-3-94 which discuss suggested feasible measures to further reduce emissions of GHGs and

pollutants. The Draft EIR has identified mitigation and project design features (PDFs) which reduce to the extent feasible the emission of GHGs and air pollutants. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment E-25-8**

The commenter references and excerpts pages 4.8-33, -36, and Table 4.8.L of the Draft EIR regarding Project Consistency with the City's General Plan Air Quality Element, and states the opinion that the Draft EIR does not adequately mitigate the Project's GHG emissions, resulting in significant impacts to local and regional air quality, the individual and cumulative impacts, and is inconsistent with the City's General Plan Air Quality Element and the 2022 AQMP.

Please refer to the responses to Comments D-3-19 regarding consistency with the 2022 AQMP; D-26-24 regarding consistency with the City's General Plan Air Quality Element, specifically Policy 4; and E-25-7 regarding GHG and air quality mitigation. In compliance with CEQA, the Draft EIR contains feasible mitigation measures for the significant impacts referenced by the commenter and analysis of Project consistency with applicable planning documents. No further response is necessary.

**Response to Comment E-25-9**

The commenter states the Project impacts remain significantly higher and do not comply with the City's General Plan even after mitigation is implemented, contributing to adverse cumulative air quality impacts on sensitive receptors which will result in underlying physical impacts that are adverse and harmful. Please refer to the response to Comment D-26-24 regarding compliance with the City's General Plan; A-3-2 regarding health impacts at sensitive receptors; and E-25-7 regarding mitigation, significant, and less than significant air quality and health impacts respectively. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment E-25-10**

The commenter references and excerpts pages 4.8-36 of the Draft EIR stating the Project will have significant individual and cumulative environmental impacts that are adverse and harmful and that the City must make findings and prepare a statement of overriding considerations to explain why the benefits of the Development Project outweigh the significant and unavoidable environmental impacts. Please refer to response to Comment E-25-2. No further response is required.

**Response to Comment E-25-11**

The commenter references and excerpts pages 4.11.2 and -3 of the Draft EIR regarding the existing pattern of land use adjacent to the project site and states the Draft EIR fails to disclose or describe the Serrano del Vista community located east of Project site, which the commenter identifies as sensitive receptors. Please refer to the responses to Comments A-3-2 and E-25-3 regarding the identification of sensitive receptors. The residential nature of land uses east of Sunset Avenue is disclosed in Sections 3.4.13 (page 3-21), 4.1.3 (page 4.3-7), and 4.11.3 of the Draft EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, no revision of the Draft EIR is required, and no further response is necessary.

**Response to Comment E-25-12**

The commenter objects to the proposed annexation of the southern portion of the Development Site, which it suggests will result in impacts to and loss of existing large lot residential uses and agricultural operations located south of Bobcat Road. This comment will be provided to the City staff and elected officials for consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment E-25-13**

The commenter states the opinion that the Development Project will negatively impact the character of the surrounding residential neighborhoods and in some cases would have a land use and planning inconsistency that results in underlying physical impacts that are significant, adverse and harmful. This comment does not accurately reflect the General Plan policies regarding considering a project's potential impacts on the character of surrounding neighborhoods. See the response to Comment D-6-20. Nevertheless, this comment will be provided to the City staff and elected officials for consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-14**

The commenter references and excerpts pages 4.11.11 and 4.11-28 of the Draft EIR, regarding General Plan Land Use consistency and maintenance of the City's Level of Service (LOS) standard. The commenter states the Project is clearly not consistent with General Plan Circulation Policy 6 related to the maintenance of sufficient LOS standards at studied intersections. Please refer to the responses to Comments D-3-15, D-3-16, and D-3-17. As indicated in those responses, CEQA does not require an analysis of level of service (LOS) impacts at the project or cumulative level. CEQA only requires an EIR to address whether the Project would conflict with the General Plan in such a way that it would result in an environmental effect. Section 4.11 of the Final EIR has been updated to be consistent with revisions noted in response to Comment D-3-15, and to be consistent with the current Circulation Element of the General Plan, Policy 6.

**Response to Comment E-25-15**

The commenter references the Traffic Analysis (Draft EIR, Appendix J-2) which identified LOS F conditions where the addition of project traffic contributed to LOS F conditions at the I-10/Sunset Interchanges and at Sunset Avenue and Lincoln Street and Sunset Avenue and Westward Boulevard intersections in the Opening Year (2027). Please refer to the responses to Comments E-25-14, D-3-15, D-3-16, and D-3-17 which detail that a project's effect on automobile delay (LOS) does not constitute a significant environmental impact under CEQA. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-16**

The commenter states that the Project is inconsistent with General Plan Air Quality Element policies 1 through 4, that the Draft EIR is incomplete and does not adequately mitigate individual and cumulative impacts (as cited in their previous comments) and is inconsistent with SCAQMD standards and the AQMP.

Regarding Project compliance with General Plan Air Quality Element Policies 3 and 4, see the responses to Comments D-6-23 and D-6-24. Regarding Project compliance with Policy 1 (regulating local pollutant emitters and cooperating with SCAG and SCAQMD to assure compliance with air quality standards) and Policy 2 (cooperate with local, regional and federal agencies to monitor, manage and reduce the levels of major pollutants affecting the City and region, concerning diesel and mobile source emissions), the Project complies with all applicable air quality regulations during construction and operation and would mitigate impacts to the extent feasible. The commenters' concerns have been previously addressed in the responses to Comments E-25-4 regarding AQMP compliance; D-3-19 regarding AQMP compliance and compliance with SCAG's 2020-2045 RTP/SCS which reduces VMT and mobile source pollutants; A-3-25, A-3-26, D-6-4, and D-6-10 which discuss electrification features provided by the Project, CARB's Advanced Clean Fleets Rule, and SCAQMD's WAIRE program to reduce air pollutant and GHG emissions; and responses to Comments D-3-56 through D-3-94 which discuss suggested feasible measures to further reduce emissions of GHGs and pollutants. No further response is required.

**Response to Comment E-25-17**

The commenter states generally that the Development Project is inconsistent with the City's General Plan Noise Element Policies 1, 2, and 3 and that the Draft EIR is incomplete and does not adequately mitigate individual and cumulative impacts. With respect to modifications to the Development Project that reduce noise impacts and consistency of the Development Project with Noise Element Policy 1, please refer to the response to Comment D-6-29. The revisions to the Development Project identified in that response eliminate significant traffic and on-site stationary noise impacts and will reduce noise levels to a less than significant level. With respect to consistency with Noise Element Policy 2, please refer to response to Comment D-6-30. Noise Element Policy 3 states: "Private sector project proposals shall include measures that assure that noise exposures levels comply with State of California noise insulation standards as defined in Title 25 (California Noise Insulation Standards) and/or Banning Ordinances 1138 and 1234, whichever is more restrictive." As indicated in Draft EIR Table 4.11.A, the Project would comply with all applicable noise regulations, through design or mitigation, to minimize potential noise impacts to adjacent communities and therefore would be consistent with this policy. Accordingly, the Development Project is consistent with the City's Noise Element.

**Response to Comment E-25-18**

The commenter references and excerpts page 4.13-2 of the Draft EIR and the Air Quality Impact Analysis (Draft EIR, Appendix C-1, page 8) regarding adjacent land uses and the location of sensitive receptors. The commenter states The Lakes Assisted Living facility and the Serrano del Vista community will be adversely impact by the Development Project and that the Draft EIR must be amended to specifically refer to those developments in the land use descriptions. Please refer to the responses to Comments A-3-2 and E-25-3 regarding the identification of sensitive receptors and analysis of impacts on such uses in compliance with CEQA. The noise analysis in Section 4.13 of the Draft EIR accurately identifies the nearest sensitive receptors in the Project area and identify the impacts that would result from construction and operation of the Development Project. No revision to the Draft EIR is required, and no further response is necessary.

**Response to Comment E-25-19**

The commenter references and excerpts pages 4.13-12 and -13 of the Draft EIR regarding acceptable maximum noise levels, ambient noise measurements and cites General Plan Noise Element Policy 1. The commenter further states the Project does not comply with the City's General Plan Noise Element, would negatively affect the character of the surrounding residential neighborhoods, and result in underly physical impacts that are significant, adverse, and harmful. With respect to modifications to the Development Project that reduce noise impacts and consistency of the Development Project with Noise Element Policy 1, please refer to the response to Comment D-6-29. The revisions to the Development Project identified in that response eliminate significant traffic and on-site stationary noise impacts and will reduce noise levels to a less than significant level. No further response is necessary.

**Response to Comment E-25-20**

The commenter states the Project would result in significant and unavoidable impacts that are adverse and harmful, and that the City must respond to each significant effect by making findings and by making a statement of overriding considerations explaining why the Development Project benefits outweigh the significant and unavoidable environmental impacts identified in the Draft EIR. To the extent this comment refers to the noise analysis, please refer to the response to Comment D-6-29 regarding changes in the Project which eliminate the significant and unavoidable operational noise impacts identified in the Draft EIR. As disclosed in the Draft EIR, the Project has a significant unavoidable construction noise impact after implementation of identified noise mitigation measures. The commenter notes that the City must make findings for each significant impact and, if necessary, prepare a statement of overriding considerations. See the response to Comment E-25-2. No further response is required.

**Response to Comment E-25-21**

The commenter references and excerpts pages 4.13-21 and -39 of the Draft EIR and pages 31, 32 and 45 of the Noise and Vibration Impact Assessment (Draft EIR, Appendix I-1) regarding traffic noise levels and traffic noise impacts, including the language in the Draft EIR that states that the Development Project would have a significant impact on off-site residential uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Opening Year traffic noise levels would exceed the City's noise standard of 65 dBA CNEL. This accurately restates the language of the Draft EIR. However, as noted in response to Comment D-6-29, with the Project modifications identified there, the level of noise at the identified residential sensitive receptors would not exceed the threshold of 65 dBA CNEL established in the Draft EIR. The Final EIR has been modified accordingly. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-22**

The commenter references and excerpts page 4.13-39 of the Draft EIR and page 45 of the Noise and Vibration Impact Assessment (Draft EIR, Appendix I-1) regarding noise levels and impacts at the MSJC campus uses located east of Sunset Avenue, including the language in the Draft EIR that states that the Development Project would have a significant impact on off-site noise-sensitive land uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Opening Year

traffic noise levels would exceed the City's noise standard of 65 dBA CNEL. This accurately restates the language of the Draft EIR. However, as noted in response to Comment D-6-29, with the Project modifications identified there, the level of noise at the identified school site would not exceed the threshold of 65 dBA CNEL established in the Draft EIR (see Final EIR, Appendix I-2, Table A). The Final EIR has been modified accordingly. Please refer to Chapter 4.0 of the Final EIR, which identifies this revision on page 4.13-39 of the Draft EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comments E-25-23 and E-25-24**

The commenter references and excerpts page 4.13-40 of the Draft EIR and page 48 of the Noise and Vibration Impact Assessment (Draft EIR, Appendix I-1) regarding noise levels and impacts at residential and MSJC campus uses located east of Sunset Avenue including the language in the Draft EIR that states that the Development Project would have a significant impact on off-site noise-sensitive land uses because project-related traffic would increase ambient noise levels by 3 dBA or more and the Horizon Year traffic noise levels would exceed the City's noise standard of 65 dBA CNEL. This accurately restates the language of the Draft EIR. However, as noted in response to Comment D-6-29, with the Project modifications identified there, the level of noise at the identified school site would not exceed the threshold of 65 dBA CNEL established in the Draft EIR. The Final EIR has been modified accordingly. These comments do not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-25**

The commenter states that the Draft EIR and Noise and Vibration Impact Assessment (Draft EIR, Appendix I-2), fail to disclose the absence of private property walls on the north side of Sun Lakes Boulevard and that the Draft EIR and Appendix I-1 must be revised. Table 4.13.U in the Draft EIR and Table AA in the Noise and Vibration Impact Analysis Report (Draft EIR, Appendix I-1) shows that the 65 dBA CNEL noise contour extends up to 58 feet from the Sun Lakes Boulevard centerline for the segment west of Highland Home Road. All noise-sensitive land uses north of Sun Lakes Boulevard west of Highland Home Road are located well beyond 58 feet from the Sun Lakes Boulevard centerline and would not be exposed to traffic noise levels exceeding the 65 dBA CNEL threshold even without shielding (no existing private property walls). Therefore, residences north of Sun Lakes Boulevard west of Highland Home Road including The Lakes Assisted Living and Memory Care facility were not disclosed or mentioned in the analysis discussion because they would not be subject to a potential traffic noise impact. The traffic noise analysis discussion only focuses on noise-sensitive land uses where there would be a potential traffic noise impact, which are residences located approximately 50 feet from Sun Lakes Boulevard centerline. All other noise-sensitive land uses are located farther from Sun Lakes Boulevard and would not be subject to a potential traffic noise impact. As explained above, although the absence of private property walls on the north side of Sun Lakes Boulevard west of Highland Home Road was not specifically identified in the Draft EIR, this does not modify the conclusions of the Draft EIR. No further response is required.

**Response to Comment E-25-26**

The commenter references and excerpts pages 4.13-40 and -41 of the Draft EIR and pages 51, and 57-58 of the Noise and Vibration Impact Assessment (Draft EIR, Appendix I-1), which identify the

significant and unavoidable traffic-noise impacts detailed in the Draft EIR and supporting study and the infeasibility of mitigation measures. The commenter states the Project would result in significant and unavoidable impacts and in physical impacts that are adverse and harmful, and that the City must respond to each significant effect by making findings and by making a statement of overriding considerations explaining why the Development Project benefits outweigh the significant and unavoidable environmental impacts identified in the Draft EIR. Please refer to response to Comment E-25-2. No further response is required.

With respect to the specific noise analysis cited from the Draft EIR, please refer to the responses to Comments D-6-29 and E-25-19 and -20 which detail changes to the Project which eliminate the significant and unavoidable traffic-related noise impacts at residential and MSJC campus uses east of Sunset Avenue identified in the Draft EIR in the Opening Year and Horizon Year. In the absence of such impacts, neither mitigation nor the preparation of findings and a statement of overriding considerations for the identified operational noise impacts is required. No further response is necessary. The discussion on page 4.13-39 of the Draft EIR will be revised as follows:

- **Sunset Avenue between the I-10 Westbound Ramps and Bobcat Road.** Noise-sensitive land uses in this area include residences located along the east side of Sunset Avenue between Lincoln Street and Westward Avenue and the MSJC campus located on the southeast corner of Sunset Avenue and Westward Avenue. Residences would be~~are~~ located approximately ~~35~~ 72 ft from Sunset Avenue centerline, with the implementation of Project Design Feature (PDF) N-1, which would shift the Sunset Avenue centerline between Lincoln Street and Sun Lakes Boulevard/Westward Avenue by 42 feet to the west and would be exposed to traffic noise levels of ~~74~~69.7~~.3~~ dBA CNEL without the existing 5 ft to 7.5 ft high private property walls. The existing 5 to 7.5 ft high private property wall along Sunset Avenue would provide a noise reduction of 5 to 8 dBA, which would reduce traffic noise levels to 64.79~~.3~~ and 61.76~~.3~~ dBA CNEL, respectively Therefore, the Development Project would have a less than significant impact on off-site residential uses because the Opening Year (2027) with project traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL even though the project-related traffic would increase ambient noise levels by 3 dBA or more. ~~and the Opening Year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL~~.

  For the MSJC campus, with the implementation of PDF N-1, the school would be~~is~~ located approximately ~~75~~ 115 ft from Sunset Avenue centerline and would be exposed to a traffic noise level of 63.85~~.9~~ dBA CNEL. Therefore, the Development Project would have a less than significant impact on off-site noise-sensitive land uses because the Opening Year (2027) with project traffic noise levels would not exceed the City's noise standard of 65 dBA CNEL even though project-related traffic would increase ambient noise levels by 3 dBA or more ~~and the Opening Year (2027) with project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL~~

**Response to Comment E-25-27**

The commenter generally states the Development Project does not comply with the City's General Plan Noise Element and would negatively affect the character of the surrounding residential neighborhoods, result in underly physical impacts that are significant, adverse, and harmful without providing further details. Please refer to the responses to Comments E-25-17 and E-25-19 for a

discussion of the specific General Plan Noise Element policies identified in the comment. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-28**

The commenter references and excerpts pages 4.13-41 of the Draft EIR and page 51 of the Noise and Vibration Impact Assessment (Draft EIR, Appendix I-1) and disagrees with the operational source noise narrative and assumptions. The Draft EIR correctly identifies the duration of maximum noise generated during truck delivery and loading/loading operations. During these activities, the maximum noise generated originates from discrete, brief, and instantaneous events (e.g., application of air brakes, slamming of overhead doors during opening/closing, dropping of forklift forks on metal dock plates or metal trailer floors). As these events do not occur during the entire 15-20 minute loading and unloading period; the total duration of individual events was correctly identified as five minutes of the longer loading/unloading operation. The commenter does not provide any substantiated reason for an alternative assumption; therefore, no revision of the methodology stated in Section 4.13 of the Draft EIR is necessary and no further response is required.

**Response to Comment E-25-29**

The commenter states that noise levels detailed in Table 4.13.F of the Draft EIR and Table F in Draft EIR, Appendix I-1 would occur in a continuous nighttime operation at 74.6 dBA which "far exceeds Conditionally Acceptable residential noise levels at a maximum 65 dBA CNEL." Although a continuous noise level of 74.6 dBA over 24 hours would result in a CNEL higher than 65 dBA, this does not represent the noise level at the residences south of Bobcat Road because the noise level is 50 ft from the source and does not factor in distance attenuation and shielding such as buildings, walls, and/or terrain. When factoring distance attenuation and shielding, noise levels at the residences south of Bobcat Road would be substantially lower. The daytime and nighttime operational noise levels would reach up to 47.2 and 45.6 dBA $L_{eq}$, respectively, at the closest receptor based on the implementation of PDF N-2, which consist of cold storage equipment previously allowed on industrial building rooftops will be shielded or relocated to the ground floor, construction of 10 ft high "wing walls" on the south end of warehouse buildings 1 and 2, and 6 ft high walls that surround the automobile parking lots south of warehouse buildings 1 and 2. A continuous noise level of 47.2 and 45.6 dBA $L_{eq}$ would be 53.9 and 52.3 dBA CNEL, respectively. Also, it should be noted that the City of Banning and Riverside County do not prohibit noise-sensitive land uses such as residential uses to exist in any noise zones, including the "Clearly Unacceptable" category even though they are discouraged or not recommended. The noise analysis in Section 4.13 of the Draft EIR has been modified in the Final EIR to reflect the changes described in response to Comment D-6-29 and accurately identifies the nearest sensitive receptors in the Project area and the impacts that would result from on-site operation of the Development Project during daytime and nighttime hours. As indicated there, with adoption of Project Design Feature PDF N-2 and the revised Mitigation Measure NOI-2, there are no significant impacts with respect to operational noise associated with the Development Project. No revision to the Draft EIR or further response is required.

**Response to Comment E-25-30**

The commenter states the Development Project would negatively affect the character of surrounding residential neighborhoods, be inconsistent in Land Use Planning and result in a significant and unavoidable operational noise impact that would affect sensitive receptors resulting in underlying physical impacts that are significant, adverse, and harmful. Please refer to responses to Comments D-6-19 and D-6-20 regarding General Plan land use consistency, and D-6-29 regarding changes in project design that will eliminate the significant and unavoidable operational noise impacts identified in the Draft EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-31**

The commenter questions the operational noise analysis methodology and results related to noise sensitive land uses. The commenter does not identify any specific deficiencies in the analysis that relate to this concern. The reference noise levels for each on-site noise source and assumptions are clearly stated in the analysis and the noise level at each receptor were calculated using the SoundPLAN noise model (see Final EIR, Appendix I-2). The commenter is referred to response to Comment D-6-29, regarding changes in project design that will eliminate the significant and unavoidable operational noise impacts identified in the Draft EIR and to responses to Comments E-25-28 and E-25-29 with respect to specific issues raised as to the noise analysis methodology. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-32**

The commenter states the Draft EIR and Noise and Vibration Assessment (Draft EIR, Appendix I-1) must be amended, revised/updated to justify the analysis and findings, and to clarify methodology. As indicated in responses to Comments E-25-28 through E-25-31 above, and D-3-29, the Draft EIR has been modified to address the inclusion of additional project design features that reduce operational noise as perceived from off-site sensitive receptors to less than significant. Due to absence of specific information detailing an inadequacy in the environmental analysis provided in the Draft EIR, no further response is required.

**Response to Comment E-25-33**

The commenter cites and excepts pages 4.13-43 and -47 of the Draft EIR and page 56 of the Noise and Vibration Impact Assessment (Draft EIR, Appendix I-1) and reiterates the conclusion in the Draft EIR that on-site operational noise associated with the Development Project would increase ambient noise levels above identified thresholds of significance at sensitive receptors (rural residences) south of Bobcat Road and that the impacts were identified as significant and unavoidable due to the absence of available mitigation at driveways for the residences. As detailed in the response to Comment D-6-29, changes in the project design have eliminated these significant and unavoidable noise impacts. No further response is required.

**Response to Comment E-25-34**

The commenter quotes from the Noise and Vibration Technical Report in Appendix I-1 of the Draft EIR (page 56) with respect to the conclusions about impacts at residences from operational noise. The comment is misleading because the text cited does not include the last half of the analysis and conclusion from Appendix I (renumbered in the Final EIR as Appendix I-1), which states the Development Project would increase ambient noise levels up to 4.1 dBA for residences at receptors R-8, R-11, and R-12 which have direct driveway access onto Bobcat Road making mitigation measures such as noise barriers ineffective and infeasible and identified the operational noise impacts as significant and unavoidable. As detailed in response to Comment D-6-29, changes in the project design have eliminated the significant and unavoidable nighttime operational noise impact to residences at Receptors R-8, R-11, and R-12. The Supplemental Noise Analysis memorandum included in Appendix I-2 of the Final EIR provides the updated results and demonstrates these changes. As the significant and unavoidable operational noise impact identified in the Draft EIR has been eliminated, no further response is required.

**Response to Comment E-25-35**

The commenter states that the operational noise impact analysis in the Draft EIR is ambiguous. The noise level of 52.8 dBA $L_{eq}$ at Receptor R-1, which is 7.8 dBA above the City's nighttime noise standard of 45 dBA $L_{eq}$ and would have an ambient noise level increase of 1.1 dBA based on an average ambient noise level of 58 dBA $L_{eq}$ is accurate and clear because the results provide the information to determine whether the project would result in a significant noise impact. Threshold 4.13-1 in the Section 4.13.5 (Threshold of Significance) of the Draft EIR defines when a project would result in a significant noise impact. Threshold 4.13-1 states, "*The Development Project would have a significant noise impact if the Development Project would result in the 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*." The ambient noise level increase is the combined noise level from the Development Project and the ambient noise level (not additive) subtracted from the nighttime ambient noise level.

As Table 4.13.V shows, the average ambient noise level of 58 dBA $L_{eq}$ is the representative ambient noise level for Receptors R-1 through R-7. However, the average ambient noise level of 58 dBA $L_{eq}$ is not the representative ambient noise level for Receptors R-8 and R-10 through R-12. Table 4.13.V shows the average ambient noise level of 45.9 dBA $L_{eq}$ is the representative ambient noise level for Receptors R-8 through R-12. Table 4.13.V correctly details the corresponding daytime and nighttime noise level generated by the Development Project, daytime and nighttime average ambient noise levels, and the daytime and nighttime ambient noise level increase for each receptor. No further response is required.

**Response to Comment E-25-36**

The commenter cites Draft EIR Table 4.13.V and states that the nighttime noise levels generated from the Development Project far exceeds the nighttime noise standard of 45 dBA $L_{eq}$ by as much as 7.8 dBA. Although the commenter's statement that nighttime noise levels generated from the Development Project far exceeds the nighttime noise standard (by up to 7.8 dBA) is correct, the findings of significant and unavoidable impact are not substantiated based on the threshold of

significance (Threshold 4.13-1) defined in Section 4.13.5 of the Draft EIR. Also, see the response to Comment E-25-35. The commenter also notes that operations throughout the nighttime would be continual, which is consistent with the assumptions made for the stationary noise impact analysis. After incorporation of the changes to the Project described in response to Comment D-6-29, the Project would not have a significant and unavoidable operational noise impact.

**Response to Comment E-25-37**

The commenter states the Noise and Vibration Assessment did not include the SoundPLAN printouts as stated in the Draft EIR. It appears the SoundPLAN printouts were inadvertently omitted from Appendix I-1 during the assembly of the Draft EIR. Though not distributed with the Draft EIR, the discussion of noise impacts included in Section 4.13 of the Draft EIR accurately and fully reflect the results of the SoundPLAN printouts. The Final EIR includes Appendix I (now referenced as Appendix I-1, including the omitted printouts. A supplemental noise assessment, including revised SoundPLAN printouts, is provided in Appendix I-2 of the Final EIR. The information identified there supports the conclusion of that the significant and unavoidable noise impacts disclosed in the Draft EIR have been eliminated. See the response to Comment D-6-29 regarding the revised noise assessment and B-2-1-B regarding the provision of new information and the standard required for recirculation of a Draft EIR. No further response is required.

**Response to Comment E-25-38**

The commenter states the Draft EIR must clarify the methodology used to determine ambient and project levels to justify the conclusions stated in the Draft EIR and Appendix I-1. The calculated noise level from on-site operations and the ambient noise level increase at each receptor is clearly detailed in Table 4.13.V. The noise impact significance threshold is outlined in Section 4.13.5 (Thresholds of Significance) of the Draft EIR. Also, the claim that the language in the Noise and Vibration Technical Report in Appendix I-1 of the EIR conflicts with the language in Section 4.13 of the EIR is not supported because the two analyses are consistent. See the response to Comment E-25-37. No further response is required.

**Response to Comment E-25-38-A**

The commenter states the Draft EIR and Appendix I-1 must be reconciled, amended, revised/updated to clarify and justify conclusions related to operational noise impacts. For the reasons set forth in responses to Comments E-25-31 through E-25-38 and D-6-29, the analysis in the Draft EIR and the Noise and Vibration Technical Report in Appendix I-1 of the EIR as supplemented by the supplemental noise assessment in Appendix I-2 of the Final EIR, accurately identifies the significance thresholds, methodology and the impacts related to noise that would result from operation of the Development Project. No revision to the Draft EIR or further response is required.

**Response to Comment E-25-39**

The commenter provides extensive excerpts from the Draft EIR (pages 4.7-2 and 4.17-13, -17) and the VMT Analysis (Draft EIR, Appendix J-1) and states that the vehicle miles traveled (VMT) for non-commercial hotel and industrial warehouse buildings result in significant and unavoidable VMT impacts, which is consistent with the analysis in the Draft EIR (see Draft pages 4.17-13 – 4.7-15). The commenter further notes that after design features were considered but not implemented, the

reduction was only 8.4 percent and is not in compliance with the City's VMT Analysis Implementation Guideline and significance thresholds.

See the response to Comment D-3-23. The commenter's reference to design features not being implemented is noted. The Draft EIR has been revised to correctly reflect the VMT reduction finding provided in Appendix J-1 as follows:

> The Development Project would exceed the City's adopted thresholds of 25.9 VMT per employee for the industrial and hotel uses. This would result in a potentially significant impact. To achieve a less than significant findings for non-retail VMT per employee, VMT would need to be reduced by 15.9 percent or 26,377 HBW VMT. The following project design features (PDFs) have the potential to reduce HBW VMT. These design features are based on coordination with the City staff and the recommendations contained within the City's Traffic Impact Analysis Guidelines and the Western Riverside Council of governments (WRCOG) TDM Strategies Evaluation Memo.
>
> ~~he Development Project would exceed the City's adopted thresholds of 25.9 VMT per employee for the industrial and hotel uses. This would result in a potentially significant impact. With implementation of the measures identified in **MM TRA-1**, a project can realize a maximum reduction of 8.4 45 percent in commute VMT. The Development Project would require a minimum reduction of 15.9 percent to achieve a less than significant impact.~~

These design features are based on coordination with the City staff and the recommendations contained within the City's Traffic Impact Analysis Guidelines and the Western Riverside Council of governments (WRCOG) TDM Strategies Evaluation Memo. Section 4.17.6.3 of the Draft EIR has been revised to more fully disclose the findings and analysis provided in Appendix J-1, including the incorporation of transportation management strategies as project design features as follows:

> **PDF T-1:** Commute Trip Reduction Marketing
>
> The Development Project will include a marketing strategy to promote the project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. The following features (or similar alternatives) of the marketing strategy are essential for effectiveness.
>
> 1. Onsite or online commuter information services.
> 2. Employee transportation coordinators.
> 3. Onsite or online transit pass sales.
>
> The Development Project will provide tenant's employees material and online resources as a means to promote the commute trip reduction program. With proper implementation and 100 percent of the employees eligible, this design feature is expected to reduce VMT by 4 percent.
>
> **PDF T-2:** Ridesharing Program
>
> The Development Project will provide a ridesharing program and establish a permanent transportation management association with funding requirements for employers.

Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips and VMT. Ridesharing must be promoted through a multifaceted approach. Examples include the following

- Designating a certain percentage of desirable parking spaces for ridesharing vehicles.
- Designating adequate passenger loading and unloading and waiting areas or ridesharing vehicles.
- Providing an app or website for coordinating rides.

The Development Project as designed, will provide carpool/vanpool/EV parking designated spaces in locations of easy and convenient accessibility to the Project building. As calculated for the Project, with proper implementation and 100 percent employees eligible, the Project is expected to reduce VMT by four percent.

**PDF T-3:** End-of-Trip Bicycle Facilities

The Development Project will install and maintain end-of-trip facilities for employee use. In this case End-of-trip facilities will only include bike parking. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT. End-of-trip facilities should be installed at a size proportional to the number of commuting bicyclists and regularly maintained.

The Development Project will include building elements for bicycle trip end facilities (i.e., parking) for commuters that choose to bicycle as a mode of travel. This will promote an alternative mode choice of commuting for employees. As calculated, the Project will reduce VMT by 0.06 percent.

As the reduction in trips and associated VMT cannot be accurately accounted for by the calculations conducted using the RIVCOM model, these adjustments are made through the following calculations as described in the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity.[65] (CAPCOA, 2021) (also see Tables 5-7, Appendix J-1). The PDFs will be incorporated into the Transportation Demand Strategy Report required under Mitigation Measure TRA-1. The inclusion of PDFs T-1 through T-3 would result in a reduction in HBW VMT of 8.4 percent. This potential reduction in VMT resulting from the stated design features is consistent with VMT reductions outlined in the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality (California Air Pollution Control Officers Association [CAPCOA] 2021).

The Draft EIR further states on page 4.17-14 that the Development Project would require a minimum reduction of 18.9 percent to achieve a less than significant impact. Although implementation of Mitigation Measure TRA-1 could reduce impacts to VMT, the reduction achieved is not enough to meet the City's VMT standard; therefore, potential impacts remain significant and unavoidable. Please refer to the response to Comment E-25-2 regarding the requirement to prepare findings for significant and unavoidable impacts. The revised mitigation provides more specificity and does not address a

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

new impact or an impact of greater significance than that stated in the Draft EIR. Please see the response to Comment E-25-25 regarding the provision of new information and the standard required for recirculation of a Draft EIR. No further response is necessary.

**Response to Comment E-25-40**

The commenter states that the condition of approval requiring a Transportation Demand Management (TDM) strategy and the VMT reduction achieved by such is arbitrary and unsubstantiated. See the response to Comment E-25-39 with respect to the basis for concluding that potential impacts are significant and unavoidable and revisions to Mitigation Measure TRA-1 to incorporate the project design features described in Appendix J-1 to the DEIR. These project design features were developed in coordination with the City staff and the recommendations contained within the City's Traffic Impact Analysis Guidelines and the Western Riverside Council of Governments (WRCOG) TDM Strategies Evaluation Memo. As part of MM TRA-1 , the transportation demand management strategies adopted by the Project applicant under the referenced mitigation measure requires review and approval by the City Traffic/Transportation Manager assuring the appropriate VMT reductions are implemented. No further response is required.

**Response to Comment E-25-41**

The commenter states that the home-based work (HBW) reduction should be specifically outlined and referenced in the Draft EIR and Appendix J-1. The HBW is identified in Table 4.17.C for Non-Retail VMT per Employee and is calculated using RIVCOM[66]. Please see the response to Comment E-25-39 which details the revisions to the Draft EIR providing the requested information. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-42**

The commenter correctly notes the conclusion of significant and unavoidable VMT impacts but states that the mitigation measures are of no effect. See the response to Comment E-25-39 relative to the VMT reduction strategies identified in the Draft EIR (Appendix J-1) and their effectiveness to reduce VMT impacts and the corresponding revisions to Mitigation Measure TRA-1. No further response is required.

**Response to Comment E-25-43**

The commenter references and excerpts pages 6-24 and 6-25 of the Draft EIR regarding the cumulatively significant impacts of Project emission of air pollutants and AQMP consistency assessment and concludes the Development Project contributes to a cumulatively considerable impact resulting from the emission of air pollutants and is inconsistent with the AQMP. The commenter further states other cumulative projects also exceeded regional air pollutant thresholds

[66] The Riverside County Transportation Model (RIVCOM) model is a complex system that analyzes road networks, socio-economic data, driver behavior, and goods movement to predict where traffic flow will occur as the population grows and changes. While the RIVCOM model covers the entire SCAG region, Riverside County is the focus of analysis, and the model data is more disaggregated within the County as opposed to other areas of the region. See: https://wrcog.us/320/Transportation-Modeling-Services.

and were inconsistent with the AQMP. The commenter accurately summarizes the conclusions stated in the Draft EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-43-A**

The commenter excerpts text from pages in the Draft EIR regarding cumulative greenhouse gas emissions. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-43-B**

The commenter excerpts text from unspecified pages in the Draft EIR regarding cumulative noise impacts. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-43-C**

The commenter excerpts text from pages 6-46 and 6-47 of the Draft EIR regarding cumulative VMT impacts. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-44**

The commenter states the Traffic Analysis (Draft EIR, Appendix J-2) is incomplete and lacks a cumulative analysis of the Highland Springs Road and I-10 ramps intersections, which operate at LOS F during peak hours during 2027 and 2045 with Project conditions. Please refer to the responses to Comments D-3-15, D-3-16, and D-3-17 which detail that a project's effect on automobile delay (LOS) does not constitute a significant environmental impact under CEQA (see Draft EIR pages 4.17-1 and 2). This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comments E-25-45 and E-25-45-A**

The commenter excerpts text from Section 7.1 of the Draft EIR regarding significant environmental effects that cannot be avoided if the proposed project is implemented. With respect to the excerpted noise discussion in this comment, please see the response to Comment D-6-29 and see revisions to the Final EIR Section 4.13 Noise and Vibration, which address changes to the Development Project and reduce operational noise impacts to less than significant. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-45-B**

The commenter excerpts text from Section 8.3 of the Draft EIR that states Alternative 1 (No Project/No Build Alternative) would result in the continuation of existing conditions and would not result in significant and unavoidable environmental impacts. The commenter notes that all elements under this Alternative would have no impact, which is different from the conclusions reached in the Draft EIR. This comment will be provided to the City staff and elected officials for consideration. This

comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-46**

The commenter excerpts text from the Project Traffic Analysis (Draft EIR, Appendix J-2) related to level of service conditions, City Circulation Element standards, and intersection operations, and submits that the Development Project is not compliant with City General Plan Circulation Element Policy 6 regarding the maintenance of acceptable LOS at studied intersections. Please refer to the responses to Comments D-3-15, D-3-16, and D-3-17 which detail that a project's effect on automobile delay (LOS) does not constitute a significant environmental impact under CEQA (see Draft EIR page 4.17-1 & 2) and addresses consistency of the project with City General Plan Circulation Element Policy 6. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-47**

The commenter references Appendix J-2 for the statement that the addition of Project traffic will cause identified intersections to operate at unacceptable levels of service during Open Year Cumulative (2027) with Project conditions. Please refer to responses to Comments D-3-15, D-3-16, and D-3-17. No further response is necessary.

**Response to Comment E-25-47-A**

The commenter states that the Development Project would result in significant and unavoidable impacts and underlying physical impacts that are adverse and harmful, and that the City must respond to each significant effect by making findings and by making a statement of overriding considerations explaining why the Development Project benefits outweigh the significant and unavoidable environmental impacts identified in the Draft EIR. Please refer to the response to Comment E-25-2. No further response is required.

**Response to Comment E-25-48**

The commenter cites information and the conclusions detailed in the Alternatives Analysis Summary for Air Quality (Draft EIR, Appendix L-1) that implementation of Alternatives 2, 3, and 4 will result in certain significant and unavoidable impacts air quality impacts and conflict with the AQMP. See the responses to Comments E-25-4 and D-3-19. The commenter states that the Development Project Alternatives 2, 3, and 4 would result in significant and unavoidable impacts and underlying physical impacts that are adverse and harmful, and that the City must respond to each significant effect by making findings and by making a statement of overriding considerations explaining why the Development Project or alternatives benefits outweigh the significant and unavoidable environmental impacts identified in the Draft EIR. The findings and statement of overriding considerations the commenter identified are only required if the City decides to approve one of these alternatives. See the response to Comment E-25-2. No further response is required.

**Response to Comment E-25-48-A**

The commenter excerpts text from Appendix L-2 GHG Alternatives Memo. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-48-B**

The commenter incorrectly states that Tables B -E of the Alternatives Analysis Summary of Greenhouse Gases (Draft EIR, Appendix L-2) show exceedance of regional operational emissions for certain criteria pollutants resulting from implementation of Alternatives 2 through 4. The referenced tables provide the long-term greenhouse gas emissions at buildout for the stated alternatives. The commenter confuses the analysis of air quality impacts for alternatives and results contained in Appendices L-1 and L-2. While the alternatives reduce the greenhouse emissions, as stated in Sections 8.4.2.8, 8.5.2.8, and 8.6.2.8, the greenhouse gas impacts of Alternatives 2-4 remain significant and unavoidable. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-49**

The commenter states the significance conclusions of Draft EIR, Appendix C-1 and Appendices L-1 and L-2 that Project emissions of certain air pollutants and greenhouse gases are significant and unavoidable, and states that the Project is inconsistent with the City's General Plan Air Quality Element and the AQMP. See the response to Comment D-3-19 regarding Project consistency with the AQMP. The commenter is incorrect regarding Project inconsistency with the General Plan Air Quality Element. Please see the responses to Comments D-6-24 and E-25-7. No further response is required.

**Response to Comment E-25-50**

The commenter states the finding in the Draft EIR that the Project is inconsistent with the AQMP. See the response to Comment D-3-19 regarding Project consistency with the AQMP. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR. No further response is required.

**Response to Comment E-25-51**

The commenter states that the Development Project would result in significant and unavoidable impacts and underlying physical impacts that are adverse and harmful, and that the City must respond to each significant effect by making findings and by making a statement of overriding considerations explaining why the Development Project benefits outweigh the significant and unavoidable environmental impacts identified in the Draft EIR. Please refer to the response to Comment E-25-2. No further response is required.

**Response to Comment E-25-52**

The commenter excerpts text from various places in the Draft EIR regarding noise impacts and identifies a potential inconsistency between the traffic noise levels identified in Section 4.13 of the Draft EIR, the Noise and Vibration Impact Analysis (Draft EIR, Appendix I-1) and the Sunset Crossroads - Alternatives Analysis for Traffic Noise (Draft EIR, Appendix L-3). Appendix L-3 addresses noise

impacts associated with implementation of the Project alternatives, including Alternative 2, which envisions development of residential and commercial uses per the existing City land use designations. The traffic noise level of 71.4 dBA CNEL at 50 ft from the centerline of the outermost lane cited by the commenter on Sunset Avenue between Lincoln Street and Westward Avenue under the Opening Year (2027) is a reference noise level (not the traffic noise level at the receptor) associated with the Development Project, which envisions the construction and operation of commercial and industrial warehouse uses. Alternative 2 is a completely different project compared to the Development Project. As the uses envisioned under the Development Project and Alternative 2 are different, resulting in a different volume and distribution of traffic, it is not proper to categorize the differing noise levels for the same roadway segment as inconsistent. Under Alternative 2 the same scenario and roadway segment has a projected traffic noise level of 64.0 dBA at the residential property line (not a reference noise level). The Draft EIR (see Section 8.2.4.13) identifies traffic noise impacts associated with implementation of Alternative 2 as less than significant. No revision to the Draft EIR or further response is required.

**Response to Comment E-25-53**

As with the commenter's previous comment, this comment identifies a potential inconsistency between Section 4.13 of the Draft EIR, the Noise and Vibration Impact Analysis (Draft EIR, Appendix I-1) and the Sunset Crossroads - Alternatives Analysis for Traffic Noise (Draft EIR, Appendix L-3). See the response to Comment E-25-52. The traffic noise level of 71.6 dBA CNEL at 50 ft from the centerline of the outermost lane referenced by the commenter is a reference noise level (not the traffic noise level at the receptor) and is for the Development Project, while for the same condition (2045) under Alternative 2, for the same roadway segment is of 63.0 dBA CNEL at the residential property line (not a reference noise level). The traffic noise modeling and analysis for the Development Project and the alternatives analysis are correct and accurate. No revision to the Draft EIR or further response is required.

**Response to Comment E-25-54**

The commenter asserts additional inconsistences exist between Section 4.13 of the Draft EIR, the Noise and Vibration Assessment (Draft EIR, Appendix I-1) and the Sunset Crossroads - Alternatives Analysis for Traffic Noise (Draft EIR, Appendix L-3). Please refer to responses to Comments E-25-52 and E-25-53. The traffic noise modeling and analysis for the Development Project and the alternatives analysis are correct and accurate. No revision to the Draft EIR or further response is required.

**Response to Comment E-25-55**

The commenter states the Draft EIR and Appendix L-3 must be clarified and reconciled with respect to actual projected dBA Noise levels outlined for Alternative 2 and the Development Project. Similarly to responses to Comments E-25-52 through E-25-54 the commenter compares traffic noise for two different development scenarios (e.g., the Development Project and Alternative 2). It is expected that two fundamentally different development scenarios would have different noise levels on the same roadway segment under the 2027 condition. The traffic noise levels reported in Section 4.13 of the EIR and the alternatives analysis in Appendix L-3 of the EIR are correct and accurate. No revision to the Draft EIR or further response is required.

**Response to Comment E-25-56**

The commenter states that Section 4.13 of the Draft EIR, Appendix I-1, and Appendix L-3 contain conflicting language that must be reconciled, amended, revised/updated to clarify and justify the finding that Alternative 2 would have a less than significant traffic-noise impact. Similar to responses to Comments E-25-52 through E-25-54, traffic noise levels reported in the Section 4.13 of the EIR and the alternatives analysis in Appendix L-3 of the EIR are correct and accurate. No revision to the Draft EIR or further response is required.

**Response to Comment E-25-57**

The commenter excerpts text from the Alternative 3 discussion in Appendix L-3 of the Draft EIR identifying that report as showing that Alternative 3 would have a significant and unavoidable traffic noise impact at residential uses and MSJC Campus uses located east of Sunset Avenue in the 2027 Opening Year with Project condition. With revisions to the Development Project since publication of the Draft EIR, operational noise impacts would be less than significant. Refer to revisions to the Development Project in Section 4.13 Noise and Vibration and Appendix I-2 in the Final EIR.

**Response to Comment E-25-57-A**

The commenter excepts text from the Alternative 3 discussion in Appendix L-3 of the Draft EIR, identifying that report as showing that Alternative 3 would have a significant and unavoidable traffic noise impact at residential uses and MSJC Campus uses located east of Sunset Avenue in the 2045 Horizon Year with Project condition. With revisions to the Development Project since publication of the Draft EIR, operational noise impacts would be less than significant. Refer to revisions to the Development Project in Section 4.13 Noise and Vibration and Appendix I-2 in the Final EIR.

**Response to Comment E-25-57-B**

The commenter states that Alternative 3 would result in significant and unavoidable impacts and underlying physical impacts that are adverse and harmful, and that the City must respond to each significant effect by making findings and by making a statement of overriding considerations explaining why the Development Project benefits outweigh the significant and unavoidable environmental impacts identified in the Draft EIR. Please refer to the response to Comment E-25-2. No further response is required.

**Response to Comment E-25-58**

The commenter excepts text from the discussion of Alternative 4 in Appendix L-3 of the Draft EIR stating that the narrative for the noise levels under the existing and opening year condition are the same. Traffic noise levels reported in the analysis of roadway segments under Alternative 4, Existing with Project and Alternative 4, Opening Year (2027) with Project are the same because the traffic volumes are similar between under these two conditions. It should be noted that other roadway segments between the Existing with project and Opening Year (2027) with project conditions are different enough that would result in different noise levels. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-59**

The commenter incorrectly states that in Table G in the Alternatives Analysis in Appendix L-3 of the EIR that the existing with project traffic noise levels at 50 ft from the centerline of the outermost lane of the referenced location (at Sunset Avenue between Lincoln and Westward) is 71.5 dBA CNEL. Table G of Appendix L-3 correctly identifies the noise level for this roadway segment as 70.7 dBA CNEL under the 2021 (existing condition). This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-25-60**

The commenter states the Draft EIR Appendix L-3 must clarify the methodology of actual projected noise levels used. The reference traffic noise levels contained in the traffic noise results tables and the distance from roadway centerline to receptor contained in the analysis discussion provide the necessary information to determine the projected noise levels used. In addition, the Noise and Vibration Impact Analysis in Appendix I-1 of the Draft EIR describes the characteristics of sound and the drop-off rate. Traffic noise levels reported in the analysis discussion for the subject roadway segment (Sunset Avenue between Lincoln Avenue and Westward Avenue) under Alternative 4, Existing with project and Opening Year (2027) with project have the same noise level of 73.7 dBA CNEL at the residential property line because traffic volumes are similar between the two scenarios and the reference noise level at 50 ft from the centerline of the outer most lane for both scenarios are the same at 70.7 dBA CNEL.

**Response to Comment E-25-61**

The commenter correctly identifies the Draft EIR's conclusion that Alternatives 3 and 4 would result in significant traffic-noise impacts to residential and MSJC campus uses located east of Sunset Avenue. The statement that the Development Project Alternative 2 would result in significant and unavoidable noise impacts is not correct. The Draft EIR (see Section 8.4.4.13) identifies traffic impacts associated with implementation of Alternative 2 are less than significant. Though the Draft EIR's conclusion that Alternatives 3 and 4 would have a significant noise impact is consistent with the conclusion detailed in the alternatives analysis in Appendix L-3 of the EIR, project revisions (see the response to Comment D-6-29) have eliminated the significant traffic noise impact at the residential and MSJC campus uses located east of Sunset Avenue (see Final EIR, Appendix I-2). The project revisions associated with the Development Project will apply equally to Alternatives 3 and 4; therefore, the significant and unavoidable noise impacts previously identified in the Draft EIR under these alternatives have been similarly eliminated. The preparation of findings and a statement of overriding considerations for noise impacts is not required. No further response is required.

**Response to Comment E-25-62**

The commenter cites text in Draft EIR, Appendix L-4 related to the VMT reduction achieved under Alternative 3. The commenter further states that Alternative 3 would result in significant and unavoidable impacts and physical impacts that are adverse and harmful, and that the City must respond to each significant effect by making findings and by making a statement of overriding considerations explaining why the Development Project benefits outweigh the significant and unavoidable environmental impacts identified in the Draft EIR. Please refer to response to Comment E-25-2; no further response is required.

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**From:** Adam Rush
**To:** Carl Winter
**Cc:** Theresa Wallace; Sandra Calderon
**Subject:** Fwd: Sunset Crossing
**Date:** Monday, January 29, 2024 12:44:11 PM

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Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
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99 E. Ramsey Street
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---

**From:** ginnyjune@aol.com <ginnyjune@aol.com>
**Sent:** Monday, January 29, 2024 12:21:10 PM
**To:** Adam Rush <arush@banningca.gov>
**Cc:** David Miller <dmil2644@gmail.com>; VIRGINIA DE BRY <ginnyjune@aol.com>; Facebook <friends@facebookmail.com>
**Subject:** Sunset Crossing

Dear Adam Rush

I live here in Banning and I am appalled that you are considering this project for our city. It will bring congestion to our streets, especially Sun Lakes Blvd. which will go through the middle of the Sunset Crossing project. The EIR makes it clear that the air quality around the city in this area which include multiple senior communities will be seriously compromised. The EIR makes it clear that this is not a good fir for our city. You must not approve this project. E-26-1 E-26-2

You should be promoting a fire station for this land as we need a fire station on the south side of the freeway that could service the homes to both the east and west of Sunset Blvd.. E-26-3

## Response to Letter E-26

Ginny June
January 29, 2024

**Response to Comment E-26-1**

The comment expresses concerns related to increased traffic congestion, particularly on Sun Lakes Boulevard which will be extended through the middle of the development site. Please refer to the responses to Comments E-2-1, E-20-1, D-3-15, and E-31-12. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-26-2**

The comment states that the analysis in the Draft EIR indicates that the air quality around the City will be compromised for multiple senior communities. Please refer to the responses to Comments A-3-2, A-3-14, A-3-16, A-3-18, B-2-5, B-2-13, B-2-15, and E-6-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-26-3**

The comment reiterates general opposition to the Project and expresses support for alternative land uses such as a fire station to serve the homes to both the east and west of Sunset Avenue. Please refer to the response to Comment E-1-1. As stated in the Section 3.1.3 of the Draft EIR (page 3-7), "…at the City's request, the Specific Plan also identifies a site in Planning Area 12 that could be used for a future fire station. However, because neither the City nor the Riverside County Fire Department has considered nor identified a need for a fire station at this location, there is no current plan for development of a fire station and, if desired, the planning, design, and construction of any fire station would occur at an undetermined future date by the City and Riverside County Fire Department." If the City and County Fire Department elect to proceed with a fire station at a future date, such development would be subject to future environmental review. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

January 29, 2024

City of Banning
Community Development Department
Adam Rush, M.A., AICP, Director (arush@banningca.gov)
99 E. Ramsey Street
Banning, CA 92220

City Manager
Doug Schultz (dschulze@banningca.gov)
City Council:
Sheri Flynn (sflynn@banningca.gov)
Mayor Alberto Sanchez (asanchez@banningca.gov)
Rick Minjares (rminjares@banningca.gov)
Colleen Wallace (cwallace@banningca.gov)

**RE: PUBLIC REVIEW OF THE DRAFT EIR FOR SUNSET CROSSROADS**

I am a resident of Banning and live in Sun Lakes Country Club. After reviewing the EIR, I am writing to protest the Sunset Crossroads project. Just the magnitude of 5,500,000 square feet in this project is mind blowing. The very location is so close to homes will subject homeowners to light pollution, noise pollution, air pollution, traffic, gridlock, and the value of properties will plummet. We do not even have a fire station below the I10 freeway. E-27-1 E-27-2

The **air quality** of the Development Project results in an exceedance of criteria pollutants. Furthermore, the Development Project is not consistent with the land use assumptions in the 2022 Air Quality Management Plan (AQMP). Due to this inconsistency and the level of criteria pollutants, impacts would be significant and unavoidable as mitigation is not available to reduce emissions to below SCAQMD thresholds. Despite the incorporation of operational practices and design features cited in the Mitigation Measure AIR-2, operation of the Development Project would result in significant and unavoidable impacts for VOCs, $NO_x$, CO, $PM_{10}$ and $PM_{2.5}$. Will the Banning City Council see this as a viable project and approve even E-27-3

at the cost of the health of Banning citizens by saying the benefits out way the risks?

E-27-3 Cont

The **noise and vibration** of this project are significant and unavoidable as well as noise and vibration at night are significant and unavoidable according to 8.0 Table 8.A. The Development Project would result in a significant permanent increase in ambient noise levels and traffic noise levels would exceed the City's exterior noise standard of 65 dBA CNEL. Nighttime noise levels would exceed the County's exterior nighttime 10-minute noise standard of 45 $DBAL_{eq}$. Do not understand how this is an acceptable project given the **permanent** increase in ambient noise and traffic. How can the Banning City Council that is supposed to represent its citizens consider this a viable project?

E-27-4

**Greenhouse gas emissions** from the implementation of the Development project would result in exceedance of criteria pollutants of greenhouse gas emissions that would be significant and unavoidable. **Greenhouse gas emissions may have a significant impact on the environment that is unavoidable. The Development Project's long-term operational impacts would exceed the City's threshold of 3,000 MT CO2 per year despite implementing all feasible mitigation.** Do not understand how this would be acceptable to our Banning City Council who should protect its citizens from harmful emissions.

E-27-5

**Light pollution** will cause light glare from the warehouses outdoor lighting thus creating "light trespass." Artificial night light from warehouses effect sleep, anxiety and even obesity.

E-27-6

Under Alternative Uses 8.0 the proposed use is by far the worst alternative. Other alternatives create more diverse/balanced use and economic opportunities and do a better job of preserving the character of Banning and the Sun Lakes community.

E-27-7

**8.1.4 As is the case with the Development Project, all the alternatives assume that the City of Banning has either previously approved or is in the process of considering various public improvements that may occur on or adjacent to the Development site whether or not the Development Project proceeds. These projects comprised of Sun Lakes Boulevard Extension, an electrical substation to serve the City's planned infrastructure needs, a reverse osmosis facility, a potable water reservoir and the Sunset Avenue Bridge.** Why would Banning City Council consider such a massive Development Project when these projects are not even ready to start?

E-27-8

Projects in both Beaumont and Banning never plan on the infrastructure before putting in all these warehouses. Just look at Pennsylvania Ave on ramp and grade separation which is years out and Highland Springs interchange also years out. Potrero Interchange will this happen before Beaumont continues to build the next big set of warehouses by Jack Rabbit Trail? All these projects lack funding, **but a developer can come in propose a massive development promise all the wonderful amenities and then things change, and we just get warehouses!** Will the Banning City Council let this happen to our city or act responsibly? E-27-9

The proposed realignment of Sun Lakes Blvd is not a part of the project. Sun Lakes Blvd capacity and safety conditions will be severely impacted by the additional traffic and pollution of the proposed projects commercial, industrial, logistics and other uses. E-27-10

For me, the bigger concern as a citizen of Banning is the Developer's proposed travel center and fueling station which will have an enormous impact on Sun Lakes Blvd and the traffic. E-27-11

Why would Banning City Council even consider such a harmful project with the full knowledge of unavoidable impacts for air quality, noise and vibration, transportation, and greenhouse gas emissions? The Banning City Council is here to serve its citizens, and this will be bad for everyone. E-27-12

Respectfully submitted,

Tennie Boggs
Sun Lakes Resident

Jack Marty
Sun Lakes Resident

## Response to Letter E-27

Tennie Boggs and Jack Marty
January 29, 2024

**Response to Comment E-27-1**

The comment states general opposition to the Project due to the proximity of residential areas that would be subject to light, noise, air pollution, traffic congestion, and lowered property values. Please refer to the responses to Comments A-3-14, A-3-16, A-3-18, A-3-23-A, B-2-5, B-2-13, D-3-15, D-6-29, E-2-4, E-18-2, and E-31-12. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-2**

The comment states that there is no fire station located south of I-10. Please refer to the response to Comments E-1-1 and E-26-3. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-3**

The comment summarizes the air quality findings and mitigation measures and expresses concerns related to the Project's impacts to the community. Please refer to the responses to Comments D-6-9, D-6-24, E-6-1, and E-25-7. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-4**

The comment summarizes the noise and vibration findings from the Draft EIR and expresses concerns related to the identified increases in ambient noise and traffic. Please refer to the response to Comment D-6-29. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-5**

The comment summarizes the greenhouse gas emissions findings and expresses concerns related to potential emissions. Please refer to the responses to Comments D-6-13 and D-6-14. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-6**

The comment states expresses concerns related to light pollution from warehouse uses and outdoor lighting and related health effects. To reduce lighting on the Development Site, Section 4.9 of the Sunset Crossroads Specific Plan (Refer to Draft EIR Appendix B) requires lighting within public rights-

of-way to adhere to applicable City of Banning outdoor lighting standards. All other lighting on private properties would adhere to Specific Plan Development Standard and Design Guidelines (Refer to Specific Plan pages 4-9 and 4-9, and Draft EIR pages 4.1-45 and 4.1-46). Please refer to response to Comment E-36-12 below. Regarding the effect on lighting on human health, please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-7**

The comment expresses an opinion that other unspecified alternatives to the Project create more diverse/balanced uses and economic opportunities and do a better job of preserving the character of the City and the Sun Lakes Community. Please refer to the response to Comments E-2-1 and E-25-13 for a discussion of impact to the character of the City. Please refer to response to Comments E-36-37 and E-36-44 which address the City's goal for maximizing economic opportunity. Please refer to response to Comments D-3-35, D-3-36, and D-6-49 for discussion regarding the selection of the alternatives and why these are not environmentally superior. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-8**

The comment questions the timing of Project approval with other public improvement projects that are planned or are ongoing. The decision to consider the Project alongside other public improvements is based on several factors and can include land use planning, economic development, environmental compliance, and community input. Section 3.1.3 of the Draft EIR provides a summary of the process for identifying project needs such as to accommodate long-term growth anticipated by the General Plan (electrical substation), enhanced capacity for service identified in the City's Integrated Master Plan (potable water reservoir), to implement the City's Circulation Element (Sun Lakes Boulevard Extension), provide necessary treatment and recharge of water (reverse osmosis facility); or other approved projects (Sunset Avenue Bridge over Pershing Wash, as part of the Rancho San Gorgonio Project). While the City recognizes the importance of ongoing public improvements, including infrastructure upgrades and community enhancements, it is essential to evaluate each project on its individual merits, as well as overall cumulative impacts. Please refer to response to Comment E-7-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-9**

The comment questions the timing and funding of various public projects and approval of a warehouse project without the necessary infrastructure already in place. Please refer to the responses to Comments E-2-1, E-20-1, E-27-8, D-3-15, and E-31-12.

It is important to clarify that the focus of the Draft EIR is solely on the activities related to the Project as outlined in the Project Description. Stated concerns regarding the Potrero Interchange falls outside the scope of our current analysis and therefore does not need to be discussed further. The comment

is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-10**

The comment correctly states the Sun Lakes Boulevard Extension Project is not part of the Project but would be impacted by traffic and pollution resulting from the Project. The comment provides no substantiation to support this claim. Please refer to the responses to Comments E-2-1, D-6-1-A, and E-34-15. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-11**

The comment states concern about the proposed travel center and fueling station and anticipated impacts on Sun Lakes Boulevard. Please refer to the responses to Comments E-2-1, D-6-1-A, and E-34-15. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-27-12**

The comment expresses general opposition to the Project and states concerns related to the Project's impacts on air quality, noise and vibration, transportation, and greenhouse gas emissions. Please refer to the responses to Comments E-2-1 and E-25-2. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

'24 JAN 29 1:19PM

Richard W. McHard
4816 W. Glen Abbey Way
Banning CA 92220
(909)706-0919 (C)
rmchard@cs.ucr.edu

January 29, 2024

RECEIVED
JAN 29 2024
Initial: ZP

To:
Adam Rush, M.A., AICP
Community Development Director
99 E. Ramsey Street
Banning CA 92220

Re:
Sunset Crossroads Project Draft Environmental Impact Report (DEIR)
https://banningca.gov/Archive.aspx?AMID=60&Type=&ADID=

To whom it may concern:

The referenced DEIR is both incomplete and woefully negligent in addressing legitimate environmental concerns. This is due largely to the planned construction of at least 9 warehouses.

The DEIR is incomplete in that there is no identifiable reference to the issues surrounding the existing pipelines and other potential utility lines lying partially exposed in the proposed project location. This has been identified as a reason not to do construction in the proposed project location in the past. E-28-1

Most importantly, the DEIR cover letter acknowledges unavoidable significant environmental impacts in the areas of air quality, greenhouse gas emissions, noise, and vehicle miles traveled. Putting a project of this magnitude with these unmitigated environmental impacts near the Sun Lakes retirement community imposes serious health risks to residents of the community. E-28-2 Furthermore, putting this project on property zoned for residence devaluates the vision of Banning as one of the fastest growing cities in Riverside County and a city with "Endless Opportunity". Mitigation of rezoning residential areas by zoning part of MSJCCD is an unacceptable alternative. E-28-3

Moreover, the lack of mitigation of vehicles miles traveled will impose additional health and safety risks to residence of The Lakes assisted living facility, due to increased transit times for emergency vehicles. The traffic load that would result from the proposed Banning Point project in a nearby area is unacceptable. The traffic load that would result from the Sunset Crossroads Project would likely be an order of magnitude worse. E-28-4

***This project must not proceed without mitigation of the above concerns!*** E-28-5

Yours truly,

Richard W. McHard

## Response to Letter E-28

Richard McHard
January 29, 2024

**Response to Comment E-28-1**

The comment generally states that the Draft EIR does not adequately address environmental concerns and that the Draft EIR does not provide identifiable references to the issue surrounding existing pipelines and other potential utility lines lying exposed in the project area. The comment states that this is the reason for not doing construction projects in this location in the past. The on-site presence of the referenced pipelines is provided in Section 3.3.1 (page 3-19) and Section 4.9.6.2 (pages 4.9-15 and -16) of the Draft EIR. Both the State of California and the City of Banning have regulations and standard practices for identifying and addressing underground utilities. As required by CGC Section 4216, standard pre-construction practices require appropriate care to define the location, alignment, depth, and operational status of pipelines, above- and below-ground utilities, and other features. It is anticipated that compliance with applicable provisions of CGC Section 4216 and the specific requirements of the facility operator would be followed to ensure the integrity of existing facilities during construction and operation. All projects must comply with applicable regulations, policies, plans, and construction standard including the proposed Project. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-28-2**

The comment states concerns related to significant and unavoidable air quality, greenhouse gas emissions, noise, and vehicle miles traveled impacts and proximity to sensitive receptors. Please refer to the responses to Comments A-3-2, A-3-14, A-3-16, A-3-18, B-2-5, D-3-15, D3-23, D-6-29, E-2-1, E-8-1, E-25-2, and E-31-12. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-28-3**

The comment states that the Development Site and MSJC Site should not be rezoned. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-28-4**

The comment states that measures to reduce VMT will impose additional health and safety risks to residence and increase transit times for emergency vehicles. The comment does not provide explanation or substantiation on how mitigation of vehicle miles traveled would reduce health and safety risks or increase traffic times. VMT analysis measures the length of vehicle trips, not the level of congestion on local roadways. Please refer to the responses to Comments E-2-1, D-6-1-A, and E-34-15. The comment is noted and will be provided to the City staff and elected officials for

consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-28-5**

The comment states that the Project must not proceed without addressing the above concerns (refer to Comments E-28-1 through E-28-4). Please refer to the responses to Comments E-2-1 and E-25-2. The comment does not provide appropriate specific mitigation measures to be considered. Pursuant to CEQA Guidelines Section 15097, the City will be required to adopt a mitigation monitoring and reporting program (MMRP) if the Final EIR is certified and the Project is approved. The Draft EIR provides that a comprehensive list of mitigation measures are consolidated in the Mitigation Monitoring and Reporting Program which identifies mitigation measures, the timing for implementation, the responsible party and approving agency, compliance deadlines, and the sanctions for non-compliance. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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**From:** Adam Rush
**To:** Carl Winter
**Cc:** Theresa Wallace
**Subject:** Fwd: Sunset Crossroads Project
**Date:** Monday, January 29, 2024 12:44:28 PM

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

**From:** Michael Volz <vmv1950@aol.com>
**Sent:** Monday, January 29, 2024 12:41:09 PM
**To:** Adam Rush <arush@banningca.gov>
**Subject:** Sunset Crossroads Project

E-29-1 I do NOT approve of the Sunset Crossroads project. Please abandon the industrial portion. Placing industrial buildings next to residential areas is poor planning, unhealthy and unsafe! E-29-2

Sent from Michael Volz
818-310-1950

## Response to Letter E-29

Michael Volz
January 29, 2024

**Response to Comments E-29-1 and E-29-2**

The comment states opposition to the Project due to its placement next to residential areas. Please refer to the responses to Comments E-2-1 and E-7-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**From:** Adam Rush
**To:** Susan Walsh
**Subject:** Re: Sunset Crossroads Project
**Date:** Monday, January 29, 2024 9:22:08 AM

Good Morning Ms. Walsh,

Thank you for your email. I am confirming receipt.

Sincerely,

Adam B. Rush, M.A., AICP
*Community Development Director*
*Community Development*
**City of Banning**
*Direct Line*: *951-922-3131*
*Cell: 760-219-2791*
arush@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

**From:** Susan Walsh <hummengberd@aol.com>
**Sent:** Monday, January 29, 2024 7:38:25 AM
**To:** Adam Rush <arush@banningca.gov>
**Subject:** Sunset Crossroads Project

Dear Mr. Rush,

My husband and I are vehemently opposed to the development of this massive warehouse project. We are so often very disappointed with the decisions made by our representatives. I truly don't understand stand the mindset of our city leaders that would promote and push warehouse projects in residential areas, close to
Senior communities and the negative issues they bring . . . 24/7 semi truck traffic, unhealthy air quality, noise. E-30-1 E-30-2

We want to see development of the Banning area, but not with warehouses. We want our property values to increase and our way of life to be enhanced and protected.

As representatives of our communities, we implore and remind each of you that you serve the people of each community and not the developers! E-30-3

You must recognize the strong opposition to this type of development overall, and see that the people of our town want other types of business development that will add value to each community.

Susan Walsh
Banning, CA

Sent from my iPhone

## Response to Letter E-30

Susan Walsh
January 29, 2024

**Response to Comment E-30-1**

The comment states general opposition to the Project. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no o further response is required.

**Response to Comment E-30-2**

The comment questions the location of the Project and proximity to sensitive receptors. Please refer to the responses to Comments E-2-1 and E-6-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-30-3**

The comment expresses support for development in the area but does not support warehouse uses. Please refer to the responses to Comments E-2-1 and E-2-4. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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I am a property owner and resident of Banning. My home is near Sunset Avenue and Wilson Street. I regularly drive Sunset Avenue south of Wilson Street and the Interstate 10 interchange at Sunset Avenue and am personally familiar with the immediate project area. E-31-1

I have taken the time to open and page through each of the 65 separate document links the City has posted to make the Draft EIR "accessible" to the public. This effort has been daunting. The disjunct nature of the record is not user-friendly and makes it impossible to conduct key word searches to cross-reference statements and assumptions within the individual reports, and between reports. E-31-2

The following comments focus on a limited number of key issues that came up in review of this more than 10,000-page record. Revision of the Draft EIR and supporting studies to resolve these issues is necessary to ensure that the environmental analysis for this project fulfills the basic purposes of disclosure and informed decision-making. E-31-3

1. The "MSJC entitlements" - The redesignation of a replacement site for the current residential development density of the development site is clearly an integral element of the proposed project. It is suggested that the entire development potential of the more than 500-acre development site can be transferred to an approximately 40-acre site. Development of such intensity at the MSJC site is clearly not feasible – the site is constrained by natural drainage features and has limited road access. E-31-4

   Contrary to statements that the MSJC site redesignation would allow more than 1,100 residential units, the replacement site entitlements as described in the Draft EIR, only create the potential for a handful of single-family residential units on the MSJC site (one single-family home per existing legal parcel according to Executive Summary, page 1-8). E-31-5

   There is no evidence in the record that the City has consulted with the Mount San Jacinto Community College District regarding this aspect of the project (see Chapter 10, References and Executive Summary, page 1-4 which identifies Chapter 10 as the location for information regarding persons consulted). E-31-6

   There is no evidence in the record that the City has considered the future development plans for the MSJC campus or the associated environmental documentation (SCH Number 2011091044). The Office of Planning and Research State Clearinghouse indicates the adopted campus master plan provides for approximately 250,000 square feet of educational building space. The suggestion that both this future campus development and more than 1,100 units of E-31-7

residential development could be accommodated at this site is unrealistic. If the MSJC site is to be redesignated for residential use, then the EIR must also consider a replacement location for the approved campus. **E-31-7 Cont**

The Draft EIR must be revised to identify a feasible option to offset lost residential development intensity and revise all relevant impact analysis categories to characterize and disclose the associated environmental impacts and any recommended mitigation measures. **E-31-8**

2. Trip Distribution, Sun Lakes Boulevard – The Draft EIR (Appendix J-2, page 60) states that no project-related truck traffic is anticipated on Sun Lakes Boulevard between Highland Springs Avenue and the project boundary, but then states that some undefined "nominal" amount of truck traffic was assumed use Sun Lakes Boulevard west of Highland Home Road. Further, there is a statement that physical deterrents to control truck movements are not proposed or recommended. **E-31-9**

   I could not find a summary of trip generation assumptions for Sun Lakes Boulevard in the main body of the Draft EIR. This information is critical to understanding several aspects of the impact assessment. The public and decision-makers should not have to dig through thousands of pages of technical appendices or compile the information from multiple exhibits in those appendices. **E-31-10**

   The dismissal of physical features to control truck movements as an enforcement mechanism is conclusory and unsubstantiated. The March Joint Powers Authority and City of Riverside have employed physical deterrents to truck movements for years to restrict truck traffic on Van Buren Boulevard in the industrial district in the vicinity of Riverside National Cemetery. **E-31-11**

   The Draft EIR must be revised to clearly disclose consistent, reasonable assumptions for trip distribution, assess environmental impacts based upon consistent, reasonable trip distribution assumptions, and identify reasonable, enforceable mitigation measures for any significant impacts. **E-31 -12**

3. Trip Distribution, Westward Avenue – I could find no mention in the Draft EIR regarding any project traffic distributed to Westward Avenue, east of Sunset Avenue. This appears to be the case given the content of Tables 4.13.N through U, which identify the same number of daily trips in the "without project" condition and the "with project condition" for Westward Avenue east of Sunset Avenue. Considering the MSJC entitlements aspect of the project (with primary **E-31-13**

access on Westward), the destination nature of the commercial elements for residents in the southern portion of the City, and local resident preference to avoid I-10 for local trips, the assumption that no project traffic will utilize this section of Westward Avenue is not reasonable.

E-31-13 Cont

The Draft EIR must be revised to disclose reasonable assumptions for trip distribution, assess environmental impacts based upon reasonable trip distribution assumptions, and identify reasonable, enforceable mitigation measures for any significant impacts.

E-31-14

4. Traffic Impacts, Transportation Hazards – the analysis in Draft EIR Section 14.17.6.4 is silent to potential hazards due to post-project conditions affecting access to the Serrano del Vista community. Serrano del Vista is accessed by a single, gated access point on the east side of Sunset Avenue, between Westward Avenue and Jefferson Street. The current condition allows for unrestricted movement and does not involve substantial truck traffic. Contrary to the statement in the Draft EIR, the Specific Plan (Figure 2-3) allows a raised median on Sunset Avenue. The Draft EIR must be revised to accurately disclose the intended improvements on Sunset Avenue at this location, to evaluate any resultant traffic safety impacts related to alterations in access and traffic mix at the gated entry, and to identify any necessary project modifications or mitigation measures.

E-31-15

5. Traffic Impacts, Emergency Access – the Draft EIR analysis (Section 14.17.6.5 and Chapter 5) is silent to the limited options for access at the MSJC site and resultant considerations for emergency access. The Draft EIR must be revised to acknowledge the proposed intensity of development, acknowledge the limited access, disclose standards for access under City planning and fire safety standards, evaluate any impacts in this regard, and identify any necessary project modifications or mitigation measures.

6. Alternatives – Recognizing the potential significant environmental impacts related to designating off-site lands for off-setting residential density, the EIR should consider an alternative that accommodates the residential intensity offset within the “development site”.

E-31-16

7. Cumulative Projects – The cumulative project analysis for this project should also consider the approved campus master plan for the MSJC campus (per SCH Number 2011091044), Banning Pointe , and the I-10 Bypass.

E-31-17

## Response to Letter E-31

Kathleen Dale
January 30, 2024

**Response to Comment E-31-1**

The commenter is a property owner and resident of Banning and the Project Area and states that they are personally familiar with the Project Area. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-31-2**

The commenter suggests that the Draft EIR posted on the City website was not accessible to the public due to the numerous separate document links provided and the inability to conduct key word searches throughout the document.

CEQA Guidelines Section 15087 requires that the lead agency provide notice of availability of the Draft EIR to the public for review and comment, as well as posting the Notice of Availability with the State of California Governor's Office of Planning and Research and local County Clerk's office which provides details of public review process. The Draft EIR was provided for public review in accordance with the CEQA Guidelines. The Notice of Availability (dated December 15, 2023) included an active weblink to the Draft EIR and supporting appendices and provided contact information for the City Community Development Director (including email and phone number) which allowed an additional pathway to request assistance and/or to ask questions or express concerns regarding the Project's environmental review process, including the accessibility of the Draft EIR and supporting appendices. Hard copies of the Draft EIR were also made available for review at City Hall and at the Banning Library.

The City has provided the Draft EIR and all supporting technical studies as required under CEQA, following its established procedures regarding the posting and availability of such documents.

This comment does not raise any issues regarding the adequacy of environmental analysis contained in the Draft EIR; therefore, no further response is necessary.

**Response to Comment E-31-3**

The commenter notes that the record exceeds 10,000 pages, notes that their comments will be limited to key issues and requests revision of the Draft EIR and supporting studies to resolve issues provided in the comment letter to ensure that the environmental analysis fulfills the basic purpose of disclosure and informed decision-making. The comment is noted. The Draft EIR Section 2.6.4 clearly identify that the Draft EIR was available for public review at the City Planning Department. Additionally, a copy of the Draft EIR was provided at the Banning Public Library. The location and manner in which the Draft EIR and appendices could be accessed online during public review was included in the NOA that was distributed and posted at the start of the public review period. Please see the response to Comment E-31-2. This comment does not raise specific issues concerning the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-31-4**

The commenter questions whether the Mount San Jacinto College site (MSJC Site) can accommodate the entire development potential of the Development Site on a site of approximately 40 acres that is constrained by natural drainage features and has limited road access. As is stated in the Draft EIR (see Section 3.1.1, page 3-5), only the Northern Portion of the Development Site (280.1 acres] is subject to the requirements of Government Code Section 66300 *et seq.* The current land use designations and zoning on that portion of the site provide for a range of low, medium and high- density residential uses that allow a maximum of 1,146 units (assuming buildout at the maximum density permitted by the City's zoning code).

As described in the City-initiated application for a General Plan Land Use Amendment and zone change and in Chapter 5.0 of the Draft EIR, the City anticipates that the development of very high-density zoning capacity will further greater diversity of housing across the spectrum of income levels and housing types in the City. The contemplated rezoning would create a maximum capacity of 1,181 units on the MSJC Site. The entitlements proposed for the MSJC Site would provide for rezoning to Very High Density Residential at a density of 18-24 dwelling units per acre. Government Code Section 66300 *et seq.* requires rezoning for an equivalent number of units. It is recognized that the natural drainage features constrain the site and that portions of the MSJC Site house school facilities. The City's zoning code expressly provides for clustering of development on sites zoned Very High Density Residential. As discussed in Chapter 5.0 of the Draft EIR, the MSJC Entitlements would establish a specific plan overlay coterminous with the MSJC Site to allow the site to be developed in a cohesive manner, account for the provision of adequate public infrastructure (i.e., roads, storm drain, electricity, sewer, potable and recycled water availability), and provide the opportunity for clustering of residential development, to provide for a mixed-use school facility and residential development on the site. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-31-5**

The commenter references the Draft EIR (Executive Summary, page 1-8) claiming the MSJC Site holds the potential for only a "handful of single-family residential units." The referenced sentence is incorrect and will be struck in the Final EIR. As stated in numerous other locations throughout the Draft EIR, including Sections 1.4.1 (page 1-8), 2.0 (page 2-1), 3.1.2 (page 3-5), 5.1 (page 5-1), 6.0 (page 6-1), 7.2.1.2 (page 7-10), and 8.1.1 (page 8-3); the City has proposed a General Plan amendment and rezoning of the MSJC Site, which is adjacent to the Development Site to the east, from its current General Plan and zoning of Public Facilities-Schools to Very High Density Residential, allowing a maximum capacity of not less than 1,146 residential units. The MSJC Site is not currently entitled for residential units. However, with the entitlements discussed in Chapter 5.0 MSJC Programmatic Analysis of the Draft EIR, the MSJC Site would be entitled for the development of very-high density residential uses to ensure no loss of residential capacity. The contemplated rezoning would create a maximum capacity of 1,181 units on the MSJC Site (see GPA 22-2502 and ZC 22-3502[67], collectively the "MSJC Entitlements"). The increase in residential density on the MSJC Site resulting from implementation of the MSJC Entitlements would ensure that no loss of residential capacity in the City

[67] This General Plan Land Use Amendment (GPA) for the on the MSJC Site which will change the land use designation from PF–S (Public Facilities-Schools) to VHDR (Very High Density Residential) (GPA 22-2502).

would result from Project. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-31-6**

The commenter states there is no evidence in the record that the City has consulted with the Mount San Jacinto Community College District (MSJCCD) regarding entitlement aspects of the Project. As stated in the Draft EIR (see pages 3-5 and 5-1), the MSJC Entitlements are comprised of (1) a General Plan Land Use Amendment (GPA) and (2) a change to the Official Zoning Map (ZC) on the MSJC Site to change the land use designation and zoning from PF–S (Public Facilities-Schools) to VHDR (Very High Density Residential), with a density range of 18–24 dwelling units per acre (18-24 DU/AC). While the adoption of the MSJC Entitlements would rezone the MSJC Site to allow very high- density residential uses, no residential development is envisioned at this time. Further, no residential development application has been filed or is contemplated for the MSJC Site; as such the Draft EIR includes a programmatic analysis (see Draft EIR, Section 5.0) of the proposed MSJC Entitlements. The City has consulted[68] extensively via email and telephone conversation with MSJCCD staff regarding the proposed entitlements for the MSJC Site. Per the City, this communication occurred between February of 2019 and July of 2021. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-31-7**

The commenter states that there is no evidence in the record that the City has considered the future development plans for the MSJC campus or the associated environmental documentation (SCH Number 2011091044), which provides for approximately 250,000 square feet of educational building space. The comment states that both this future campus development and more than 1,100 units of residential development could be accommodated at this site is unrealistic and if the MSJC Site is to be redesignated for residential use, then the EIR must also consider a replacement location for the approved campus. In a Board of Trustees Facilities Workshop/Facilities Master Plan Review conducted on September 22, 2022 (see: https://www.msjc.edu/businessservices/documents/BOT-Facilities-Workshop-22-0922.pdf) providing an update overview of the Facilities Master Plan 2020, the expansion of campus facilities at the MSJC San Gorgonio Pass campus (referred to in the Draft EIR as the MSJC Site) was limited to landscaping plans within the existing campus footprint located at the southeast corner of Sunset Avenue and Westward Avenue.

Master Plans are guidance documents used for long-term planning and are not carried out until the need arises and funding secured. While a Facilities Master Plan exists for the MSJC system, including the San Gorgonio Pass campus, this plan does not commit the MSJC Site for the uses planned nor guarantee the planned campus development would occur and does not restrict the use of the site for residential purposes. The infeasibility of alternative locations for this new residential zoning is discussed in Section 8.2.1 (page 8-9) of the Draft EIR. The transfer of units to multiple sites would generate the same number of trips and therefore equivalent air quality, noise, and GHG impacts, and potentially increased VMT impacts due to the dispersed nature of multiple sites. This comment does

[68] Email discussions were between Adam Rush (then Banning Community Development Director) and Beth Gomez (MSJCCD Facilities Manager); email discussions were between Adam Rush, Beth Gomez, and Roger Schultz (MSJCCD Superintendent).

not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-31-8**

The commenter requests that the Draft EIR be revised to identify a feasible option to offset lost residential development intensity and revise all relevant impact analysis categories to characterize and disclose the associated environmental impacts and any recommended mitigation measures. As discussed in Section 3.0 and 5.0 of the Draft EIR, the City is required under State law, set forth in Government Code Section 66300 et seq., to identify and concurrently rezone other land in the City to ensure no net loss of residential capacity. The City has identified an approximately 49.2-acre site located adjacent to the Development Site at the MSJC Site location to create a maximum capacity of 1,181 units on the MSJC Site, sufficiently transferring the potential 1,146 residential units and ensuring no loss of residential capacity required under State law. See the response to Comment E-31-7. As the Project already includes a feasible option to ensure no loss of residential capacity and this comment does not raise any specific question or issues regarding the analysis contained in the Draft EIR, no further response is required.

**Response to Comment E-31-9**

The commenter notes that the Draft EIR (Appendix J-2, page 60) states that no project-related truck traffic is anticipated on Sun Lakes Boulevard and the project boundary, but then identifies that some nominal amount of traffic was assumed to use Sun Lakes Boulevard west of Highland Homes Road. The commenter identifies language in the Draft EIR that physical deterrents to control truck movements are not proposed or recommended.

The commenter does not provide the additional context for the cited statement on page 60 of the Traffic Analysis in Appendix J-2. The relevant discussion is excerpted below:

> "No truck access is anticipated to the west on Sun Lakes Boulevard towards Highland Springs Avenue. Tenants can provide driver education on the truck routes to be utilized and also post signage at driveways along Sun Lakes Boulevard Extension/Westward Avenue. However, since there are no physical deterrents in place or proposed, a nominal amount of truck traffic has been assumed to head west towards Highland Springs Avenue in order to disclose any potential deficiencies if this were to occur. Physical deterrents are not recommended as they are frequently driven over and/or may potentially limit the access for passenger cars."

Per consultation with the City during the traffic scoping process, the 'nominal' amount of truck traffic traveling westbound on Sun Lakes Boulevard was set at 10 percent of truck traffic (all axel types) for Phases 1, 3, and 4. This equates to 76 eastbound and 26 westbound trucks in the AM peak hour and 27 eastbound and 70 westbound trucks in the PM peak hour. As indicated above, the Traffic Analysis (TA) recognizes that truck traffic may access Sun Lakes Boulevard towards Highland Springs Avenue because there are no deterrents precluding this possibility. Accordingly, the Traffic Analysis trip distribution assumes that trucks could use this route. The preferred means to deter truck traffic from using this route is by providing driver education and directional aides guiding truck traffic to designated truck routes. An additional project design feature (PDF) included in Section 3.4 of the revised Specific Plan (Final EIR PDF T-4) requires preparation of a Truck Route Management Plan

approved by the City to discourage truck travel along Sun Lakes Boulevard west of the Development Site, and therefore, minimizing impacts at Highland Springs Avenue. The Truck Route Management Plan, to be approved by the City Community Development Director, will be required prior to issuance of the first occupancy permits for each industrial site, and will include the following components:

- Posting of signage clearly showing the designated entry for trucks from the public streets to the designated on-site truck check-in and truck parking areas.
- Posting of signage indicating that all parking and maintenance of trucks must be conducted within the designated onsite areas and not within the surrounding community or on public streets.
- Posting of signage for exiting traffic (other than exempt vehicles) showing the designated exits and restricting westward travel on Sun Lakes Boulevard west of Highland Home Road.
- Lease provisions clearly identifying the required truck routes, including requiring trucks to use Sunset Avenue to access the I-10 Freeway interchange and prohibiting trucks (other than exempt vehicles) on Sun Lakes Boulevard west of Highland Home Road.
- Consider and include, where feasible, driveway aprons providing egress to SLB Extension that physically direct trucks east on Sun Lakes Boulevard Extension in a manner that does not affect exempt vehicles.
- Truck route maps provided to all drivers and posted in breakrooms and throughout the Development Site.
- Designation of a Traffic Coordinator contact for the City to notify in the event of traffic issues.

See the response to Comment D-6-1-A regarding the Truck Route Management Plan. Although it cannot be assured that all trucks will use Sunset Avenue, it is appropriately designated as the primary route upon which trucks will travel from the Development Project to the freeway. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-31-10**

The commenter states that a summary of the trip generation assumptions for Sun Lakes Boulevard was not provided in the main body of the Draft EIR and was needed to understand several aspects of the impact assessment. The comment further states that the public and decision-makers should not have to dig through thousands of pages of technical appendices or compile the information from multiple exhibits in those appendices; this comment is noted. It is not clear what "trip generation assumptions" the commenter is seeking. The assignment of traffic to the adjoining roadway system is based upon the trip generation (see Draft EIR, Appendix J-3, Attachment B). Trip distribution (see Draft EIR, Appendix J-2, Section 4.2) and the arterial highway and local street system improvements that would be in place at time of operation. The assignment of trips to various roadway segments within and adjacent to the Development Site at buildout of the Development Project is detailed in Figure 4-20 of Draft EIR, Appendix J-2.

Further, as an EIR must contain substantial evidence to provide a thorough analysis and support its findings, EIRs in general may contain a vast amount of supporting information including technical studies written by subject matter experts that are typically provided in appendices to support the findings and conclusions stated in the EIR. There is no mandate under CEQA as to how the City must post documents. The City has provided the Draft EIR and all supporting technical studies as required under CEQA, following its established procedures regarding the posting of such documents. This comment will be provided to the City staff and elected officials for consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-31-11**

The commenter disagrees with the dismissal of physical features to control truck movements as an enforcement mechanism as conclusory and unsubstantiated within the Draft EIR and further states that the March Joint Powers Authority and City of Riverside have employed physical deterrents to truck movements for years to restrict truck traffic on Van Buren Boulevard in the industrial district in the vicinity of Riverside National Cemetery.

Please refer to the responses to Comments D-6-1-A and E-31-9 regarding the Project's Truck Route Management Plan. Although the March Joint Powers Authority and City of Riverside may have employed practices and physical deterrents to truck movements in other situations it is by no means an assurance that such features would be feasible or effective for the Development Project. Further, the commenter does not provide any analysis or substantiation that these features have improved traffic conditions, precluded traffic incidents, or have not resulted in access limitations or access conflicts such as those noted in the Traffic Assessment in the other locations identified. The Traffic Assessment (Appendix J-2) in the Draft EIR is not intended to provide final designs and engineering-level details of prospective transportation system improvements. Rather, it provides the City and public and agency reviewers with information indicating where improvements will likely be required, and the type and scope of those improvements, not their final and ultimate designs. The findings and conclusions of the Draft EIR are not affected. This comment does not raise any specific question or issues regarding the analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-31-12**

The commenter states that the Draft EIR should be revised to clearly disclose consistent, reasonable assumptions for trip distribution, assess related environmental impacts, and identify reasonable, enforceable mitigation measures for any significant impacts. As described in detail in Section 4.17 of the Draft EIR, CEQA does not require an analysis of traffic congestion or level of service impacts. Effective July 1, 2020, LOS and similar metrics measuring automobile delay no longer can be used to determine whether a land use project's impacts on transportation constitute a significant environmental effect under CEQA. CEQA Guidelines Section 15064.3(a) provides that "a project's effect on automobile delay (or LOS) shall not constitute a significant environmental impact". However, because LOS is still used by the City of Banning in its General Plan for local planning purposes, that information is analyzed for informational purposes only for consistency with the City of Banning General Plan in Section 4.11.6.2 (land use) of the Draft EIR. The traffic analysis (see Appendices J-2 and J-3 of the Draft EIR) was developed for that purpose using Institute of Transportation Engineers (ITE) protocols and methodologies, and consistent with the City of Banning and Riverside County

requirements. The City's Public Works Department and City Engineer have reviewed the Draft EIR and supporting traffic analysis and determined that they provide reasonable assumptions for trip distribution and apply appropriate methodology and have been prepared consistent with accepted professional practices and in conformance with CEQA requirements. Additionally, as part of the City's review process, the Draft EIR and supporting Traffic Analysis have been independently reviewed and approved by City staff and determined to be adequate and accurate in terms of identifying and disclosing the Project's potential environmental impacts. Accordingly, the Draft EIR and supporting technical studies comprise a good faith effort at full disclosure of the Project's potential environmental impacts.

Appendix J-2 and Appendix J-3 identify recommended conditions of approval (COA TRA-1 through TRA-35), also listed in the Section 4.11 (land use) of the Draft EIR, that the City can adopt to ensure the Development Project would be consistent with the City of Banning General Plan. With payment of mandatory City DIF and TUMF fees, implementation of the referenced conditions of approval and the Specific Plan roadway infrastructure requirements, the Project will either construct (in the case of Sunset Avenue) or contribute to an established program for improvement for the intersections identified in Table I-3, with the exception of Intersection 2 for which a non-construction modification to the existing signal to extend the existing signal cycle length would be required in 2045, an activity under City control.

The traffic analysis in Appendix J-2 of the DEIR was developed by experts in traffic analysis using appropriate contemporary Institute of Transportation Engineers (ITE) protocols and methodologies, and consistent with the City of Banning and Riverside County requirements. The commenter's general statements and concerns about the adequacy of the transportation analysis are noted but do not constitute substantial evidence pursuant to CEQA Guidelines Section 15064; therefore, no further response is required.

**Response to Comment E-31-13**

The commenter states that there was no mention in the Draft EIR of any project traffic distributed to Westward Avenue, east of Sunset Avenue and further states the assumption that no project traffic will utilize this section of Westward Avenue is not reasonable. The commenter offers opinion and narrative regarding the Traffic Analysis (Draft EIR, Appendix J-2) trip distribution assumptions. As discussed in the Traffic Analysis, trip distribution involves several interactive elements including anticipated travel patterns to and from the Development Site for the retail use, industrial passenger cars, and truck traffic. Trip distribution patterns were developed based on an understanding of existing travel patterns in the area, the geographical location of the Development Site, and the site's proximity to the regional arterial and State highway system. Trip distribution modeling is facilitated by use of the Riverside County Model (RIVCOM) forecasting (Appendix J-2, page 60). Trip distribution is not readily attributable to any given travel path, or route preference such as suggested by the commenter. Credible trip distribution modeling requires traffic engineering expertise and professional experience in trip distribution modeling. The City considers the Traffic Assessment to provide a reasoned good faith effort in developing and presenting the likely Project trip distribution. Analysis and conclusions based on the trip distribution are similarly considered to constitute a good faith effort in disclosing effects of the distributed trips on the area roadway system. The commenter's

concern will be provided to City decision-makers for consideration prior to any future City action on the Project. No further response is required.

**Response to Comment E-31-14**

The commenter requests that the Draft EIR be revised to disclose reasonable assumptions for trip distribution, assess environmental impacts based upon reasonable trip distribution assumptions, and identify reasonable, enforceable mitigation measures for any significant impacts related to trip distribution on Westward Boulevard. Please refer to Response E-31-12. This comment does not raise any specific question or issues regarding the analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-31-15**

The commenter identifies access to Serrano del Vista in the current condition as allowing unrestricted movement without substantial truck traffic, states an inconsistency in the description of roadway design between the Specific Plan and the Draft EIR and requests revision to the Draft EIR to accurately disclose the intended improvements on Sunset Avenue at this location to evaluate traffic safety impacts related to alterations in access and traffic mix at the gated entry and to identify any necessary project modifications or mitigation measures.

As cited in the Specific Plan (Draft EIR, Appendix B, page 2-9) Sunset Avenue would have a, "center raised or painted median." The improvement stated in the Specific Plan for this segment of Sunset Avenue is identified in Section 3.5.3.2 of the Draft EIR (see page 3-45 and Figure 3-9). As detailed in the Draft EIR (Section 4.11, pages 4-11-32 and -33), the improvements at the intersection of Sunset Avenue at both Lincoln Street and the Sun Lakes Boulevard include the installation of traffic signals, dedicated left turn lanes, and through- and right turn-lanes.[69] These features will regulate traffic along Sunset Avenue, thereby promoting sufficient and safe access into the Serrano del Vista Community and the MSJC Campus. As discussed in the Specific Plan (Appendix B, pages 1-4 and 2-10) the proposed circulation improvements are in conformance with the City's General Plan and would require appropriate review by the City Engineer. The City, through established design and development review processes, ensures that developments do not introduce inefficient or unsafe transportation system or traffic improvements. Established traffic safety designs and design protocols routinely employed by the City typically include: the California Manual on Uniform Traffic Control Devices (CA MUTCD); the Highway Design Manual; the AASHTO Policy on Geometric Design of Highways and Streets; the Caltrans Standard Plans and Standard Specifications; the City's Standard Drawings; and the City's Special Provisions. Other pertinent documents may include Specific Plans, Master Plans, and the Conditions of Approval for the Project. These design protocols would appropriately consider community access, truck movement, and potential traffic hazards. The provision of the circulation improvements (as reviewed and approved by the City Engineer and the with the incorporation of appropriate design criteria) would ensure such improvements provide sufficient safe access to and through the Project area and to/from the Serrano del Vista community.

As stated in the Draft EIR (Section 4.20, page 4.2-119), the Development Project would provide general and emergency access to the commercial uses in Planning Area 1. This access would be

[69] See COAs TRA-25 and TRA-25, at Draft EIR pages 4-11-32 and 4.11-33.

provided by "Street A" and Lincoln Street. Direct access to Planning Areas 2, 3, and 4 would be provided by Sunset Avenue. Access to Planning Areas 6 and 7 would be provided from the south by Lincoln Street and access to Planning Areas 2, 5, and 8 would be provided from the north by Lincoln Street and by the SLB Extension to the south. Planning Areas 9 and 10 would provide access from the future SLB Extension. Planning Areas 11 and 12 are accessible from the SLB Extension and Highland Home Road. Planning Area 4 would be accessible from the SLB Extension on the north and Bobcat Road on the south. All roadways and structures within the Development Site would be developed in accordance with City and RCFD emergency access standards. The Development Project would also be required to comply with all applicable codes and ordinances for emergency vehicle access, which would ensure adequate access to, from, and on the Site for emergency vehicles.

The commenter also speculates on potential hazards due to "the limited options for access at the MSJC Site and states the Draft EIR must be revised to include "resultant considerations for emergency access" based on potential future development and disclose impacts and necessary mitigation for said impacts. As detailed in Section 5.3 of the Draft EIR, adoption of the MSJC Entitlements would rezone the MSJC Site for very high-density residential (VHDR) uses, yet no specific residential development is envisioned at this time. As detailed in Sections 5.4.17.2 (page 5-69) of the Draft EIR, adoption of the proposed MSJC Entitlements is not a physical project that would alter any facility or inhibit emergency access or the execution of the City's Emergency Operations Plan. Regarding the MSJC Site, Draft EIR Sections 5.4.9.2 (page 5-43), and 5.4.20.2 (page 5-78), subsequent development of the MSJC Site with residential uses would be reviewed at the time such residential development occurs to ensure such development conforms to applicable emergency access requirements. As the type, location, configuration, or orientation of future development on the MSJC Site is not known at this time, the commenter's assumption of inadequate emergency access is unsubstantiated. Absent further definition of the asserted limited access conditions, further response to this comment would involve speculation on the type and extent of such potential limited access.

Based on the preceding and the substantial evidence presented in the Draft EIR, the Project would not result in potentially significant hazards due to post-project conditions affecting access to the Serrano del Vista community, nor adversely impact emergency access at the MSJC Site. The findings and conclusions of the Draft EIR are not affected. Revisions to the Draft EIR are not required.

**Response to Comment E-31-16**

The commenter requests that the Draft EIR consider an alternative that accommodates the residential intensity offset within the development site. Under Government Code Section 66300 et seq., no "offset" of residential units is required if residential units within the City's jurisdiction are retained on site for development.

Per CEQA Guidelines Section 15126.6, an EIR must describe a reasonable range of alternatives to the project, or to the location of the project, that could feasibly attain most of the project basic objectives, while avoiding or substantially reducing the project's significant environmental impacts. An EIR does not need to consider every conceivable alternative to a project, rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

Section 8.2 of the Draft EIR considered six potential alternatives (including an off-site alternative, commercial uses, office uses, and increased and decreased levels of residential development) determined as infeasible because they would exceed or not substantially lessen the impacts of the Project being analyzed, are repetitive of other alternatives, or would not meet most of the basic objectives for the Project. A comprehensive quantitative analysis of four alternatives is provided in the Draft EIR (see Draft EIR Sections 8.3 through 8.6), including: No Project/No Build (Alternative 1); No Project/Existing General Plan and Zoning/Residential and Commercial Development (Alternative 2); Reduced Commercial Alternative (Alternative 3); and Reduced Industrial Alternative (Alternative 4). Alternative 2 as discussed in Section 8.4 of the Draft EIR consists of mixed-use residential and commercial uses. CEQA does not require consideration of variations on alternatives analyzed in the Draft EIR. See *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 491. No further response is required.

**Response to Comment E-31-17**

The commenter requests that the cumulative project analysis for the Project also consider the approved campus master plan for the MSJC campus, Banning Pointe, and the I-10 Bypass. An EIR may utilize a list of past, present and probable future projects producing related impacts to be analyzed in connection with a proposed project. See CEQA Guidelines Section 15130(b)(1)(A). The fact that a project is undergoing environmental review is not by itself sufficient to qualify for inclusion on a cumulative projects list, and need only be included to the extent that the environmental review is evidence that the proposed project is both probable and sufficiently certain to allow for meaningful cumulative impacts analysis, and this is particularly the case for roadway projects. See, for example, CEQA Guidelines Section 15130(b)(1)(A) (future projects must be "probable"); *City of Maywood v. Los Angeles Unified Sch. Dist.* (2012) 208 Cal.App.4th 362, 398. In addition, CEQA allows the lead agency to select a cutoff date for generating the list of cumulative projects to be included in the cumulative impacts analysis, and the date of the notice of preparation (NOP) is an accepted date to use. See CEQA Guidelines Section 15125(a)(1). The NOP date for the Development Project was February 1, 2021.

Cumulative projects that could potentially interact with effects of the Project are identified and discussed in detail in Draft EIR Section 6.0, Cumulative Impacts. The MSJC campus and Banning Pointe (also titled as Sun Lakes Village North Specific Plan Amendment No. 5) are specifically noted as cumulative projects (Draft EIR pages 6-3 and 6-10 respectively). As stated in the response to Comment E-31-7, while a Facilities Master Plan exists for the MSJC system, including the San Gorgonio Pass campus, this plan does not commit the MSJC Site for the planned uses nor guarantee the future campus development would occur. Currently no future campus development on the MSJC Site is reasonably foreseeable. However, the potential buildout of the MSJC Site with between 1,146 and 1,181 residential units consistent with the rezoning of the site is analyzed at a programmatic level (see Draft EIR, Section 5.0). The buildout of the MSJC Site pursuant to the MSJC Entitlements is addressed programmatically in Draft EIR Section 5.0 and evaluated as part of the cumulative impacts analysis in Draft EIR Sections 6.5.1 through 6.5.20.

The proposed I-10 Bypass[70] would provide a roadway connection between the City and the unincorporated community of Cabazon to the east. The preferred alignment would connect the west end of the bypass to Westward Avenue, approximately 3 miles east of the Development Site and Sunset Avenue. Connection to the I-10 is provided by a full interchange at Hathaway Street. While the I-10 Bypass Project had been under environmental review prior to publication of the NOP[71], and the joint EIR/Environmental Assessment had been recirculated, neither the CEQA nor National Environmental Policy Act (NEPA) component of the I-10 Bypass Project had been finalized. For the NEPA component of the I-10 Bypass Project, Caltrans issued a Finding of No Significant Impact (FONSI) on October 6, 2021, while the Riverside County Board of Supervisors certified the EIR and issued a Notice of Determination on December 7, 2021. The commenter provides no substantial detail as to how the bypass would affect the cumulative condition in the Project area. While the I-10 Bypass Project is included in the Connect SoCal Project List Technical Report[72] (the final design has not been prepared, and a required right of way has not yet been obtained). See https://rcprojects.org/i10bypass. Accordingly, the City properly excluded the I-10 Bypass Project from the list of cumulative projects prepared on February 1, 2021. The findings and conclusions of the Draft EIR are not affected. Revisions to the Draft EIR are not required; and no further response is necessary.

[70] The I-10 Bypass Project is located east of the City of Banning in unincorporated Riverside County. This project proposed to construct a new road which will provide a missing link between the City of Banning and the unincorporated community of Cabazon. The proposed project is located in close proximity to the Morongo Indian Tribal land, Smith Creek, and the San Gorgonio River. The purposes of the project include: to provide a local roadway to accommodate local trips on a local roadway; provide an alternate route between Banning and Cabazon in the event of closure of I-10; provide a connection between Cabazon and Banning that does not require an at-grade railroad crossing: provide a safe route for pedestrians and bicyclists; and to improve public safety and emergency access response. See: https://rcprojects.org/i10bypass

[71] The Recirculated EIR/EA was available for the I-10 Bypass Project was provided for public review and comment from August 12, 2019 to September 25, 2019 and included the identification of a Locally Preferred Alternative.

[72] https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-connect-socal-2024-project-list-draft-110223.pdf?1698263410, see page 114.

**From:** Cindy Medley
**To:** Adam Rush
**Cc:** Alberto Sanchez; Colleen Wallace; Sheri Flynn; Rick Minjares; Doug Schulze
**Subject:** Sunset Crossroads Project
**Date:** Tuesday, January 30, 2024 11:26:16 AM

Hello Adam Rush, M.A., AICP Community Development Director, City Council Members, and City Manager,

I am writing this to share my opinion on the Sunset Crossroads Project. It would be nice if the City of Banning would do a survey to ask residents what they would like to see here. Wouldn't it be nice for residents to spend their money here in our community instead of going to Riverside, Redlands, Palm Desert, Hemet and other cities to have family activities and shopping. Maybe even include the Cities of Beaumont, Calimesa, and Yuciapa in the survey to determine what would draw their residents to spend their money in our community? **E-32-1**

I do believe the extension of Sun Lakes Blvd. is a good idea but I don't agree with your choice of structures to be built on the land. **E-32-2**

I don't believe from all the negative talk that City of Banning residents want any more warehouses, traffic congestion or pollution to dirty up our communities and the environment in the Pass area. Maybe Banning's Economic Development Department needs to be tasked with finding new ideas other than just jumping on board the "Warehouse" train. Take a good look at Fontana, Rialto, San Bernardino, and others and what has the warehouse's done for them except bring more big truck congestion to their surface streets and air pollution to their area. This is our City not the Developers and you need to listen to your residents. **E-32-3**

No More Warehouses

Thank you,

Cindy Medley
Sent from my iPhone

## Response to Letter E-32

Cindy Medley
January 30, 2024

### Response to Comment E-32-1

The comment states that the City should survey residents on the preferences for development of the Development Site. It should be noted that the description of the project as identified in Section 3.0 of the Draft EIR identifies up to 68,400 square feet of commercial uses which will provide a variety of local- and regional-serving uses that are consistent with the mix of land uses noted as preferred by the commenter. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-32-2

The comment states that the extension of Sun Lakes Boulevard is desirable, but states opposition to the Project. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

### Response to Comment E-32-3

The comment states opposition to the Project based on the proposed warehouse uses and resulting traffic congestion and pollution. Please refer to the responses to Comments E-2-1 and E-2-2. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**From:** Gae Rusk
**To:** Adam Rush
**Cc:** Linda Page
**Subject:** Sunset Crossroads choices
**Date:** Wednesday, January 31, 2024 9:49:04 AM

To Banning City Council and Community Development Director Adam Rush:

Why not create something visionary and grand with the open land targeted by Sunset Crossroads? Why fill that rare acreage of open land with obscenely huge warehouses and massive traffic intersections and endless semi truck traffic?

Warehouses now sit empty around the San Gorgonio Pass. Warehouses destroy small towns. Warehouses and all their cascading negative consequences are incompatible with human life. Nothing about plans that include warehouses increases Banning's desirability.

Eliminating every piece of open land in Banning will complete the City's campaign to homogenize what is left of Banning's uniqueness. Banning's historic and still used airport? Plans to erase it. Banning's rare and beautiful low-rise downtown? Plans to turn it into a multi story "tunnel" of condos. Our precious historic neighborhoods of bungalows and yards? Forget about it and just squeeze in 24 units per acre. E-33-1

According to the article in the Record Gazette, the commercial part of Sunset Crossroads is meant to be "… a regional commercial and entertainment attraction". But I ask you, who will actually choose to dine or shop or take their children to a park next to warehouses? The belief that it doesn't matter is a definitive example of delusional thinking. I point out that this replacing of unique identity is what has ruined smaller towns all along the I-10 corridor, in case you haven't noticed.

Because I actually love this small town of Banning CA, and because I am not trying to ruin what makes Banning unique and desirable, I must vote for Sunset Crossroads **ALTERNATIVE #1 - No Project/No build**.

Thank you for your attention.
T. Gae Rusk

## Response to Letter E-33

T. Gae Rusk
January 31, 2024

**Response to Comment E-33-1**

The comment states that the Development Site should not be used for warehouse development because of the negative effect of warehouse uses on small towns. The comment states concern that the proposed commercial uses would be diminished by the proximity to warehouse uses. The comment states opposition to the Project and a preference for Alternative 1 (No Project/No Build Alternative). Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**From:** Robert Messier
**To:** Sandra Calderon
**Subject:** Fwd: DEIR SUNSET CROSSROADS
**Date:** Tuesday, January 30, 2024 7:48:12 AM

Begin forwarded message:

**From:** Robert Messier <bmyucaipa@gmail.com>
**Subject: Fwd: DEIR SUNSET CROSSROADS**
**Date:** January 30, 2024 at 7:35:10 AM PST
**To:** arush@banningca.gov
**Cc:** bmyucaipa@gmail.com

**From:** Robert Messier <bmyucaipa@gmail.com>
**Subject:DEIR SUNSET CROSSROADS**
**Date:** January 30, 2024 at :07:32 AM PST
**To:** **arush@banningca.gov,**

Community Development Director

Adam B. Rush, Director
844 Pine Valley Road

99 East Ramsey Street
Banning, CA 92220-5409

Banning, CA. 92220

Dear M. Rush

**RE: SUNSET CROSSROADS DEIR REVIEW**

The Mega Sunset Crossroads Warehouse and Commercial Development is a major concern for the area due to it's size and impact upon the health and safety and traffic, etc for the area and the City of Banning. The DEIR has made a great attempt to evaluate all of the possible impacts to the immediate area, the City and the region. Major

E-34-1

concerns from the DEIR review are the forecast of future traffic and the health and safety of the adjacent residents. Outlined in the material which follows are questions to be answered and further analysis by the City of Banning based upon a review, analysis and identification of potential conflicts in the DEIR for Sunset Crossroads.

E-34-1 Cont

**General**

In the vicinity of the project and subject to significant impacts there are three sensitive receptors namely, Sun Lakes Country Club with 3327 homes and a population of approximately 5,000 residents, Serrano Del Vista with 246 homes and The Lakes Assisted Living and Memory Care all of which are designated 55+ communities and citizens of the City of Banning, California.

E-34-2

The Sun Lakes Country Club community abuts the westerly side and up against the Sunset Crossroads project from approximately the northwest corner of the project to the south along the existing and planned Highland Home Road and continues beyond the southern extent of the project. The Sun Lakes Country Club is also being impacted by another City of Banning warehouse project called Banning Pointe which is located on Sun Lakes Boulevard opposite the main entrance to Sun Lakes Country Club and adjacent to the Banning Pointe project as well as The Lakes Assisted Living and Memory Care facility located on Sun Lakes Boulevard opposite and adjacent to the Sun Lakes Country Club. Serrano Del Vista is located along the east side of Sunset Avenue between Lincoln Street and Westward Avenue directly across from proposed Buildings #5 and #6 of the Sunset Crossroads project. From the above description one can appreciate the potential significant impacts to these sensitive receptor 55+ communities.

E-34-3

The DEIR attempts to address the Serrano Del Vista but seemingly does not address Sun Lakes Country Club, The Lakes Assisted Living and Memory Care or the Banning Pointe project adequately.

E-34-4

**Traffic Surveys**

*The DEIR indicates under Existing Count Data that, " traffic counts were utilized in conjunction with a 2% growth rate to reflect 2021 COVID19 conditions", on page 1.1-8.* The surveys were taken at various years and months with the majority of all the traffic surveys being taken in a period where COVID 19 was dominate in the lifestyle of everyone at the time and any traffic numbers were absolutely not reflective of any normal traffic characteristics. Commuting peak hours were significantly changed

E-34-5

and the number of commuters in those same periods were significantly reduced due to the changes in lifestyles and then to working from home.

E-34-5 Cont

In the DEIR Traffic Analysis Report(TA) on page 43, Part 3.8 Existing Traffic Counts, a 2% growth rate was applied to the various traffic survey data and historic 2017, 2018 and 2021 traffic data to arrive at 2021 conditions. A 2% growth rate appears almost absurd considering everyone was going on lockdown to protect from getting COVID19 and hiding out at home . Therefore, traffic was extremely light at that time. It is believed a growth rate of greater than 10% would be much more realistic. Therefore using traffic from this pandemic period with a 2% growth rate to create a 2021 existing traffic baseline should certainly not be used for evaluating existing traffic conditions, never mind trying to project future Sunset Crossroads Opening Year 2027 and 2045 Horizon Year traffic and planning future transportation improvements. This is because when the whole basis for all future projections are not reflective of the normal traffic at the time the surveys were taken, this traffic is incorrect and the future numbers projected would equally make all the future analysis incorrect including all recmmendations on intersections, number of lanes required and percentages of auto and truck traffic. **Please explain why only a 2% growth was used to get to the 2021 base? Was that base 2021 factored to include the normal traffic for that year without COVID19? What was the source of any growth rate used? Is there now a better defined growth rate for the COVID19 years that is agreed to by the various Federal, State and the professionals?**

E-34-6

E-34-7

E-34-8

Similar comments were made to the City of Banning and the same consultant during the review of traffic from the Banning Pointe warehouse development project a couple of years ago and the forecasts were increased but still were not adequately addressed by the City. Indicated below are some United States COVID19 statistics relating to the time (within a couple of days) in which the traffic surveys were performed. Another statistic that is worthy of mentioning is California had the greatest number of cases at the start of COVID19 so the pandemic was spreading fastest here and residents were already staying home and not traveling on the roadways as they previously had. In fact, the Governor declared " a State of Emergency on March 4, 2020 (4 months before the first traffic survey was taken) . Please note that 133,195 Americans had died by July 9, 2020 (the first traffic study) and 455, 316 Americans died by February

E-34-9

E-34-10

11, 2021 (the second traffic study). At this period of time this country was certainly well into a pandemic and every restriction and closure imaginable and unimaginable were being put in place by authorities and people were not traveling to work and minimizing any travel or exposure.

E-34-10 Cont

| Traffic Survey Date | Number of US COVID Deaths |
|---|---|
| 5/24/2018 | N/A |
| 7/09/2020 | 133,195 to date |
| 2/11/2021 | 455,316 to date @ 5,316 per day |
| 9/30/2021 | 700,000 to date |
| 3/23/2022 | 1,000,000 |

**Trip Generation**

Although it is believed that the traffic surveys being used and the growth rate applied to provide for the COVID19 influence and a 2021 basis for trip generation and forecasting future traffic is not credible, a review of the traffic generated in the DEIR was undertaken. This review was done to identify anomolies and areas where further analysis has to be undertaken and questions answered. Indicated below are the findings of that review and the questions raised that need to be answered. All references are to the Traffic Aanalysis Report

E-34-11

1. In the review of the traffic on Exhibit 4-15 Phase 1A, page 77 for Driveways 4, 7, 11 and intersection 33 it was realized the traffic numbers from intersection 33 and driveway 11 thru Driveway 7 and finally to Driveway 4 do not total correctly from one intersection to the other. ***Please review these traffic numbers and provide an explanation.***

E-34-12

2. It was noticed that in Exhibit 4-3 Phase 1B driveways 4,7 and 11 (on Sun Lakes Blvd Extension / Westward Avenue) which were used in Phase 1A were no longer used in 1B and instead traffic generated utilized Driveways 5,8,12 and 18. **There was no explanation for this change in traffic pattern and *it should be provided and explained on Page 7 why the traffic moved from the north of Buildings 1, 2 and 3 to the south side at Bobcat Road.***

E-34-13

3. On page 94, under 4.8 HORIZON YEAR TRAFFIC FORECASTS it is indicated RIVCOM3 was

E-34-14

used for
the forecast and it had a base year of 2018 and the future year model was 2045. ***What was the traffic input into***
***the model and how was it developed?***

E-34-14 Cont

**Highland Springs and Sun Lakes Boulevard**
The City of Banning is committed to extending Sun Lakes Boulevard from Highland Home Road to Sunset Avenue for the Banning Pointe Warehouse and Commercial Development projects and the Sunset Crossroads Warehouse and Commercial Development projects. The Sun Lakes Boulevard Extension / Westward Avenue will now attract significant more traffic and congestion on Sun Lakes Boulevard and to Highland Springs which is already highly congested. Without traffic management as part of the planned developmentst the traffic survey performed before the preparation of this DEIR indicates the *existing traffic on Highland Springs Avenue ramps to East Bound (EB) and West Bound (WB) I-10 operate at a Level of Service "F" which is the worst Level of Service traffic can operate at.*

E-34-15

***All critical intersections and interchanges have increased significantly in the 2027 traffic and further impacting the traffic conditions is the fact that a significant percent of this new increase in traffic will be truck traffic.***

E-34-16

*1.* Traffic Analysis Exibit 6-2: Opening Year Cumulative (2027) With Project Traffic Volumes (Page 1 of 3) on page 137
when compared to Exhibit 3-9: Existing (2021) Traffic Volumes ( Page 1 of 3)
*indicates that at the Highland Springs Av & I-10 WB Ramps there is generally a 10-15% increase in the various*
*movements* ***except for the critical Northbound to Westbound movement which increases approximately 20%***
***for the AM Peak and nearly 30% for the PM Peak Hour. With a greater percentage of trucks in these volumes***
***the traffic impact will be considerately worse.***
*Please explain what the City will do to*

E-34-17

*2. Currently the I-10 exit ramps backup onto I-10 quite often but in the future (2027) this will be be significantly*
*(15-25% ) worse.*

E-34-18

3. In the same Exhibit 6-2 the Highland Springs Av & I-10 EB Ramps indicate the **southbound Highland Springs Av**
**to Westbound I-10 increases approximately**

E-34-19

**20% in th AM Peak Hour and 30% in the PM Peak Hour.This is**
**significant because both this movement and the Northbound to to Westbound I-10 volumes have increased**
**similarly and each movement will require more time.**

E-34-19 Cont

4. On this same Exhibit 6-2 the Highland Springs Av and 1st St/Sun Lakes Bl intersection indicates extremely
significant increases in the most difficult traffic movements to manage on Sun Lakes Boulevard (SLB) and Highland
Springs Avenue (HSA). The Westbound SLB to Northbound HSA traffic movement increased almost 30% in the AM
Peak Hour and over 85% in the PM Peak Hour. The HSA Southbound to SLB Eastbound traffic likewise increased
60% in the AM Peak Hour and over 35% in the PM Peak Hour. This is truly problematic because there are a greater
percentage of truck traffic that will require more time to get through the intersection.The other important aspect that
must be considered is that the majority of vehicular traffic they will dealing with will be senior citizens of Banning and
Beaumont in the nearby communities of Sun lakes Country Club and the Four Seasons with slower response rates
due to their aging populations.
**Please address how the City of Banning will accommodate the increased traffic**
**congestion and other problems identified above at the four (4) items mentioned above.**

E-34-20

E-34-21

**VMT Development**
In reviewing the VMT development on page 4 of 11 of the VMT basis of calculation it was noticed that in Table 1 on
page 5 of 11 and in Table 4.17.A: Employment Estimates there was an employee number of 73 for the hotel which
appeared exceptionally low for the hotel to use for VMT development. Since all other land uses utilized factors for their
particular land use to develop employee numbers for VMT development the hotel employee calculation should be
consistent with the other land use methods of calculation. Commercial uses should have the VMT developed based
upon the number of employees.

E-34-22

E-34-23

Traditionally hotels use factors to determine the number of employees based upon the Class of a hotel. The factor for

Class 1,2 and 3 is 122 employees per 100 rooms and Class 4 and 5 is 162 employees per 100 rooms. Using an

average of the two would be reasonable. Therefore (122 x 1.25 allowing for the additional 25 rooms ) + (162 x 1.25) =

354 employees / 2= 177 average employees for a 125 room hotel. This 177 employee number is approximately 240%

higher than the number of 73 in Table 1. ***As a result of this the present 73 employees utilized should be reconsidered***

***and the revised number of 177 employees should be used in a recalculation of the VMT to determine what impact it***

***may have on the VMT analysis.***

E-34-23 Cont

E-34-24

**4.6 Cumulative Development Traffic**

Cumulative projects are identified in Table 4-3 although it is not clear the traffic from those projects has been included in the analysis. Banning Pointe warehouse and commercial development was identified but only in a table of cumulative projects that could influence the 2027 and 2045 traffic. If one compares the 2021 base traffic to the 2027 and 2045 forecast it is apparent that there has to be a much greater volume of traffic at Highland Springs and I-10 for the EB and WB On-Ramps. This is due to the large quantity of trucks and cars generated just from the Banning Pointe project. There should also be a contribution of traffic from the Sunset Crossroads project.

E-34-25

E-34-26

Because it is not apparent that the Banning Pointe project traffic data and projections were included in Cumulative Development and instead a 12.6% factor was included to consider the Ambient Growth as indicated in the following quote.The traffic study indicates, "To account for background traffic growth, traffic associated with other known cumulative development projects in conjunction with an ambient growth from existing (2021) conditions of 12.62% is included for Opening Year Cumulative (2027) traffic".

E-34-27

**As previously noted the base traffic surveys do not accurately relate to the actual normal traffic that would have been detected had it not been for COVID19. It is believed the City of Banning is providing inadequate existing traffic data as a basis to forecast what the traffic will be in the Years 2027 and 2045 and will not achieve**

E-34-28

**developing the necessary transportation improvements to address the actual future traffic which will occur as a result. That is why the traffic at various intersections does not appear to be increasing as it should have. Please review this anomaly.**

E-34-28 Cont

On page 145 in Section 7.1 it is mentioned, " Other parallel facilities, that although not evaluated for the purposes of this analysis, are anticipated to be in place for Horizon Year(2045) traffic conditions and would affect the travel patterns within the study area". The EIR transportation and traffic studies does not specifically even identify the Banning Pointe project and address the significant impacts that it can have on the Sunset Crossroads project and visa versa, with the construction and traffic from both these projects*. The reasoning for the increases in traffic from Banning Pointe toward Sunset Crossroads is due to the City changing the wording in the Banning Pointe EIR from limiting access and egress from the project to only via Sun Lakes Boulevard to Highland Springs Avenue and added wording that allowed for the future access and egress via Sun Lakes Boulevard Extension to the east.* It is believed there is a significant inconsistency because the Specific Plan for Sunset Crossroads outlined that traffic from the Sunset Crossroads project would not be allowed to use Sun Lakes Boulevard. It can only be assumed that the traffic projections do not include the auto and multi-axle trucks being generated as a result of the Banning Pointe project even though the consultants preparing this EIR were also involved in the Banning Pointe Project traffic study.

E-34-29

E-34-30

E-34-31

**Cumulative Observations**

1. On page 97 of TA Report, Exhibit 4-22 Cumulative Only Traffic Volumes (Page 2 of 3) at intersection 9 Highland

Homes and Sun Lakes Blvd/Westward Ave the eastbound traffic is 52 (300) and the westbound is 85 (208) with

westbound to Highland Home north 26 (0) while on page 138 of TA Report, Exhibit 6-2 Opening Year Cumulative

(2027) With Project Traffic Volumes (Page 2 of 3) eastbound is 192 (134) and the westbound is 77 (207) with

westbound to Highland Home north 13 (13) The difference in eastbound traffic is nearly three (3) times the amount

on Exhibit 4-22 and the westbound to north is nearly two (2) times that shown on Exhibit 6-2.

**Please note the other differences as well and provide an explanation for all of them.**

E-34-32

2. On page 98 of TA Report, Exhibit 4-22 Cumulative Only Traffic Volumes (Page 3 of 3) at the intersection (33) of

Sunset Ave and Westward Ave, Westward Ave has a large westbound traffic volume of 178 (170) and a eastbound

Westward Ave volume of 96 (233) and an eastbound to southbound (right turn) of 19 (67) and a northbound Sunset

Ave to Westward Avenue volume of 63 (38), none of which are shown on Page 139, Exhibit 6-2: Opening Year

Cumulative (2027) with Project Traffic Volumes (Page 3 of 3). In addition, on Exhibit 4-22 the southbound Sunset

Ave to eastbound (left turn) Westward Ave volume of 142 (337) and the westbound Westward Ave to

northbound (right turn) volume of 245 (264) are much larger volumes on Exhibit 4-22 than on Exhibit 6-2. Also,

there is no westbound Westward Ave to northbound (left turn) volume which should have been included in Exhibit

4-22. Since Exhibit 4-22 does not have Project Traffic Volumes it appears Exhibit should have much larger volumes.

**Please provide a complete, detailed explanation?**

E-34-33

Construction Traffic

It appears the traffic studies do not include the cumulative impact of the Banning Pointe warehouse and the associated commercial development based upon the fact that the traffic numbers are very low for both the Opening Year 2027 and Horizon 2045 year traffic. This can have a dramatic impact on the forecasting of traffic during construction phases of both projects and upon the phased completion of both projects due to the traffic congestion on Highland Springs Avenue and the interchange with I-10 , as well as, similar congestion on Sunset Avenue and at the I-10 interchange. In addition, the same factor relating to Highland Springs traffic congestion can change how residents of Sun Lakes Country Club travel. Considering 4 of the total 6 gates at Sun Lakes are on Sun Lakes Boulevard and if a significant portion of the residents change how they travel as a result of the Banning Point auto and multi-axle trucks travel on the current Sun Lakes Boulevard that could also impact the overall traffic heading toward Sunset Crossroads development roadways. There will be significant automobiles and trucks of all sorts that will be

E-34-34

E-34-35

E-34-36

attracted to the Sun Lakes Boulevard Extension / Westward Avenue and Sunset Avenue to access I-10. ***Since Sunset Avenue will have a poor Level of Service at the I-10 interchange particularly eastbound during the various phases it is imperative the impacts of Banning Pointe are ascertained beforehand so they may be mitigated with the proper improvements to have a very functional operating traffic system making the mega development of Sunset Crossroads more acceptable.***

E-34-36 Cont

**Highland Home Road Improvements**

The City plans to make significant improvements to the existing Highland Home Road south of the planned Sun Lakes Boulevard Extension / Westward Avenue. It also then plans on extending it northward of the extension to Sun Lakes Boulevard to allow it to be utilized as a driveway for access and egress to and from the warehouse Building #9 for auto and multi-axle truck traffic. Highland Home Road will become a major roadway (within 50 feet and adjacent to the Sun Lakes Country Club 55+ community) handling the traffic generated by the Sunset Crossroads industrial development.

E-34-37

The new improved road replaces a seldom used local road, south of Sun Lakes Boulevard and replaces it with a major collector for all the development to the south. North of Sun Lakes Boulevard there is no actual roadway existing for Highland Home Road but there is a kind of trail that is circuitously accessed and occasionally used by utility and fire departments. The traffic along the northern extension of Highland Home Road from Building #9 will be adjacent to the eastern boundary of Sun Lakes Country Club. The northern extension being used as a driveway for Building #9 directs all the traffic to and from Building #9 to use Sun Lakes Boulevard and Highland Springs Avenue to access I-10 because it is closer and more attractive to use. *This use as a driveway goes against the intent and direction of the overall planning which is to not direct vehicles away from traveling Sunset Avenue to access I-10. This new redeveloped roadway both north and south of Sun Lakes Boulevard will have significant impacts upon residents all along the roadway that is adjacent to Sun Lakes Country Club which it is believed has not been addressed adequately in the EIR. It is recommended to reduce some of the impacts, the northern extension not be built and at most a gravel access road for emergency purposes be constructed and a gate be installed at Sun Lakes Boulevard. Building #9 access and egress should be relocated to the end of Lincoln Street.*

E-34-38

E-34-39

E-34-40

E-34-41

***The DEIR should now include <u>this additional analysis to reduce traffic and noise impacts at the residences and place the Sunset Crossroads back onto Lincoln Street by providing the access and egress there..</u>***

E-34-42

***Construction Phase Impacts***

E-34-43

There are significant impacts in the area due to construction in various phases. What was most troubling was a statement made in the “DEIR in 4.13..6,"The construction of Phase 1 would use Highland Springs Avenue and Sun Lakes Boulevard/Westward Avenue or Sunset Avenue and Bobcat Road to access the Development Site. ***Exact travel patterns of employees will be based on personal choice of the employee; however, as a reasonable estimate for purposes of this analysis, it is assumed that 1,125 construction trips would use Highland Springs Avenue and Sun Lakes Boulevard/Westward Avenue route to access the Development Site*** while the other 1,125 construction trips would use Sunset Avenue and Bobcat Road to access the Development Site for a conservative noise analysis." ***<u>This is a concern because it is not addressed in the DEIR construction traffic management and must be addressed</u>. But what is even more troubling is that the construction of Banning Pointe will coincide with this construction and it believed it was never taken into consideration. Also it is of great concern because it would mean traffic would be using Highland Springs Avenue and the congested interchange with I-10 and traveling to Sun Lakes Boulevard and driving through the Sun Lakes Country Club's 55+ community of sensitive receptors. Thereby, causing significantly more of an impact to Highland Springs and Sun Lakes Country Club residents, a community with an average age of 76. This just is not realistic and identifies a lack of EIR Cumulative construction planning.***

E-34-44

*<u>Anyone with just a little appreciation of traffic and construction would know the construction traffic should be mandated to come from the Sunset Avenue interchange with I-10 and enter the construction site would be the least disruptive to the area. Construction traffic on local roadways should be part of construction phasing and it appears this aspect has not been considered adequately.</u>*

E-34-45

**Therefore it is requested this EIR analyze the traffic during construction based upon a traffic management plan that has the least impact upon the area. In addition, that plan should include the cumulative impacts of the Banning Pointe construction traffic by phase and how that traffic impacts the Sunset Crossing**

E-34-46

**construction traffic. In addition the traffic generated from that project and how it impacts the Sunset Crossing project.**

E-34-46 Cont

In reviewing the narrative on construction of Sunset Crossing project it was noticed that there was a plan to construct a 10 foot berm around the perimeter of the project along Sunset Avenue to the east and Bobcat Road Road to the south to try to minimize the construction impacts of the project and shield the residences in that area. **This was found to be significantly short sighted on the part of the City and neglected to consider the Sun Lakes Country Club 55+ community of sensitive receptors who already have respiratory issues and an average age of 76 years who live all along the entire west side of this mega project site.The senior community protection from the impacts due the City of Banning and the developers of the mega Sunset Crossroads project is necessary for the Health and Safety of this aging community.**

E-34-47

E-34-48

**NOISE (EIR Section 4.13**

**Threshold 4.13-1**: Would the Development Project result in 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?

**Level of Significance without Mitigation: Significant**

E-34-49

***Please include the paragraph below to shield the residences of Sun Lakes Country Club along the western boundary of the Sunset Crossroads as has been provided for other residences along the eastern and southern boundaries of the project.***

E-34-50

During grading, site work, paving and utility construction, the construction contractor shall install a minimum 10 ft high temporary construction barrier along the southern and western construction boundary to shield the Sun Lakes Country Club residences along Highland Home Road from the southern end of the project area across Sun Lakes Boulevard / Westward Avenue and continuing along the westerly side of the project up to the northwest corner of the project and along the southern construction boundary to shield residences along Highland Home Road, and along the eastern construction boundary. When project construction activities are within 100 ft from the nearest residential structure to that activity.The temporary construction barrier may be any material that has a minimum Sound Transmission Class (STC) rating of 28. For off-site construction,

including for construction of the roadway and utilities, and the City will determine whether the noise barrier can be constructed on City right of way without impacting roadway access and the construction contractor shall install such barrier on City-owned property provided that such roadway access can be maintained during construction.
During all Development Site excavation and grading, the Development Project contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.
The construction contractor shall locate equipment staging in areas that will create the greatest feasible distance between construction-related noise sources and noise-sensitive receptors nearest the Development Site during all project construction.
The construction contractor shall place all stationary construction equipment so that the emitted noise is directed away from the sensitive receptors nearest the Development Site.

E-34-50 Cont

S*ince the City of Banning has proven it does not seem to consider the Sun Lakes Country Club community as evident in their involvement on Banning Pointe warehouse and commercial development project that impacts that community.*
**It is requested that the City of Banning develop a similar construction phasing and traffic management plan as part of the major construction they will be responsible for on the Sunset Crossroads including Sun Lakes Boulevard Extension, Highland Home Road, bridges, culverts and all other construction to ensure to coordinate the Banning Pointe construction phases to shield the residences from construction noise and pollution impacts to this community.**

E-34-51

**Planning and Design of Mega Warehouse Development**

*Serrano Del Vista 55+ Community*
In the planning and design of a mega project such as Sunset Crossroads and trying to maximize the utilization of as much acreage as possible for buildings often causes the designer to overlook the residential aspects of the project. The locating of Buildings #5 and #6 on the west side of Sunset Avenue between Westward Avenue and Lincoln Street creates an unmistakable impact upon the Serrano Del Vista 55+ community. In addition, the

E-34-52

E-34-53

proximity to the intersections of the access and egress driveways at these buildings may be problematic to the residential community of sensitive receptors with impacts from traffic, health, safety, noise and pollution. With the future poor levels of service at the intersections in the future the complete removal of Buildings #% and #6 may be a means to minimize traffic congestion at these intersections but also minimize significant impacts to the nearby community. **Therefore it is suggested this be considered for the aforementioned reasons.**

E-34-53 Cont

Highland Homes Road Extension North of Sun Lakes Boulevard Extension / Westward Avenue

**The traffic and noise impacts that will result from this roadway being used as a driveway to Building #9 do not warrant the consideration of it particularly when access/egress to this Building #9 is much more logical located at Lincoln Street.**

E-34-54

***Significant and Unavoidable***

In the evaluation and analysis of mega projects such as Sunset Crossroads the above terms are used throughout the reporting in this DEIR. But are they really this?

There are always numerous ways to make changes in the planning and design to reduce impacts by being more macro and looking at the total picture.

E-34-55

The size of buildings, their means of access and egress and the traffic they generate or the function of the buildings and how that generates additional traffic. How reducing building usage, location and size can perhaps reduce traffic at a key intersection because of less driveways to interfere with major traffic flow and the traffic generated may significantly reduce traffic at a key intersection.

E-34-56

Planning and design is an art form in a way, because there are many variables to consider in all aspects of the planning and development. Too often the more experienced professionals were not involved in the project to identify areas for opportunities as outlined.

E-34-57

**Before ruining the remaining lives of more than 5,000 residents of 55+ communities in the area please consider the opportunities for lessening the impacts on them and use a little less land and generate less traffic to help this Sunset Crossroad project become more acceptable and more functional to the City of Banning residents, the region and the State.**

E-34-58

## Response to Letter E-34

Robert Messier
January 30, 2024

**Response to Comment E-34-1**

The commenter identifies the Project as a mega-development, compliments the effort made in the Draft EIR to evaluate all possible impacts to the immediate area, City and region, states that future traffic, and the health and safety of adjacent residents are the main concerns of the commenter and notes questions to be answered and requests further analysis by the City as described in the letter. This comment does not raise any issues regarding the adequacy of the environmental analysis provided in the Draft EIR, and no further response is required.

**Response to Comment E-34-2**

The commenter states there are three residential areas in the vicinity of the Development Project (Sun Lakes Country Club Community, Serrano Del Vista, and The Lakes Assisted Living and Memory Care) that would be subject to significant impacts and provides details regarding the locations and number of units at those sites. Sun Lakes Country Club Community and Serrano Del Vista are the locations identified in the Draft EIR as sensitive receptors for purposes of the air quality and noise analysis in Sections 4.3.1.3 (Air Quality) and 4.13.3.2 (Noise) of the Draft EIR. Figure 4.13-2 Modeled Receptor Locations in the Draft EIR identifies each of the modeled receptor locations analyzed in the noise analysis and Draft EIR. With respect to the location of these projects and potential air quality impacts, see the response to Comment E-25-3. With respect to noise impacts, with the modifications to the Development Project described in response to Comment D-6-29, there are no significant operational noise impacts identified in the Final EIR for the identified communities. Further, as described in response to Comment D-6-30, after imposition of required mitigation measures, construction noise impacts are identified as significant and unavoidable for the Serrano del Vista communities only when work may be performed in adjoining streets and noise barriers cannot feasibly be constructed. The environmental analysis provided in the Draft EIR, as modified by the Final EIR, adequately analyses noise impacts to neighboring sensitive receptors. Further, the revisions described in the Final EIR provide additional environmental protection and do not result in any additional impacts. Under applicable provisions of CEQA Guidelines §§15088.5(a)(1) and (3), additional information and additional mitigation measures require recirculation only if they are new and significant, narrowly defined as (1) changes to an EIR that deprive the public of a meaningful opportunity comment on substantial, adverse environmental project impacts, or (2) a feasible way to mitigate or avoid an effect that the project proponent declines to adopt. The project design features, analysis and mitigation measure modifications in the FEIR with respect to noise impacts expand the scope of mitigation in the Draft EIR and clarify, amplify, or make other modifications in an otherwise adequate EIR and do not result in adverse environmental impacts or identify mitigations measures the applicant declines to adopt; therefore, the modifications do not constitute new information. See CEQA Guidelines §15088.5(b). Therefore, recirculation is not required.

**Response to Comment E-34-3**

The commenter provides further detail regarding the location of the residential developments described in Comment E-34-2 in relation to the Project and surrounding area. Please refer to the

response to Comment E-34-2 with respect to this portion of the comment. The commenter also references the impact of the Banning Pointe Project, an industrial project identified as located directly opposite the main entrance to Sun Lakes Country Club, on the residential communities on Sun Lakes Boulevard. Banning Pointe is identified as a cumulative project in the Draft EIR. No further response is required.

**Response to Comment E-34-4**

This comment states the Draft EIR appears to address Serrano Del Vista but not Sun Lakes Country Club, The Lakes Assisted Living and Memory Care or the Banning Pointe project adequately. With respect to the residential communities, please refer to the response to Comment E-34-2. With respect to the analysis of the impacts of Banning Pointe, please refer to response to Comment E-34-3. No further response is required.

**Response to Comments E-34-5 through E-34-8**

The commenter states that the majority of traffic surveys were taken during the COVID-19 period when traffic did not reflect normal characteristics. The Traffic Analysis and Supplemental Traffic Analysis prepared for the Project and attached to the Draft EIR as Appendix J-2 and Appendix J-3 respectively) (collectively, the "Traffic Analysis") specifically recognizes the abnormal traffic conditions occurring during the COVID-19 pandemic and upwardly adjusted to pre-pandemic conditions to establish a representative baseline condition in 2021. As stated in the TA, "Due to the currently ongoing COVID-19 pandemic, schools and businesses within the study area were closed or operating at less than full capacity at the time this study was prepared. As such, the Traffic Analysis relied upon historic (2017, 2019, and 2020) traffic counts in conjunction with a 2 percent growth rate (compounded annually for every year between the count year to 2021) to reflect 2021 conditions. The 2017, 2019 and 2020 pre-Covid historic weekday AM and weekday PM peak hour count data is representative of typical weekday peak hour traffic conditions in the study area. Specifically, this methodology was applied to 6 study area intersections. The 2% per year adjustment factor was selected as it is consistent with the ambient growth used for near-term cumulative traffic conditions. In addition, the 2% per year is in excess of the annual growth in households and employment projected for the Banning area of Riverside County per the Connect So Cal 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) of the Southern California Association of Governments (SCAG) Demographics and Growth Forecast Technical Report (adopted April 4, 2024). The RTP/SCS identifies an average of 0.6% growth in households and 1.3% in employment annually. There were no observations at the time the historic weekday traffic count data was made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour routes and near-by schools were in session and operating on normal schedules. For the intersections where historic traffic counts from these years (8 study area intersections) were not readily available, traffic counts were collected in February and September 2021. During this period, most schools had returned to in-person instruction as well as offering classes virtually (hybrid option). As such, an adjustment factor (2 percent minimum) was applied to the current 2021 traffic counts (8 study area intersections), which has been derived based on the growth at other study area intersections to reflect non-COVID-19 conditions. (Appendix J-2, p. 43). Based on a comparison (where available) to current 2024 counts, the adjusted volumes used for 2021 conditions are similar to or are greater than current 2024 conditions. This is attributable to changes

in employment, work from home, and other long-lasting effects from the COVID-19 Pandemic that are unlikely to result in traffic at study intersections returning to historic levels. The analysis, as conducted with the adjusted volumes, is conservative and has been adjusted to overstate as opposed to understate potential deficiencies. No count data was collected for the remaining 24 study area intersections as they are future driveways or streets that did not exist in 2021. See also response to Comment E-34-25. This analysis was reviewed in detail by the City's Department of Public Works and City Engineer who determined that the analysis was prepared consistent with accepted professional practices and in conformance with CEQA requirements. The Draft EIR and supporting technical studies comply with CEQA's requirements and no further response is required. The commenter also states the two percent growth rate applied to COVID-19 traffic counts does not seem adequate to account for the light traffic at the time. Please refer to the response to Comment E-34-5. No further response is required. The comment also suggests a ten percent growth rate would be more realistic to create 2021 baseline conditions and if improperly low would distort future projections and therefore all recommendations on intersections, lane requirements and percentages of auto traffic. Please refer to Response E-34-5. No further response is required. The commenter also requests an explanation as to why a two percent growth was used, if the base 2021 was factored to include the normal traffic for that year without COVID-19. Additionally, the commenter questioned the source of, and the appropriateness of the growth rate used. The use of the annual growth rate was reviewed and approved by City staff as part of the Traffic Study scoping agreement review process (initiated in December 2020 with revisions to the scope in September 2021 and December 2021). By early 2021, most schools were offering hybrid options for return to school by offering in-person instruction and virtual options, however, by the start of the 2021-2022 school year most of the virtual options had been phased out and students returned to in-person instruction. The growth rate is applied as an exponential growth as opposed to a linear growth rate. The two percent compounded annual growth (12.62 percent growth over the 6-year cumulative growth period) is considered representative of traffic growth in the area, is consistent with County of Riverside TIA Guidelines for the purposes of calculating the ambient growth for near-term cumulative conditions and is used by many other agencies in Riverside County (including Banning).The 2% per year is in excess of the annual growth in households and employment projected for the Banning area of Riverside County per the Connect So Cal 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) of the Southern California Association of Governments (SCAG) Demographics and Growth Forecast Technical Report (adopted April 4, 2024). The RTP/SCS identifies an average of 0.6% growth in households and 1.3% in employment annually. In that context, the City of Banning's total population is projected to grow by approximately 33.9 percent over the period 2016 through 2045.[73] This equates to an approximate 56.2 percent increase in total population over 30 years, or an approximate compounding growth rate of 1.5 percent per year. Not all members of the population (children, pre-teens, elderly, et al.) would be drivers that would contribute to traffic growth. As such, the assumed two percent annual growth in area traffic reflected in the Traffic Analysis is considered a reasonable estimate of traffic growth within the study area. Please refer to response to Comment E-34-5. No further response is required.

[73] https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

**Response to Comment E-34-9**

The commenter states that similar comments were made during another project and traffic forecasts were increased but still not adequately addressed. Commenter statements regarding previous City of Banning analyses are noted. Commenter statements regarding growth forecasts are previously addressed in response to Comment E-34-5. The commenter's recommendation will be provided to the City staff and elected officials for consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-10**

The commenter includes, without citation, statistics of California deaths from COVID during the dates when traffic surveys were taken during the pandemic and states that California was in a "State of Emergency" four-months prior to the traffic surveys starting. As noted previously, the Traffic Analysis (Draft EIR Appendix J-2 and Appendix J-3) and Draft EIR have appropriately adjusted pre-pandemic conditions to establish baseline conditions for analytic purposes. The Traffic Analysis and Draft EIR do not reflect or rely on pandemic conditions as a baseline for analysis as any count data collected pre-pandemic and/or post-pandemic were adjusted upwards to calculate higher forecasts for the purposes of the intersection operations analyses. Please refer to the responses to Comments E-34-5 through E-34-8. No further response is required.

**Response to Comment E-34-11**

The commenter reiterates concern about the credibility of the baseline but states that a review of traffic generated, and findings was undertaken in any case. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

> **Note: Per the commenter "All references are to the Traffic Analysis Report". The referenced report, *Sunset Crossroads Traffic Analysis, City of Banning*, Urban Crossroads, June 15, 2023, was included as Appendix J-2 to the Draft EIR.**

**Response to Comment E-34-12**

The commenter states that in "Exhibit 4-15 Phase 1A, page 77, Driveways 4, 7, 11, and Intersection 33" the traffic counts do not total correctly and asks to please review and explain. The commenter is incorrect; the volumes between the intersections do flow (there are no loss of volumes). For example, in the westbound direction during the AM peak hour at Driveway 4 (#12), there are 46 southbound left and 14 westbound through for a total of 60, vehicles and at Driveway 7 (#15) you have 9 northbound left and 51 westbound through which also sum up to 60 vehicles. Similarly at Driveway 7 (#15) you have 146 westbound left and 51 westbound through for a total of 197 with Driveway 11 (#19) summing to 197 with 5 northbound left and 192 westbound through. Similar calculations can be made for the eastbound direction and also for the PM peak hours. No further response is required.

**Response to Comment E-34-13**

The commenter states that "Exhibit 4-3 Phase 1B" Driveways 4, 7, 11 were used in Phase 1A but not Phase 1B, which instead used Driveways 5, 8, 12, and 18 and requests an explanation why traffic

moved…". The commenter review of exhibits and various driveway/intersection volumes is noted. This noted perceived discrepancy does not affect the analysis because Exhibit 4-3 Phase 1-B shows warehouse truck trips, while Exhibit 4-2 Phase 1-A shows warehouse passenger vehicle trips. Warehouse trucks would be directed south to Bobcat Rd., not using Driveways 4, 7, and 11. See the response to Comment E-31-12. No further response is required.

**Response to Comment E-34-14**

The commenter states that RIVCOM3 was used and asks about the traffic input into the model and how was it developed. The Traffic Analysis utilized Riverside County Model (RIVCOM) Version 3.0, which is the Lead Agency's accepted modeling protocol for transportation/traffic forecasting. An overview of RIVCOM3 can be accessed at https://scag.ca.gov/sites/main/files/file-attachments/mtf052621-rivcom.pdf?1621974436. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-15**

The commenter states that construction of Sun Lakes Boulevard extension will attract more traffic which will increase existing traffic at Highland Springs Avenue ramps to Eastbound and Westbound I-10 which is identified as operating at LOS F. Please refer to response to Comment E-31-9 regarding truck traffic from the Development Project and response to Comment E-31-12 (LOS deficiencies that may result from project related or cumulative traffic conditions would not be significant environmental impacts subject to CEQA consideration). This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-16**

The commenter states that traffic, and specifically truck traffic, will be increased in the 2027 condition, further impacting traffic conditions. This general comment does not raise any specific issues regarding the adequacy of the environmental analysis provided in the Draft EIR, and no further response is required.

**Response to Comment E-34-17**

The commenter references the traffic impacts detailed in "Exhibit 6-2," specifically that Highland Springs Avenue and I-10 westbound ramps will be considered worse, and questions how the City will address this. See the responses to Comments E-31-9 and E-31-12. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-18**

The commenter restates that the I-10 exit ramps will be significantly worse under future conditions. Please refer to the response to Comment E-31-12 regarding LOS review under CEQA. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-19**

The commenter states that changes in traffic conditions shown in "Exhibit 6-2" of the Traffic Analysis at southbound Highland Springs Avenue to I-10 westbound will cause more delay. Please refer to the response to Comment E-31-12 regarding LOS review under CEQA. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-20**

The commenter restates findings from Exhibit 6-2 of the Traffic Assessment (Appendix J-2) and identifies concerns regarding projected traffic/LOS conditions at Highland Springs Ave. and 1st St./Sun Lakes Blvd. intersection and states that increases in traffic are problematic because of the greater percentage of truck traffic. Please refer to response to Comment E-31-12. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-21**

The commenter states that the traffic analysis needs to consider the aging driving population and slower response rates of senior citizens and asks how the City of Banning will accommodate the increased traffic congestion and problems described in Comments E-34-18 through E-34-21. Commenter statements regarding projected traffic congestion and diminished response rates of aging populations are noted. Commenter statements regarding projected traffic congestion/future LOS conditions, as part of the commenter's previously mentioned comments, are addressed in response to Comment E-31-12. The diminished response rates of aging populations are not an environmental effect of the Project and are beyond the scope of the Traffic Analysis and Draft EIR. This comment will be provided to the City staff and elected officials for consideration. It does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-22**

The commenter states, without evidence, that the hotel employee calculation for VMT listed in the VMT analysis is not consistent with the other land use methods of calculation for the number of employees at hotels and states that it is exceptionally low. The VMT analysis has been prepared by traffic engineering experts consistent with the City of Banning's approved Traffic Impact Analysis Guidelines for Local Transportation Analysis and Vehicle Miles Traveled Analysis (October 2021) (City Guidelines). Questions regarding the City's approach and standards in the City Guidelines should be directed to the City as they are not generated at a project level. Employment factors reflected in the VMT analysis were obtained from Riverside County General Plan, Appendix E, and derived from data presented in ITE Trip Generation Manual (10th Edition). The ITE Trip Generation Manual establishes industry standards, data, and metrics employed by traffic engineering professional in the development of traffic and VMT analyses. The Project VMT includes extensive detail, modeling employing accepted protocols and was reviewed by the City's Department of Public Works and City Engineer who determined that the analysis was prepared consistent with accepted professional practices and in conformance with CEQA requirements. No further response is required.

**Response to Comments E-34-23 and E-34-24**

The commenter comments on the City Guidelines described in response to Comment E-34-22 with respect to how employee counts should be generated for commercial uses and hotels and suggests an unsourced hotel industry standard based on hotel class and that a revised number of 177 hotel employees should be used, compared to the 73 employees used in the Traffic Assessment, to determine the impact on the VMT analysis. Please refer to the response to Comment E-34-22 regarding development of the City Guidelines, which were used to develop the VMT analysis. The commenter's statements regarding VMT preparation and analysis will be provided to the City staff and elected officials for consideration. No further response is required.

**Response to Comment E-34-25**

The commenter states it is not clear how traffic from cumulative projects was included in the Project analysis. As discussed in the Traffic Analysis (Draft EIR, Appendix J-2, p. 94), traffic generated by individual cumulative projects was manually added to the ambient growth forecasts. This ensures that traffic generated by the listed cumulative development projects is reflected as part of the total background traffic. In that the ambient growth estimates represent likely total growth in area traffic conditions, the addition of traffic generated by cumulative projects to these likely total traffic growth estimates provides a conservative estimate of probable maximum traffic conditions. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-26**

The commenter states that the Banning Pointe Warehouse and Commercial development should be included as a contribution of traffic from the Sunset Crossroads project and questions the statement that it was considered as a cumulative project, stating, without support that there are not enough trips shown at Highland Springs and the I-10- for the EB and WB on-ramps in 2027 and 2045 as compared to 2021 to account for the large number of trucks and cars from The Banning Pointe project. The Banning Pointe warehouse and commercial development (Sun Lakes Village) is listed as a cumulative project in the Draft EIR (Chapter 6.0 Cumulative Impacts, Table 6.B: Cumulative Projects) and in the Traffic Analysis (see Draft EIR, Appendix J-2, Table 4-3). The Banning Pointe project was approved by the City of Banning in 2022. Opening year for Sun Lakes Village development is not anticipated until after 2027. Appropriately, that project's contributions to cumulative traffic conditions are reflected in the cumulative traffic analysis for the year 2027 and beyond. The 2027 opening year traffic contributions for the Banning Pointe project, including Sun Lakes Village, conservatively assume the project's complete development and maximum occupancy. More likely, it will be sequentially developed and occupied over multiple years extending beyond 2027. Cumulative traffic from this proposal would incrementally affect future traffic conditions. Moreover, any LOS deficiencies that may result from project related or cumulative traffic increases would not be significant environmental impacts subject to CEQA consideration. Please refer to response to Comment E-31-12. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-27**

The commenter disputes how the cumulative traffic was calculated and the possible omission of the Banning Pointe project data. Please refer to responses E-34-5 and-E-34-25 and E-34-26 describing the methodology used to calculate ambient growth and trips from cumulative projects and E-31-12 regarding the review of LOS in CEQA analyses. No further response is required.

**Response to Comment E-34-28**

The commenter states that the 2027 and 2045 traffic counts do not adequately reflect what traffic will be in those years as a result of undercounting during base traffic surveys due to reduced COVID-19 traffic and requests that this be reviewed by the City. LOS deficiencies that may result from project related or cumulative traffic increases would not be significant environmental impacts subject to CEQA consideration. Please refer to Comment E-31-12. This recommendation will be provided to the City staff and elected officials for consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-29**

The commenter states the Draft EIR transportation and traffic studies did not specifically identify the Banning Pointe project and address the impacts it can have on the Project. The Banning Pointe project is identified as Sun Lakes Village North (SLVN) in Chapter 6.0 (see page 6-10, Figure 6-1 and Table 6.B) of the Draft EIR and Section 4 (page 95) of the Traffic Assessment (Draft EIR, Appendix J-2) prepared for the Project. Please refer to responses to Comments E-34-25 and E-34-26. As described in response to Comment E-31-12, any LOS deficiencies that may result from project related or cumulative traffic increase would not be significant environmental impacts subject to CEQA consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-30**

The commenter states that the City changed the wording in the Banning Pointe EIR on Sun Lakes Boulevard to allow trucks to go east on Sun Lakes Boulevard Extension, which led to increases in traffic from Banning Pointe toward Sunset Crossroads. This project does not analyze the Banning Pointe EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-31**

The commenter states there is a significant inconsistency because the Draft EIR traffic projections do not include the auto and multi-axle trucks being generated as a result of the Banning Pointe project. Truck traffic from the Development Project is projected in the Traffic Analysis to primarily use the Sun Lakes Boulevard Extension and Lincoln Street to the east to connect to Sunset Avenue at the eastern edge of the Development Site, which provides direct access to the I-10 freeway. The Specific Plan has been updated to require development and implementation of a Truck Route Management Plan to restrict truck travel to the west on Sun Lakes Boulevard. Please refer to Response D-6-1-A for further discussion regarding the Truck Route Management Plan. As described in response to Comment E-31-12, any traffic related deficiencies that may result from project related or cumulative traffic increase

would not be significant environmental impacts subject to CEQA consideration. The commenter states that it is assumed that auto and multi-axle truck traffic from the Banning Point Project is not accounted for in this analysis. The Banning Pointe Project is identified as item B5 in table 4-3: Cumulative Development Land Use Summary in Appendix J-2 Traffic Analysis of the Draft EIR. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required No further response is required.

**Response to Comment E-34-32**

The commenter states Exhibit 4-22 and 6-2 from the Traffic Assessment (Appendix J-2) have differing traffic counts and requests that these differences be noted and explained. Exhibit 4-22 of the Traffic Assessment (Draft EIR, Appendix J-2) identifies the traffic generated by individual cumulative projects only. As stated in Draft EIR, Appendix J-2 (page 133), the "Opening Year (2027) Cumulative with Project Condition" includes, "…Existing traffic volumes plus an ambient growth factor of 12.62%, the addition of cumulative development traffic, and the addition of Project (Buildout) traffic." As the exhibits illustrate separate conditions, it is reasonable the data cited in each does not match. As described in response to Comment E-31-12, any LOS deficiencies that may result from project related or cumulative traffic increase would not be significant environmental impacts subject to CEQA consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-33**

The commenter requests a complete, detailed explanation for differences in traffic volumes in Exhibits 4-22 and 6-2. Please refer to the response to Comment E-34-32.

**Response to Comment E-34-34**

The commenter states the traffic studies do not include the cumulative impact of Banning Pointe warehouse and associated commercial development, which can impact the forecasting of construction traffic. The commenter states that as Sunset Avenue will have a poor level of service at the I-10 interchange eastbound, it is imperative that the impacts of Banning Pointe are ascertained. Cumulative effects of the Banning Pointe project and all related projects that could interact with effects of the Project are considered and addressed in detail in the Draft EIR (Draft EIR at Section 6.0, Cumulative Impacts). Please refer also to Responses E-34-25 and E-34-26. As described in response to Comment E-31-12, any traffic deficiencies that may result from project related or cumulative traffic increase would not be significant environmental impacts subject to CEQA consideration. This comment will be provided to the City staff and elected officials for consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-35**

The commenter states that Highland Springs traffic congestion can change because residents from Sun Lakes Country Club may change how they travel due to truck travel on Sun Lakes Boulevard. As discussed in the Traffic Analysis, trip distribution involves several interactive elements including anticipated travel patterns to and from the Project site for the retail use, industrial passenger cars,

and truck traffic. Trip distribution patterns were developed based on an understanding of existing travel patterns in the area, the geographical location of the site, and the site's proximity to the regional arterial and state highway system. Trip distribution modeling is facilitated by use of the Riverside County Model (RIVCOM) forecasting. Trip distribution is not readily attributable to any given travel path, or route preference such as is suggested by the commenter. As described in response to Comment E-31-12, any traffic related deficiencies that may result from project related or cumulative traffic increase would not be significant environmental impacts subject to CEQA consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-36**

The commenter describes potential traffic changes that could occur due to the construction of Sun Lakes Boulevard Extension and states that the impacts of Banning Pointe should be ascertained, especially at Sunset Avenue and I-10 interchange, so they can be mitigated, which would make development of Sunset Crossings more acceptable. See the responses to Comments E-34-34 and E-34-35. As described in response to Comment E-31-12, any traffic related deficiencies that may result from project related or cumulative traffic increase would not be significant environmental impacts subject to CEQA consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-37**

The commenter summarizes the improvements and extensions planned for Highland Home Road. As stated in the Traffic Analysis at p. 36, Highland Home Road (north of Sun Lakes Boulevard) is currently classified in the City's General Plan Circulation Element as a Secondary Highway. Secondary Highways are four-lane roadways that may include a painted median. These roadways typically have an 88-foot right-of-way with a 64-foot curb-to-curb measurement. Highland Home Road (south of Sun Lakes Boulevard) is classified as a Collector Highway by the City's General Plan. Collector Highways are designed as 2-lane roads that provide on-street parking on both sides. These roadways typically have a 66-foot-wide right-of-way, a 44-foot curb-to-curb width, and provide connections to secondary streets, arterials, and freeways, with most traffic being through-traffic or intra-city volumes. Highland Home Road is currently a 2-lane paved roadway south of Sun Lakes Boulevard and does not exist north of Sun Lakes Boulevard. As indicated in the Traffic Analysis, the Development Project will construct Highland Home Road to its ultimate half-width as a Secondary Highway (88-foot right-of-way) plus 10-feet of pavement along the western boundary, which will terminate at the northern end at a cul-de-sac just north of Building 9 in order to accommodate two-way traffic from the Project's northern boundary to southern boundary. The commenter does not raise any issues regarding the adequacy of the environmental analysis provided in the Draft EIR; therefore, no further response is required.

**Response to Comment E-34-38**

The commenter describes potential traffic changes that could occur due to the improvements to Highland Home Road. See the response to Comment E-34-37. No further response is required.

**Response to Comment E-34-39**

The commenter states that proposed use of Highland Home Road as a driveway for Building # 9 goes against the intent and direction of the overall planning, which otherwise directs traffic to Sunset Avenue. Please refer to response to Comment D-6-1-A for discussion regarding the truck management plan included in Appendix B Specific Plan in the Final EIR. The Truck Route Management Plan will identify set routes for each building to use to access the I-10 Freeway. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-40**

The commenter states the redeveloped Highland Home Road will have significant impacts upon residents that have not been adequately addressed in the Draft EIR. Primary truck access to Building 9 would be from Lincoln Street. The 24 foot wide accessway to Highland Home Road from Building 9 would accommodate emergency access, and provide required secondary access. The Truck Route Management Plan will identify set routes for each building to use to access the I-10 Freeway and will direct traffic away from Sun Lakes Boulevard west of the Development Site. Nonetheless, as indicated in Appendix J-1 VMT Analysis, the Draft EIR traffic distribution assumed 35 automobile and 13 daily truck trips along the northern portion of Highland Home Road to reflect the potential that up to ten percent of Building 9 truck trips would utilize Highland Home Road and travel west on Sun Lakes Boulevard. Please refer to Response D-6-1-A for discussion regarding the truck management plan for the Development Project. No significant operational noise impacts, or health risk impacts were identified along Highland Home Road north of Sun Lakes Boulevard/Westward Avenue or on Sun Lakes Boulevard in Sections 4.3 (Air Quality), 4.13 (Noise), or 4.17 (Transportation) of the Draft EIR. No further response is required.

**Response to Comment E-34-41**

The commenter recommends not extending Highland Home Road north other than as a gravel road for emergency purposes, that a gate be installed at Sun Lakes Boulevard, and ingress and egress should be relocated. Highland Home Road and Lincoln Street would be used to access Building 9. Please refer to response to Comment D-6-1-A for a discussion access to Building 9 via Highland Home Road and of the Truck Route Management Plan. Highland Home Road north of the SLB Extesion is already identified in the City's General Plan and will be developed consistent with the General Plan and will provide secondary/emergency access route to Building 9. Primary access to Building 9 will be via Lincoln Street. Please refer to the response to Comment E-34-40. The commenter's recommendation will be provided to the City staff and elected officials for consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-42**

The commenter requests the Draft EIR to include additional analysis to reduce traffic and noise impacts at the residences and place the Sunset Crossroads back onto Lincoln Street by providing the ingress and egress there. Please refer to the response to Comment D-6-1-A. The commenter does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-34-43**

The commenter states the statement in the Draft EIR in 4.13.6 regarding using Highland Springs Avenue and Sun Lakes Boulevard/Westward Avenue or Sunset Avenue and Bobcat Road to access the Development Site for development of Phase 1 is not addressed in the Draft EIR construction traffic management and must be addressed. As described in response to Comment E-31-12, any traffic related deficiencies that may result from project related or cumulative traffic increase would not be significant environmental impacts subject to CEQA consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-34-44**

The commenter states the construction of Banning Pointe would occur substantially concurrently with construction of the Development Project and this was not taken into consideration, and traffic will cause significantly more of an impact to Highland Springs and Sun Lakes Country Club residents. The commenter statements regarding construction traffic are addressed in Response E-31-12. As described in response to Comment E-31-12, any traffic related deficiencies that may result from project related or cumulative traffic increase would not be significant environmental impacts subject to CEQA consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-45**

The commenter requests the Draft EIR analyze the construction based on a traffic management plan that has the least impact upon the area, and that construction access should occur from Sunset Avenue. Please refer the response to Comment E-34-15 which states congestion (LOS) is no longer assessed as a transportation impact pursuant to CEQA The commenter statements regarding construction traffic are addressed in Response E-34-43 and E-34-46. No further response is required.

**Response to Comment E-34-46**

The commenter requests that a construction traffic management plan be prepared and should include the cumulative impacts of Banning Pointe construction traffic. Construction traffic management is addressed by the City at issuance of development permits. This is appropriate as construction traffic management is highly dependent on the traffic conditions at the time construction is anticipated to commence. Typical Construction Traffic Management Plan requirements and protocols employed by the City are outlined below:

- Name of on-site construction superintendent and contact phone number.
- Identification of Construction Contract Responsibilities - For example, for excavation and grading activities, describe the approximate depth of excavation, and quantity of soil import/export (if any).
- Identification and Description of Truck Routes - to include the number of trucks and their staging location(s) (if any).

- Identification and Description of Material Storage Locations (if any).

- Location and Description of Construction Trailer (if any).

- Identification and Description of Traffic Controls - Traffic controls shall be provided per the Manual of Uniform Traffic Control Devices (MUTCD) if the occupation or closure of any traffic lanes, parking lanes, parkways or any other public right-of-way is required. If the right-of-way occupation requires configurations or controls not identified in the MUTCD, a separate traffic control plan must be submitted to the City for review and approval. All right-of-way encroachments would require permitting through the City.

- Identification and Description of Parking - Estimate the number of workers and identify parking areas for their vehicles.

- Identification and Description of Maintenance Measures - Identify and describe measures taken to ensure that the work site and public right-of-way would be maintained (including dust control).

The Plan would be reviewed and approved by the City prior to the issuance of the first building permit. The Plan and its requirements would also be required to be provided to all contractors as one component of building plan/contract document packages. In this manner, the City manages the individual and cumulative effects of construction traffic. As described in response to Comment E-31-12, any traffic deficiencies that may result from project related or cumulative traffic increase would not be significant environmental impacts subject to CEQA consideration. This comment will be provided to the City staff and elected officials for consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-47**

The commenter incorrectly indicates that there would be berm construction along Sunset Avenue as part of the construction process and expresses concern about this in light of the older population the commenter identifies as residing west of the Development Site and having high levels of respiratory issues. As stated in the response to Comment E-34-2, the sensitive receptors (residential uses) located within the community were identified in the noise assessment, air quality analysis, and health risk assessment prepared for the project and in the revised noise assessment and health risk assessment prepared in response to public comments (see Final EIR, Appendices I-2 and C-5). These receptors included locations within the Sun Lakes Community. The Project does not include the construction of a 10-foot berm around the perimeter of the Development Site. The commenter appears to refer to Mitigation Measure NOI-1 which relates to mitigation construction-related noise (see Draft EIR, Section 4.13, page 4.13-47) which identifies construction of a temporary noise barrier, as follows:

> …During grading, site work, paving and utility construction, the construction contractor shall install a minimum 10 ft high temporary construction barrier along the eastern construction boundary to shield residences along Sunset Avenue between Lincoln Street and Westward Avenue, along the southern construction boundary to shield residences along Bobcat Road, and along the eastern construction boundary to shield the school located at the southeast

corner of Sunset Avenue and Westward Avenue when project construction activities are within 100 ft from the nearest residential structure to that activity.

The health risk, localized air quality, and operational noise impacts resulting from implementation of the Development Project were assessed respectively in a supplemental Health Risk Assessment and Noise Impact Assessment (included in the Final EIR as Appendices C-5 and I-2, respectively). These supplemental analyses (and the original HRA) confirmed that no significant health risk or localized air quality would result from implementation of the Development Project and that the significant noise impacts previously addressed in the Draft EIR had been eliminated through the inclusion of project design features into the Project and relocation of the portion of Sunset Avenue between Westward Avenue and Lincoln Street, 42 feet to the west. As the impacts to the Sun Lakes Community have been appropriately assessed, and in the absence of any significant impact to the residents, no further response is required.

**Response to Comment E-34-48**

The commenter states the Health and Safety of the community must be considered. The project specific Health Risk Assessment is included as Appendix C-2 to the Draft EIR. The revised HRA addressing Project changes is included as Appendix C-5 of the Final EIR. Neither the original or revised HRA identified a significant health risk or localized air quality impact at the sensitive receptors located nearest to the Development Site. The commenter does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is needed.

**Response to Comments E-34-49 and E-34-50**

The commenter accurately restates the level of significance of Noise Threshold 4.13-1. It is noted that the comment states Threshold 4.13-1 in Section 4.13 of the Draft EIR and that the level of significance without mitigation is significant. The commenter requests inclusion of language to shield Sun Lakes Country Club residents at the western boundary of the Project. South of the SLB Extension, Planning Area 12 will be retained as open space, providing approximately 700 feet of separation between the nearest residential uses in the Sun Lakes Community from the nearest industrial use envisioned under the Development Project. Planning Area 11, located north of the SLB Extension, is planned for Open Space and Park uses. A recreational vehicle parking area in the Sun Lakes Community is located between the nearest residential use and the planned open space/park uses (approximately 250 feet). Further north on the future Highland Home Road, Sun Lakes Community residential uses are located approximately 700 feet from the nearest industrial use planned in Planning Area 7, It should be noted, Table 3.D of the Draft EIR identifies, "…the western portion of Planning Area 7 would be retained as open space, buffering land uses west of the Development Site." The residences of Sun Lakes Community along the western boundary of the Development Project have a sufficient distance from the Development Project that and interior noise levels would not exceed the City's interior construction noise standard of 55 dBA for more than 15 minutes per hour. Therefore, a 10 ft high temporary construction barrier is not required at this location. No further response is required.

**Response to Comment E-34-51**

The commenter requests the City to develop a similar construction phasing and traffic management plan to ensure coordination with the Banning Pointe construction phases to shield construction noise

and pollution impacts. As noted in the responses to Comments E-34-47 and E-34-49, no significant health risk, localized air quality, or noise impacts would result from implementation of the Development Project (as revised). Please refer to response to Comment E-34-12 which states congestion (LOS) is no longer assessed as a transportation impact pursuant to CEQA. The commenter's statement regarding construction traffic have been previously addressed in response to Comment E-34-43. See also Draft EIR Section 6.5.3.4 regarding cumulative localized air quality (less than significant). No further response is required.

**Response to Comment E-34-52**

The commenter states the location of Buildings 5 and 6 create an impact on the Serrano Del Vista community, which is located east of Sunset Avenue. The commenter does not provide sufficient detail as to what impact would be created by locating the buildings as proposed. As previously stated in the responses to Comments E-34-47 and E-34-49, no significant health risk, localized air quality, or noise impacts would result from implementation of the Development Project (as revised). See also Draft EIR, Section 4.3 Air Quality, Table 4.3.Q and Appendix C-2 HRA, Table 4.C., and Final EIR Appendix C-5. Please refer to Response E-34-43 above for further discussion on traffic conditions along Sunset Avenue. As the comments do not raise a specific issue or question the adequacy of the environmental analysis provided in the Draft EIR, no further response is required.

**Response to Comment E-34-53**

The commenter requests considering removing Buildings 5 and 6 to minimize traffic congestion and health, safety, noise, and pollution impacts. The commenter's comments regarding the Project's potential environmental effects on sensitive land uses are noted and will be provided to City decision-makers prior to future City action on the project. Please refer to the response to Comment E-31-12 regarding LOS review under CEQA and Comments E-34-47, E-34-49, and E-34-52 stating that no significant health risk, localized air quality, or noise impact at the nearest sensitive receptor would result from implementation of the Development Project (as revised).

The individual and cumulative environmental impacts of the Project, including but not limited to, potential traffic, health, noise, and pollution impacts at sensitive receptors are comprehensively considered and addressed in the Draft EIR. In Alternative 4, the City considered reducing the size of Buildings 5 and 6, but not removing them. While the commenter states concern about reducing noise and health impacts, those are already less than significant so no reductions are required under CEQA. Alternative 4 would result in between 2% and 6% reduction in air quality pollutants but no changes in significance, as identified in Section 8.6.2.3 of the Draft EIR. Concerning traffic congestion (i.e. level of service at intersections) and safety, under this alternative, there would be a slight decrease in traffic. Overall traffic would be 97.6 percent of project traffic, passenger cars reduced by only 1.7 percent and truck traffic reduced by 6.1 percent. The City would be required to impose conditions that would ensure that any intersections that might be impacted differently than the project would meet city LOS criteria and that driveway designs ensure public safety (Refer to Draft EIR Chapter 8.6.2.17). Therefore, impacts would be similar to the Project and less than significant. No further response is required.

**Response to Comment E-34-54**

The commenter states that access to Building 9 should come from Lincoln Street and not from the extension of Highland Home Road to reduce noise and traffic impacts. Please refer to Responses E-31-12 regarding the analysis of LOS in CEQA documents and E-34-2 related to the potential Project-related noise impacts. No traffic noise impacts were identified along Highland Home Road north of Sun Lakes Boulevard/Westward Avenue in Section 4.13 of the EIR. No further response is required.

**Response to Comments E-34-55 through E-34-57**

The commenter states the terms "Significant and Unavoidable" should be reviewed when evaluating and analyzing "mega projects." As used in CEQA, a significant and unavoidable impact is an impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the State CEQA Guidelines. To address these concerns, the commenter suggests reducing building usage, location, and size can reduce traffic. Please see the response to Comment E-31-12 regarding LOS review under CEQA. Please refer to Response E-25-2 for discussion regarding project approval actions pursuant to State CEQA Guidelines. This comment does not raise any issue regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

The commenter also states, without support, that experienced professionals were not involved in the design of project to identify areas for opportunities for different placements for driveways and to reduce traffic. The Specific Plan was prepared by T&B Planning Inc. in accordance with City requirements. The City has conducted necessary and appropriate analyses addressing the Project's likely environmental impacts. All analyses have been conducted consistent with accepted professional practices and have been determined to accurately and adequately disclose the Project's potential environmental impacts. The commenter's question of whether the Project impacts are significant and/or unavoidable is noted and will be provided to City decision-makers prior to any future action on the Project. This comment does not raise any issue regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-34-58**

The commenter requests consideration of opportunities to lessen impacts on the surrounding residents by using less land and generating less traffic. Per CEQA Guidelines Section 15126.6, an EIR must describe a reasonable range of alternatives to the project, or to the location of the project, that could feasibly attain most the project basic objectives, while avoiding or substantially reducing any of the project's significant environmental impacts. An EIR does not need to consider every conceivable alternative to a project, rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. Section 8.0 of the Draft EIR provides an assessment of alternatives to the project. Section 8.2 of the Draft EIR considered six other potential alternatives (including an off-site alternative) determined as infeasible because they would exceed or not substantially lessen the impacts of the Project being analyzed, are repetitive of other alternatives, or, based on City input, would not meet most of the City's basic objectives for the Project. A comprehensive quantitative analysis of four alternatives is provided in the Draft EIR (see Draft EIR Sections 8.3 through 8.6). These include:

- **Alternative 1:** No Project/No Build
- **Alternative 2:** No Project/Existing General Plan and Zoning/Residential and Commercial Development
- **Alternative 3:** Reduced Commercial Alternative
- **Alternative 4:** Reduced Industrial Alternative

The City has determined that the Draft EIR adequately and appropriately responds to CEQA Guidelines Section 15126.6 requirements regarding Alternatives to the Project. As the commenter does not propose an alternative for consideration or suggest that the alternatives addressed in the Draft EIR do not satisfy CEQA requirements, no further response is required.

**From:** Caroline Patton
**To:** Sandra Calderon
**Subject:** FW: Banning Point and other proposed warehouses
**Date:** Wednesday, January 31, 2024 11:45:09 AM

-----Original Message-----
From: City Manager <citymanager@banningca.gov>
Sent: Wednesday, January 31, 2024 8:34 AM
To: Doug Schulze <dschulze@banningca.gov>; Caroline Patton <cpatton@banningca.gov>
Subject: FW: Banning Point and other proposed warehouses

Sincerely,

Laurie Sampson
Assistant City Manager
City of Banning
Direct Line: 951-922-4860
lsampson@banningca.gov
99 E. Ramsey Street
Banning, CA 92220
www.banningca.gov

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-----Original Message-----
From: Diane Nethercott <di.nethercott@gmail.com>
Sent: Tuesday, January 30, 2024 2:45 PM
To: City Manager <citymanager@banningca.gov>
Subject: Banning Point and other proposed warehouses

We have owned a home in Banning for almost 9 years. After living in 5 states and 7 cities, ranging from 13,000 residents to 1.5 million, it still is astonishing to hear that the staff in Banning gets away with presenting almost nothing but development that will harm the city. **E-35-1**

Turning Sun Lakes Blvd. into a truck route to serve several million square feet of warehouses and a truck stop will ruin the long established residential developments in between and surrounding the proposed warehouses from Sunset to Highland Springs. **E-35-2**

The pollution from diesel big rigs and the health issues including asthma and increased cancer will be a blight and a legacy attached to the failed job performance of both Doug Schulze and Adam Rush and the City Attorney and MANY of the council members. **E-35-3**

Warehouses and truck stops DON'T BELONG IN ANY NEIGHBORHOOD. If we had city staff who cared about anything other than their jobs, they would protect the residents and bring healthier development to the city. **E-35-4**

DO YOUR JOB Doug Schulze.

Diane Nethercott
Sent from my iPhone

## Response to Letter E-35

Diane Nethercott
January 30, 2024

**Response to Comment E-35-1**

The comment states that the proposed Project will adversely affect the City. Please refer to the response to Comments E-2-1 and E-25-13. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-35-2**

The comment states a concern that Sun Lakes Boulevard will become a truck route for warehouse Projects and will adversely affect the nearby residential neighborhoods. Please refer to the responses to Comments E-2-1, E-7-1, and E-20-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-35-3**

The comment states that pollution from diesel big rigs will result in adverse health effects. Please refer to the responses to Comments A-3-2, B-2-5, E-2-1, E-5-2, and E-8-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**Response to Comment E-35-4**

The comment states that warehouses and truck stops are not compatible with nearby residential uses due to potential health impacts. Please refer to the response to Comments E-2-1, E-5-2, and E-8-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

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January 30, 2024

City of Banning
Department of Community Development
99 Ramsey Street
Banning, Ca. 92220
(951) 922-3131/ arush@banningca.gov

Attn: Adam Rush, M.A. AICP
Community Development Director

From: Ron Roy, Beaumont Resident
35161 Hogan Dr. Beaumont, Ca.

Re: Sunset Crossroads Project Draft Environmental Impact Report
Public Notice Date: December 15,2023

Dear Mr. Rush:

Pursuant to the California Environmental Quality Act (Pub. Resources Code, §21001.1, subdivision (a) and guideline 15085(d)(4), the City of Banning (the City) as lead agency on this project is required to consider the information contained in the Draft Environmental Impact Report (DEIR prior to taking any discretionary action on the project.

E-36-0-A

I start by asking: At what point does the threat that 5 million square feet of warehouses pose to the health, safety, property values (equity), burden on infrastructure and services, and quality of life to the people who've retired and live nearby, finally become greater than the tradeoff for the lure of money the city believes it will receive in its treasury from these monstrosities. The city must realize that this point has finally been reached with the Sunset Crossroads Specific Plan project, and that these warehouses no longer belong in Banning, nor the San Gorgonio Pass.

E-36-0-B

There are clearly better land uses for the applicant's property. Some of the Alternatives discussed in 8.0 of the DEIR open a window into much more diverse, more balanced, land use choices that will better enrich the community economically, culturally, aesthetically, and in its health and safety.

I am asking that the city not only find that the EIR is inadequate, but deny the warehouse project in its current form, as it fails to provide Pass Area residents the acceptable composition of land uses that residents would like to see for future generations-for perpetuity.

E-36-0-B Cont

The failures and harms of the project are so numerous and significant, as to warrant a denial of the project. Areas and issues where the DEIR fails include, but are not limited to the following: Aesthetics, Air Quality, Noise, Light and Glare, GHG, Transportation, Land Use, Energy, Wildfire, Circulation, Design, physical, cultural, and economic diversity, health and safety of the thousands of sensitive receptor communities very near the project.

**Please note that I've copied parts of the DEIR and Sunset Crossroads Specific Plan in the body of this comment letter to facilitate reference**: **My comments in response to the referenced parts of the EIR below are highlighted in red**. I reserve the right to comment on additional concerns relating to the EIR and specific plan at a later date.

E-36-0-C

I have concerns and objections to the DEIR for the Sunset Crossroads Project and appreciate the opportunity to submit our comments and concerns. DEIR is incomplete and falls short of its objective of addressing mitigation measures for the proposed Projects's potential individual and cumulative-level impacts, in that the Project would not comply with the City's General Plan, and Environmental Issues discussed in Section 4 including: 4.1 Aesthetics, 4.3 Air Quality, 4.13 Noise, 4.1 Light and Glare, 4.8 GHG, 4.17 Transportation, 4.11 Land Use, 4.6 Energy, 4.2 Wildfire, in Noise Element, Circulation

E-36-0-D

The Outline of the EIR and **my comments in red** located in and relating to pertinent sections of the EIR **are found below:**

E-36-0-D Cont

# 1. EXECUTIVE SUMMARY

# 2.0 INTRODUCTION AND PURPOSE

## 2.2 REGIONALLY SIGNIFICANT PROJECT

When an EIR is prepared for any project that is considered to be of statewide, regional, or area-wide significance,7 then the Draft EIR must be submitted to the State Clearinghouse and the appropriate metropolitan area council of governments for review and comment. A project is considered to be of statewide, regional, or area-wide significance if it meets any of the following criteria:

E-36-1

(A) A proposed residential development of more than 500 dwelling units

(B) A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.

(C) A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.

(D) A proposed hotel/motel development of more than 500 rooms.

(E) A proposed industrial, manufacturing, processing plant, or industrial park planned to employ more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.
**Sunset Crossroads SP clearly falls into this category.**

E-36-1 Cont

(3) A project which would result in cancellation of an open space contract made pursuant to the California Land Conservation Act of 1965 (Williamson Act) for any parcel of 100 or more acres.
**Williamson Act parcels need to be examined within the 500+ acres of the project.**

E-36-2

(4) A project for which an EIR has been prepared that is located in and would substantially affect areas of critical environmental sensitivity.

(5) A project which would substantially affect sensitive wildlife habitats and habitats for endangered, rare, and threatened species.

(6) A project which would interfere with the attainment of regional water quality control standards as stated in the approved area-wide waste treatment management plan.

(7) A project which would provide housing, jobs, or occupancy for 500 or more persons within 10 miles of a nuclear power plant.

E-36-2-A

As described in Chapter 3.0, the Development Project would be considered a "project of Statewide, regional or area-wide significance" per criteria 1 and 2(E); therefore, the Notice of Preparation (NOP), Draft EIR, and Notice of Completion (NOC) have been transmitted to the State Clearinghouse and the appropriate metropolitan area council of governments, which in this case is the Southern California Association of Governments (SCAG), for review and comment.

# 2.4 DOCUMENTS INCORPORATED BY REFERENCE

## 2.4.1 City of Banning

## 2.4.1.1 City of Banning General Plan (2006)

The State of California mandates that every city and county adopt a General Plan. The City's General Plan is considered its blueprint for the future. It lays out the vision for how the City would develop. As stated itself, the General Plan provides, ". . .goals, policies and programs to guide the development of the City and to preserve its valued assets, resources and quality of life. In addition to goals and policies, the General Plan includes issues discussions, exhibits, and tables that provide direction for the rational and thoughtful management of existing and future development." The City's General Plan was adopted in January 2006.

E-36-3

The state strongly suggests that cities update or renew their general plans every 10-15 years. Here the city is 19 years after its last GP, without achieving an update. The General Plan needs to reflect changes in areas including climate change, air pollution, traffic, noise, healthy communities, safe streets, transit oriented development, regional transit, active transportation programs, impact on I10 as an area of national security concern, and how to protect against the viral encroachment of warehouses.
See: https://opr.ca.gov/planning/general-plan/guidelines.html

I have included an outline of each potentially significant environmental issue that has been identified for the proposed Sunset Crossroads Project (Development Project) for my own reference..

- **4.1 Aesthetics (incl. Light and Glare)**
  **Light and Glare needs to be taken out of 4.1 and be addressed as its own stand-alone potentially significant environmental issue**
- 4.10 Hydrology
- **4.11 Land Use**
- 4.12 Mineral Resources
- **4.13 Noise**
- 4.14 Population and Housing
- 4.15 Public Services
- 4.16 Recreation
- **4.17 Transportation**

E-36-3-A

- 4.18 Tribal Cultural REsources
- 4.19 Utilities
- 4.2 Agricultural Resources
- **4.20 Wildfire**
- **4.3 Air Quality**
- 4.4 Biological Resources
- 4.5 Cultural Resources
- **4.6 Energy**
- 4.7 Geology and Soils
- **4.8 GHG**
- 4.9 Hazards Hazardous Materi[1]als

- 5.0 MSJC Programmatic Analysis

E-36-3-A
Cont

# 4.1 Aesthetics

1

From DEIR: My edits in red:

Includes:

- 4.1.5.2 Damage Scenic Resources within a State scenic highway
- 4.1.5.3 Degrade the Existing Visual Character
- 4.1.5.4 Substantial Light or Glare

Key View Summary. (4.1-37) (from report)

Key Views 1 through 7 provided above illustrate development that is planned to occur with approval of the Development Project and, in certain cases, construction by the City of the SLB Extension. Although the Development Project would obstruct some views of the San Jacinto Mountain Range, the San Bernardino Mountain Range, and the western foothills of both of these mountain ranges from some public vantage points, the City has not designated these topographical features as scenic vistas and as such, no significant impact would occur to scenic resources. Viewpoints were analyzed in the above discussion and include motorists traveling on I-10, Sunset Avenue, and South Highland Home Avenue, looking towards the Development Site. Visual impacts for motorists looking towards the Development Site would be temporary as they drive along I-10 and surrounding roads. Motorists on the west side of the Development Site looking east across the Site would continue to have limited views of the San Jacinto Mountain Range and San Bernardino Mountain Range as the uses of the Development Project would not obstruct these vistas above and beyond what is occurring under existing conditions. The characteristics of the Development Site would change from a vacant property occupied by natural grasslands and drainage areas to one occupied by surface parking lots, industrial and general commercial buildings, open space areas, natural drainage areas, a neighborhood park, and bicycle/pedestrian trails. The Development Project includes design guidelines for on-site development, open space areas, and also includes a landscaping plan that would ensure consistency

E-36-4

with the City's General Plan goals and policies regarding aesthetics, as included in Section 4.6 Landscape Design Guidelines, of the Specific Plan. The plant palette for the Development Site was selected to complement and enhance the setting of the site, while ensuring the conservation of the Development Site's natural vegetation and habitats. The design guidelines and landscaping plan would also ensure the Site is developed with consistent visual characteristics of the surrounding uses. For these reasons, implementation of the Development Project would not have a substantial, adverse effect on views of scenic vistas. Impacts would be less than significant, and no mitigation would be required.

**The 7 locational pictures inadequately portrays the actual views of the project, instead cherry pics views that are favorable to the developer as follows:**

- **Simulation View 1 is taken where I10 is below grade by approximately 15 feet, obscuring the high-cube industrial building walls. A fairer visual portrait would entail a video going Eastbound I10 along the 1 mile long northern boundary to Sunset Avenue. Along this stretch the public would see I10 rise to at-or-above grade, revealing the entire 50-75 high walls of these buildings, the trailer storage yard, and the retail component.**
- **Simulation View 2: Is taken on westbound lane across to the project. Additional views on the Eastbound I10 lanes would be nearer the project boundary, and more accurately reflect views from I10 east bound.**
- **Simulation View 3: Confirms that all westerly and southerly scenic vistas of the open space and nearby mountains would be obliterated by the massive high cube warehouse walls.**
- **Simulation View 4:**
- **Simulation View 5: Only shows view of Building 3. Additional Simulation Views (preferably videos) are needed along the 3900 foot long southern boundary along Bobcat Rd. viewing northward to show the visual impact of Building 1 and Building 2.**

E-36-4 Cont

- **Simulation View 6: Need to show additional simulated views along the Sunset Blvd extension, view southerly towards Buildings 10,1,2 and Northerly towards RV storage, Trailer Storage, Building 7 and Building 5. Also examples of Class IV separated bike-lanes should be shown along Sunset Blvd Extension.**
- **Simulation View 7: Sunset Ave runs approximately 4700 feet along the eastern boundary. Yet only 1 View is displayed. Additional views, via video/animation should be made showing how the view of the industrial buildings, slopes, fences or walls, landscaping of the project changes as one travels either northerly or southerly along Sunset Ave by the project.**
- **Add a Simulation View 8: Add an animated view here showing how views would look of Industrial Blds 5,6,7,8,9, Trailer Storage, and Retail, as one traverses down the future Lincoln Ave extension within the project.**
- **Night views from all locations to show how the lighting from the project building sites, streets, and other sources, will visually affect the amount of artificial light will have on the nearby sensitive receptor communities.**

**E-36-4 Cont**

City of Banning General Plan. Although the City of Banning's General Plan acknowledges State Route 243 (SR-243) as a designated State Scenic Highway, the Development Site is located approximately 2 miles from the nearest segment of SR-243, and more than 5 miles from any portion of the highway designated as a State Scenic Highway and is therefore not immediately within the vicinity of a designated State Scenic Highway. As described in Chapter 3 – Community Development, within the City of Banning's General Plan; it is acknowledged that the Open Space and Conservation Element follows the guidelines set forth in California Government Code 65560, which requires discussion of areas particularly suited for parks and recreational purposes, including areas with links between major recreation and open space reservations, trails, and scenic highways.

**E-36-5**

Under the City's Open Space and Conservation Element, the following goals and policies have been incorporated to preserve elements such as Scenic Highways.

Goal 1: Open space and conservation lands that are preserved and managed in perpetuity for the protection of environmental resources or hazards, and the provision of enhanced recreational opportunities and scenic qualities in the City. The developer needs to allocate far more significant share of the project for open space. For example, develop the project only north of Westward Ave (Sun Lakes Blvd Extension) with all lands south of Westward preserved as open-space or open space park recreation. This also removes the emission threat of Building 4 which, under the current proposal, appears less than 500 feet from the sensitive receptor: MSJC San Gorgonio Pass Campus. Also, People move to the San Gorgonio Pass for its open space and rural character. Developers, like this one from Missouri, do not live in the Pass, so they cannot appreciate its scenic and natural qualities like long-time residents.

E-36-5 Cont

Policy 3: Development in all land use categories shall be of the highest quality. Of all the conceivable land uses available for developing this sight, none could be worse that siting 500 plus acres with monolithic high-cube (50-100 foot high walls) boxes. As Pass resident's know there is not a more ugly site. And developers make no effort to design aesthetically pleasing diversity in the building exteriors, the building pads, or landscaping.

E-36-6

Policy 5: The City shall preserve permanent open space edges or greenbelts that define the physical limits of the City and provide physical separation between adjoining neighborhoods.

## 4.1.5 Thresholds of Significance

The City has not established local CEQA significance thresholds as described in Section 15064.7 of the CEQA Guidelines. Therefore, significance determinations utilized in this section are from Appendix G of the CEQA Guidelines. According to Section I of Appendix G to the CEQA Guidelines, the Development Project would result in a significant impact to aesthetics if the Development Project or any Development Project-related component would:

Threshold 4.1-1: Threshold 4.1-2:

Threshold 4.1-1 Have a substantial adverse effect on a scenic vista.

Threshold 4.1-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

Threshold 4.1-3 In non-urbanized 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.

Threshold 4.1-4 ***Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.***

E-36-7

# 4.1.5.1 Scenic Vistas

## Threshold 4.1-1: Would the Development Project have a substantial adverse effect on a scenic vista?

Development projects have the potential to impact scenic vistas in two ways: 1) a development could physically alter a designated scenic resource (e.g., disturb or develop upon a designated ridgeline, hillside, or other designated scenic resource) or 2) could block a view corridor or "vista" of the scenic resource from public view. Important factors in determining whether a project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

The City has not designated any portion of the Development Site as a scenic resource. Accordingly, the Development Project will not physically alter a designated scenic resource.

E-36-7-A

With respect to the ability of the Development Project to block a scenic vista, the Development Site and the City of Banning are located in a valley situated approximately 41 miles south of the San Bernardino Mountains and approximately 25 miles northwest of Mount San Jacinto Peak. Both mountain ranges, along with their foothills rising from the valley floor constitute the most prominent scenic vistas in the vicinity of the Development Site and City of Banning. The Little San Bernardino Mountains are also visible to the east of the Development Site and City. Two of the highest peaks in southern California are visible from the Development Site: San Gorgonio Mountain in the San Bernardino Mountains, the highest peak in southern California (11,503 feet), is approximately 13 miles north of the Development Site and is visible from nearly the entire Development Site. San Jacinto Peak in the San Jacinto Mountains (10,834 feet) is approximately 15 miles southeast of the Development Site. The western foothills of the San Jacinto mountains begin approximately 1.5 miles south of the southern portion of the Development Site (SOI). However, the City has not designated these mountain ranges or foothills as scenic vistas Nevertheless, the discussion below analyzes

whether the Development Project would affect surrounding views or affect the existing visual character or adjacent land uses and the Development Site as seen from public locations. The public locations from which the Development Site is currently visible consist of the I-10 and the roadways surrounding the Development Site (Sunset Avenue and Highland Home Road, and Bobcat Road). In addition, to account for the future development of the SLB Extension, this analysis considers views of the Development Project that seek to replicate views from locations near the future SLB Extension looking west from the intersection of Sunset Avenue and Westward Avenue, and east from the intersection of Sun Lakes Boulevard and Highland Home Road.

Key View Analysis. Figures 4.1-2a through 4.1-2g, Key Views 1 through 7, respectively, illustrate each of the seven key views selected for this analysis as the most representative views at which the Development Site is visible from public right of way locations along roadways and Interstate 10 adjacent to and in the vicinity of the Development Site. To determine impacts related to aesthetics, views in the existing condition are compared to Development Project conceptual renderings. The conceptual renderings are derived from the Development Standards in the Specific Plan and are illustrative of typical development that is projected to occur upon Development Project implementation and are representative of the scale, mass, and proportion of future development on the Development Site. The following discussion describes the seven key views in their existing and post-buildout condition to analyze impacts associated with Development Project implementation.

E-36-7-A Cont

Key View 1, Figure 4.1-2a. Key View 1 depicts the view of the Development Site from the eastbound lanes of I-10 approximately 0.98 mile east of the Highland Springs Avenue freeway entrance under existing conditions and proposed conditions (with simulations depicting the Development Site). Key View 1 represents the view of the Northern Portion of the Development Site as seen by motorists traveling eastbound on I-10 as one passes just north of the Development Site.

**Existing Conditions**. In the foreground, one can see I-10 that traverses eastbound adjacent to the Development Site. In this view, the view of the eastbound lanes

transitions into a view of the shoulder which is occupied by dirt and natural vegetation. The middle ground setting at this location provides motorists traveling eastbound along I-10 views of trees, powerlines, power poles, fencing, and advertisement signs. From this area, motorists looking towards the Development Site have views of the San Jacinto Mountain Range 2 miles to the south (to the foothills), and the 10,834-foot-tall Mount San Jacinto Peak, 16 miles to the southeast, in background views.

**Development Project Renderings**. With Development Project buildout, motorists traveling eastbound on I-10 north of the Development Site would have partial views of a low profile 274,000-square-foot industrial building (Building 9) on the northwest corner of the Development Site. As I-10 in this location is higher in elevation than the Development Site and views of the site are partially blocked by the vegetated shoulder of the freeway, only a small portion of conceptual Building 9 on the Development Site would be visible. The rendering of the Development Project at this Key View location (conceptual at this point) shows that this specific industrial building would be painted to match the paint color palette provided in the Chapter 4 – Design Guidelines listed within the Sunset Crossroads Specific Plan, so that it would blend in with the natural vegetation and mountain backdrop. Though the San Jacinto Mountain Range as well as Mount San Jacinto Peak would be somewhat blocked, it should be noted that views of foothills and peaks would still be retained and would be visible.

E-36-7-A Cont

As discussed in Chapter 3.0 of this EIR, the Battery Energy Storage Systems Facility (BESS) would be located on the Development Site. This would be a privately owned and operated 65 megawatt-hours (MWh) BESS proposed to be constructed on the Development Site to support storage of energy by the City of Banning Electrical Utility. The facility would be a permitted use and may be constructed anywhere within the industrial zoned areas of the Development Site. However, it is anticipated to be located in proximity to the planned electrical substation located in PA 7.No off-site electricity transmission is anticipated from the BESS. The visual character of this facility would be similar to that of the electrical substation, with battery storage blocks, electrical equipment and transmission lines, as well as an approximately 85-foot tower. While this tower's height is substantial, it would be a thin, metal tower, and would not significantly obstruct key views discussed in this section. This facility is not portrayed in any of

the key view simulations, as a location for this facility within the Development Site is not defined at this time. If located in proximity to the City-proposed electrical substation, it would be located at the northwest corner of the Development Site. This would make it most visible from Key View 1.

The Sunset Crossroads Specific Plan includes architectural and landscape design standards establishing lot and building standards such as minimum lot area, maximum building coverage, height, setback, signage and equipment screening requirements. The Specific Plan also establishes design guidelines applicable to the Development Project. Although implementation of the Development Project would change the visual character of the Development Site, compliance with these development standards and design guidelines would ensure that future development on the Development Site is thematically consistent and has a unified design. Listed below are select sections from the Specific Plan that would be applicable to the design features being implemented on the Development Site.

• **Development Standards and Design Guidelines:** Chapter 3 – Development Standards and Chapter 4 – Design Guidelines from the Sunset Crossroads Specific Plan provide detail on both the General Development Criteria for the entire Specific Plan area and Design Guidelines which intend to establish the quality and character of the built environment for the master-planned development area of Sunset Crossroads. Adherence to these provisions is intended to ultimately result in consistent and coherent architectural and landscape architecture expression across the Specific Plan area, while allowing for flexibility in response to continuously evolving building design. The Development Project would be required to adhere to the General Development Criteria and permitted uses in Chapter 3 of the Specific Plan, and to be consistent with Design Guidelines set forth in Chapter 4 of the Specific Plan. The Specific Plan also states that through implementation of the guidelines provided, all projects subject adhering to these standards and criteria will also implement the intent of goal and policies related to preservation of scenic views and the integrity of overall landscape aesthetics, as listed in the City of Banning General Plan.

E-36-7-A Cont

• **Signage Design Guidelines:** Section 4.5 of the Sunset Crossroads Specific Plan provides signage design guidelines proposed for the project area. As stated in the

Specific Plan, signs will identify “Sunset Crossroads” and its building occupants and ensure the efficient circulation of vehicle traffic within the Development Site by identifying vehicular entry points and directing vehicles to their on-site destinations. Also, signage will enhance the pedestrian experience through the design of way finding components: directories, directional signage, and destination identifiers.

The Specific Plan requires preparation of a Specific Plan Sign Program prior to issuance of the first occupancy permit to provide adequate and appropriate project, pylon street, building, tenant identification, pedestrian path, and wayfinding signage for the anticipated variety of building sizes, designs, and uses to ensure that all project signage is designed with a single vision and theme. All building signage should be in scale with and in proportion to, the primary building facades so that the signage is not ‘overpowering’ and does not dominate the overall appearance. Ultimately, signage associated with the Development Project will cause very minor, if any, visual obstructions as they will typically be associated with development of any new buildings. Development of new buildings will pose the greatest potential impact to surrounding views due to their larger size. However, the potential impacts related to the construction of new buildings associated with the Development Projects are analyzed below and appropriate mitigation measures are provided where necessary. E-36-7-A

The architectural style of industrial uses within the Development Site emphasizes a contemporary design. Conceptually, Building 9 would be characterized by simple and distinct cubic masses with interlocking volumes of wall planes, colors, and materials that would create visual appeal and conformity across the entire Development Site. All of these elements would minimize the impact of the Development Project as seen from the I-10. Moreover, because the I-10 is not a designated scenic highway, the mountain ranges and foothills that are visible from the Site are not designated as scenic vistas. The Development Project will be required to adhere to Specific Plan Development Standards and to implement Design Guidelines that will result in coherent and consistent architectural and landscape design. Therefore, implementation of the Development Project, as shown in Key View 1, would not have a substantial adverse effect on views of

scenic vistas. Impacts would be less than significant, and no mitigation would be required.

Key View 2, Figure 4.1-2b. Key View 2 depicts the view of the Development Site from the westbound lanes of I-10 at the Sunset Avenue overcrossing under existing conditions and proposed conditions (with simulations depicting the Development Project). Key View 2 represents the view of the Northern Portion of the Development Site in the foreground as seen by motorists traveling eastbound on I-10 as one passes just north of the Site.

*Existing Conditions*. In the foreground, one can see the lanes of westbound I-10 and a concrete jersey barrier separating westbound traffic from eastbound traffic. The middle ground of the Key View shows vehicles traveling eastbound on I-10, trees beyond the freeway, an open/unoccupied parcel, and street utility structures supporting utility lines (see Figure 4.1-3, Public On-Site Utility Features). Motorists in this area looking towards the Development Site have distant views of the western side lower foothills of the San Jacinto Mountain Range which are approximately 1 mile from the Site, and approximately 2 miles from this location.

E-36-7-A Cont

*Development Project Renderings.* Motorists traveling westbound along I-10 approaching the Development Site would have views of general commercial and industrial buildings within Planning Areas (PAs) 1, 6, and 7 of the Site. The simulation from this viewpoint shows a conceptual rendering of the 125-room, 90,000-square-foot hotel, and other general commercial buildings totaling to a maximum size of 268,400 square feet. Dock loading areas and semi-truck parking/loading areas would also be visible to motorists at this vantage point. Distant views of the Development Site on its western end, approximately 1 mile from this viewpoint, are also visible to motorists from this viewpoint. Conceptual renderings of low-rise industrial buildings on the western side of the Development Site shown on Key View 2 can be seen from this position by motorists on I-10. The open, vacant land of the Development Site would be replaced by industrial/general commercial development that would change the existing characteristics of the area. The western foothills of the San Jacinto Mountain Range, approximately 2 miles from I-10, would still be visible from this viewpoint. However, views of the lower

portion of the foothills would be obstructed by the buildings associated with the Development Project. The proposed hotel would be a maximum of 60 feet tall (5 stories), taller than the other industrial/general commercial buildings on the Site. However, from this viewpoint, the height and massing of the hotel building would blend in with the industrial buildings behind it as these buildings would be developed on elevated pads. This type of design gives viewers the visual sense that buildings across the site are generally the same height.

The Specific Plan also establishes design guidelines applicable to the Development Project. Although implementation of the Development Project would change the visual character of the Development Site, compliance with these development standards and design guidelines would ensure that future development on the Site is thematically consistent and has a unified design. The architectural style of industrial uses within the Site emphasizes a contemporary design. The goal of the General Commercial Architectural Guidelines of the proposed Project is to promote visual compatibility and individuality within the Site. As described in Section 4.4 – General Commercial Architectural Guidelines, of the Sunset Crossroads Specific Plan, the architectural styles that would be used for the general commercial area within the Site have historical precedence in Southern California and throughout the world and are capable of contemporary interpretation and variation in a modern master planned development. The intent of the architectural style for the general commercial area is to avoid monotonous architecture while encouraging the application of detail and materials authentic to the spirt and visual character of the Development Project. The industrial, general commercial, and hotel buildings on the Site in this view would be characterized by simple and distinct cubic masses with interlocking volumes of wall planes, colors, and materials that would create visual appeal and conformity across the entire Development Site. Chapter 4 Design Guidelines, of the Specific Plan, ensures that the architecture of the buildings throughout the Development Site is consistent with the existing architecture in the Development Site vicinity. The color palette would match surrounding structures and the earth tones that are predominant in the existing environment. All of these elements would minimize the impact of the Development Project as seen from the I-10. Moreover, because the I-10 is not a designated scenic highway and the mountain ranges and foothills that are visible from the Site are not designated as scenic vistas. Therefore, implementation of the

E-36-7-A

Development Project, as shown in Key View 2, would not substantially adversely affect views of scenic vistas. Impacts would be ***less than significant,*** and no mitigation would be required.

**Key View 3, Figure 4.1-2c**. Key View 3 depicts the view of the Development Site from Sunset Avenue approximately 0.1 miles south of Lincoln Street, looking west towards and across the Development Site under existing conditions and proposed conditions (with simulations depicting the Development Project). This view represents what motorists on Sunset Avenue and residents living in the residential neighborhood just east of Sunset Avenue would see as one looks towards the Development Site.

*Existing Conditions*. In the foreground, one can see the shoulder area of Sunset Avenue transitioning to natural vegetation and a fence demarking the eastern boundary of the Development Site. The middle ground at this Key View shows naturally vegetated (grass and some short trees), and the relatively flat topography of the unoccupied Development Site. The background from this Key View offers views of the westernmost foothills of the San Jacinto Mountain Range approximately 1.5 miles south of the Development Site as they reduce in elevation and meet the valley floor. Distant views of electrical transmission line towers are also available in the background from this Key View. Overall, there are no views of scenic resources, memorable topography, or scenic vistas from this vantage point under existing conditions.

E-36-7-A Cont

*Development Project Renderings.* As shown in this rendering, the Sunset Avenue streetscape from I-10 to the SLB Extension is a 110-foot right-of-way. The westerly portion of the right of way consists of a 9-foot median and 34 feet of paving, with a 4-foot curb-adjacent landscaped parkway and an 8-foot-wide parkway-adjacent Class 1 bikeway. The Development Project will construct only the west half-width of this roadway, including the median plus 10 feet. Beyond the new sidewalk, a vegetated area developed to a maximum slope ratio of 2:1 would be installed as the topography transitions upslope to the development pads of the Site. Development Project-related landscaping consisting of short trees, and shrubbery would be installed on this slope to provide an aesthetic transition

between natural area and the proposed buildings on the Site. A surface parking area is shown between the vegetated slope and buildings that would be developed in this area. Under the Specific Plan guidelines, included below, the parking area would allow for landscaping or low, decorative walls or a combination thereof. This portion of the Development Project, PA 2, would be developed with a low-rise, 326,000-square-foot industrial building (Building 5) as shown in the rendering at this Key View. Development of Building 5 at this Key Viewpoint would block motorists' and residents' (directly east of Sunset Avenue) views of the westernmost foothills of the San Jacinto Mountain Range as they reduce in elevation and meet the valley floor.

E-36-7-A Cont

## Parking and Circulation Standards

A. Pedestrian linkages between uses in commercial developments should be clearly separate from vehicular circulation patterns and should including distinct pedestrian access.

B. Parking aisles should be separated access driveways whenever possible.

C. Whenever possible, the driveway's throat should be extended to set back the parking spaces from the street.

E-36-8

D. Whenever possible, project planning should include joint driveways providing access to more than one site.

E. Parking areas shall be landscaped in accordance with the requirements of this Zoning Ordinance.

F. Shared parking is desirable whenever practical.

G. Interior circulation should always incorporate logical direction of travel to avoid vehicle conflicts. **Also needs to incorporate class IV or comparable bike lane network within each building site and utilizing Class IV bike lanes, connecting throughout the project streets and trail systems.**

H. Access to parking areas should be from side streets whenever possible, or from driveways to the rear or to the side (between structures) of the subject structure. When access from a primary roadway is required, enhanced paving should be provided to clearly locate sidewalks within the entry drives.

I. The access to parking areas should be located as far from street intersections as possible. Access points should be limited to only the number necessary for efficient circulation. Public works standards for separation between driveways, and for separations between driveways and intersections shall be enforced.

E-36-8 Cont

J. Large expansive parking lots should be avoided.

K. Pedestrian **and bike lane** circulation should be designed to minimize the need to cross parking aisles and landscape areas.

L. The parking area should be located behind or between existing structures and link the structures to the street sidewalks.

E-36-9

M. Large parking area should be divided into connected smaller lots by buildings and landscaping and raised concrete areas.

N. Large parking areas should be located at least forty feet from the curb. In larger projects, this distance may be greater, to accommodate vehicle cueing.

O. Whenever possible, parking areas are discouraged along the street; however, should parking be located along the street, a combination of walls, and/or berms, and/or landscape material must be provided to screen parking areas from the adjacent street. The screening should be between thirty-six inches and forty-eight inches, except when a drive-through aisle is being screened, in which case a higher screen is necessary to hide the vehicles. Lowered grades in parking lots may also be used to accomplish this.

**P. Bike lane route system should circulate within each building area and connect between building sites using Class IV. Bike lanes should be incorporated into a trail system that follows natural creek courses. Each Industrial Building should have at least 1 bike rack for every 10,000 sq.ft. of floor area. Bike racks should be distributed near entrance/exit points and reasonably concentrated.**

E-36-10



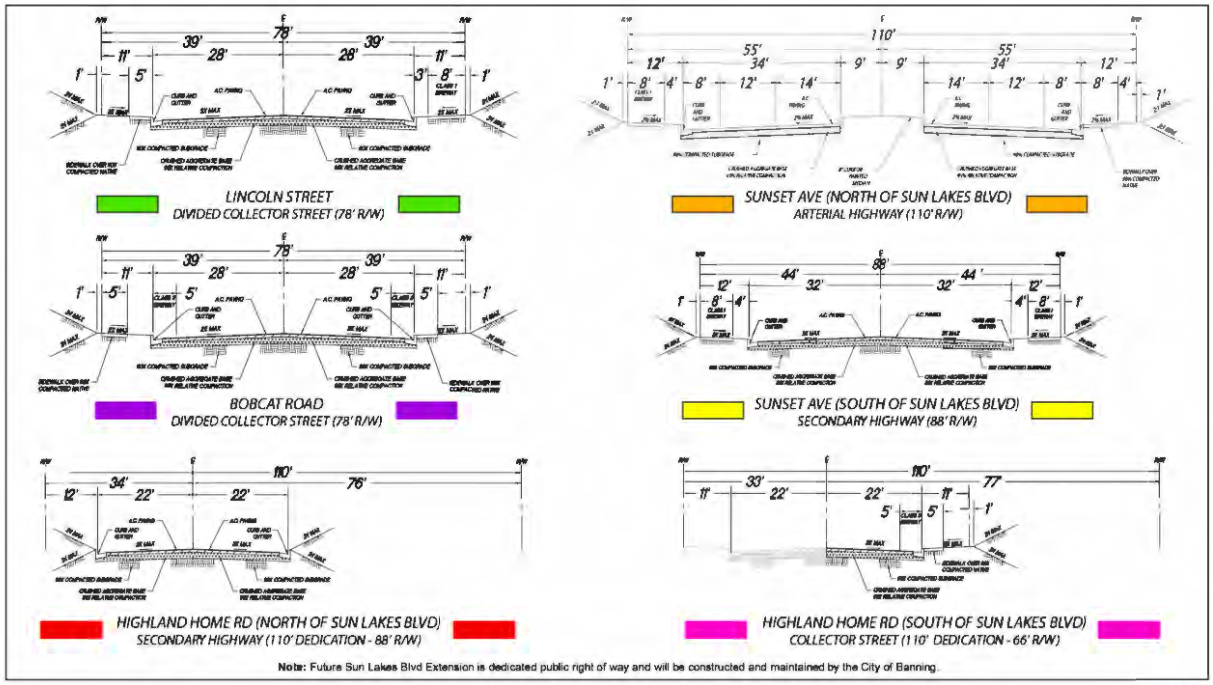


FIGURE 2-3

Per the above Figure 2-3 Conceptual Roadway Cross Sections, the developer has not included in their proposed design, safety features such as class IV bike lanes, pedestrian or equestrian trails. Bobcat Rd is especially egregious as NO bike-lanes, pedestrian or equestrian trails of any kind have been included. An equestrian Trail is appropriate at Bobcat Rd to support the equestrian travel between horse-ranch properties, and for equine fitness and recreation.

E-36-11

Also no provision has been made for safe and convenient public transit. There's no extra right-of-way or lanes, transit stops or shelters for transit vehicles. Also no bike-racks or other bike storage near transit stops.

E-36-11-A

As indicated above, the Specific Plan includes architectural and landscape design standards establishing lot and building standards such as minimum lot area, maximum building coverage, height, setback, signage and equipment screening requirements. The Specific Plan also establishes design guidelines applicable to the Development Project. Chapter 4 Design Guidelines of the Specific Plan describes height limits and color palette requirements for the Development Project, including those visible from this Key View. Although implementation of the Development Project would change the visual character of the Development Site, development of the Development Project compliance with these development standards and design guidelines would ensure that future development on the Site is thematically consistent and has a unified design. The industrial buildings at this Key Viewpoint would be characterized by simple and distinct cubic masses with interlocking volumes of wall planes, colors, and materials that would create visual appeal and conformity across the entire Site Per Chapter 4 – Design Guidelines, of the Sunset Crossroads Specific Plan; the following design features will be incorporated in order to develop a clean, contemporary visual environment as designated in the Specific Plan:

E-36-11-B

• Appropriate primary exterior building materials will include concrete and similar materials, as well as tilt-up panels. The primary materials will be accented by secondary materials including but not limited to natural or fabricated stone, fire resistant wood siding (horizontal or vertical), and metal.

• Trim details may include metal finished in a consistent color, plaster, or concrete elements finished consistently with the building treatment.

• Material changes shall occur at intersecting planes, preferably at the inside corners of change of wall planes, or where architectural elements intersect.

• Primary exterior building colors will be light and warm tones designated from the color palette provided in the Specific Plan. Darker and/or more vibrant accent

colors shall be provided in focal point areas, such as around building entrances and near outdoor gathering spaces.

• Bright primary colors, garish use of color and arbitrary patterns or stripes that will clash with the color palette are discouraged, except in signage logos.

• Exposed downspouts, service doors and mechanical screen colors should be the same color as the adjacent wall.

Although views of the lower portion of the westernmost foothills of the San Jacinto Mountain Range as they reduce in elevation and meet the valley floor, as shown in the left side of the existing view for Key View 3, would be blocked, the top of the foothills, as well as the higher mountains and peaks above would remain fully visible. This would not be considered significant as the foothills are an unremarkable characteristic of the local topography. Furthermore, the City of Banning has not designated these topographical features as scenic vistas. For these reasons, and because the mountain ranges and foothills that are visible from this Viewpoint are not designated as scenic vistas, implementation of the Development Project, as shown in Key View 3, would not have a substantial adverse effect on views of scenic vistas. Impacts would be ***less than significant,*** and no mitigation would be required.

E-36-11-B Cont

**Key View 4, Figure 4.1-2d.** Key View 4 depicts the view of the Development Site from South Highland Home Road, looking east across the property at 14350 Highland Home Road, towards the Development Site, approximately 0.5 miles from the Site, under existing and proposed conditions (with simulations depicting the Development Project). This view represents what motorists traveling north- and southbound along Highland Home Road and residents in the residential neighborhood just west of Highland Home Road would see while looking east towards the Development Site.

*Existing Conditions.* In the foreground from this Key Viewpoint, one can see a mason wall/ranch-style fence demarking the parcel boundary of 14350 Highland Home Road. The middle ground at this location provides views of a fenced-in

animal corral as well as some ornamental trees landscaping the property. In the background, one can see accessory buildings associated with the property at 14350 Highland Home Road and beyond those buildings semi-obstructed views of the San Jacinto Mountain Range (approximately 2 miles to the right side of the pictured viewpoint) and the San Bernardino Mountain Range (approximately 4 miles to the left side of the pictured viewpoint).

*Development Project Renderings.* This rendering of the Development Project shows minimal changes to the background of this viewpoint. Limited views of the conceptual 1,420,000- square-foot industrial building (Building 1) on the Development Site can be seen from this Key Viewpoint. The low profile of Building 1 would not block distant views of the San Jacinto Mountain Range or the San Bernardino Mountain Range any more than compared to existing conditions.

The Development Project includes architectural and landscape design guidelines that provide design standards for the development of the Site. Although implementation of the Development Project would change the visual character of the Site, compliance with these design guidelines would ensure that future development on the Development Site is of high quality and would maintain the overall vision of the Development Project. The architectural style of industrial uses within the Development Site emphasizes a contemporary design. Building 1 at this Key Viewpoint would be characterized by simple and distinct cubic masses with interlocking volumes of wall planes, colors, and materials that would create visual appeal and conformity across the entire Development Site. As described above, existing distant views of the San Jacinto Mountains and San Bernardino Mountains would not be further obstructed with implementation of the Development Project from this viewpoint because of the elevation of these mountain ranges and their distance from the Development Site. Further, the mountains that are visible from the Site are not designated as scenic vistas. Therefore, implementation of the Development Project, as shown in Key View 4, would not have a substantial adverse effect on views of scenic vistas. Impacts would be **less than significant**, and no mitigation would be required.

E-36-11-B Cont

**Key View 5, Figure 4.1-2e.** Key View 5 depicts a view of the Development Site from Sunset Avenue, approximately 500 feet north of Bobcat Road, looking west, under existing and proposed conditions (with simulations depicting the Development Project). This view represents what motorists traveling on Sunset Avenue approximately 0.5 miles west of the Development Site, looking east toward the Development Site, would see when looking west towards the Development Site.

*Existing Conditions*. The foreground from this Key Viewpoint shows natural vegetation that is just west of Sunset Avenue and a dirt road cut along the shoulder area. The middle ground at this Key Viewpoint offers views of the Development Site in its existing conditions covered with natural vegetation and some trees (cypress and oaks). The topography of the Development Site is relatively flat but does have small elevation variations as seen from this Key Viewpoint. The background from this Key Viewpoint offers distant views of the western foothills of the San Jacinto Mountain Range (approximately 3 miles from this View Site) as they decrease in elevation to the valley floor (left side of the photograph) and the western foothills of the San Bernardino Mountain Range as they decrease in elevation to the valley floor (right side of photograph). Overall, the view from this Key Viewpoint offers unremarkable views of the Development Site and distant topographical features.

E-36-11-B Cont

*Development Project Renderings*. As shown in this rendering, curbing would be installed along the western side of the improved Sunset Avenue. Beyond the curb, no sidewalk would be installed; however, the Sunset Avenue right-of-way would transition to a slope (maximum 2:1 slope ratio) landscaped with various trees and shrubs up to the development pad of the Development Project. At the top of the vegetated slope, limited views of a 575,000-square- foot industrial building (Building 3) would be visible. Parked or loading semi-trucks would be visible from this Key Viewpoint, as the eastern side of Building 3 would have loading docks and a truck court. Implementation of the Development Project in this area would partially block views of the western foothills of the San Jacinto Mountain Range as they decrease in elevation to the valley floor and the western foothills of the San Bernardino Mountain Range as they decrease in elevation to the valley floor.

However, the tops of these foothills, and the rest of the larger mountain range above them, would remain visible from this Key View through construction and operation of the Development Site. Although views of these topographical features would be partially blocked, **this would *not* be considered significant as the foothills are an unremarkable characteristic of the local topography,** and the City of Banning has not designated these topographical features as scenic vistas. Therefore, implementation of the Development Project, as shown in Key View 5, would not substantially adversely affect views of scenic vistas. Impacts would be less than significant, and no mitigation would be required.

**Key View 6, Figure 4.1-2f.** Key View 6 depicts a view of the Development Site from Sun Lakes Boulevard, looking west, under existing and proposed conditions (with simulations depicting the Development Project). This view assumes construction of the Sun Lakes Boulevard Extension by the City (which would provide public views) and represents what motorists traveling on Sun Lakes Boulevard approximately 0.5 miles west of the Development Site, looking east toward the Development Site would see.

E-36-11-B

*Existing Conditions.* The foreground from this Key Viewpoint shows the Sun Lakes Boulevard and South Highland Home Road intersection. The middle ground at this Key Viewpoint offers views of the Existing ROW, including unpaved portions of Western Avenue that traverses the Development Site, and the Development Site in its existing conditions covered with natural vegetation and some trees (cypress and oaks). The topography of the Development Site is relatively flat but does have small elevation variations as seen from this Key Viewpoint. The background from this Key Viewpoint offers distant views of nearby commercial and industrial buildings. Overall, the view from this Key Viewpoint offers unremarkable views of the Development Site and distant topographical features.

*Development Project Renderings*. As shown in this rendering, the Sun Lakes Boulevard Extension (SLB) has been developed by the City as a four-lane road that will connect Sunset Avenue to South Highland Home Road. The SLB Extension

will have two travel lanes in each direction which will be separated by a landscaped median. The SLB Extension is not part of the proposed Project but is considered as a related project in this EIR. Grading of the Development Site would occur south of the SLB Extension (Grading Phase 1) and north of the SLB Extension (Grading Phase 2). Completion of the SLB Extension would allow access to the Development Site via Sunset Avenue on the east and Highland Home Road on the west. A planned park and open space would be located to the north of the portion of the SLB Extension visible from this viewpoint. Buildings comprising part of the Development Project are set back from this roadway but would be visible north and south of the Sun Lakes Boulevard. These buildings would partially affect views of the mountains at the right of the roadway (south), obstructing portions of the view of the lowest portion of the mountains. The peaks and most of the mountainsides would still be visible from the roadway. Therefore, implementation of the Development Project, as shown in Key View 5, would not substantially adversely affect views of scenic vistas. Impacts would be less than significant, and no mitigation would be required.

E-36-11-B Cont

**Key View 7, Figure 4.1-2g**. Key View 7 depicts a view of the Development Site from the intersection of Sunset Avenue and Westward Avenue, looking west, under existing and proposed conditions (with simulations depicting the Development Project). As with Key View 6 above, the simulation assumes construction of the Sun Lakes Boulevard Extension by the City and represents what motorists traveling on Sun Lakes Boulevard approximately 0.5 miles east of the Development Site, looking west toward the Development Site, would see.

*Existing Conditions*. The foreground from this Key Viewpoint shows the Sun Lakes Boulevard and Sunset Avenue intersection. The middle ground at this Key Viewpoint offers views of the Development Site in its existing conditions covered with natural vegetation and some trees (cypress and oaks) and pipeline signage and electrical poles. The topography of the Development Site is relatively flat but does have small elevation variations as seen from this Key Viewpoint. The background from this Key Viewpoint offers distant views of commercial and industrial buildings. Overall, the view from this Key Viewpoint offers unremarkable views of the Development Site and distant topographical features.

*Development Project Renderings*. As shown in this rendering, Sun Lakes Boulevard (SLB) (refer to **Appendix A, Figure 4.1-2g**) has been developed by the City as a four-lane road that will connect Sunset Avenue to South Highland Home Road. From this location, the proposed buildings are set back on both sides of the road, north and south. As with the other locations throughout the Development Site, Project structures will partially obstruct views of the San Bernardino and San Jacinto mountains. However, from the viewpoint, only the lower portion of the mountains and foothills would be obstructed. The rest of the foothills and mountain slopes would remain visible. Therefore, implementation of the Development Project, as shown in Key View 5, would not substantially adversely affect views of scenic vistas. Impacts would be **less than significant, and no mitigation would be required**.

**Key View Summary**. Key Views 1 through 7 provided above illustrate development that is planned to occur with approval of the Development Project and, in certain cases, construction by the City of the SLB Extension. Although the Development Project would obstruct some views of the San Jacinto Mountain Range, the San Bernardino Mountain Range, and the western foothills of both of these mountain ranges from some public vantage points, the City has not designated these topographical features as scenic vistas and as such, no significant impact would occur to scenic resources. Viewpoints were analyzed in the above discussion and include motorists traveling on I-10, Sunset Avenue, and South Highland Home Avenue, looking towards the Development Site. Visual impacts for motorists looking towards the Development Site would be temporary as they drive along I-10 and surrounding roads. Motorists on the west side of the Development Site looking east across the Site would continue to have limited views of the San Jacinto Mountain Range and San Bernardino Mountain Range as the uses of the Development Project would not obstruct these vistas above and beyond what is occurring under existing conditions. The characteristics of the Development Site would change from a vacant property occupied by natural grasslands and drainage areas to one occupied by surface parking lots, industrial and general commercial buildings, open space areas, natural drainage areas, a neighborhood park, and bicycle/pedestrian trails. The Development Project

E-36-11-B Cont

includes design guidelines for on-site development, open space areas, and also includes a landscaping plan that would ensure consistency with the City's General Plan goals and policies regarding aesthetics, as included in Section 4.6 Landscape Design Guidelines, of the Specific Plan. The plant palette for the Development Site was selected to complement and enhance the setting of the site, while ensuring the conservation of the Development Site's natural vegetation and habitats. The design guidelines and landscaping plan would also ensure the Site is developed with consistent visual characteristics of the surrounding uses. For these reasons, implementation of the Development Project would not have a substantial, adverse effect on views of scenic vistas. **Impacts would be less than significant, and no mitigation would be required.**

***Freeway Oriented Freestanding Sign***. The Development Project would also include the placement of a maximum 80-foot tall, 30-foot-wide, freeway-oriented freestanding sign, on the north side of the Development Site. Additional signs would be placed throughout the Development Site; however, the freeway-oriented freestanding sign would be taller than surrounding buildings and has the potential to partially block views of vistas of the San Jacinto foothills from the freeway-oriented Key Views 1 and 2, and of the San Bernardino foothills from Development Site-oriented Key Views 3-5. **Figure 4.1-4: Project Freeway-Oriented Freestanding Sign** shows the visual characteristics of the freeway- oriented sign, the sign's estimated maximum dimensions, and the location of the sign on the northern boundary of the Development Site. The sign would be oriented towards motorists on I-10 and may consist of fabricated aluminum, a faux Corten color finish with the Development Project logo, a stone veneer base, landscaping around the base, and individually illuminated channeled letters (no neon illumination or video/high definition (HD) signs). The freeway-oriented freestanding sign has the potential to partially block motorist's views of the San Jacinto Mountains and its western foothills; however, the design, location and size of the sign would make this a minimal temporary obstruction as motorists drive past the Development Site on westbound and eastbound I-10. Overall, implementation of the freeway-oriented freestanding sign as part of the Development Project would not adversely affect views of scenic vistas. **Impacts**

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**would be less than significant, and no mitigation measures are required.**

**Level of Significance Prior to Mitigation**: Less than Significant Impact.

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

**Level of Significance After Mitigation:** Less than Significant Impact.

E-36-11-B Cont

## *4.1.5.2 Damage Scenic Resources within a State scenic highway*

Threshold 4.1-2: Would the Development Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

The Caltrans Scenic Highway Program identifies SR-243 (approximately 2 miles east of the Development Project) between I-10 and State Route 74 as both an Eligible and Officially Designated State Scenic Highway.4 Due to intervening topography, distance, existing buildings, and vegetation (i.e., trees), the proposed Development Project is not visible from SR-243. Neither are areas on the Development Site for the future development of an electrical substation (PA 7) or reverse osmosis facility (PA 12). PAs 4, 7, and 12, where these facilities would be located, are not within, adjacent, or near a State- designated scenic highway.

4.1.5.2 Damage Scenic Resources within a State scenic highway

4.1.5.3 Degrade the Existing Visual Character

General Plan. The City of Banning General Plan is intended to guide future growth and development within the City. The General Plan lists the following goals and policies pertaining to aesthetics that would be applicable to the Development Project. The following provides a consistency discussion pertaining to these goals and policies:

- Goal 1: Open space and conservation lands that are preserved and managed in perpetuity for the protection of environmental resources or hazards, and the provision of enhanced recreational opportunities and scenic qualities in the City.

E-36-11-B Cont

o Consistent: As described above, the Specific Plan would guide design and landscaping features for uses developed on the Development Site. Scenic qualities within the surrounding area of the Development Project are expected to be maintained with only minor obstructions due to Project implementation. Open space would be preserved on the Development Site through incorporation of park facilities within the Development Project. Additionally, three existing drainage features on the Development Site would be preserved. For additional discussion regarding the parks and open space within the Development Project, refer to Section 4.16 of this EIR. Overall, the Development Project would be consistent with this policy and the City of Banning General Plan.

- Policy 3: Development in all land use categories shall be of the highest quality.

o Consistent: As described above, the Specific Plan would guide design and landscaping features for uses developed on the Site. Commercial and industrial

buildings would consist of contemporary aesthetics, which would provide architectural styling with attractive detailing, steel accents, and light-toned color palette. These design features would be consistent with zoning code and General Plan requirements pertaining to aesthetics and visual characteristics. Overall, the Development Project would be consistent with this policy and the City of Banning General Plan.

• Policy 5: The City shall preserve permanent open space edges or greenbelts that define the physical limits of the City and provide physical separation between adjoining neighborhoods.

o Consistent: As described above, the Specific Plan would guide design and landscaping features for uses developed on the Site. The Development Project is not expected to impact or obscure open space edges or greenbelts that define physical limits of the City. For additional discussion regarding the parks and open space, including buffer areas, within the Development Project, refer to Section 4.16, and Section 4.11, of this EIR. Overall, the Development Project would be consistent with this policy and the City of Banning General Plan. E-36-11-B Cont

The Development Site is currently undeveloped, and grading/other construction activities will permanently alter the visual character of the Development Site. However, visual impacts from construction would be temporary, and with implementation of the above-described best management practices, regulatory compliance measures, and mitigation measures, impacts would be less than significant. As previously discussed, the visual character of surrounding views would be maintained during construction and operation. Building height and signage would partially obstruct views of the San Jacinto and San Bernardino mountains, as noted in Threshold 4.1-1 above. These views are defining features of the San Gorgonio pass region where the Development Site is located.

The visual character and quality of the Site and surrounding area would be preserved and enhanced through the application of the architectural and landscape design guidelines of the Development Project. The architectural and landscape

design guidelines guide the quality and aesthetic value of future commercial and industrial buildings as a result of implementation of the Development Project. Any development undertaken as a result of implementation of the Development Project would be required to comply with the development standards and architectural and landscape design guidelines contained in the Specific Plan. Impacts would be less than significant, and no mitigation measures are required.

Zoning. (ADDRESSES LIGHTING) The Specific Plan does not supersede municipal code requirements regarding lighting. Section 17.24.100 of the City's municipal code describes lighting requirements applicable to the Development Project. All lighting in the Development Project would conform to brightness and directionality requirements outlined in the City's zoning and municipal code, minimizing flashing lights on signage and overflow lighting impacting residential land uses on the east, west, and rural south sides of the Development Site. For details regarding the Development Standards and municipal codes for lighting at the Development Site, refer to the Signage Design Guidelines from the Specific Plan discussed in Threshold 4.1-5 below. For details regarding the Development Standards for signage at the Development Site, refer to the Signage Design Guidelines from the Specific Plan discussed in Threshold 4.1-1 above. Therefore, with adherence to the Specific Plan guidelines and the City's zoning and municipal codes, implementation of the Development Project would neither substantially degrade the visual character of the Site nor conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant, and no mitigation measures are required.  No way.

E-36-11-B Cont

Chapter 17.96 of the Banning Municipal Code provides uniform procedures for the adoption and implementation of Specific Plans. Implementation of the Specific Plan associated with the Development Project would result in land use changes that would be consistent with the City of Banning General Plan (No Way! Specific Plan is a tool to circumvent GP) . The Specific Plan addresses the entire Development Project and would be subject to approval by the City's Planning Commission, as well as adoption by the City Council. The Specific Plan is intended to guide development and land uses for the Development Site. Upon approval of the

Development Project, the Specific Plan would become a part of the City's Zoning Code and the land use changes would become effective.

The Specific Plan includes development standards and architectural and landscape design guidelines that are intended to provide design direction and standards for the development of the general commercial, industrial, open space – resource, and open-space park uses of the Site. Compliance with these design guidelines would ensure that future design and development associated with the Development Project are of high quality and would maintain the overall vision of the Development Project. A cohesive design theme would be created for the land uses identified by the Specific Plan to maintain design continuity throughout the Site. The 392.0 acres of industrial land uses associated with the Development Project would feature contemporary aesthetics, which would provide architectural styling with attractive detailing, steel accents, a light-toned color palette, and timeless features. The design elements in the Specific Plan are included to reduce the visibility and intensity of the commercial and industrial activities, including walls, landscaping, and building design. Internal signs would be modern, lighting would be focused and directed on uses on the Site to avoid spillover, and landscaping would be colorful and drought tolerant. Overall, although development would change the visual character of the Development Site, it could be viewed as improving the visual character when compared to the existing drab natural vacant conditions of the Site. Elevated structures on the Development Site, including the freeway-oriented signage and BESS tower, as discussed above, would not, or only partially, obstruct existing views, as shown in the key view simulations. Accordingly, the Development Project would be consistent with City regulations governing scenic quality, including those outlined in the City of Banning General Plan Land Use Element and the City's Municipal Code, and impacts would be less than significant, and no mitigation is required.

**E-36-11-B Cont**

4.1.5.4 Substantial Light or Glare

The Development Site is currently undeveloped and therefore is not illuminated at night. Surrounding development generates light near the Development Site; however, much of this light is directed onto these adjacent parcels and does not

spill over onto the Development Site. Since the Development Site is undeveloped, there are no structures on site that generate glare during daytime hours. Increases in artificial lighting from development may alter natural outdoor daytime light levels, and excessive night lighting can lead to skyglow which can interfere with the operation of astronomical observation.

Constructing and operating the Development Project would **introduce new sources of light**. Most construction activities on the Development Site will occur during the hours of 7:00 a.m. to 6:00 p.m. per City Zoning Code guidelines. Any construction-related illumination during evening and nighttime hours would consist of the minimum lighting required for safety and security purposes only and would occur only for the duration required for the temporary construction process. All lighting shall incorporate City of Banning standards set forth in Section 17.24.100 (Outdoor Lighting) of the City's Zoning Ordinance, measures to aid in reducing light pollution, or as approved by the Community Development Director. Low-level security lighting may be provided for the park, tot lot playground, trails, parking lot, and restrooms. The trails and parking lot may include bollard lighting while the tot lot playground and restrooms may include security lighting. ? The Specific Plan's Outdoor Lighting Guidelines also indicate that the Development Site would minimize glare and "spill over" light onto public streets. As a project design feature, night lighting will be directed away from the conserved areas to protect species within the conserved areas from direct night lighting.? **(really? This attempted mitigation cannot prevent Light dispersal from negatively emanating (spilling) into nearby residential communities and schools, disrupting sleep cycles of residents)** Shielding shall be incorporated in the Development Project designs to ensure that ambient lighting in the conserved areas is not increased. With implementation of this project design feature and due to the limited nature of nighttime construction lighting, light resulting from construction activities would not substantially impact sensitive uses, substantially alter the character of off-site areas surrounding the Site nor interfere with the performance of an off-site activity. For further detail, please reference Section 4.04, Biological Resources. Therefore, construction of the Development Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and light impacts associated with construction would be less than significant.

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**The Development Project would introduce new sources of light** on the Development Site through development of general commercial, industrial, and open space-parks uses on the Site. The Development Site would be divided into 19 PAs. PA 1 would permit a maximum of 268,400 square feet of leisure, retail, and entertainment development to occur as well as a freeway accessible 125- room hotel and a complete Travel Center. PAs 2 through 10 would allow for the maximum development of 5,450,000 square feet of industrial development while PAs 11 and 12 would include a 5.0-acre passive park with associated trails and a passive trail system, respectively. Low-level security lighting may be provided for the park, tot lot playground, trails, parking lot, and restrooms. The trails and parking lot may include bollard lighting while the tot lot playground and restrooms may include security lighting. Low-level security lighting may be provided for the park, tot lot playground, trails, parking lot, and restrooms. The trails and parking lot may include bollard lighting while the tot lot playground and restrooms may include security lighting. PAs 13 through 19 would remain as undisturbed open spaces except for required road and infrastructure crossings. Overall, the Development Project. would add new sources of daytime glare and nighttime lighting to an area that is not generating glare or day or nighttime illumination. To reduce lighting on the Site, the Specific Plan requires all new development that would be built on the Site to adhere to applicable City of Banning outdoor lighting standards on building facades as well as in surface parking lots, parks, trails, and other walkways throughout the site. **The Development Project requires any development that occurs on the Site to adhere to the following Specific Plan guidelines pertaining to light and glare:**

E-36-13

- Minimize glare and "spill over" light onto public streets, open space, I-10, and adjacent properties by using downward-directed lights and/or cutoff devises on outdoor lighting fixtures, including spotlights, floodlights, electrical reflectors, and other means of illumination for structures, parking, loading, unloading, and similar areas. **This relates to "Light Trespass". There will be a significant amount of light trespass from the project to neighboring communities, notably the nearby ranches, residential communities (Sun Lakes, Serrano Del Vista, MSJC San Gorgonio Campus, The Lakes At Banning Assisted Care). See also: https://ceds.org/lighttrespass/ The Developer must show the amount of light trespass remaining after light mitigations.**

- Select all lighting fixtures used in the Specific Plan area from the same—or complementary— family of fixtures with respect to design, materials, fixture color, and light color. Use of light emitting diode (LED) lighting is encouraged.
- Lights should be unbreakable plastic, recessed, or otherwise designed to reduce the problems associated with damage and replacement of fixtures.
- Neon and similar types of lighting are prohibited except as part of advertising signage within the Development Site.
- Locate all electrical meter pedestals and light switch/control equipment in areas with minimum public visibility or screen them with appropriate plant materials.

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- Illuminate parking lots, loading dock areas, pedestrian walkways, building entrances, and public sidewalks to the level necessary for building operation and security reasons. **The level necessary for building operation and security reasons may require illumination levels that generate significant and unhealthy levels of light pollution to nearby communities. Developer has not shown the actual effect from the project areas, and whether its at an unhealthy level.** Dimmers and motion detectors are permitted.

E-36-14

- Along sidewalks and walkways, the use of low-mounted fixtures (ground or bollard height) is encouraged.
- Use exterior lights to accent entrances, plazas, activity areas, and special features.
- To illuminate parking lots or parking structures and their pedestrian links that provide more than five parking spaces of use by the general public, provide a minimum coverage of one foot-candle of light with a maximum of eight foot-candles on the parking or walkway surface, unless otherwise approved by the City of Banning for visibility and security.
- To illuminate aisles and passageways within a building complex, provide a maximum of one-half to one foot-candle of maintained lighting.
- High pressure sodium (HPS) light fixtures are prohibited for site lighting.
- All sign lighting shall be consistent with the Sign Program and Signage Design Guidelines outlined in the Specific Plan

**The installation and operation of the above combined lighting features may cumulatively reach unhealthy light pollution levels.**

E-36-15

Development Project implementation of these requirements would meet the City's standards pertaining to lighting and glare by adhering to the policies outlined in the Sunset Crossroads Specific Plan which meet City requirements, and therefore would reduce the generation of lighting and glare to levels that are similar to what is occurring at adjacent and nearby parcels.

E-36-16

**(really? This attempted mitigation cannot prevent Light dispersal from negatively emanating (spilling) into nearby residential communities and schools, disrupting sleep cycles of residents)**

The Mount Palomar Observatory is located approximately 39 miles south of the Development Site. The Mount Palomar Observatory requires dark skies (minimal light pollution) to operate adequately; therefore, the County of Riverside has adopted Ordinance 655, Regulating Light Pollution. The intent of this ordinance is to restrict the permitted use of certain light fixtures emitting into the night sky undesirable light ways, which have a detrimental effect on astronomical observation and research at Mount Palomar Observatory. Ordinance 655 establishes two zones around the Mount Palomar Observatory that dictate the type of lighting that can be used in new development to reduce nighttime light pollution. Zone A is a circular area 15 miles in radius centered on Palomar Observatory, and Zone B is a circular area 45 miles in radius centered on Palomar Observatory (encompassing Zone A), both of which provides lamp type and shielding requirements for lighting fixtures. **The Development Project is located in Zone B**; however, the City of Banning has not officially adopted Riverside County Ordinance 655. Nevertheless, the Specific Plan provides lighting guidelines that would be implemented by the Development Project requiring compliance with County Ordinance 655 to reduce nighttime light pollution.6

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6. Development within Zone B established by the Riverside County Ordinance 655 is required to implement the following lighting standards: Class I- Color Rendition Important Low Pressure Sodium Lamp = Allowed; Others above 4050 Lumens = Allowed if fully shielded; Others 4050 Lumens and Below = Allowed. Class II – Parking Lots, Walkways, Security Low Pressure Sodium Lamp = Allowed; Others above 4050 Lumens = Prohibited; Other 4050 Lumens and Below = Allowed. Class III-Decorative Low Pressure Sodium = Allowed; Others above 4050 Lumens = Prohibited; Others 4050 Lumens and Below = Allowed.

Implementation of the Development Project would not create a new source of substantial light and glare that would adversely affect day or nighttime views in the area. Therefore, the Development Project would have a less than significant impact related to this issue. No mitigation is required.

4.10 Hydrology

4.11 Land Use

4.12 Mineral Resources

# 4.13 Noise

**Mitigations against noise:**

**Inside the buildings:**
**See: The Importance of Soundproofing Warehouses**
**https://www.acousticalsurfaces.com/blog/industrial-soundproofing/soundproofing-warehouse/**

E-36-17

**How to Improve The Sound Quality in the warehouse?**

Improving the sound in and around your warehouse requires a two-pronged solution—sound absorption and soundproofing. The absorption will address issues within your warehouse. The soundproofing will address issues outside the warehouse floor. By investing in the right materials and taking the time to install them properly, the benefits will become clear quickly. E-36-18

## How to reduce echo in the warehouse (sound absorption)?

All the hard surfaces in a warehouse create echos that pile on top of each other in a giant sonic mess. This is why it is important to know how to reduce echo in a warehouse. Installing warehouse acoustic panels will reduce those echos on a large scale. The result of this sound absorption is an environment in which your workers can communicate with each other with significantly more ease. Taking away echo means there is less sound to compete with when relaying information. E-36-19

Maximizing available space on walls and the ceiling of your warehouse to absorb sound is the key. There are several productsthat will improve the sound quality of your work floor. Once you know how to reduce echo and where you can install, for example, hanging baffles, sound absorption is simple.

## Soundproofing Warehouse

Soundproofing industrial buildings can be a bit more difficult but are well worth it. Soundproofing means keeping sound from going from one space to another if you recall. Doors, windows, and spaces inside walls can all be avenues for sound bleed. Incorporating acoustical doors and windows is the first step to take to soundproof your facility. When it comes to soundproofing other avenues for sound bleed, remember that installing acoustic panels will reduce the echo within your warehouse, but that isn’t really soundproofing. E-36-20

### Exterior Noise Control Products

**From: https://www.acousticalsurfaces.com/exterior-products/**

Exterior noise control products are important in construction zones, airports, highways, industrial sites, or any applications where a noisy environment would cause a noise pollution problem. A number of outdoor soundproofing products are available to suit any exterior applications.
We offer a wide selection of outdoor soundproofing products that can be installed as permanent or temporary noise control. To meet noise abatement requirements, flexible barriers and absorbers come in many types of materials such as porous expanded polypropylene, polyethylene, fiberglass, or metal making it possible to create a cost efficient and easy to install system. If a jobsite requires a temporary noise control solutions, installing a reusable sound barrier/absorber to fencing improves conditions for workers and those in the surrounding areas. Our products, like our exterior sound absorbing panels, withstand harsh environmental conditions and resist mold and mildew.

E-36-21

### 4.13.3.2 Sensitive Land Uses in the Project Vicinity

**West: Includes Sun Lakes as Age Restricted but no mention of The Lakes Assisted Living Facility**

E-36-22

4.14 Populationa and Housing

4.15 Public Services

4.16 Recreation

4.17 Transportation

4.18 Tribal Cultural Resources

4.19 Utiliities

4.20 Wildfire

4.3 Air Quality

# 4.3 AIR QUALITY

# SUNSET CROSSROADS CITY OF BANNING, CALIFORNIA

This section is based on the Air Quality Impact Analysis1 and Health Risk Assessment2 prepared by LSA and attached to this Environmental Impact Report (EIR) in Appendices C-1 and C-2, respectively. This section describes existing air quality and evaluates short-term impacts during construction, long-term emissions associated with operation, and how potential impacts correlate to human health.

## 4.3.1 Existing Setting

The Development Project is located in the City of Banning (City) and Riverside County, which are part of the South Coast Air Basin3 (Basin) and are under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Background information about air pollutants and health effects, climate, meteorological conditions, and regional air quality conditions in the Basin and local air quality conditions in the vicinity of the Project site is provided below.

E-36-22-A

### 4.3.1.1 Air Pollutants and Health Effects

Both State and federal governments have established health-based ambient air quality standards for six criteria air pollutants: carbon monoxide (CO), ozone (O3), nitrogen dioxide (NO2), sulfur dioxide (SO2), lead (Pb), and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl

chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O3 and NO2, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as CO, SO2, and Pb are considered local pollutants that tend to accumulate in the air locally.

The primary pollutants of concern in the planning area are O3, CO, and suspended particulate matter. Significance thresholds established by an air quality district are used to manage total regional and local emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual development projects that would contribute to regional and local emissions and could adversely affect or delay the air basin's projected attainment target goals for nonattainment criteria pollutants.
Because of the conservative nature of the significance thresholds, and the basin-wide context of individual development project emissions, there is no direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity. This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as ozone precursors like nitrogen oxides (NOX) and reactive organic gases (ROGs).

E-36-22-A Cont

No single project is sufficient in size to by itself result in nonattainment of ambient air quality standards. However, if a project's individual emissions exceed an applicable threshold, especially for
1 2 3
LSA Associates, Inc. 2023c. Air Quality Impact Analysis, Sunset Crossroads Specific Plan. October.
LSA Associates, Inc. 2023d. Health Risk Assessment, Sunset Crossroads Specific Plan. March.
This air basin includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties.

4.3.1.3 Sensitive Receptors

4.3.5.4 Thresholds for Determining Impacts to Sensitive Receptors

4.3.6.1.[2] Air Quality Management Plan Consistency

4.4 Biological Resources

4.5 Cultural Resources

4.6 Energy

4.7 Geology and Soils

# 4.8 GHG

**Project Design Features**

The Project applicant proposes the following Project Design Features (PDFs) that would be incorporated into the Development Project design and construction or implemented as part of the Development Project during operations. The following are the PDFs of the Development Project:

---

2

- Occupant sensing **lighting** that dims to at least 50 percent when unoccupied shall be within the interior areas of warehouses and offices.
- Office **space heating** within warehouses must utilize heat pumps.
- Development **Project Street improvements** will include sidewalks.
- Secure **bicycle storage racks or bicycle lockers, and employee lockers** will be provided within the industrial land uses of the Development Project. (how much? At least ….. for each planning area must be specified.)
- **Larger parking spaces** will be provided that can accommodate vans used for ride-sharing programs and reserve them for vanpools and include adequate passenger waiting/loading areas.
- Provide adequate areas for **onsite truck parking, onsite truck queuing, and truck check-in point.**
- **Post signs** clearly showing the designated entry and exit points from the public street to the designated onsite truck check-in and truck parking areas.
- **Post signs** indicating that all parking and maintenance of trucks must be conducted within the designated onsite areas and not within the surrounding community or public streets.
- Development Project installed traffic signals shall be smart signals that can be synchronized and connected to an ITS system.

E-36-23

## Project Mitigation Measures

The following summarizes the GHG reducing aspects of Mitigation Measure AIR-2 shown in the Air Quality Impact Analysis for Sunset Crossroads Specific Plan (LSA 2022).

- All **on-site cargo handling equipment** including yard trucks, hostlers, yard goats, pallet jacks, forklifts and other onsite equipment **shall be electric** with the necessary electrical plug-in charging included in the design of the Development Project electrical system, buildings, and equipment storage and parking areas.
- **Tenant lease agreements** for the Development Project shall include contractual language **restricting trucks and support equipment from nonessential idling longer than 5 minutes while on site.** The idling restriction will be presented on signs at the entrance to the industrial portions of the Development Project as well as at loading docks and truck parking areas.
- **All facility operators** shall train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- **Interior- and exterior-facing signs**, including signs directed at all dock and delivery areas, shall be provided **identifying idling restrictions**, and contact information to report violations to the air district and the building manager.
- **At buildout of the industrial land uses**, a minimum of 50 Level 3 AC Class 8 electric vehicle (EV) truck chargers shall be installed at the tractor trailer parking spaces in logical locations to facilitate electric truck charging. Each Planning Area should have its own specific mitigation measures.

E-36-24

- **For the warehouse/industrial portions of the Project, the buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for installation of electric charging systems for electric trucks and power transport refrigeration units (TRUs). Conduit shall be installed from the electrical room**

**to all tractor trailer parking spaces in logical locations onsite to facilitate future electric truck charging.** (including TRUs) E-36-25

- At buildout of the Development Project will include the higher value of either: o 1) at least 350 Level 2 AC EV chargers, or o 2) a percentage (50%) of total parking spaces with Level 2 AC EV chargers E-36-26
- · All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug in capabilities and support use of electric standby and /or hybrid electric TRUs.. (All parking spaces supporting TRUs shall also be electrified to facilitate plug in capabilities and support use of electric standby and/or hybrid electric TRUs) E-36-27
- · Prior to issuance of occupancy permits for the industrial/warehouse area, the **Development Project operators** employing 200 or more employees shall prepare and submit a **Transportation Demand Management Program** detailing strategies for reducing the use of single occupant vehicles by employees by **increasing carpool/vanpool participation, transit use, bicycling and walking to work.**
- · **Signs at every truck exit driveway** shall be provided **showing directional information to the truck route.** E-36-27-A
- · Every **tenant** shall be required to **train staff** in charge of keeping vehicle records **in diesel technologies and compliance with CARB regulations,** by attending CARB-approved courses. Facility operators shall also be required to maintain records on-site demonstrating compliance and make records available for inspection by the City of Banning, SCAQMD, and State upon request.
- · **Tenants** shall be required to enroll in the United States Environmental Protection Agency's **SmartWay program**, and tenants shall be required to use carriers that are SmartWay carriers.
- · **Industrial and commercial buildings** within the Development Project will be **all electric**unless the land use

requires natural gas (restaurants, bakeries, dental and medical laboratories, etc.).

- **Tenants** shall be provided with information on **incentive programs**, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.
- **All Commercial and Industrial buildings within the Development Project will have solar ready roofs,** that includes roof vents and skylights spaced in a manner that allows the south facing roof areas sufficient space to install PV solar panels. Electric conduit leading from the roof area to the electric control panels shall be installed and include electrical panels with sufficient capacity to accommodate PV soler.
-

The following are additional mitigation measures addressing GHG emissions:

MM GHG-1
Provide separate recycling bins within each commercial/industrial building and provide large external recycling collection bins at central locations in the commercial and industrial land uses for collection truck pick-up. Provide a commercial recycling/composting program that provides 70 percent diversion of waste for the commercial land uses. Provide an industrial recycling program that provides 80 percent diversion of waste for the industrial land uses.

E-36-27-A Cont

MM GHG-2
Provide drought tolerant low-water landscaping and trees throughout the project site and use recycled (purple pipe) irrigation water with drip irrigation and weather based smart irrigation controllers.

MM GHG-3
Prior to the issuance of building permits, the Project Applicant or successor in interest shall provide documentation to the City of Banning

demonstrating that the Project is designed to achieve energy efficient buildings exceeding Title 24 standards with the following design criteria:

- · Building envelop Insulation of conditioned space within all commercial and industrial buildings shall be R15 or greater for walls and R30 or greater for attics/roofs.
- · Windows of commercial and industrial buildings shall have an insulation factor of 0.28 or less U-factor and 0.22 or less SHGC.
- · All roofing material for commercial buildings shall be CRRC Rated 0.15 aged solar reflectance or greater and 0.75 thermal emittance.
- · All heating/cooling ducting within the commercial and industrial buildings shall be insulated with R6 or greater insulation.
- All heating and cooling equipment shall be ERR 14/78 percent AFUE, or 7.7 HSPF levels of efficiency or greater.
- · All water heaters in the commercial and industrial buildings shall be high efficiency electric water heaters with a minimum 0.72 Energy Factor or greater.
- · Lighting within the commercial and industrial buildings shall be high efficiency LED lighting with a minimum of 40 lumens/watt for 15 watt or less fixtures; 50 lumens/watt for 15-40 watt fixtures, 60 lumens/watt for fixtures greater than 40watts.

E-36-27-A Cont

MM GHG-4:
All appliances within the commercial and industrial land uses shall be energy star rated appliances.

MM GHG-5
All water fixtures shall be water efficient (toilets/urinals (1.5 GPM or less), showerheads (2.0 GPM or less), and faucets (1.28 GMM or less)).

MM GHG 6
All landscape equipment used to maintain the landscaping within the Development Project shall be electric.

- 5.0 MSJC Programmatic Analysis
- **6.0 Cumulative**

# 6.0 Cumulative Impacts

## 6.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT STATUTORY GUIDANCE

The California Environmental Quality Act (CEQA) requires that an EIR assess the cumulative impacts of a project with respect to past, present, and probable future projects within the region. Under CEQA, "cumulative impact"2 is defined as follows:

E-36-27-B

"Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
(a) The individual effects may be changes resulting from a single project or a number of separate projects.
(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable

probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

1. In collaboration with the Beaumont Unified School District, MSJC is housing the Beaumont Middle College High School at the San Gorgonio Pass Campus. The middle college high school is designed to raise graduation rates, prepares students for transfer to a 4-year institution or an associate degree, and serves underrepresented students.
2. CEQA Guidelines §15355.

Pertinent guidance for cumulative impact analysis is given in Section 15130(b) of the CEQA Guidelines:

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

To have an adequate discussion of cumulative impacts, the EIR must either analyze a list of past, present, and probable future projects producing related or cumulative impacts, including, as necessary, those projects outside the control of the agency; and/or a summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect. Factors to consider when determining a list of projects is the nature of each environmental resource being examined and the location and type of the projects considered.

In preparing an analysis of cumulative impacts, lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used, and should provide:

• A summary of the expected environmental effects to be produced by those projects.

E-36-27-B Cont

• A reasonable analysis of the cumulative impact of relevant projects and an examination of reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

Cumulative impacts are required to be analyzed when the combined impact of a project and cumulative projects is significant and a project's incremental contribution is "cumulatively considerable."3 A project's incremental contribution is cumulatively considerable if the incremental effects of the project are significant "when viewed in connection with the effects of past projects, the ef[3]fects of other current projects, and the effects of probable future projects."4 Where an effect is not cumulatively considerable, "a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable."5

E-36-27-B Cont

6.2 METHODOLOGY

This chapter documents cumulatively considerable environmental impacts of the Project (i.e., the Development Project and the MSJC Entitlements) that cannot be feasibly mitigated or avoided, cumulatively considerable environmental impacts that can be feasibly mitigated or avoided, and environmental impacts that are not cumulatively considerable. Mitigation measures to reduce cumulative impacts are identified where necessary.

As of 2023 the city of Fontana with a population of just over 200,000 has approved more than 70 warehouses, which cover some 860 acres and produce more than 16,000 truck trips a day[4]. Now compare this with the Pass area including the cities of Banning, Beaumont and Calimesa and the

E-36-28

3

3. CEQA Guidelines §15130(a).
4. CEQA Guidelines §15065(a)(3).
5. CEQA Guidelines §15130(a).

4 https://calmatters.org/commentary/2023/01/inland-empire-california-warehouse-development/

unincorporated area of Cherry Valley. With a current population of just over 110,000, these communities have already approved over 10 million square feet of warehouses taking over 700 acres of land. Projects with applications already in the pipeline will take up a staggering 40 million more square feet and almost 2800 acres of land, which will dwarf Fontana by over 325% more acreage captured by warehouses, diesel truck fleets, and untenable traffic congestion, among other negative cumulative impacts.

What the Pass Area communities are experiencing "reveals holes in the region's approach to planning. Warehouses typically are approved by local officials, often with little consideration for their impact on neighbors even though the cumulative effect of the new warehouses is regional rather than localized (pollution and traffic don't stop at a city's edge)".[5]

The explosion of new warehouses is clearly having a cumulative negative effect on Pass Area and other Inland Empire Residents.[6]

E-36-28 Cont

Pg 6-9

This cumulative effects analysis assumes that projects located beyond these general geographic boundaries would be unlikely to result in cumulative impacts that would compound those associated with the Project.
This is an incorrect assumption as warehouse pollution does not stop at political boundaries. Any project in the San Gorgonio Pass area from Calimesa, to Beaumont, to Cabazon will have a cumulative impact.
Pass area residents will be looking at well over 50 million square feet of warehouses in only a 5 year period. The impact from warehouse projects approved in an uncoordinated fashion by individual Pass Cities and the county, needs to be addressed.

E-36-29

[5] IBID
[6] https://www.latimes.com/california/newsletter/2023-02-07/essential-california-warehouses-inland-empire-essential-california

Source emissions and regional impacts need to be measured from each of the projects listed in Figure 6-1, plus the projects missing from Figure 6-1 which I've identified below. E-36-29

Moreover, rising ozone levels of warehouse projects in nearby Moreno Valley, San Bernardino Valley (Redlands), and the Coachella Valley must be included and combined with San Gorgonio Pass projects to arrive at a projected ozone level for this entire area as these regions and Pass Area projects are all interrelated as their ozone levels impact each other. Also rising ozone levels caused by heat waves and wildfires, and other source Pollutants need to be studied. Ozone levels in the San Gorgonio Pass are notoriously unsafe during the hotter months between May and November[7]. E-36-29-A

- **Similar Environmental Impacts:** A cumulative project would contribute to effects on environmental resource areas that would also be affected by the Project.

  Construction activity and subsequent operation/occupation of the cumulative projects will modify existing topography, remove existing land cover, and alter the visual character of surrounding areas. While the scope and impact of these changes may vary depending on the existing characteristics and quality of each cumulative project, it is likely each project will incrementally increase demand on public service and utility resources, generate air pollutants and greenhouse gas emissions, contribute additional noise sources in the community, create changes in the local visual condition, alter drainage patterns or hydrologic conditions, or contribute additional traffic into the community. E-36-29-B

[7] See 2022 AQMD AIR QUALITY MANAGEMENT PLAN: Appendix II: Current Air Quality: Link: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/appendix-ii.pdf?sfvrsn=6

As with the Project, the cumulative development projects will result in the irreversible conversion of these sites to urban uses. Depending on location, the cumulative projects may result in long- term impacts to open space, biological resources (including sensitive habitat), agricultural land, or cultural or tribal resources. The siting of cumulative projects may be similarly affected by limitations due to the presence of geologic, hydrologic, and/or wildland hazards. It is reasonable that the discretionary review of the cumulative projects will consider the environmental effects and identify appropriate measures to address these effects.

- **Temporal Scope:** The timing and schedule for construction and implementation, or the ongoing operational effects associated with a cumulative project would overlap in time with the Project.
  ○ Typically, construction-related impacts would be temporary and short-term. A number of the cumulative projects are large, multi-phased Specific Plans envisioning buildout over a considerably longer period of time. Other cumulative projects include related public facility projects (Sun Lakes Boulevard Extension, an electric substation, reverse osmosis facility, potable water reservoir, and the bridge on Sunset Avenue over Pershing Creek proposed to be developed on or immediately adjacent to the Development Site) that would be anticipated to generate few operational impacts but may be constructed concurrently with the Project. The Development Project is expected to be developed in phases, with a total construction window of approximately 51 months. The development of the MSJC Site is not anticipated within the same time period as the Development Project. Therefore, the buildout is analyzed in this EIR in the 2045 horizon year traffic projections with conditions derived from the Riverside County Transportation Analysis Model (RIVCOM) Version 3.0 to evaluate the circulation network in order to compare the findings with the currently adopted General Plan. These conditions include the future Sun Lakes Boulevard Extension and also take into account the MSJC Entitlements. The California Emissions Estimator Model (CalEEMod) was used to model mobile source emissions associated with passenger vehicles, which are based on the trip numbers, length, and fleet mix/vehicle type assumptions in the traffic analysis for employees and site visitors/shoppers.

E-36-29-B Cont

It is possible that construction/operation of other cumulative projects would occur concurrent with the Development Project. Traffic noise impacts for existing (2021), opening year (2027) and horizon year (2045) were derived from the traffic analysis for the Project, which incorporates future circulation network and traffic from the cumulative projects. The impact analyses contained in Sections 4.3, 4.13, and 4.17 consider future conditions in modeling and represent the cumulative condition for these environmental issues.

E-36-29-B Cont

6.3
It is possible that construction/operation of other cumulative projects would occur concurrent with the Development Project. Traffic noise impacts for existing (2021), opening year (2027) and horizon year (2045) were derived from the traffic analysis for the Project, which incorporates future circulation network and traffic from the cumulative projects. The impact analyses contained in Sections 4.3, 4.13, and 4.17 consider future conditions in modeling and represent the cumulative condition for these environmental issues.

## 6.3 CUMULATIVE PROJECTS

As stated previously, the Project consists of the Development Site and MSJC Entitlements. The cumulative discussion in this EIR addresses the impacts related to buildout of the Project, combined with other past, present, and reasonably foreseeable projects. Table 6.B: Cumulative Projects and Figure 6-1: Cumulative Projects identify the past, present, and foreseeable future cumulative projects considered in this chapter. The information included in Table 6.B was developed through consultation with planning and engineering staff from the City of Banning and the City of Beaumont which shares a common street network with the City of Banning and would generate traffic and contribute traffic to the study area intersections.

As detailed in Table 6.B and Figure 6-1, a number of planned developments in the cities of Banning and Beaumont have been identified as cumulative projects. **This list is incomplete and needs to be updated to reflect a number of massive warehouse projects totaling well over 40 million square feet, and having a harmful health impact on the sensitive receptor communities throughout the San Gorgonio Pass Communities.** The following cumulative projects are more specifically described because they represent large cumulative projects in the City that are located within, adjacent to, or in close proximity to the Project Sites.

E-36-30

- **Sun Lakes Village North Specific Plan (BA5)**: The Sun Lakes Village North (SLVN) Specific Plan was recently amended by Amendment (SPA) No. 5 to allow Business Park & Warehouse (BW), Office & Professional (OP), and Retail & Service (RS) uses, including development of 877,298 square feet of industrial and warehouse uses, 52,065 square feet of medical office uses, and 37,189 square feet of retail uses on 47 acres of land located approximately 1⁄2 mile from the western boundary of the Development Site south of the I-10.
  Information related to the Sun Lakes Village North Specific Plan project is incorporated into this EIR by reference and can be accessed at: https://ceqanet.opr.ca.gov/Project/2020029074.

- **Rancho San Gorgonio Specific Plan (BA11)**: The approved Rancho San Gorgonio Specific Plan (RSG SP or RSG site) encompasses 831 acres directly east of the Development Site and south of the MSJC Site. The RSG SP envisions the creation of a master community offering a variety of residential and commercial uses, a school, and 210 acres of public open space uses. Similar to the Development Project, existing drainages within the community are planned to remain in their natural condition with enhanced trail systems on either side of their full frontage. Buildout of the RSG SP has not commenced and is estimated to occur over a 20-year period. The Final EIR for the RSG SP was adopted in October 2016.

Information related to the Rancho San Gorgonio Specific Plan project is incorporated into this EIR by reference and can be accessed at: http://www.banning.ca.us/432/Rancho-San-Gorgonio- Specific-Plan.




LSA

FIGURE 6-1

NO SCALE
SOURCE: Urban Crossroads
I:\NPD2001\G\Cumulative_Projects.ai (9/11/2023)

*Sunset Crossroads*
Cumulative Projects

## Table 6.B: Cumulative Projects

| ID | Project | Land Use | Quantity |
|---|---|---|---|
| **City of Banning** | | | |
| BA1 | Butterfield Specific Plan | Residential<br>Commercial<br>Golf Course<br>School | 5,387 DU<br>549,000 SF<br>253.9 AC<br>23.0 AC |
| BA2 | 7-11 @ 3251 W. Ramsey Street | Gas Station with convenience mart | 10.0 VFP |
| BA3 | Nourish | Commercial | 1.07 AC |
| BA4 | The Alley Barber & Hair Styling | Commercial | 0.16 AC |
| BA5 | Sun Lakes Village | Industrial Park<br>Medical Office<br>Commercial Retail | 877,298 SF<br>52,065 SF<br>37,189 SF |
| BA6 | Banning 98 | Residential | 98 DU |
| BA7 | Hathaway Industrial | Industrial Park | 3,523,107 SF |
| BA8 | Robertson's Ready Mix Expansion | Mining | 23 AC |
| BA9 | SoCal West Coast Electrical 200 S 8th St | Industrial | 55,100 SF |
| BA10 | Estes Truck Terminal | Truck Terminal | 63,360 SF |
| BA11 | Rancho San Gorgonio Specific Plan | Residential<br>Commercial<br>Elementary School<br>Community Park | 3,134 DU<br>101,604 SF<br>800 Students<br>25.0 AC |
| | **Related Public Facilities** | | |
| | Sun Lakes Boulevard Extension | Public Facilities | |
| | Electrical Substation | Public Facilities | |
| | Reverse Osmosis Facility | Public Facilities | |
| | Potable Water Reservoir | Public Facilities | |
| | Sunset Avenue Bridge | Public Facilities | |
| **City of Beaumont** | | | |
| B1 | Sundance | Residential | 4,450 DU |
| B2 | Fairway Canyon 5CPGA | Residential | 3,300 DU |
| B3 | Four Seasons Tract No. 32260 &330961 | Residential | 1,891 DU |
| B4 | Heartland (Olivewood) | Residential | 981 DU |
| B5 | Beaumont Pointe | Commercial/Industrial | 5,000,000 SF |
| B6 | Sundance Corporate Center | Commercial/Industrial | 13.6 AC |
| B7 | Kirkwood Ranch | Residential | 403 DU |
| B8 | Potrero Creek Estates | Residential | 700 DU |
| B9 | Tract No. 32850 | Residential | 95 DU |
| B10 | Noble Creek Vistas | Residential | 648 DU |
| B11 | Sunny-Cal Specific Plan | Residential | 571 DU |
| B12 | San Gorgonio Village Phase 2 | Commercial | 22.5 AC |
| B13 | Tournament Hills 3, TM 36307 | Residential | 279 DU |
| B14 | Rolling Hills Ranch Industrial Park, Phase 2 | Industrial | 2,850,000 SF |
| B15 | Beaumont Village | Commercial | 50,810 SF |
| B16 | Beyond Beaumont | Commercial | 6,859 SF |

Source: Table 4-3, Cumulative Development Land Use Summary, *Sunset Crossroads Traffic Analysis* (Urban Crossroads 2023).
AC = acres SF = square feet
DU = dwelling units VFP = vehicle fuel positions

**Figure 6.1 and Table 6.B Cumulative Impacts is Incomplete:**

**It failed to include the following massive warehouse projects which will have a significant cumulative impact:**

# OMITTED COMMERCIAL INDUSTRIAL PROJECTS HAVING CUMULATIVE IMPACT

## Banning:

- ***Banning Distribution Center***

Commercial Industrial: 63.9 acres, 1 million Square feet

## Cherry Valley:

- ***San Gorgonio Crossing:***
    - Commercial Industrial: 140 acres: 1.8 million Square feet

E-36-31 Cont

## Calimesa:

- ***"Oak Valley Town Center"*** (part of Summerwind Ranch Specific Plan Amendment):
    - Commercial Industrial:244 acres, 2.25 million square feet

- ***Oak Valley North***
    - Commercial Industrial: 110 acres, 982,232 square feet
    - See: https://www.cityofcalimesa.net/DocumentCenter/View/954/RNOP-Oak-Valley-North-PDF?bidId=

## Beaumont:

- ***Hidden Canyon Industrial Park***
  - Commercial Industrial: 197 acres, 2.86 million square feet

- ***Legacy Highlands Specific Plan***
  - Commercial Industrial: 1415 Acres, 20.23 million square feet
- ***Orchard Logistics Center***
  - Commercial Industrial: 30.1 acres, 610,000 square feet

- ***Rudolph foods Warehouse***
  - Commercial Industrial: Acreage/Square feet TBD

- ***CJ Foods Manufacturing***
  - Commercial Industrial: Acreage/Square feet TBD

- ***iFIT Warehouse***
  - Commercial Industrial: Acreage/Square feet TBD

- ***Lowes Flatbed Distribution Center***
  - Commercial Industrial: Acreage/Square feet TBD

**E-36-31 Cont**

- **Butterfield Specific Plan (BA1)**: The Butterfield Specific Plan (BSP) is located on approximately 1,543 acres north of I-10 and one mile north/northwest of the Development Site. The adopted BSP envisioned development of residential, (5,347 units), golf course, parks, open space, school, and commercial uses within a Master Planned Community. In 2017, the BSP was revised to replace the golf course with active recreational space, eliminating development on the northern most portion of the BSP site, and reducing residential uses to a maximum of 4,862 dwellings. The BSP retained other previously approved commercial and school uses. The BSP intended to be developed in five primary phases over an estimated 30-year implementation period, with portions of Phase 1 currently developed and/or under construction.

Information related to the Butterfield Ranch Specific Plan is incorporated by reference and can be accessed at: https://banningca.gov/399/Butterfield-Specific-Plan-Documentation.

- **Beaumont Pointe Specific Plan (B5**): The Beaumont Pointe Specific Plan (BPSP) would allow for the development of up to 246,000 square feet of general commercial uses, a 125-room hotel, and up to 4,995,000 square feet of industrial uses on a 539.9-acre site located south of SR-60 in unincorporated Riverside County (within the Sphere of Influence of the City of Beaumont). The project would provide 124.7 acres of open space to accommodate landscaped manufactured slopes, fuel modification areas, and natural open space to buffer an adjacent conservation area and 152.4 acres for open space/conservation.

Information related to the Beaumont Pointe Specific Plan is incorporated by reference and can be accessed at: https://www.beaumontca.gov/1143/Beaumont-Pointe-Specific-Plan.

This DEIR fails to include the projected pollution (emission) levels from Beaumont Pointe, which exacerbates air, noise, light, and other forms of pollution, and which is located in a high wind/high fire area with a history of wildfires increasing ozone levels. Note that SR 60 through the Badlands creates a wind tunnel affect further accelerating wildfire spread that easily travels easterly along

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the South Beaumont hills over SR 79, past Four Seasons, Sun Lakes to the project site in Banning

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"Related Public Facilities" include the following City public improvements projects that are proposed to occur whether or not the Project proceeds and for which the City has commenced environmental review:

- **Sun Lakes Boulevard Extension:** The City's General Plan Circulation Element identifies a future Arterial Highway to connect Sunset Avenue to Highland Home Road, bisecting the Development Site. In conformance with the City's existing circulation map, the City is currently planning construction of this four-lane divided roadway with two travel lanes in each direction, separated by a landscaped median, within an approximately 21-acre area (SLB Extension). The SLB Extension will be constructed as an Arterial Highway, approximately 5,400 linear feet (1.02 mile) long and 110 feet wide, and include two eastbound and two westbound lanes, a raised 18-foot wide median; eastbound and westbound 8-foot-wide bike lanes **(needs to include Class IV bike-lanes. Also a bike-lane route system needs to be designed that safely links Sun Lakes Boulevard Extension to Project's 10 buildings, trailer parking areas, protected creeks and habitats, Lincoln Ave., Sunset Ave., Bobcat Trail, Highland Home Ave. and existing Sun Lake Blvd. (from Highland Home to Highland Springs Rd.) bike-lanes and other alternative transportation significantly reduce number of cars and trucks on highway/road systems, vehicular travel, reduce carbon emissions and footprint, increase health and fitness).**; 8-foot-wide sidewalks; associated road striping, drainage, and streetlight improvements. Three multi-cell reinforced concrete box (RCB) channels running under the proposed Sun Lakes Boulevard roadway extension at drainage crossings. Warped wing walls will be constructed at the upstream end of each channel while rip- rap and vertical wing walls will be provided at the downstream end of channels. Grouted rip-rap ramps will be constructed at the south end of the channels to provided maintenance access. Grading operations and construction associated with the development of the

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SLB extension is anticipated to occur during the first phase of Development Site's grading operation.

The City's amended Circulation Element can be accessed at: http://www.banning.ca.us/418/ General-Plan-Circulation-Element-Amendme.

- **Electrical Substation:** An approximately 1-acre area within PA 7, which is part of the Development Site, has been identified by Banning Electric Utility (BEU) as a potential site for development of an electric substation to be developed by the BEU to support the City's existing General Plan's planned for long-term growth. The future substation will accommodate current step-down transformation from 34.5kV to 12.47kV step-down transformation and (8)-600 amp 12.47kV distribution circuits. The electrical substation's tallest components would be the power circuit breakers, which would be a similar height as off-site electrical poles.

- **Potable Water Reservoir:** To serve the water storage requirements of the City and the approved RSG development, the City has identified a portion of Planning Area 3 which is part of the Development Site, south of Westward Avenue, west of Sunset Avenue, and east of Pershing Creek for a proposed 1.5-million-gallon potable water reservoir. Based on the size of existing water reservoirs in the City, the 1.5 mg water reservoir will be approximately 100 feet in diameter and up to 26 feet in height. The need for additional water storage capacity was identified in the City's Integrated Master Plan (2018) and the RSG EIR, but the exact location was not identified at that time. The City and the RSG applicant will be responsible for the future development of this reservoir.

- **Reverse Osmosis Facility:** The City has identified the need for development of a reverse osmosis facility in Planning Area 12. The Sun Lakes Country Club is currently using recycled water from the Banning Water Reclamation Facility (WRF); however, the recycled water (even after treatment) has high levels of Total Dissolved Solids (TDS) (specifically nitrates) that percolate into the groundwater basins below the Sun Lakes Country Club. The reverse osmosis facility would act as a tertiary treatment facility for the recycled water delivered from the Banning WRF and would remove nitrates, in order for the recycled water to be used at the Sun

Lakes Country Club without further contaminating groundwater below the golf course.

The City would construct, operate, and maintain this facility. The timeframe for the construction and ultimate operation of this facility is dependent on a number of variables, including: the timing of construction of the on-site purple pipe (recycled water) distribution system and the City's infrastructure to connect to the reverse osmosis facility, quantities of recycled water delivered to Sun Lakes Golf Course, and the quantity of imported water recharged by the City in the Beaumont Basin. By adjusting the manner in which the City operates its recycled water system, the City may be able to defer construction and operation of this facility until 2030. While the precise capacity of the facility is dependent on the concentration of TDS in effluent from the wastewater treatment plant, a preliminary estimate anticipates a facility capable of processing 0.5 million gallons per day (mgd). Treated wastewater from the Banning WRF would be conveyed to the reverse osmosis facility by a 24-inch pipe. The reverse osmosis facility would most likely be housed in a small brick/mortar building, which the 24-inch pipe would enter, send water through additional filtration devices, and be conveyed through an outgoing 24-inch pipe to the Sun Lakes Country Club. Water from the reverse osmosis facility containing TDS would be reconveyed back to the Banning WRF for continued treatment. The reverse osmosis facility would be remotely operated, and crews would visit the facility on a monthly basis (or as required) for maintenance activities.

The timing of development of the reverse osmosis facility would be at the discretion of the City, and construction of the reverse osmosis facility would take approximately 12 months.

- **Sunset Avenue Bridge**: Access on Sunset Avenue across the Pershing Creek drainage, south of Westward Avenue, is currently limited during rain and is typically inaccessible by vehicle during flood events. Construction of a future bridge crossing at this location (Sunset Avenue Bridge) has been approved by the City as part of the RSG SP. This construction is under the control of the City and could be constructed by the City or third parties designated by the City.

In the development of cumulative conditions, the project-specific Traffic Assessment evaluated various scenarios. The "Opening Year Cumulative (2027) without Project" includes existing traffic volumes plus an ambient growth factor of 12.62 percent and the addition of cumulative development traffic. The "Opening Year Cumulative (2027) with Project" includes existing traffic volumes plus an ambient growth factor of 12.62 percent, the addition of cumulative development traffic, and the addition of Project (Buildout) traffic. The assessment of Horizon Year (2045) traffic forecasts of traffic conditions derived from the RIVCOM Version 3.0 regional model using accepted procedures for model forecast refinement and smoothing. The traffic forecasts reflect the area-wide growth anticipated between base (2018) and Horizon Year (2045) traffic conditions. The Horizon 2045 forecast includes the evaluation of the MSJC Site with 1,181 units.

## 6.4 PLANS AND PROGRAMS

The following relevant plans are recognized and are referenced in this cumulative analysis:

### 6.4.1 City of Banning General Plan

The City of Banning adopted its current General Plan[8] in 2006, with updated Circulation and Housing elements adopted in 2013 and 2021[9], respectively. The General Plan identifies the environmental, social, and economic goals for the City and sets forth policies and programs for existing and future development. The General Plan also provides the framework to analyze and respond to changing circumstances as the City continues to grow and evolve[10]. The General Plan is organized into five major chapters: Administration, Community Development, Environmental Resources, Environmental Hazards, and Public Services and Facilities. Within each chapter are the various General Plan elements and their

[8] Prior to construction, the Southern Portion of the Development Site would be annexed by the City of Banning. This action would result in the entire Development Site lying within the area covered by the City of Banning's General Plan policies.

[9] City of Banning. 2021. General Plan, Housing Element. Website: http://www.banning.ca.us/DocumentCenter/View/9517/Revised-Banning-Draft-Housing-Element-October-5-2021-with-Appendices (accessed March 15, 2023).

[10] City of Banning. 2006. General Plan, Introduction and Administration, page II-2.

accompanying background information, goals, policies, and programs. The Community Development chapter includes elements for circulation, housing, economic development, land use, and parks and recreation. The City General Plan policies relevant to the Development Project have been identified in the assessment of environmental issues contained in Sections 4.1 through 4.20 of this EIR, and those relevant to the MSJC Entitlements have been identified in Chapter 5.0 of this EIR.

The City's General Plan can be accessed at: http://banning.ca.us/468/General-Plan-Amendments.

, in Noise Element, Circulation Element, Air Quality Element, South Coast Air Quality Management District (SCAQMD) Standards in Pollutant Thresholds and is in conflict with the Basins, 2022 Air Quality Management Plan (AQMP).

Therefore, the Development Project would negatively affect the character of surrounding residential neighborhoods and in many cases, its inconsistency in Land Use Planning would result in underlying physical impacts that are significant, adverse, and harmful.

We remind the City's decision makers as the Lead Agency and per the Executive Summary of the DEIR, that the information in an EIR must constitute substantial evidence in the record to support the agency's action on the project, if its decision is later challenged in court. Under CEQA Guidelines Section 15123, this Executive Summary describes the Development Projects potentially significant impacts that could result from its implementation, and avoidance, minimization and mitigation measures. While the information in the EIR does not control the agencies ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15081 and if necessary, by making a statement of overriding considerations under Section 15093.

### 6.5.3.2 Regional Emissions for Concurrent Construction and Operation

**Under a conservative analysis where concurrent construction and operation of each phase of the proposed Development Project (Tables 4.3.J through 4.3.M) occurs, emissions would exceed the SCAQMD thresholds for all pollutants except for sulfur oxides. Despite implementation of the planned Project Design Features (PDFs) and mitigation measures identified in Mitigation Measure AIR-2 (which requires the implementation of all feasible measures to reduce operational impacts associated with the Development Project) and the measures identified in Section 4.17 of this EIR to reduce vehicle miles traveled (VMT) (which do not result in quantifiable emissions reductions) for the Development Project, emissions associated with operation of the Development Project would remain significant and unavoidable.**
**the proposed Development Project would result in a significant and unavoidable impact for VOCs, NOx, CO, PM10, and PM2.5, and mitigation would be required. With the implementation of this mitigation, emissions of these pollutants would still exceed SCAQMD standards, prompting a significant and unavoidable impact (see Table 4.3.N). D**
**Combined, the significant and unavoidable emission impacts from other cumulative projects and the emissions resulting from operation of the Project would contribute to a cumulatively considerable air quality impact and would be significant and unavoidable.**

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### 6.5.3.3 AQMP Consistency

**As stated in Section 4.3, the Development Project was determined to be inconsistent with the AQMP..**
**Consistency with the applicable AQMP is based on two criteria: (1) whether a project is consistent with the SCAG growth forecasts, which is based, in part, on the planned land uses in general plans of cities located within the SCAG region; and (2) whether a project would increase the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions**

**reductions specified in the AQMP. The Development Project also contributes to a cumulatively considerable impact under the second criterion because the regional operational-source emissions are anticipated to exceed the regional thresholds of significance for VOC, NOX, CO, PM10, and PM2.5 emissions. The RSG, BSP, SLVN, and BPSP projects also each exceed regional emission thresholds and were determined to be inconsistent with the AQMP.**

**6.5.8 Greenhouse Gas Emissions**

**Greenhouse gas reducing practices have been identified in Mitigation Measures AIR-2 and GHG-1 through GHG-6, which would reduce emissions to 38,726.25 MT CO2e per year at Project buildout, 43 which would still exceed the City's threshold of 3,000 MT CO2e. Again, the majority of these are generated from mobile sources that are regulated by the State and not the City. Therefore, under CEQA Appendix G threshold VIII a), the Project's GHG emissions are significant.**

**The second threshold of significance pertains to whether the Project would conflict with an applicable GHG reducing plan or policy. Due to the annual volume of CO2e emitted in excess of the City's 3,000 MT CO2e per year threshold, and the infeasibility of additional mitigation measures to reduce the impacts of the Development Project to less than significant, the Development Project's contribution of GHG is cumulatively considerable. The GHG analyses conducted for various cumulative projects44 each identified significant and unavoidable emissions of GHGs in excess of established thresholds and concluded the projects' contribution of GHG emissions would be cumulatively significant. As such, the Project would result in a significant cumulative impact with respect to GHG emissions.**

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**6.5.13.3 Off-Site Operational Noise Impacts**

**With respect to long-term operational noise which would primarily be caused by traffic, this EIR analyzed the cumulative impacts of the Project Sites, and cumulative projects as described in Section 4.13 of this EIR and Appendix I. The standard vehicle mix for Southern California roadways was used for**

roadways in the Project vicinity under the no project scenario and the cumulative long-term noise impacts on off-site land uses were determined to be significant. Based on this review, as analyzed in Section 4.13 of this EIR, Horizon Year (2045) with Development Project traffic would result in a traffic noise increase of up to 13.5 dBA along Sunset Avenue between the I-10 westbound ramps and Bobcat Road. Increases in ambient noise levels for residential uses along Sunset Avenue and MSJC campus uses would be up to 10.7 and 11.8 dBA, respectively. 57 Therefore, the Development Project, MSJC Site development and cumulative projects would collectively have a significant noise impact on off-site residential uses because Project-related traffic would increase ambient noise levels by 3 dBA or more and the horizon year (2045) and Project traffic noise levels would exceed the City's noise standard of 65 dBA CNEL.

In the absence of other feasible noise reduction measures (for either project), the traffic related cumulative noise impacts resulting from implementation of the Project remain significant and unavoidable; therefore, impacts related to traffic noise would be cumulatively considerable and significant.

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6.5.17 Transportation and Traffic

The Development Project's VMT net change for retail uses and VMT per non-retail worker exceeds the City's respective thresholds of no net increase in regional VMT for retail and 25.9 VMT per nonretail worker. Even with implementation of the limited feasible mitigation measures, the Development Project's VMT cannot be reduced to levels that would be less than significant. Therefore, the Development Project's contribution to cumulative transportation impacts from increases in VMT would be considerable and significant. No mitigation measures beyond the measures identified in Section 4.17 are available. This cumulative impact would be significant and unavoidable.

Changes to the CEQA Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying

**transportation impacts for land use projects. This statewide mandate took effect July 1, 2020. Environmental documents for cumulative projects published subsequent to this date (e.g., SLVN and BPSP projects) identified significant VMT impacts. Despite the implementation of mitigation for these projects, the VMT impacts of these other cumulative projects remained significant and unavoidable. As the Project and other cumulative projects have significant and unavoidable impacts, a cumulative significantly VMT impact would result from such planned, proposed, and future development.**

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# 7.0 OTHER CEQA CONSIDERATIONS

**Note: Health Risk Assessment (HRA) for the project must be summarized in this section of the DEIR, rather than be buried as an appendix.**

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Section 15126 of the CEQA Guidelines requires that all aspects of a project must be considered when evaluating its impacts on the environment, including planning, acquisition, development, and operation. Including the mitigation measures proposed to minimize the significant effects of a proposed project, those significant environmental effects that cannot be avoided (see analysis of specific environmental issues in Chapter 4.0 and the programmatic discussion of the MSJC Entitlements in Chapter 5.0), as well as alternatives to a proposed project (see Chapter 8.0), the Environmental Impact Report (EIR) must also identify the significant environmental effects that cannot be avoided if a proposed project is implemented, the significant irreversible environmental changes that would be involved if the proposed project should be implemented, and the growth- inducing impact of the proposed project.

# 7.1 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

As required by Section 15126(b) of the CEQA Guidelines, even with the implementation of the mitigation measures identified in Chapter 4.0, Table 7.A: Significant Environmental Effects That Cannot Be Avoided identifies the significant unavoidable impacts anticipated to result from the proposed Project. Section 15126(c) of the CEQA Guidelines mandates that the EIR must address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented. Section 15126.2(d) of the CEQA Guidelines provides that an impact would fall into this category if it resulted in any of the following:

• The Project would involve a large commitment of non-renewable resources.

• The primary and secondary impacts of the Project would generally commit future generations of
people to similar uses.

• The Project involves uses in which irreversible damage could result from any potential environmental accidents associated with the Project.

Determining whether the proposed Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The Development Project would commit the Development Site to the uses detailed in Chapter 3.0.1 Through the lifetime of any commercial or industrial use constructed, those portions of the Development Site would be unavailable for other uses. The Development Site is currently bounded by and accessible from existing roadways. The Development Project would not extend access to a previously inaccessible area.

While the MSJC Site would be entitled for future residential development as part of the Project, no physical development is proposed at this time. Therefore, this component of the Project would not commit the site to these future uses or result in any irreversible environmental effects.

## 7.1 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED (All are listed in table 7A)

**Air Quality (4.3.6.1) Implementation of the Development Project would conflict with implementation of the applicable air quality plan. The Development Project results in an exceedance of criteria pollutants. Furthermore, the Development Project is not consistent with the land use assumptions cited in the 2022 AQMP. Due to this inconsistency and the level of criteria pollutants, the Development Project is inconsistent with the 2022 AQMP and impacts would be significant and unavoidable as mitigation is not available to reduce emissions to SCAQMD thresholds.**

**Air Quality (4.3.6.2) Implementation of the Development Project would result in exceedance of VOC emissions during project construction. Maximum daily construction emissions would be less than the SCAQMD thresholds of all pollutants except for VOCs. Mitigation Measure AIR-1 would reduce construction VOCs by requiring low VOC paint application. There are no additional feasible mitigation measures to further reduce VOC emissions to below SCAQMD daily thresholds.**

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**Air Quality (4.3.6.2) Implementation of the Development Project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under an applicable federal or State ambient air quality standard. Emissions associated with operation of the Development Project would exceed established SCAQMD thresholds. Despite the incorporation of operational practices and design features cited in Mitigation Measure AIR-2, operation of the Development Project would result in significant and unavoidable impacts for VOCs, NOX, CO, PM10, and PM2.5.**

**Air Quality (6.5.3.2) Operation of the Development Project would result in a cumulative exceedance of SCAQMD emission thresholds. The Development Project's long-term operational emissions would exceed SCAQMD's criteria pollutant thresholds for all pollutants except SOX. SCAQMD's operational emissions thresholds are designed to accomplish regional emissions goals. While Mitigation Measure AIR-2 would reduce emissions to the extent feasible, project emissions would remain significant and unavoidable. Therefore, the Development Project's operations would result in a significant and unavoidable cumulative increase in long-term regional emissions.**

**Greenhouse Gas Emissions (4.8.5.1) Implementation of the Development Project would generate GHG emissions that may have a significant impact on the environment. Project-related GHG emissions would exceed the City's 3,000 MTCO2e per year threshold. While the implementation of Mitigation Measures GHG-1 through GHG-6 would reduce GHG emissions to 38,726.25 MTCO2e/year, the majority of the GHG emissions (66 percent of unmitigated emissions) are associated with non-construction mobile sources that are either federally or State regulated. Neither the City of Banning nor the Development Project has control over these standards, and no additional feasible measures are available that would further reduce GHG emissions**

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**Greenhouse Gas Emissions (4.8.5.2) Implementation of the Development Project would conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emission of GHGs. The Development Project would not conflict with applicable local, regional, and Statewide plans, policies, programs, and regulations that have been adopted for the purpose of reducing GHG emissions. Despite this consistency, the Development Project's long-term operational impacts would exceed the City's threshold of 3,000 MTCO2e per year despite implementing project design features and all feasible mitigation. Thus, the Development Project may impede various plans' long-term GHG reduction goals (e.g., for 2030 and 2050), and a potentially significant impact may occur as a result of the Development Project.**

**Noise and Vibration (4.13.6.1) Implementation of the Development Project would generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance. Existing private walls are located adjacent to residential uses along Sunset Avenue between Lincoln Street and Westward Avenue. Additional noise barriers at this location would not be feasible as walls are already in-place and adding height to these walls would provide minimal noise reduction and would not achieve the noise reduction needed to reduce impacts to a less than significant level. Also, obtaining consent from all property owners would not be possible. A minimum 6-foot-high wall adjacent to the existing MSJC buildings along Sunset Avenue would provide a noise reduction of 5 dBA and reduce traffic noise levels to below the City's noise standard of 65 dBA CNEL to 63.6 dBA CNEL; however, the off-site traffic noise impact at the MSJC campus uses remains significant because the construction of the wall would require approval of the property owner, which is outside of the control of the Project Applicant and the City. Due to the uncertainty if the wall would be constructed, a significant off-site noise impact to MSJC uses would occur. The Development Project would result in a significant permanent increase in ambient noise levels, and traffic noise levels would exceed the City's exterior noise standard of 65 dBA CNEL. In the absence of feasible or certain new mitigation measures that would reduce long-term off-site traffic noise levels along Sunset Avenue between Lincoln Street and Westward Avenue and at MSJC uses south of Westward Avenue, off-site traffic noise impacts from operation of the Development Project would be significant and unavoidable.**

**Noise and Vibration (4.13.6.1) Nighttime noise levels at receptors would exceed the County's exterior nighttime 10- minute noise standard of 45 dBA Leq. The Development Project would increase ambient noise levels by up to 3.8 dBA for residences at Receptors R-11 and R-12. Therefore, noise generated from operations of the Development Project would be significant. As the Development Project and residences at Receptors R-11 and R-12 have direct driveway access onto Bobcat Road, mitigation measures such as unbroken noise barriers would not be feasible. Therefore, noise impacts from operations of the Development Project would be significant and unavoidable.**

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**Transportation (4.17.6.2) Implementation of the Development Project would conflict with CEQA Guidelines Section 15064.3, subdivision (b). A significant impact to VMT would occur if the addition of the Development Project's industrial or hotel component would result in Developmen Project-generated VMT per employee that exceeds the City's significance threshold of 25.9. The Development Project's non-retail VMT per employee would exceed the City's significance threshold of 25.9 by 4.95, which is an increase of 18.9 percent in VMT per employee. While the Transportation Demand Measures implemented pursuant to Mitigation Measure TRA-1 would realize a maximum 45 percent reduction in commute VMT, implementation of the feasible TDM measures cannot be guaranteed to reduce the industrial and service component's VMT per employee or the retail component's total VMT to a level of less than significant**.

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# Table 7.A: Significant Environmental Effects That Cannot Be Avoided

| Topic/Section | Impact | Determination Significance | Details of Impact |
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# 8.0 Alternatives

### 8.1.2 Project Objectives

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

**• Establish a functional and balanced pattern of land use that maximizes economic opportunity and provides needed public improvements for City residents.**

**Land use will not be balanced, but rather will become monolithic as warehouses will dominate as the prevailing land use for all lands East of the Sun Lakes Community.**

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**• Establish land uses for properties in the City's sphere of influence that will create positive fiscal impact to the City and provide sufficient fiscal benefit to permit annexation of the property upon which the project is proposed into the City.**

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

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

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

**The massive scale of this project will be dominated by one land-use: industrial, whereas residents will be bereft of much more needed and desirable land uses, such as regional and neighborhood retail, recreation, resort tourism, hospitality, high-tech office.**

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

**Industrial development dominates this project, in contrast to the token/miniscule presence much needed commercial is.**

**In stark contrast to a diversified economy, this projects dominant industrial use creates a monolithic use, with a landscape dominated by massive monolithic high-cube warehouse buildings, containing a low wage, unskilled labor force, that will be unable to afford to buy housing stock near the project.**

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

Everyone knows that high-cube warehouses are ugly monstrosities, devoid of any diverse or attractive design elements. They eliminate diversity rather than create it.

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

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The city cannot prove that the cost burden to build the infrastructure, utilities, and provide services, will be sufficiently offset by the estimated revenues from the project.

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

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

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

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

Demand for water will dramatically increase from the water needs of the industrial and commercial uses of the 19 planning areas and over 5 million sq.ft. of warehouses.

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

### 8.1.4 Summary of Project Alternatives

**SUNSET CROSSROADS CITY OF BANNING, CALIFORNIA**

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

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

**• Alternative 1: No Project/No Build. This alternative assumes that the Development Site would remain in its current, undeveloped condition. Alternative 1 is an ideal scenario. It maintains 500 acres of open space that allows for scenic vistas of the surrounding foothills and mountains, key acreage for groundwater recharge, and enhances property values of Sun Lakes, Serrano Del Vista and other nearby residential communities who attract residents wanting to buy homes and settle in a largely rural residential, bucolic atmosphere, also preserves 2 riparian creeks, and the absence of 5 million sq.ft. of diesel polluting, noisy, and light glaring warehouses, improves air-quality, quiet, and darker nights better suited for the mental and physical health of the thousands of adjacent senior residents. For example excessive amounts of artificial night light has proven to be harmful for human sleep cycles, anxiety, obesity, diabetes, etc.**

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**The MSJC Site would also not be rezoned for residential development. Refer to Section 8.3 for a complete description and evaluation of this alternative. Banning's existing General Plan designates less intrusive land uses that, are not only oe**

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

**development. Refer to Section 8.4 for a complete description and evaluation of this alternative.**

**Alternative 2 achieves a Banning General Plan Goal and a project objective of establishing a functional and balanced pattern of land use that maximizes economic opportunity and provides needed public improvements for City residents. Balanced land use means a diversity of land use types, that creates a diverse land use portfolio and economic base that can shield Banning from economic downturns caused by a collapse/contraction of a single sector, such as logistics/warehouses. If the dominant warehouse use goes forward, the cities economic health would be dependent on the rise-and-fall of logistics economy. A drop in warehouse demand could quickly cause mass vacancies of the millions of square feet of warehouses, dramatically reducing sales tax and other revenue streams, that the city grows singularly dependent on, generate blight and the unforeseen burden on city services to maintain, and prevent attractive nuisance of abandoned buildings. .**

**In contrast, maintaining the existing land use achieves a number of objectives. First, California is in a historic housing crisis. The existing residential zoning is an ideal fit to fill the unmet need for housing units. The variety of residential zoning establishes an attract diversity of residential properties ranging from Single Family Residential to high value rural residential ranches along the southern foothills (South of Bobcat Rd. East of Highland Home), which are a community focal point of bucolic living. Thus this alternative balances the desire of the thousands of adjacent residents to maintain a largely rural and residential lifestyle, with the General Plans desire**

**Moreover, Banning and nearby residents are craving for a higher-quality robust retail economy, that allows residents far greater consumer options that improves their homes, lifestyles, pride of ownership, and pride in the community. Banning Economic Development Department, should be doing vastly more here in reaching out to better retail, hospitality, recreation, destination tourism, education, multi-modal transit center, alternative and regional rail, transportation, and other high-quality economic drivers, and community supported land uses.**

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

**This alternative is a poor one, in that it goes against a general plan and project goal of achieving maximum balance (diversity) of land use. Also community interest is overwhelmingly in favor of retail, high quality hospitality (with revenue sources other than overnight stay that draw local resident dollars such as restaurants, recreation (pools,tennis,golf ), shopping etc. Also a regional rail/multi-modal transit hub and/or a regional retail center needs to be thoroughly examined.**

E-36-45

**• Alternative 4: Reduced Industrial Alternative. This alternative assumes that the annexation of the Southern Portion of the Development Site proceeds and that the Development Project proceeds with no changes to the commercial component of the Development Project and the following changes to the industrial component: this alternative eliminates Building 9 (274,000 square feet of Warehousing uses) and foregoes the extension of Lincoln Street over the Smith Creek drainage. Additionally, this alternative replaces the warehousing and general light industrial uses in Buildings 5 and 6 with a single building containing 330,000 square feet of high-cube cold storage warehouse use. These changes result in a reduction of 422,000 square feet of industrial use and total industrial development of up to 5,123,000 square feet of industrial uses. This alternative does not require the extension of Lincoln**

**Street beyond Planning Area 6, results in one less drainage crossing at Lincoln Street, and eliminates fire access to Highland Home Road at the Northern Portion of the Development Site as well as eliminating the buildout of Highland Home Road north of Sun Lakes Boulevard. Similar to the Development Project, the MSJC Site would be rezoned to allow development of up to 1,181 residential units. Refer to Section 8.6 for a complete description and evaluation of this alternative.**

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

**The MSJC Entitlements are included in the Project analysis only as a result of the proposed rezoning of the Development Site from residential to non-residential use and *the State law requirement that the City rezone in another location to avoid a net loss of residential capacity.* Because both Alternative 1 and Alternative 2 do not result in rezoning of the Northern Portion of the Development Site from residential to non-residential use, the MSJC Entitlements would not be adopted.** E-36-45-A **Under these alternatives, it is anticipated that the MSJC Site would retain its public facilities designation and would be developed, if at all, with school facility uses that are not contemplated at this time. As any future development of the MSJC Site for school purposes would be speculative, no future development of educational or other facilities is contemplated for the MSJC Site under Alternatives 1 and 2. *Under Alternatives 3 and 4, rezoning either at the MSJC Site or in another location identified by the City would be required.* Because State law requires no net loss of residential units, no reduction in the residential unit count at the MSJC Site is contemplated in Alternatives 3 or 4. The infeasibility of alternative locations for this new residential zoning is discussed in Section 8.2.4. *In addition, for Alternatives 3 and 4, development of a battery energy storage system within industrially zoned areas of the Development Site is also contemplated.***

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

E-36-45-A Cont

**8.2 ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR FURTHER ANALYSIS (Just because an alternative was not selected for further analysis, does not mean its not a viable alternative.)**

E-36-46

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

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

**8.2.1 Off-Site Alternative**

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

**Generally, any development of the size and type proposed by the Project would have substantially the same environmental effect, regardless of where it was located in the City. The Development Site consists of 533.8 contiguous acres under a single ownership. Based on a review of the current and proposed development in the City, no single undeveloped property of sufficient size is available. The First Hathaway and Banning Commerce Center projects, located north of Interstate 10 (I-10), east of Hathaway Street, are currently under review by the City and are unavailable as an alternative site. Property east of these sites and west of Malki Road is controlled by the Morongo Band of Mission Indians and is not available as an alternative site. The Banning Distribution Project is slated for development on property south of I-10 and north of Banning Municipal Airport. Undeveloped land located between Banning Municipal Airport and the City's wastewater treatment facility is not sufficiently sized to accommodate the Development Project and is occupied by smaller industrial and residential uses which would require relocation. Land farther south is constrained by Smith Creek, rural residential uses, and the foothills of the San Jacinto Mountains. Other large currently undeveloped properties (the Butterfield Specific Plan [BSP] and RSG sites) are entitled with Specific Plans envisioning the development of residential and commercial uses; therefore, these sites are not available as alternative sites. Due to the size of the Development Site, the current ownership of other properties, current or pending entitlements, and/or site constraints, no alternative site is available to accommodate the Development Project; therefore, an off-site alternative was rejected from further consideration in this EIR. Using Alternatives for the 500+acres does not have to be a single contiguous piece of land dominated by a single industrial warehouse use. Especially when residents are asking for diverse land uses, the**

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**project could be broken down into suitable, chunks. For example a neighborhood shopping center runs between 15-20 acres. A Regional Shopping Center can be accomplished at 50-100 acres. Residential housing is most flexible and can be built on as little as one acre for multiple residential, Single Family Residential can start at 5 acre parcels, rural residential which is already established next to the project would also be a very attractive land use alternative.**

**Therefore distributing the total 500 acres over multiple locations is feasible. Also a Master Planned Residential Community with parks, schools, shopping centers, public facilities etc. would be very well suited for the project site.**

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***The Project includes the transfer of residential capacity to the 49.2-acre MSJC Site, located south of Westward Avenue and east of Sunset Avenue. As part of its updated Housing Element, the City identified nine parcels that have been rezoned to VHDR to accommodate additional units required by the City's Regional Housing Needs Assessment (RHNA).*** **Appendix B of the City's Housing Element update includes an inventory of "Vacant and Underutilized Sites"4 which was consulted to determine if other alternate sites remain available to accept the Project's transfer of residential capacity. As the relocation of existing residents and removal of existing structures would result in potential impacts and would not be consistent with State law requirements to achieve no net loss of residential units, only vacant sites included in this inventory were considered as potential alternative locations for the transfer of residential capacity5 As there are no other singular potential sites large enough to fully accommodate the transfer of residential capacity required, consideration of an alternative site other than the MSJC Site was deemed infeasible and was not carried forward for further analysis in Alternatives 3 or 4.**

**8.2.2 Increased Commercial Use Alternative**

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

**Traffic is not the only consideration. And even if there's more traffic from increased commercial, the type of pollution generated would be less harmful than big rig truck diesel soot. Also, unlike warehouses where over 80% of the trucks will be from outside of the Pass Area, much of which from LA/LB ports, other parts of southern california, the state and the southwest, causing much greater, and more harmful regional pollution than commercial, most the commercial traffic will be from local sources.**

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

**8.2.3 Office Use Alternative (see increased commercial use)**

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**The traffic assessment for the Development Project anticipated a variety of industrial uses. The daily and peak hour trips for the most traffic intensive industrial use6 estimated daily, a.m. peak hour, and p.m. peak hour rates are 4.96, 0.70, and 0.63 trips per 1,000 square feet of use, respectively. Trip generation rates for general office uses in an urban/suburban setting7 are 10.84 daily trips, 1.52 a.m. peak hour trips, and 1.44 p.m. peak hour trips per 1,000 square feet. Assuming the replacement of industrial square footage with an equal amount of office space, per 1,000 square feet of development, it is reasonable to conclude that office uses would generate more passenger car traffic than industrial uses8.**

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

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

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

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

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**Based on the "Land Use 710" rate, this rejected alternative would generate approximately 59,533 passenger cars trips from offices uses and 7,702 from commercial uses (67,255 passenger car trips total), Truck uses generated total 1,718 trips with 554 and 1,164 generated from office and commercial uses, respectively. In comparison, the Development project generates 17,166 passenger vehicle 3,330 truck trips (20,496 trips total). While truck trips are 52 percent of that associated with the Development project, passenger vehicle trips are increased by nearly 400 percent. Developer needs to show the amount of diesel or other GHG pollution generated by the total number of trips for each use. Even though trucks are 7% of state vehicles they generate over 70% of Diesel/GHG pollution.**

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

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

**8.2.4 Residential Alternative (with Annexation)**

**This alternative would analyze development of the Development Site with a mix of residential options and includes annexation of the Southern Portion of the Development Site into the City for redevelopment with residential uses. Alternative 2 (Existing General Plan and Zoning) already considers potential impacts associated with development of the Development Site with residential uses. Furthermore, without inclusion of development of commercial or industrial uses in this portion of the Development Site, which is in the City's sphere of influence, it is not likely this potential alternative would generate sufficient revenue to justify annexation into the City.**
**As a residential alternative is already under consideration (see Section 8.4 below), further assessment of this potential alternative was not pursued.**
**8.2.5 Reduced Residential Alternative (the housing crisis allows for an arguably unlimited number of additional housing units for the area)**

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

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

**Traffic is not the only consideration. And even if there's more traffic from increased commercial, the type of pollution generated would be less harmful than big rig truck diesel soot. Also, unlike warehouses where over 80% of the trucks will be from outside of the Pass Area, much of which from LA/LB ports, other parts of southern california, the state and the southwest, causing much greater, and more harmful regional pollution than commercial, most the commercial traffic will be from local sources.**

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

**Also the state is advancing Transit Oriented Development to reduce GHG, single occupant vehicular travel, and more housing near transit alternatives.**

**Need to add as an alternative, a regional hub, either individually, or in combination or fusion, for a regional shopping center, a regional multi-modal transportation hub, including a rail stop for the Coachella Valley San Gorgonio Pass Corridor Rail Corridor Service (see:https://www.rctc.org/projects/coachella-valley-san-gorgonio-pass-corridor-rail-corridor-service-project/ ) , transit oriented development, a community center, and/or an urban village.**

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***Re: CHAPTER 3 | DEVELOPMENT STANDARDS SUNSET CROSSROADS SPECIFIC PLAN NO. 20-20000002***

***Table 3-1***

Permitted, Conditionally Permitted, Ancillary, and Prohibited Uses

**The development standards are much too prohibitive in the "industrial" Planning Areas 2-9, prohibiting opportunities for, example retail, which thwarts diversity of land uses and creates a massive monolithic "warehouse district" that will create the dominant land use for the 500+ acre project, which is in opposition to the cities general plan which calls for creating the maximum diversity in land use for the city.**

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- 9.0 List of Preparers

# APPENDICES

## HEALTH RISK ASSESSMENT: March 2023

## Contents Below:

## 2.1.1 Climate/Meteorology

**The windrose data is misleading as it only measures wind speeds during June 2022. Average windrose should be measured for a much longer period. For example average monthly wind speed over a five year period would reveal windy seasons, and also how wind conditions occur in the hotter months where air quality is historically worse.**

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## 2.1.2 Toxic Air Contaminants

The public's exposure to TACs is a significant environmental health issue in the State of California.

Although the CARB has designated nearly 200 compounds as TACs (CARB Identified Toxic Air Contaminants), the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (diesel particulate matter [DPM]).

**This project will be uniquely dangerous to residents health because the vast majority of hits TACs will be emitted from the 6500 daily truck trips to-and-from the warehouses, the vast majority of which are big-rig diesel trucks. There are a number of alternative land uses that will not create a large-scale concentration of diesel-big rig trucks traversing in-and-out, and throughout the 5.5million square feet of warehouses over the 500 acre property. The current project proposal is arguably the worst conceivable land use in terms of TAC emissions, and therefore should be denied. The developer needs to stop its tunnel vision for warehouses and explore far more environmentally friendly and diverse land uses.**

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# 3.0 THRESHOLDS

# 3.1 HEALTH RISK ASSESSMENT THRESHOLDS OF SIGNIFICANCE

Both the State and federal governments have established health-based ambient air quality standards for seven air pollutants. For TACs, "substantial" is taken to mean that the individual health risk exceeds a threshold considered to be a prudent risk management level.

The following limits for **maximum individual cancer risk (MICR)** and noncancer acute and chronic **Hazard Index (HI)** from project emissions of TACs are considered appropriate for use in determining the health risk for projects in the Basin:

- MICR: MICR is the estimated probability of a maximum exposed individual (MEI) contracting cancer as a result of exposure to TACs over a period of 30 years for adults and 9 years for children in residential locations and over a period of 25 years for workers. The MICR calculations include multipathway consideration, when applicable.

The cumulative increase in MICR that is the sum of the calculated MICR values for all TACs would be considered significant if it would result in an increased MICR greater than 10 in 1 million (1 x 10-5) at any receptor location.
**The developer misleads the public by not summarizing the findings for this project in this paragraph. Were the project's TAC emissions substantial? Did or did not the project TACs exceed a threshold considered to be a prudent risk management level? Developer needs to state the results in plain language here.**

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- Chronic HI (Hazard Index): Chronic HI is the ratio of the estimated long-term level of exposure to a TAC for a potential MEI to its chronic reference exposure level. The chronic HI calculations include multipathway consideration, when applicable.

The project would be considered significant if the cumulative increase in total chronic HI for any target organ system would exceed 1.0 at any receptor location.

**What are the results for Chronic HI: the results should be stated here!**

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- Acute HI: Acute HI is the ratio of the estimated maximum 1-hour concentration of a TAC for a potential MEI to its acute reference exposure level.

The project would be considered significant if the cumulative increase in total acute HI for any target organ system would exceed 1.0 at any receptor location.

**State the results of the Acute HI analysis here. Was the project considered significant? State here. Omitting or burying the findings in obscure portions of the report meadleads the public, who needs to know this information, in the most readily available manner.**

***According to CEQA: an EIR shall be written in plain language and use appropriate graphics so that decision- makers and the public can rapidly understand the documents. This is intended to improve the clarity of the EIR.***

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**Also regarding Technical Data:**

**The information contained in an EIR shall include *summarized* technical data, maps, plot plans, diagrams, and similar relevant information *sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided* through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses, which assist in public review.**

# 4.0 HEALTH RISK IMPACTS

## 4.1 GENERAL INFORMATION

For the purposes of an HRA, short-term emissions are of concern for analyzing acute health impacts, and long-term emissions are of concern for analyzing chronic and carcinogenic health impacts. A screening-level multipathway assessment has been conducted. This technique was chosen as recommended in the OEHHA Air Toxic Hot Spots Program Risk Assessment Guidelines (2015).

***The OEHHA has determined that long-term exposure to diesel exhaust particulates poses the highest cancer risk of any TAC it has evaluated. Exposure to diesel exhaust can also have immediate health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, diesel exhaust particles (also***

TABLE ES-3. Emission Reduction Targets for Community and Municipal Operations

| | Community |
|---|---|
| 2020 Target | 15% below 2012 levels |
| 2020 Emissions Goal (MT $CO_2e$) | 234,007 |
| 2030 Target | 41.7% below 2012 levels |
| 2030 Emissions Goal (MT $CO_2e$) | 160,501 |

***known as DPM) made people with allergies more susceptible to the materials to which they are allergic, such as dust and pollen. Exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks. For risk assessment procedures, the OEHHA specifies that the surrogate for whole diesel exhaust is DPM***.

**State the results of the study here. What were the results in plain language?**

### 4.1.1 Vehicle Emission Sources

The first step of an HRA is to characterize the project-related emissions of TACs. According to the Sunset Crossroads Traffic Analysis (Urban Crossroads 2021), the project would generate daily trip rates as shown in Table 4.A.

**Table 4.A: Project Phasing Plan**

| Operational Phase | Opening Year | Number of Project Vehicles per Day | | | |
|---|---|---|---|---|---|
| | | Autos | 2-Axle Trucks | 3-Axle Trucks | 4+-Axle Trucks |
| Phase 1 (Buildings 1 through 4) | 2024 | 6,120 | 142 | 142 | 1,023 |
| Phase 2 (Phase 1 plus the Commercial area & Buildings 5 & 6) | 2025 | 14,892 | 236 | 374 | 2,075 |
| Phase 3 (Phases 1 & 2 plus Buildings 7 & 10) | 2026 | 16,402 | 308 | 436 | 2,275 |
| Phase 4 (The entire project) | 2027 | 17,706 | 348 | 486 | 2,423 |

Source: *Sunset Crossroads Traffic Analysis* (Urban Crossroads 2021).

This HRA analyzes the health risk levels from operation under full project operation (buildout of Phase 4). While the nearby sensitive receptors would be exposed to TACs during the earlier phase periods, **the emissions will be at the highest level when the entire project is in operation,** thus, health risks levels will be lower during the earlier phase periods. While the TAC emissions from gasoline-powered vehicles have a small health effect compared to DPM, this HRA includes all the traffic information described and both gasoline- and diesel-powered vehicle emissions. For the diesel exhaust emissions, it is sufficient to only consider the DPM (particulate matter less than 10 microns in diameter [PM10] and particulate matter less than 2.5 microns in diameter [PM2.5]) portion of the exhaust; all the TACs for the gasoline exhaust emissions are contained in the reactive organic gas (ROG) emissions. Using speciation data from CARB,1 the emission rates of the TAC components in gasoline exhaust are derived from the total ROG emissions. The TAC components of the gasoline vehicle ROG exhaust are 1,3-butadiene, benzene, ethylbenzene, methyl ethyl ketone (MEK), naphthalene, propylene, styrene, toluene, and xylenes.

**Again summarize and conclude findings in plain language. How harmful are these emissions to sensitive receptors.**

Although the actual hours of operation and schedules are unknown at this time, the vehicles associated with the project were conservatively **assumed to operate 24 hours per day, 7 days per week, and 52 weeks per year. This will, in fact, be the actual hours, days, and weeks of operations, unless the city sets conditions of approval which restrict hours of operation to 12 hours per day, 5-6 days per week. Restricting hours reduces air, light, and noise pollution during the night hours, which dramatically improves nearby residents health.** Making this assumption is conservative, resulting in higher health risk levels that would occur using fewer hours per day. The trucks operate in two modes: stationary idling and moving on and off the site. The emissions from trucks while idling result in a much higher concentration of TACs at nearby sensitive receptors compared to the emissions from moving trucks. This is due to the dispersion of emissions that occurs with distance and with travel of the vehicle. For this HRA, the truck travel emissions were modeled as a series of volume sources along the on- site driveway and along truck routes as shown on Figure 4-1, AERMOD Modeling Layout, with the overlapping dark blue squares. Although it is possible that a few trucks could take other routes, the small number of trucks going on any routes other than those identified as the main routes would not add substantial amounts of TACs along those routes. LSA assumed vehicles traveling near the buildings would maneuver slowly, averaging approximately 5 miles per hour (mph), and that vehicles traveling on roadways would average 35 mph. Although the trucks will spend time at higher speeds, their emissions are greater at lower speeds, so using 5 and 35 mph results in a conservative analysis.

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The idling emissions of trucks operating on the project site was modeled as individual point sources at idling locations along the planned loading docks, shown on Figure 4-1 as red circles next to the buildings. While the idling times of the trucks are regulated to be no more than 5 minutes, **it is possible the trucks would stop at the loading dock and one or two other areas during a single delivery.** For the purposes of this HRA, the idling times per delivery were conservatively assumed to be a total of 15 minutes per delivery.

EMFAC2021 was used to determine the emissions factors of idling and operating diesel trucks to determine the total emissions of PM10. Although the TAC of concern from diesel trucks is DPM, EMFAC2021 does not include emissions

factors for this TAC. DPM is a component of the overall exhaust from the project-related trucks. While it is expected that the truck emissions rate will continue to reduce over time, an HRA only allows for a single emission rate to represent the entire 30-year exposure period. The use of emissions factors for the first year of full operations under project buildout (2027) was selected for this HRA to be conservative. For instance, based on operations starting in 2027, using emissions factors for a 2031 vehicle fleet (the midpoint of the 9- year exposure period) or using emissions for a 2042 vehicle fleet (the midpoint of the 30-year exposure period) could be used; however, either of these would be less conservative.

The tables in Appendix A show the development of the exhaust emission rates for the trucks while operating both near the buildings and on the roadways as described in the project traffic study. The tables show the average daily traffic for the project on each stretch of road by vehicle category. Appendix A **(needs to be summarized in plain language)** also shows the percentage within each vehicle category that is diesel powered (from EMFAC2021), the PM10, particulate matter 2.5 microns or less in size (PM2.5), and ROG emissions factors for each vehicle category at the average vehicle speed of 5 mph near the buildings and 35 mph on roadways. Because the AERMOD dispersion model cannot use emissions in grams per mile, emissions are converted to grams per second. The same derivation is repeated for ROG emissions from gasoline-powered vehicles (the majority of TAC emissions from gasoline exhaust are contained in the ROG emissions).

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Table 4.B shows the development of the exhaust emission rates for the trucks while idling in the building areas. The emissions are equally divided among the point sources along the loading dock areas. These are depicted on Figure 4-1 as red circles within the loading dock areas, approximately where the truck engine exhaust pipe would be while positioned for unloading or loading. Table 4.B shows emissions data using the idling emissions factors from EMFAC2021 for these trucks, combined with the total truck count and assuming 15 minutes of idling per trip.

**Table 4.B: On-Site Truck Idling Emission Rates**

| Facility | Hours/ Day | Trucks/ Day[1] | Trucks/ Hour | Diesel Idle Exhaust per Vehicle (g/hr)[2] | | Idle Time (min/trip)[3] | Idle Exhaust Diesel (g/hr) | |
|---|---|---|---|---|---|---|---|---|
| | | | | $PM_{10}$ | $PM_{2.5}$ | | $PM_{10}$ | $PM_{2.5}$ |
| Building 1 | 24 | 481 | 20.0 | 0.0122 | 0.0116 | 15 | 0.0609 | 0.0582 |
| Building 2 | 24 | 472 | 19.6 | 0.0122 | 0.0116 | 15 | 0.0597 | 0.0571 |
| Building 3 | 24 | 197 | 8.2 | 0.0122 | 0.0116 | 15 | 0.0249 | 0.0238 |
| Building 4 | 24 | 16 | 0.7 | 0.0122 | 0.0116 | 15 | 0.0020 | 0.0019 |
| Building 5 | 24 | 128 | 5.3 | 0.0122 | 0.0116 | 15 | 0.0162 | 0.0155 |
| Building 6 | 24 | 50 | 2.1 | 0.0122 | 0.0116 | 15 | 0.0063 | 0.0061 |
| Building 7 | 24 | 168 | 7.0 | 0.0122 | 0.0116 | 15 | 0.0213 | 0.0204 |
| Building 8 | 24 | 88 | 3.7 | 0.0122 | 0.0116 | 15 | 0.0111 | 0.0107 |
| Building 9 | 24 | 110 | 4.6 | 0.0122 | 0.0116 | 15 | 0.0139 | 0.0133 |
| Building 10 | 24 | 94 | 3.9 | 0.0122 | 0.0116 | 15 | 0.0119 | 0.0114 |

Source: Compiled by LSA Associates, Inc. (2022).

[1] *Sunset Crossroads Traffic Analysis* (Urban Crossroads 2021). Note that each truck visit comprises two trips, one to arrive and one to depart.

[2] CARB EMFAC2021 idling emissions factors for 2027 HHDT diesel trucks.

[3] This table assumes each truck idles for 15 minutes per trip to account for multiple stops (i.e., at an entry check-in, loading/ unloading, and miscellaneous on-site activities).

CARB = California Air Resources Board
EMFAC2021 = California Emissions Factor Model, Version 2021
g/hr = grams per hour
HHDT = heavy heavy-duty truck
min/trip = minutes per trip
$PM_{10}$ = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter

It was assumed the trucks would idle using their main engines rather than an auxiliary power unit or plugging in to shore power throughout their time at the project site. This is a very conservative assumption, as the loading docks are required to have electrical hookups and the trucks to have the ability to run their accessories from that electricity, so it is likely that the trucks would only operate on their own power when arriving or departing. It was also assumed that all refrigerated trucks would use the electrical hookups rather than operate their transport refrigeration units (TRUs).

### 4.1.2 Gas Station Emission Sources

Emissions from gasoline and diesel transfer and dispensing mainly occur during loading, breathing, refueling, and spillage as described below:

• Loading: Emissions occur when a fuel tanker truck unloads gasoline and diesel to the storage tanks. The storage tank vapors, displaced during loading, are emitted through its vent pipe. A pressure/vacuum valve installed on the tank vent pipe significantly reduces these emissions.

• Breathing: Emissions occur through the storage tank vent pipe as a result of temperature and pressure changes in the tank vapor space.

• Refueling: Emissions occur during motor vehicle refueling when gasoline and diesel vapors escape through the vehicle/nozzle interface.

• Spillage: Emissions occur from evaporating gasoline and diesel that spills during vehicle refueling.

• Hose Permeation: Emissions occur when liquid gasoline or gasoline vapors diffuse through the dispensing hose outer surface to the atmosphere.

All retail service stations under AQMD jurisdiction have Phase I and II vapor recovery systems to control gasoline emissions. Phase I vapor recovery refers to the collection of gasoline vapors displaced from storage tanks when cargo tank trucks make gasoline deliveries. Phase II vapor recovery systems control the vapors displaced from the vehicle fuel tanks during refueling. In addition, all gasoline is stored underground with valves installed on the tank vent pipes to further control gasoline emissions. Out of the TACs emitted from the gasoline stations, only benzene, ethylbenzene, and naphthalene have cancer toxicity values. Diesel fuel does not require these control systems, and diesel does not generate sufficient vapor to require controls.

### 4.1.3 Toxic Air Contaminant Air Dispersion Modeling

To assess the dispersion of emissions associated with the project, air dispersion modeling was performed using AERMOD. The model is provided by the EPA to

estimate the pollutant concentrations associated with emissions sources in simple and complex terrain. The model was used to calculate the annual average and short-duration (e.g., 1-hour) TAC concentrations associated with project operations. Details of these inputs are shown in Appendix B **Needs to be summarized in plain language. How harmful are the emissions?**.

E-36-63

In addition to the idling point sources described above, a series of volume sources were used to represent vehicle activity along nearby roadways. The volume dimensions used were based on the EPA guidance for trucks. For all the truck idling sources, the release height was set to the approximate truck exhaust stack height of 12 feet, a temperature of 200° Fahrenheit, a flow rate of 50 meters (164 feet) per second, and an exhaust pipe diameter of 4 inches. Because building wake effects (building downwash) influences can significantly increase concentrations for receptors
The

# APPENDIX A

# EMISSION FACTORS FOR VEHICLES AND HEALTH RISK ASSESSMENT EMISSION RATES

**According to the Health Risk Assessment Traffic Data the project will generate 15327 daily trips for cars and 6553 trips for trucks (2-Axle to 4+-Axle).**

**That means, on a daily basis residents will be subjected to fossil fuel exhaust in the form of gasoline and diesel powered trucks, to the tune of 6553 truck trips per day. This involves trucks both arriving and leaving each day from 133 sources throughout the 10 proposed warehouse buildings of over 5 million square feet.**

E-36-64

*LSA Associates, Inc.* **Traffic Data** NPD2101

**Sunset Crossroads**

| Land Uses | Units TSF | ADT Cars | 2-Axle | 3-Axle | 4+-Axle |
|---|---|---|---|---|---|
| Building 1 | 1,420 | 2,486 | 58 | 58 | 423 |
| Building 2 | 1,386 | 2,426 | 57 | 57 | 415 |
| Building 3 | 575 | 1,006 | 24 | 24 | 173 |
| Building 4 | 44 | 202 | 4 | 4 | 12 |
| Building 5 | 326 | 368 | 26 | 32 | 96 |
| Building 6 | 152 | 622 | 10 | 12 | 38 |
| Building 7 | 896 | 848 | 34 | 42 | 126 |
| Building 8 | 250 | 956 | 18 | 22 | 66 |
| Building 9 | 274 | 348 | 22 | 28 | 82 |
| Building 10 | 222 | 662 | 38 | 20 | 74 |
| Commercial/Retail | 268.4 | 4,441 | 2,667 | 474 | 156 |
| Gas Station [1] | | 962 | 58 | 188 | 918 |
| Total | | 15,327 | 3,014 | 960 | 2,579 |

Note [1] Gas station trips based on the number of pumps, 20 gas fueling positions and 6 diesel fueling positions.
ADT = Average Daily Trips
TSF = Thousand Square Feet

Pollutants include diesel particulate matter, PM2.5, 1,3-butadiene, benzene, ethylbenzene, MEK, naphthalene, propylene, styrene, toluene, and m & p-xylene.

# APPENDIX B

# AERMOD OUTPUT AND HARP RESULTS

AIRMOD= Atmospheric Dispersion Modeling
See: https://en.wikipedia.org/wiki/Atmospheric_dispersion_modeling

HARP = The Hotspots Analysis and Reporting Program (HARP)

HARP:
The Hotspots Analysis and Reporting Program (HARP) is a software suite used by California Air Resources Board that addresses the programmatic requirements of the Air Toxics "Hot Spots" Program (Assembly Bill 2588). HARP incorporates the information presented in the 2015 Air Toxics Hotspots Program Guidance Manual for Preparation of Health Risk Assessments. HARP is divided into three programs: the Emissions Inventory Module (EIM), Air Dispersion Modeling and Risk Tool (ADMRT), and Risk Assessment Standalone Tool (RAST). HARP can be used by the air pollution control and air quality management districts (districts), facility operators and other organizations or individuals to promote statewide consistency, efficiency and cost-effective development of facility emission inventories and conducting health risk assessments. HARP can also be used for conducting health risk assessments used in other programs (e.g., facility permitting, CEQA reviews).

**The AERMOD and HARP data must be summarized in a manner that is understandable to the lay residents, per requirements of CEQA**

E-36-65

Thank you



Ron Roy

## Response to Letter E-36

Ron Roy
January 30, 2024

**Response to Comment E-36-0-A**

The commenter notes that as the lead agency for environmental review of the proposed Project, the City of Banning is required to consider the information contained in the Draft EIR prior to taking discretionary action on the Project. This comment is noted. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-0-B**

The commenter suggests that generally, warehouse projects such as the Project have adverse effects on health, safety, property values (equity), infrastructure and services, and quality of life of residents and that these effects should be considered when the City weighs the other potential benefits of the project, such as revenue. The commenter also states the opinion that the alternatives described in Chapter 8 of the Draft EIR provide more balanced land use choices and recommends that the City disapprove the Project in its current form. The commenter also states that it would like the City to find that the EIR is inadequate and lists specifics Draft EIR sections without identifying any substantive concerns with the information or analysis provided in the Draft EIR. These comments are noted. Please refer to response to Comment E-27-7. This comment does not raise any specific issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-0-C**

The commenter indicates parts of the Draft EIR and the proposed Sunset Crossroads Specific Plan have been copied into the comment letter and reserves the right to comment on additional concerns related to the EIR and specific plan at a later date. This comment is noted. State law provides specific time periods for review and comment by the public with respect to a draft EIR and a final EIR. This comment does not raise any specific issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-0-D**

The commenter states general concerns and objections to the Draft EIR for the Project, including that the Draft EIR is incomplete and falls short of its objective of addressing mitigation measures for the proposed Project's potential individual and cumulative-level impacts. Specifically, the comment states that the Project would not comply with the City's General Plan, and environmental issues discussed in Section 4 including: 4.1 Aesthetics, 4.3 Air Quality, 4.13 Noise, 4.1 Light and Glare, 4.8 GHG, 4.17 Transportation, 4.11 Land Use, 4.6 Energy, and 4.2 Wildfire. It is unclear what the commenter intends by the phrase, "in Noise Element, Circulation". The comment does not raise any specific issues regarding the adequacy of the environmental analysis contained in the Draft EIR. See specific responses to Comments E-36-1 through E-36-53 below. No further response is required.

**Response to Comment E-36-1**

The commenter correctly identifies the Development Project as a regionally significant project. Chapter 2.0 of Draft EIR identifies the Development Project as a "project of Statewide, regional or area-wide significance" and noted that the Notice of Preparation (NOP), Draft EIR, and Notice of Completion were transmitted to the State Clearinghouse and the appropriate metropolitan area council of governments, which in this case is the Southern California Association of Governments (SCAG), for review and comment. No further response is required. The commenter restates text from the Introduction Section of the Draft EIR without comment. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-2**

The commenter restates a portion of the definition of regionally significant project, and states that Williamson Act parcels within the Development Site should be identified. As discussed in Section 4.2, Agricultural Resources of the Draft EIR, "review of the parcels (through title searches) within the Development Site indicates that none were under Williamson Act contracts. Additionally, the status of past Williamson Act contracts placed on parcels within the Development Site was confirmed with Riverside County Planning Staff, and these contracts have been terminated; therefore, implementation of the Development Project would not result in conflict with land under a Williamson Act Contract." This comment does not raise issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-2-A**

The commenter appears to restate text from the Introduction Section of the Draft EIR relating to the definition of regionally significant project, without comment. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-3**

The commenter cites OPR Guidelines concerning State of California requirements for preparing General Plan updates, notes that the City's General Plan was adopted in January 2006 and indicates that the City's General Plan is outdated and should be updated. Chapter 2, pg. 22 of the Guidelines provide that General Plan updates generally occur every 20 years. Since the City's adoption of the General Plan in 2006, portions of the General Plan, including the Housing Element and the Circulation Element, have been updated or amended by the City. The proposed Project complies with the current General Plan, except where noted as requiring a General Plan amendment for land use and zoning changes. This comment does not raise issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-3-A**

The commenter indicates that Light and Glare should be addressed as its own standalone topic in the EIR. Under Appendix G of the State CEQA Guidelines, which the City followed in preparing this EIR, Light and Glare is not a separate, standalone topic but rather is discussed in Sections 4.1 Aesthetics of

the Draft EIR in response to Threshold 4.1-4 (Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.) as well as in Section 4.4 Biological Resources. This topic is thoroughly addressed in both sections pursuant to established thresholds. This comment does not raise issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required. The commenter indicates that the comment letter includes an outline of each potentially significant environmental issue that has been identified for the Development Project "for my own reference" and then lists the sections. This comment does not raise issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-4**

The commenter provides language from the Draft EIR regarding the location of aesthetic view photographs included in the Draft EIR and indicates that the simulation viewpoints provided in Section 4.1 Aesthetics of the Draft EIR are inadequate for a variety of reasons:

- **Simulation View 1:** The commenter incorrectly indicates that I-10 is higher than the Development Site at this location not lower, as indicated by the Draft EIR. The commenter correctly identifies a berm along the shoulder of the eastbound side of the freeway that does partially obscure the Development Site. However, the Development Site is still visible, as accurately shown in Simulation View 1.

- **Simulation View 2:** The commenter states that locating this viewpoint on the Eastbound I-10 would be closer and more accurately reflect views from I-10 East. However, this viewpoint was selected because it shows the Development Site as visible from the westbound side of I-10 in the forward direction where travelers would be looking while moving in the westbound direction; therefore, the commenter's suggestion is noted but no change in Simulation View 2 is necessary.

- **Simulation View 3:** The commenter states that westerly and southerly views of the existing open space and mountains to the south will be "obliterated" by the Project. At this location, directly adjacent to the Development Site looking west onto the Development Site, the current westerly view across the Development Site would be obscured by buildings on the Development Site. However, scenic views of the San Gorgonio and San Jacinto Mountain ranges to the south and north, respectively, that define the San Gorgonio pass area would be maintained at this location. The simulation view is intended to show a representative view of the Development Site itself from various locations in its vicinity. Other simulations demonstrate that the scenic views of the dominant natural features of the area would be maintained. Thus, the commenter's characterization of the Project as obliterating the viewshed is inaccurate and no change in the simulation view or Draft EIR is necessary.

- **Simulation View 5:** The commenter states that additional simulated views along Bobcat Road are needed. This location was chosen due to the topography of the Development Site. The southeast end of the Development Site is at lower elevation than the rest of the Development Site due to topography. The embankment from Bobcat Road to Building 3 is the highest embankment proposed on the Development Site. Because of the topography of the Development Site, a simulation view of Buildings 1 and 2 would have elevation change and thus be less impactful than

the position of this location. This location was chosen for the Simulation View to demonstrate a conservative view of the embankments visible on the Development Site from Bobcat Road, a limited access road which will dead end at the western edge of the Development Property, and no additional simulation views are required.

- **Simulation View 6:** The commenter requests additional Simulated Views along the SLB extension. The current Simulated View shows the Development Site looking east from Sun Lakes Boulevard. As designed, the western portion of the Development Site would largely be maintained as open space for onsite mitigation and to reduce noise and air quality impacts to the community to the west of the Development Site. This Simulation View shows what the Development Site would look like from the eastern edge of the Sun Lakes Community. The SLB Extension is not a part of the Development Project and is outside of the Development Site and is still in the design process. As such, Simulated Views of the SLB extension would not accurately depict the planned project. No additional simulation views are required.

- **Simulation View 7:** The commenter requests additional simulated views and/or video simulations along Sunset Avenue. The current simulated view shows the view from Sunset Avenue and Westward Avenue, looking west towards the Development Site along the future Sun Lakes Boulevard Extension. This location was selected due to its proximity to the community northeast who would be traveling on the roadway, and the Mount San Jacinto College (MSJC) buildings to the southeast. In total, there are three simulated views along Sunset Avenue provided in the EIR, including from between Lincoln and Westward, at Sunset and Westward, and between Westward and Bobcat. These simulations accurately reflect the westward-facing views of the Development Project from the eastern boundary of the Development Site. No additional simulation views are required.

The commenter also suggests adding a simulated view along Lincoln Avenue. A simulation along Lincoln was not selected because other views of the Development Site from I-10 and Sunset Avenue would be substantially similar. Finally, the commenter suggests a view at night to demonstrate the lighting and glare from the Development Site at night. Night lighting is discussed in Section 4.1.5.4 Aesthetics of the Draft EIR. See also the response to Comment E-36-12. A view simulation could not accurately demonstrate the lighting conditions of the Development Site for real-world conditions. No revisions to the Draft EIR are required.

**Response to Comment E-36-5**

The commenter identifies and accurately reflects text form the Draft EIR regarding various elements of the City's General Plan Open Space and Conservation Element related to open space and park and recreation areas, including Goal 1, and states that the Development Project needs to include a more significant share of the property as open space, including no development south of Westward Avenue. The Project, as proposed, would designate a combined 78.2 acres of the 533.8-acre Development Site for Open Space Resources and Open Space Parks - 53.0 acres for Open Space – Resources and 12.6 acres for Open Space – Parks. This is only 4.7 fewer acres than the current planning for the Project site which is combined 82.9 acres for Open Space Resources and Open Space Parks. See Draft EIR Section 3.0 pages 3-4 and 3-19.

The commenter states there is an emissions threat to the MSJC Site from Building 4. However, the Health Risk Assessment (HRA) demonstrates that no emissions impacts would occur at the MSJC Site. Refer to Final EIR Appendix C-2 Health Risk Assessment. The South Coast Air Quality Management District sets the significance threshold for cancer risk at 10 in one million. In response to public comment, the emissions totals for the Development Project were updated based on the updated CalEEMod run for truck trip lengths and the updated calculations for TRU emissions (see Final EIR Appendix C-4). Regarding the exposure of sensitive receptors to substantial pollution concentrations, the Health Risk Assessment (HRA) (original and revised (Final EIR, revised Table 4.3.Q and Final EIR, Appendix C-4) found no significant impact to sensitive receptors. Please refer to the response to Comment A-3-18. Based on the supplemental analysis, the cancer risk to the Residential and Student Maximum Exposed Individual (MEI) slightly from 3.3 in one million to 3.8 in one million. Though increased, this risk level remains well below the health risk thresholds established by the SCAQMD and does not result in any new significant health risk impacts from those described in the Draft EIR, Project Design Feature PDF N-1 has been added to the Specific Plan and Final EIR and shifts the centerline of Sunset Avenue an additional 17 feet (total of 42 feet) west from its current location. This shift further reduces cancer risk from emissions at these locations to 3.8 in one million. Refer to Final EIR Appendix C-2 Health Risk Assessment and Appendix C-4 Sunset Crossroads Supplemental Memorandum with TRU Emissions and HRA. No additional changes to the Draft EIR are necessary.

The commenter states the developers are not local and do not reside in the San Gorgonio Pass and cannot appreciate the scenic and natural qualities like long-time residents. This comment does not raise an issue regarding the adequacy of the environmental analysis contained within the Draft EIR. No revision to the Draft EIR is required and no further response is necessary.

**Response to Comment E-36-6**

The commenter cites the City's General Plan Open Space and Conservation Element Policy 3 that development in all land use categories shall be of the highest quality and expresses an opinion on the Project building height and appearance. The comment is noted, the aesthetic of the buildings including exteriors and Specific Plan is in compliance with applicable General Plan policies and is accorded deference and is determined by the City's ordinances and City's Design Guidelines, as outlined in Appendix B Specific Plan of the Draft EIR. As long as the City's determination of compliance with this General Plan policy regarding the quality of the Project's design and aesthetics is reasonable, it is entitled to deference even if individuals might make a different determination. See *California Native Plant Soc'y v. City of Rancho Cordova (2009) 172 Cal. App. 4th 603, 638*. The Project complies with applicable ordinances and design requirements, as identified in Draft EIR, Appendix B Specific Plan, Section 4.4 General Commercial Architectural Guidelines, Section 4.5 Signage Design Guidelines, and Section 4.6 Landscape Design Guidelines, and would be consistent with other developments in the City. The commenter also identifies the City's General Plan Open Space and Conservation Element Policy 5, that the City shall retain existing open edges or greenbelts that define the physical limits of the City and provide physical separation between adjoining neighborhoods, without applying it to the Development Project. No further response is required.

**Response to Comment E-36-7**

The commenter identifies CEQA Appendix G Thresholds of Significance for Aesthetics and highlights without further comment Threshold 4.1-4 (as identified in the Draft EIR) regarding new sources of

nighttime light and glare. See the response to Comment E-36-4 regarding nighttime lighting. The comment does not raise any issues regarding daytime light and glare. No further response is required. As discussed in Section 4.1, Aesthetics of the Draft EIR, the proposed buildings onsite would include lighting required by City ordinances for safety and activities in the nighttime hours. However, this lighting would be targeted and downward facing. No direct lighting would spill into the adjacent drainage features or open space. The Development Project would be consistent with all applicable ordinances related to lighting and glare to reduce potential impacts to adjacent land uses to less than significant.

**Response to Comment E-36-7-A**

The commenter appears to restate text from Section 4.1, Aesthetics of the Draft EIR without comment. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-8**

The comment lists a series of Parking and Circulation Standards without identifying the source and, as noted in this response and in responses to Comments E-36-9 and E-36-10, seeks to modify the standards. The list of standards appears to come from the City zoning code (see Section 17.12.110 (parking and circulation). The commenter suggests including Class IV or comparable bike lanes within each building site and connecting to the project streets and trail systems. See the response to Comment D-6-21 for a discussion of bike lanes on the Development Site and adjoining roadways. Each Site Plan shall identify, and the Project shall provide safe pathways for bicyclists from public roadways to on-site bicycle storage locations, using signage and/or striping. For clarification, there are no trail systems in the vicinity of the Development Site and the City's Circulation Element does not address or call for Class IV bikeways in the City (see e.g., Program 25.A of the General Plan Circulation Element stating that the City shall inventory all streets for potential Class I, Class II and Class III bikeways and program their installation in its Capital Improvement Program). This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-9**

The commenter identifies further parking and circulation standards that appear to be derived from the City zoning code and suggests revising the zoning code parking and circulation standards bullet that deals with pedestrian circulation to add a reference to bike lane circulation, seeking to minimize the need to cross parking aisles and landscape areas. The Specific Plan has been modified to include detailed parking standards and requirements (Specific Plan Section 3-1 General Development Criteria). Each Site Plan shall identify, and the Project shall provide safe pathways for bicyclists from public roadways to on-site bicycle storage locations, using signage and/or striping. This comment does not raise issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-10**

The commenter suggests adding a new item to the City zoning code parking and circulation standards to address bike lane circulation and bike racks. See the responses to Comments E-36-8 and E-36-9.

This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-11**

The commenter suggests adding a new feature to the Specific Plan to provide Class IV bike lanes or pedestrian or equestrian trails including along Bobcat Road. This recommendation will be provided to the City staff and elected officials for consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-11-A**

The commenter states that no provision has been made for safe and convenient public transit. See the response to Comment D-6-27. This recommendation will be provided to the City staff and elected officials for consideration. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required. .

**Response to Comment E-36-11-B**

The commenter appears to restate text from Section 4.1, Aesthetics of the Draft EIR without comment. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comment E-36-12**

The commenter appears to restate text from the Section 4.1, Aesthetics of the Draft EIR without comment other than to question the effectiveness of a project design feature to prevent direct lighting from spilling into the adjacent conserved wash areas at night and state that this cannot prevent light spillage into nearby residential communities and schools and disrupting the sleep cycles of residents. The Development Standards in the Specific Plan mandate compliance with the following lighting requirements in the Specific Plan (Section 3.1, Item 15).

All lighting within this Specific Plan shall adhere to the following standards:

a. All exterior lighting shall be approved by the Community Development Department. Lighting shall be limited to that necessary to light the project site. No lighting source shall be visible, or shall be permitted to spill over to adjacent properties.

b. Lighting shall not be permitted which blinks, flashes, or is of unusually high intensity or brightness. Exterior lighting shall be shielded or recessed so that light is contained within the boundaries of the parcel on which the lighting is located. All lighting shall be directed downward and away from adjoining properties and public rights-of-way.

c. Lighting in commercial and industrial projects should be only the minimum required for safety and security.

d. Light standards should be limited to eighteen to thirty-four feet. Smaller pedestrian oriented light standards are encouraged in the downtown commercial district.

e. Lighting should be integrated into the structure's architecture to the greatest extent possible.

f. All lighting fixtures shall not have a visible light source, must be shielded and directed downward to confine light spread within the site boundaries.

With implementation of these measures and the Outdoor Lighting Guidelines in the Specific Plan, the Development Site would minimize glare and "spill over" light onto public streets and, as discussed in the EIR, the impact from lighting is less than significant. See CEQA Guidelines Section 15126.4(c). No further response is required.

**Response to Comment E-36-13**

The commenter appears to restate text from the Section 4.1, Aesthetics of the Draft EIR without comment other than to question the ability of the project design features in the Draft EIR and Specific Plan to minimize glare and light spillover/trespass into neighboring communities. The commenter provides a link to a discussion providing tips to avoid light trespass and states that the Draft EIR should identify the amount of light trespass remaining after mitigation. Please refer to response to Comments E-2-1 and E-36-12 above regarding City zoning ordinance requirements related to outdoor lighting applicable to the Development Project. Compliance with regulatory standards as a design feature or mitigation measure is sufficient under CEQA to address an impact that otherwise could be significant. See CEQA Guidelines Section 15126.4(c).

**Response to Comment E-36-14**

The commenter appears to generally restate text from the Section 4.1, Aesthetics of the Draft EIR regarding Project exterior lighting requirements but expresses concern that sufficient nighttime lighting for operations and security may generate significant and unhealthy levels of light pollution to nearby communities and states that the Project applicant has not shown the actual effect and whether it is at an unhealthy level. The stated goal of sufficient lighting for nighttime operations and security is limited by compliance with City lighting requirements. During the design of each building, exterior lighting studies will be produced by the Project design team and approved by the City prior to issuing a building permit. This process ensures compliance with the City's lighting requirements. See the response to Comment E-36-13. No further response is required.

**Response to Comment E-36-15**

The commenter appears to restate text from Section 4.1, Aesthetics of the Draft EIR, and expresses concern that installation and operation of the specified lighting features may cumulatively reach unhealthy light pollution levels. See the responses to Comments E-36-13 and E-6-14. No further response is required.

**Response to Comment E-36-16**

g. The commenter questions without substantiation whether implementation of the City's requirements for lighting described in the Draft EIR would prevent light dispersal from spilling into

nearby residential communities and schools and disrupting the sleep cycles of residents. The Development Standards in the Specific Plan mandate compliance with the following at the Development Site: "All exterior lighting shall be approved by the Community Development Department. Lighting shall be limited to that necessary to light the project site. No lighting source shall be visible, or shall be permitted to spill over to adjacent properties." The City shall ensure prior to approval of improvements at the Development Project that this standard is achieved as part of its building plan review. See also responses to Comments E-36-12 through E-36-15. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is required.

**Response to Comments E-36-17 through E-21**

The commenter provides a list of measures for additional mitigation against noise which appear to focus on onsite operational noise impacts. The only significant unavoidable operational impact identified by the Draft EIR occurred adjacent to residences along Bobcat Road. Please refer to response to Comment D-6-29. The project design features added to the Development Project to address on-site operational noise result in the elimination of the significant nighttime operational noise impact identified in Section 4.13, Noise and Vibration in the Draft EIR and reduce noise impacts to a less than significant level. With respect to the number of truck trips, see the response to Comment D-6-1-A. As operational traffic and operational noise impacts are mitigated to less than significant with the adopted Development Project modifications, no further response is necessary.

**Response to Comment E-36-22**

The commenter notes that the Draft EIR identifies the age-restricted Sun Lakes community as a sensitive land use in the Project vicinity and questions why The Lakes Assisted Living facility is not listed. The noise-sensitive areas associated with The Lakes Assisted Living and Memory Care at 5801 Sun Lakes Boulevard are located well beyond the 65 dBA CNEL noise impact zone from Sun Lakes Boulevard between Highland Home Road and Highland Springs Avenue. The 65 dBA CNEL noise impact zone along this roadway segment is 58 feet from the Sun Lakes Boulevard centerline. The location was not mentioned because no significant noise impact from the Project was identified at any location west of the Development Site. The Lakes Assisted Living and Memory Care is further west of the closest residences identified as sensitive receptors in the Draft EIR, so there would be no significant impact at The Lakes. No modification to the Draft EIR is necessary, and no further response is required.

**Response to Comment E-36-22-A**

The commenter appears to restate and summarize text from Section 4.3, Air Quality of the Draft EIR without comment. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

**Response to Comment E-36-23**

The commenter requests additional information regarding the bicycle rack/storage facilities that would be included in the Development Project. The number and location of these facilities will be determined as each tenant is identified. Both the Riverside County CAP compliance Table 4.8.K and VMT Project Design Feature T-3 provide for bicycle racks and storage features. Mitigation Measure AIR-2 requires TDM's to be developed separately for Project Development operators employing 200

or more people, and TDM Design Feature 3 requires that there be sufficient facilities to accommodate the number of commuting bicyclists. Thus, each business will provide bicycle facilities. Refer to response to Comment E-36-8 for discussion regarding bike facilities identified within the Specific Plan. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment E-36-24**

The commenter specifies the mitigation provision for 50 Class 8 EV truck chargers and states that each planning area should have its own specific mitigation measures. See the response to Comment D-6-4. CEQA requires mitigation measures be applied to a project with significant impacts. However, there is no such requirement for mitigation measures to be applied to subsections or planning areas within a project for impacts that are project wide.

**Response to Comment E-36-25**

The commenter cites the measure in Mitigation Measure AIR-2 requiring that building electrical rooms be sufficiently sized to hold additional panels needed to supply power for electric truck charging systems for TRUs and suggests adding TRUs to the text regarding installation of conduits from electric rooms to logical locations to facilitate future truck charging. This requirement must be read in connection with the TRU specific provision requiring installation of stand-by plug-in capability at all dock bays for charging TRUs, which states: "All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric TRUs. A condition of approval shall be included for the cold storage facility that requires that by buildout at least 90 percent of trucks with TRUs are fully electric." TRUs must be electrically powered by the end of the decade. As discussed in Appendix C-4 of the Final EIR, "This analysis ignores regulations that will gradually force the elimination of diesel-powered TRUs. The CARB TRU ATCM would require that increasing percentages of the Statewide TRU fleet be transitioned to all-electric, with requirements beginning in 2024 and full phase out of diesel TRUs required by 2030. TRU emissions will continue to decrease into the future due to upcoming regulatory requirements and technological advances." Accordingly, for the small number of electric or hybrid TRUs that are not at the truck/dock bays, conduit will be run to tractor trailer parking spaces for TRUs to facilitate charging if necessary. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

**Response to Comment E-36-26**

The commenter suggests a revision to Mitigation Measure AIR-2 to include Level 2 AC EV charging stations at 50 percent of parking stalls. The mitigation measure requires the greater amount of 350 Level 2 AC EV chargers, or the percentage required to comply with the minimum requirements of CCR, Title 24, Part 11: California Green Building Standards Code for passenger vehicle parking. The Building Code requirements have been increasing and the Project will be required to comply with the percentage in effect at the time of construction which may exceed 350 spaces. CEQA Guidelines Section 15126.4(c) provides that compliance with a regulatory requirement may be utilized as mitigation. The commenter does not provide a basis for the requested 50 percent. The Development Project is designed to be able to increase the number of passenger vehicle charging stations commensurate with regulatory requirements and provide conduit to future expansion of charging

stations within the Development Site. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is necessary.

**Response to Comment E-36-27**

The comment suggests requiring parking spaces for TRUs to be electrified to support plug in capabilities for electric and hybrid TRUs. See the response to Comment E-36-25. No further response is required.

**Response to Comment E-36-27-A**

The commenter appears to restate and summarize mitigation measures from Section 4.8, Greenhouse Gas Emissions of the Draft EIR without comment. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

**Response to Comment E-36-27-B**

The commenter appears to restate and summarize draft EIR provisions regarding CEQA requirements for analyzing cumulative impacts from Chapter 6.0, Cumulative Impacts of the Draft EIR without comment. This comment does not raise any issues regarding the adequacy of the environmental analysis contained in the Draft EIR, and no further response is necessary.

**Response to Comment E-36-28**

The commenter expresses concern regarding the cumulative effects of warehouse projects in the San Gorgonio Pass region. The commenter provides information regarding the concentration of warehouses in Fontana, California. Refer to Section 6.1, CEQA Statutory Guidance in the Draft EIR for CEQA provisions regarding cumulative impacts analysis. In compliance with these CEQA provisions, Section 6.3, Cumulative Projects of the Draft EIR identifies all cumulative projects within the San Gorgonio Pass region. Warehouse projects in Fontana serve a different population based on the CEQA statutory guidelines for cumulative projects and therefore are not included in this cumulative project's analysis. As such, the Draft EIR complies with CEQA statutory guidelines for cumulative projects. No other CEQA-related issues are raised, and no further response is required.

**Response to Comment E-36-29**

The commenter suggests that the Draft EIR incorrectly assumes warehouse projects outside the San Gorgonio Pass region would not contribute to cumulative emissions impacts. According to CEQA guidance, air quality emissions are evaluated on a basin-wide basis. Any exceedance of specific pollutants is considered a cumulative impact. Refer to Chapter 6.0, Cumulative Impacts of the Draft EIR for a discussion of cumulative impacts. Air quality and pollutant emissions at a cumulative level are accounted for in the analysis. The EIR's emissions analysis takes nearby and regional projects and emissions sources, as well as topographic and meteorological conditions into account, as discussed in Section 4.3.1.4, Climate and Meteorology of the Draft EIR. In the San Gorgonio Pass region, the topography of the pass between the San Gorgonio and San Jacinto Mountain ranges funnels winds through the pass predominantly from the southwest to the east. Due to the regular winds and

topography, emissions from outside the region would not be a significant source of cumulative GHG emissions in the region.

**Response to Comment E-36-29-A**

The commenter specifically identifies ozone as a cumulative issue in the San Gorgonio Pass region and refers to the 2022 SCAQMD Air Quality Management Plan. Refer to response to Comment E-36-29 and Chapter 6.0, Cumulative Impacts of the Draft EIR for a discussion of CEQA requirements for cumulative impacts analysis. Air quality and pollutant emissions at a cumulative level are accounted for in the analysis. No other CEQA-related issues are raised, and no further response is required.

**Response to Comment E-36-29-B**

The commenter provides text from Chapter 6.0, Cumulative Impacts from the Draft EIR without further comment. No other CEQA-related issues are raised, and no further response is required.

**Response to Comment E-36-30**

The commenter indicates the cumulative project list is incomplete and should be updated to include additional warehouse projects throughout the San Gorgonia Pass communities. Refer to response E-36-28 above. No other CEQA-related issues are raised, and no further response is required.

**Response to Comment E-36-31**

The commenter identifies the cumulative projects list included in Chapter 6.0, Cumulative Impacts of the Draft EIR and states that the cumulative project list is incomplete and should be updated to include additional warehouse projects outside the region, including Calimesa and Cherry Valley. Refer to response to Comment E-36-29 and Chapter 6.0, Cumulative Impacts of the Draft EIR for a discussion of CEQA requirements for cumulative impacts analysis and the relevant region for assessment of cumulative air quality impacts. With respect to identification of cumulative projects, see the response to Comment E-31-17. Air quality and pollutant emissions at a cumulative level are accounted for in the analysis. No further response is required.

**Response to Comment E-36-32**

The commenter states that the Draft EIR failed to include projected emission levels from the Beaumont Pointe project west of the Development Site, indicating that that project exacerbates air, noise, light and other forms of pollution, and could pose a wildfire risk to the Development Project. Table 6.8 and Draft EIR Chapter 6.0, Cumulative Impacts clearly indicate that the cumulative impacts analysis includes the Beaumont Point project. However, CEQA requires assessment of cumulative impacts of a project which is "evaluated…together with other projects causing related impacts." See CEQA Guidelines Section 15130(a)(1). Thus, specific emissions levels or other impacts from an individual project are not required to be evaluated as part of the cumulative impacts analysis. Chapter 4.20, Wildfire of the Draft EIR indicates that the Development Project does not have a significant impact of wildfire risk to the surrounding environment, and Chapter 8.0, Alternatives pages 8-38 and 8-58 states that even for cumulative projects that may be located within or adjacent to fire hazard severity zones, mandatory fire protection plans and mitigation for each result in a less than significant cumulative impact. The commenter's statement that the Beaumont Pointe project poses a wildfire

risk to the Development Project is speculative. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR that is required by CEQA, and no further response is necessary.

**Response to Comment E-36-33**

The commenter provides a Draft EIR excerpt from Chapter 8.0, Alternatives describing the Sun Lakes Boulevard Extension, suggests modifications to the Sun Lakes Boulevard Extension to add bike lanes and a bike lane system to safely link that road to the Project, protected creeks and habitats and the onsite and surrounding offsite roadway system including Lincoln Avenue, Sunset Avenue. Etc., to provide other alternative transportation to reduce the total number of trips and their environmental effects. See the responses to Comments E-36-8 and E-36-9. As specified in the Draft EIR and cited by the commenter, the list of Public Facilities are City public improvements and are not part of the Project description; thus, these comments should be directed to the City in connection with its CEQA analysis of that project. The Public Facilities are analyzed in Chapter 6.0, Cumulative Impacts of the Draft EIR. Refer to response to Comment D-6-29. This comment does not raise any issues regarding the adequacy of the Project environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-34**

The commenter summarizes the Draft EIR's description of significant cumulative concurrent construction and operations air quality impacts in Draft EIR Section 6.5.3.2, cumulative AQMD consistency analysis in Section 6.5.3.3, GHG emissions in Section 6.5.8, cumulative traffic noise analysis in Section 6.5.13.3, and cumulative Traffic and VMT impacts in Section 6.5.17. The commenter does not identify any specific concerns or issues related to these topics. These sections have been revised to account for project modifications made in response to public comment, including the shifting of Sunset Avenue an additional 17 feet (total of 42 feet) west from its current location, adding wing walls to the buildings along Bobcat Road and rooftop shields for noise reduction, and updating the AQ and GHG modeling. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-35**

The commenter requests that the HRA be summarized in Chapter 7.0, Other CEQA Topics. The HRA is provided as Appendix C-2 of the EIR and is summarized in Section 4.3, Air Quality of the EIR, as required under CEQA. See CEQA Guidelines, Appendix G, III c). This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-36**

The commenter summarizes the significant and unmitigable Project impacts for (1) inconsistency with the 2022 AQMP, (2) exceeding VOC emissions thresholds during Project construction, (3) cumulatively considerable increase in criteria pollutants for which the Project region is in nonattainment, (4) emission of VOCs, NOX, CO, PM10, and PM2.5 from Project operations, (5) GHG emissions, (6) traffic noise and on-site stationary noise, (7) transportation and VMT. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-37**

The commenter quotes the Project objective to "Establish a functional and balanced pattern of land use that maximizes economic opportunity and provides needed public improvements for City residents," and states that the Project land use will not be balanced because warehouses will dominate as the prevailing land use east of the Sun Lakes community. This comment isolates that land use component of the objective from the overall City goal of maximizing economic opportunity and implementation of needed public improvements. The City seeks to create and maintain a balance of residential, commercial, industrial and open space land use while balancing its already planned population growth with employment opportunities. Currently, the population outpaces and will continue to outpace employment opportunities without the addition of additional employment opportunities (see Section 4.14 Population and Housing in the Draft EIR). Industrial development has been an important source of jobs in the city, and the City continues to attract industrial land uses. The Development Project retains existing commercial development uses and complies with all City design criteria. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-38**

The commenter cites the Project objective to "Provide commercial development that allows for a diversified economy, complements existing uses, provides a range of employment opportunities, and promotes a safe and enjoyable shopping experience for residents and visitors," and states the Project does not meet this objective because it is dominated by industrial warehouse uses and leaves residents of Banning without needed land uses such as retail, recreation, resort tourism, hospitality, and high-tech office. In addition to the industrial space, the Development Project provides up to 268,400 square feet of medical office, professional office, education, recreation, and commercial uses, including travel center retail uses, a fueling facility, and a 125-room hotel. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-39**

The commenter cites the Project objective to "Provide commercial development that allows for a diversified economy, complements existing uses, provides a range of employment opportunities, and promotes a safe and enjoyable shopping experience for residents and visitors", and states that the Project does not meet this objective because it is dominated by industrial development and low wage warehouse jobs. While the Development Site will be dominated by industrial land uses, the Development Project would provide up to 268,400 square feet of commercial uses, medical offices, professional offices, education, and recreation uses and includes Travel Center Retail Uses, a Fueling Facility, and a 125-room hotel. This mix would provide a variety of employment opportunities at different wage ranges. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-40**

The commenter criticizes the aesthetic of warehouse buildings generally. The comment is noted. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-41**

The commenter cites the Project objective to "Increase City sales tax and property tax revenues by establishing commercial and industrial uses…that can increase City revenues and assist in offsetting public services costs incurred by the City in the development and maintenance of housing and public facilities." The commenter states that the City cannot prove that the cost to build the infrastructure, utilities, and provide services would be sufficiently offset by Project operations revenues. The Fiscal Impacts Analysis shows that the Project generates net revenue increases for the City and that revenue generated would offset costs incurred for City services on the Development Site. Draft EIR Chapters 4.15 and 4.19 identify a number of City impact fees applicable to the Development Project including, a Level 1 School Impact Fee and Banning Municipal Code Chapter 15.68 Fire Protection, Police Facilities, Banning Library District, and Development Impact Fees (see RCMs PS-1 through PS-3). In addition, the Development Agreement that would be approved in connection with the Project (see Draft EIR Chapter 3.0 pages 3-2 and 3-109) would provide additional financial benefits to the City. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-42**

The commenter cites the Project objective to "Minimize the demand for water resources and other public services by creating drought tolerant landscaping and encouraging use of recycled water." The commenter states without substantiation that the Development Project will dramatically increase water use and demand in the region. Water demand for the existing zoning and General Plan commercial and residential uses was included in the 2020 Urban Water Management Plan (UWMP). A Water Supply Assessment (WSA) for the previously planned residential and commercial project on the Development Site determined a project water demand of 1,072 AFY. The Project WSA conservatively treats the Project water demand as a new demand. With the project design features requiring use of drought resistant landscaping and water saving interior features to reduce water demand, the project demand on the Development Site would be 1,060 AFY. In addition, the residential uses on the MSJC Site would require a separate water demand of 734 AFY. This total represents a slight increase from that analyzed in the 2020 Urban Water Management Plan (UWMP). As shown in Tables 11, 12, and 13 of Appendix K WSA of the Draft EIR, the Development Project's overall water demand as compared to the 2020 UWMP on a General Plan level basis of comparison, water demand increases by 1,060 AFY. This increase translates to as much as 11.1 percent (Normal Year Comparison 2025) and as little as 7.5 percent (Single Dry Year Comparison 2045). This increase was determined to be less than significant. No further response is required.

**Response to Comment E-36-43**

The commenter suggests that Alternative 1 (No Project/No Build) is the ideal alternative as it maintains the current condition with open space and no development on the Development Site by providing statements of the Alternative's benefits. The commenter further provides unsubstantiated comment that excessive artificial light has proven harmful to human sleep cycles and human health. Please refer to response to Comments E-2-1 and E-27-6. This alternative would have the fewest potential environmental impacts of any alternative. In the context of site lighting, the commenter does not quantify or define what is "excessive"; therefore, it is speculative to address the supposed health effects of such lighting. As required under CEQA (Section 15126.6(c)), the selection of a range

of alternatives should include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. As stated in Section 8.3.3 of the Draft EIR, this alternative would not meet any of the project objectives, including providing employment opportunities for the City and regional residents, providing diversified retail options, and providing additional tax revenue for the City. As a result, this alternative was not selected as the environmentally superior alternative. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-44**

The commenter suggests that Alternative 2 (No Project/Existing General Plan and Zoning/Residential and Commercial Development) would satisfy a single Project objective of functional and balanced pattern of land uses that maximize economic opportunity and provide needed public improvements for the City. CEQA requires that alternatives feasible attain *most* of the basic project objectives. See CEQA Guidelines Section 15126.6(a). As discussed in Chapter 8.0, Alternatives of the Draft EIR, Alternative 2 would maintain current General Plan land use for the Development Site with residential buildout of 1,630 units and the same commercial options. However, Alternative 2 does not meet the project objectives for providing employment opportunities for the City and regional residents, providing diversified retail options, and providing additional tax revenue for the City. Refer to Section 8.4 Alternative 2: No Project/Existing General Plan and Zoning for full analysis of Alternative 2. Alternative 2's residential land uses would not provide sufficient tax revenue for the City to justify annexing the southern portion of the Development Site. Refer to Section 8.4 and Table 8.S in the Draft EIR for analysis regarding tax revenue generation as a project objective. Moreover, the City has more housing than jobs and seeks to improve the housing-jobs ratio. Refer to Section 4.14.3.3 Jobs/Housing Balance in Section 4.14, Population and Housing in the Draft EIR for analysis regarding the jobs/housing balance in the City and region (See also the response to Comment D-3-18). Refer to Tables 8.Q and 8.R for a detailed comparison of impacts for this and all alternatives relative to the Development Project. This Alternative would exacerbate the discrepancy rather than improve the ratio by providing far fewer jobs than the proposed Project. In addition, Under Alternative 2, average daily trips (ADT) from residential traffic would be increased relative to the Development Project. While emissions for VOCs, $NO_x$, $PM_{10}$, and $PM_{2.5}$ are reduced over the Development Project, emissions for VOCs, $NO_x$, and $PM_{10}$ impacts nevertheless remain significant. CO impacts increase and, unlike the Development Project, are significant. In addition, this Alternative would not meet most of the basic Project objectives. Therefore, the Draft EIR analysis did not identify this Alternative as the environmentally superior alternative. No further response is required.

**Response to Comment E-36-45**

The commenter states that Alternative 3 (Reduced Commercial) is a poor option because it conflicts with the General Plan and project goal of maintaining balanced land use, community interest in high-quality retail and hospitality, and suggests the City consider a regional rail transit hub and a regional retail center. While the commenter is focusing on a single Project objective, CEQA requires that alternatives feasible attain *most* of the basic project objectives. See CEQA Guidelines Section 15126.6(a). That is not an appropriate alternative to consider for this privately-owned property. As discussed in Chapter 8.0 of the Draft EIR, Alternative 3 would maintain much of the proposed land uses of the Development Project, while reducing commercial uses to reduce VMT and emissions

impacts from those uses. The suggestion that a regional transportation hub, including a rail station, would be a better use of the Development Site, is noted; however, no regional transportation hub or rail station is proposed for this privately-owned Development Site. This alternative would not allow for high quality retail and hospitality, and with its reduced commercial footprint, Alternative 3 is not the environmentally superior alternative identified in the Draft EIR. Alternative 4, which would maintain the commercial uses of the Development Project while reducing Industrial uses, is the environmentally superior alternative. No other CEQA-related issues are raised, and no revisions are needed in the Final EIR. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-45-A**

The commenter appears to restate and highlight excerpts from the analysis of Alternatives 3 and 4 in Chapter 6.0 without comment. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-46**

The commenter states that just because an alternative was not selected for further analysis does not mean it is not a viable alternative. CEQA requires analysis in detail only of those alternatives that could feasibly attain most of the project's basic objectives and that would avoid or substantially lessen any of the project's significant impacts. See CEQA Guidelines Section 15126.6(f). Chapter 8.0, Alternatives of the EIR discusses the alternatives evaluated for their viability on a variety of factors including constructability, general plan consistency, potential impacts on residents and adjacent land uses, and revenue potential for the City, among others. Alternatives that were determined to not be feasible or would not meet CEQA's other criteria were not carried forward for additional consideration. No further response is required.

**Response to Comment E-36-47**

The commenter, in connection with the Draft EIR's discussion of alternative Project sites, states that (1) alternative uses such as neighborhood or regional shopping centers and residential housing could be accommodated throughout the city in multiple locations and (2) the Development Site could be utilized for a master planned residential community. See the responses to Comments E-36-44, E-36-45, and E-36-46. In addition, as discussed in Chapter 8.0 Alternatives, there are no other properties within the City that could accommodate the size of and proposed uses of the Development Project or even the uses suggested by the commenter over comparable acreage in the city. Moreover, spreading the uses around to different sites in the region would also increase VMT. The Development Site would not generate enough revenue for the City to offset costs of services if built out as a mixed use residential/commercial project. See Section 8.4 - Alternative 2 in Chapter 8.0, Alternatives of the Draft EIR. No further response is required.

**Response to Comment E-36-48**

The commenter states that increased traffic from a commercial alternative should not be the only consideration because automobile emissions are less harmful than truck emissions and 80 percent of warehouse truck traffic would be to/from Los Angeles/Long Beach ports and other parts of Southern California causing more regional pollution. The commenter's statements are not correct. See the

responses to Comments A-3-6 (regarding truck trip lengths and destinations) and E-36-44. As discussed in Chapter 8.0, Alternatives of the Draft EIR and demonstrated in Appendices L-4 and L-5, a mixed use residential/commercial buildout such as under current land use designation would result in higher traffic volumes (though fewer commercial trucks) than the Development Project. The suggested project is akin to the current General Plan buildout would provide additional housing in the city but limited additional employment opportunities. It therefore would increase the existing housing-to-jobs imbalance, and likely increase regional VMT and related impacts compared to the Development Project, which would provide employment opportunity for residents closer to home than are currently available. No further response is required.

**Response to Comment E-36-49**

The commenter adds the suggestion of "increased commercial use" to the Office Use Alternative heading without comment. This comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-50**

The commenter states that the discussion of truck trips under the Office Use Alternative needs to demonstrate the amount of diesel or other GHG pollution generated by the total number of trips for each use. It is unclear which portion of the Alternatives discussion this comment is summarizing. It is also unclear what the commenter means by "each use" – the Office Use Alternative discusses passenger and truck trips for commercial and office uses based on ITE rates and also discusses passenger car truck trips for the Development Project. GHG emissions are generated by all mobile sources, not just trucks. The unmitigated GHG emissions for the Development Project, organized by use (Commercial, Commercial Mobile, Industrial, and Industrial Mobile) is included in Table 4.8.F in Section 4.8, Greenhouse Gas Emissions of the Draft EIR. Table 4.8.F indicates that the total unmitigated GHG emissions generated by Project mobile emissions (both industrial and commercial uses) is 37,544.94 $CO_2$e MT, with commercial mobile emissions generating 7,938.25 $CO_2$e MT and industrial mobile emissions generating 29,606.70 $CO_2$e MT. Extrapolating from this table, if the entire Development Site were converted entirely to Office Use/Commercial, passenger and truck trips – and related mobile GHG emissions- likely would increase significantly over the Project. For example, if the 5.5 million square feet of industrial buildings were instead built as office/commercial, the unmitigated commercial mobile GHG emissions could increase approximately 20 times the amount of Project commercial mobile emissions to roughly 158,760 $CO_2$e MT. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-51**

The commenter, in connection with the Residential Alternative (with annexation) discussion in Section 8.2.4 of the Draft EIR Chapter 8.0, states that the State housing crisis allows for an arguably unlimited number of additional housing units in the area. The Development Project as designed would maintain residential unit potential within the city by rezoning the MSJC Site to the east for residential, with potential for an equivalent or greater number of units than the Development Site within city limits currently accommodates. The city does not suffer a housing deficit as additional residential development projects are in the process of being approved and built in the city and the region,

satisfying the current directive to maintain capacity for housing in the State. Refer to Section 4.14.3.3 in Section 4.14, Population and Housing. The State also has the goal of reducing GHG emissions by locating jobs near housing, and the City currently has a housing-to-jobs imbalance that this alternative would exacerbate. Refer to Section 4.14, Population and Housing of the Draft EIR. In addition, this alternative does not meet CEQA's requirements for further consideration. Refer to Chapter 8.0 Alternatives of the Draft EIR. Also see response to Comment E-36-44; CEQA Guidelines Section 15126.6(a). The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-52**

The commenter states that increased traffic from increased commercial uses is not the only consideration because the type of pollution generated would be less harmful. It is unclear which alternative this comment pertains to. See the response to Comment E-36-50. If this comment pertains to the Residential Alternative (with annexation), the commenter is not correct. See the response to Comment E-36-51. As discussed in Chapter 8.0 Alternatives of the Draft EIR and demonstrated in Appendices L-4 and L-5, buildout under current land use designation would result in higher traffic volumes (though fewer commercial trucks) than the Development Project. Because the current General Plan buildout would provide additional housing in the City but no additional employment opportunities, regional VMT likely would increase under current General Plan buildout compared to the Development Project, which would provide employment opportunity for residents closer to home than are currently available. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-53**

The commenter states that the Draft EIR should add a transit-oriented development alternative including a stand-alone regional transportation hub, or in combination with regional shopping center including a station stop for the Coachella Valley San Gorgonio Pass Corridor Rail Corridor Service. In addition, the commenter states that the Specific Plan development standards in Table 3-1 for industrial areas 2-9 are too restrictive. See the response to Comment E-36-45. The Banning area is not considered a transit priority area in the current 2020 RTP/SCS. See Exhibit 3.9. To qualify as a Transit Priority Area, a planned major transit stop needs to be scheduled for completion within the planning horizon included in the adopted RTP. See SCAG Connect SoCal 2024, Programmatic EIR page 3.17-28. At this time, there are no plans to include a transportation hub at this location or anywhere in the City of Banning. The Development Project would not preclude the construction of a transportation center or rail station in its vicinity if that would become an option in the future. The purpose of the Draft EIR is to evaluate feasible alternatives that would lessen or avoid potential impacts under current conditions and account for projects and development in the foreseeable future. See CEQA Guidelines Section 15126.6 and CEQA Guidelines Section 15364, which defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time…." Such a regional transportation system is not on the current horizon as a reasonably foreseeable project and has correctly not been included in the analysis of the Draft EIR. Table 3-1 in the Specific Plan identifies permitted and prohibited uses for each planning area. No further response is required.

**Response to Comment E-36-54**

In commenting on HRA methodology, the commenter states that the Windrose data used in the Draft EIR is misleading because it only measured wind conditions in June 2022 and an average over a five-year period should have been used. According to SCAQMD, OEHHA/HARP guidelines, the methodology to use only the June 2022 data is sufficient. Refer to the Methodology Section on page 32 of Appendix C-1 for a discussion of the sufficiency of the methodology for the analysis. As noted in Appendix C-1, Air Quality Technical Report, and Appendix C-2 HRA, the area's general climate, including prevailing wind speeds and direction were considered when modeling the air quality and emissions data for the Development Site and Development Project. No further response is required.

**Response to Comment E-36-55**

The commenter states that the Development Project would negatively impact the health of residents from TACs emitted by the truck trips and suggests that more diverse, environmentally friendly alternative land uses should be considered. Appendix C-2 HRA and Appendix C-4 Supplemental Memorandum with TRUs & HRA indicate that impacts to residents and other sensitive receptors adjacent to the Development Project would be less than significant. See the responses to Comments A-3-4 and B-2-5.

**Response to Comment E-36-56**

The commenter states that the HRA impacts findings for Toxic Air Contaminants (TACs) emissions should be included in the paragraph discussing thresholds of significance. The HRA in Appendix C-2 and Draft EIR Section 4.3, Air Quality are organized to describe methodology, thresholds of significance, and significance conclusions. The TACs included in the HRA include DPM (as $PM_{10}$ and $PM_{2.5}$) from the diesel vehicle exhaust, 1,3-butadiene, benzene, ethylbenzene, methyl ethyl ketone (MEK), naphthalene, propylene, styrene, toluene, and xylenes (all components of ROGs) from the gasoline vehicle exhaust, and benzene, ethylbenzene, and naphthalene from the gasoline station operations.

HRA-specific air dispersion modeling was conducted for the HRA with the EPA's AERMOD model similarly to how it was used for the LST analysis to predict TAC emission dispersion, with the primary difference that this HRA analysis includes all on-site emissions sources and vehicle emissions when traveling both on and off site. The CARB Hot Spots Analysis and Reporting Program (HARP) model was used to translate the TAC concentrations from AERMOD into long-term carcinogenic and chronic, and short-term acute health risk levels following the guidance in the SCAQMD risk assessment guidelines[74] for sensitive receptors. The conclusions and findings of less than significant impact for Project TACs can be found in Section 4.1.3 and 4.1.6 in Appendix C-2 HRA of the Draft EIR that compares the total to the applicable thresholds of significance. An EIR is sufficient as an informational document if it contains all required information about project impacts, but CEQA does not dictate a specific organization in which information must be presented. See, e.g., Pub. Resources Code Section 21002.1(a), 21003(b); CEQA Guidelines Section 15003(I). The comment does not raise any CEQA issues

[74] SCAQMD. 2003. *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis.* August. Website: www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc (accessed January 2023).

regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-57**

The commenter states that the results for the Chronic HI analysis should be presented in the Health Risk Assessment description of Thresholds of Significance. The Chronic HI discussion is included in Section 4.3.5 of the Draft EIR. Table 4.3.Q: Health Risk Levels for Nearby Residents and Students indicates that the maximum noncancer chronic risk to residents and students would be 0.0008 and the chronic risk to workers would be 0.0001. The SCAQMD threshold is 1.0. As such, the risk is not significant. Similarly, Table 4.3.Q: Health Risk Levels for Nearby Residents and Students indicates that the maximum noncancer acute risk to residents and students would be 0.0005 and the acute risk to workers would be 0.0001. The SCAQMD threshold is 1.0. As such, the risk is not significant. See the response to Comment E-36-56. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-58**

The commenter states that the Acute HI analysis be presented in the Health Risk Assessment description of Thresholds of Significance and criticizes the placement of technical data and states that conclusions from data must be summarized in the Draft EIR while technical data must be placed in appendices. See the response to Comment E-36-36. As stated in Section 4.3.3.1 of the Draft EIR (pgs 4.3-20 and 4.3-21):

> *For the purposes of an HRA, short-term emissions are of concern for analyzing acute health impacts, and long-term emissions are of concern for analyzing chronic and carcinogenic health impacts. A screening-level multipathway assessment has been conducted. This technique was chosen as recommended in the Office of Environmental Health Hazard Assessment.*
>
> and
>
> *…The CARB Hot Spots Analysis and Reporting Program (HARP) model was used to translate the TAC concentrations from AERMOD into long-term carcinogenic and chronic, and short-term acute health risk levels following the guidance in the SCAQMD risk assessment guidelines for sensitive receptors.*

The Chronic HI discussion is included in Section 4.3.5 of the Draft EIR. Table 4.3.Q: Health Risk Levels for Nearby Residents and Students indicates that the maximum noncancer chronic risk to residents and students would be 0.0008 and the chronic risk to workers would be 0.0001. The SCAQMD threshold is 1.0. As such, the risk is not significant. Similarly, table 4.3.Q: Health Risk Levels for Nearby Residents and Students indicates that the maximum noncancer acute risk to residents and students would be 0.0005 and the acute risk to workers would be 0.0001. The SCAQMD threshold is 1.0. As such, the risk is not significant. Similarly, Acute HI is discussed in Section 4.3.5.3 and 4.3.6.3 of the Draft EIR. The SCAQMD significance threshold for noncancer acute risk is 1.0. As demonstrated in table 4.3.Q, the residential and student MEI risk is 0.0003, while the worker MEI risk is 0.0003. As such, the noncancer acute risk is less than significant. Please also refer to the response to Comments A-3-18 and E-36-5 regarding the findings of the supplemental health risk assessment (Final EIR, Appendix C-4) prepared to address public comments on the Draft EIR.

Regarding the technical nature of the information presented in the Draft EIR, CEQA Guidelines (Section 15147) states:

> The information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR…

As required, and as noted by the commenter, the technical information has been included in the Draft EIR appendices. As appropriate, this information was summarized in the main body of the Draft EIR. In its review of the Draft EIR, the City has exercised its independent judgement that the information contained in the Draft EIR is accurate, accessible, and sufficiently understandable to the public. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-59**

The commenter requests that the results of the Health Risk Assessment concerning diesel exhaust particulates be stated with the OEHHA data regarding emission reduction charges for this pollutant and that the results be explained in plain language. See the response to Comment E-36-36. The model runs are included in Appendix C-2 Health Risk Assessment in the Draft EIR and as required under CEQA, are analyzed and explained in Section 4.3 Air Quality in the Draft EIR. Refer to response to Comment E-36-58 for a discussion of the results of the HRA and the technical nature of the information presented in the Draft EIR. Please also refer to the response to Comments A-3-18 and E-36-5 regarding the findings of the supplemental health risk assessment (Final EIR, Appendix C-4) prepared to address public comments on the Draft EIR. No other CEQA-related issues are raised, and no revisions are needed in the Final EIR. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-60**

The commenter requests that the results of the health risk model for each pollutant analyzed be explained in plain language in the general description of the pollutants considered and methodology. The model runs are included in Appendix C-2 Health Risk Assessment in the Draft EIR and as required under CEQA, are analyzed and explained in Section 4.3, Air Quality in the Draft EIR. Refer to response to Comment E-36-58 for a discussion of the results of the HRA and the technical nature of the information presented in the Draft EIR. Please also refer to the response to Comments A-3-18 and E-36-5 regarding the findings of the supplemental health risk assessment (Final EIR, Appendix C-4) prepared to address public comments on the Draft EIR. No other CEQA-related issues are raised, and no revisions are needed in the Final EIR. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-61**

In response to the conservative HRA assumptions regarding project operations of 24 hours per day, 7 days per week, 52 weeks per year, the commenter states restricting hours of operations would lessen air, light and noise impacts if nighttime hours were limited. It is unlikely that all future tenants on the

Development Site would operate around the clock, as was modeled. If this is indeed the case, it would still be an accurate representation of the health risks for the Development Project which were determined to be less than significant. Refer to response to Comment E-36-58 for a discussion of the results of the HRA. Please also refer to the response to Comments A-3-18 and E-36-5 regarding the findings of the supplemental health risk assessment (Final EIR, Appendix C-4) prepared to address public comments on the Draft EIR. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-62**

The commenter requests that Appendix A tables for the HRA showing exhaust emissions rates for daily project truck traffic along each stretch of road by vehicle category be explained in plain language. The model runs are included in Appendix C-2 Health Risk Assessment in the Draft EIR and as required under CEQA, are analyzed and explained in Section 4.3 Air Quality in the Draft EIR. Refer to response to Comment E-36-58 for a discussion of the results of the HRA. Please also refer to the response to Comments A-3-18 and E-36-5 regarding the findings of the supplemental health risk assessment (Final EIR, Appendix C-4) prepared to address public comments on the Draft EIR. No other CEQA-related issues are raised, and no revisions are needed in the Final EIR. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-63**

The commenter requests that the results of Toxic Air Contaminants (TACs) modeling be summarized in plain language so that the harmfulness of these emissions can be easily understood. While the model runs are included in Appendix C-2 Health Risk Assessment in the Draft EIR and the HRA in Appendix C-2 discusses how the modeling was conducted and the results in technical terms, as required under CEQA, these results are explained in Section 4.3, Air Quality in the Draft EIR. Per Section 4.3.1.1 of the Draft EIR, “Some examples of TACs include benzene, butadiene, formaldehyde, and hydrogen sulfide. Potential human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity.” The model runs are included in Appendix C-2 Health Risk Assessment in the Draft EIR and as required under CEQA, are analyzed and explained in Section 4.3 Air Quality in the Draft EIR. Refer to response to Comment E-36-58 for a discussion of the results of the HRA. Please also refer to the response to Comments A-3-18 and E-36-5 regarding the findings of the supplemental health risk assessment (Final EIR, Appendix C-4) prepared to address public comments on the Draft EIR. No other CEQA-related issues are raised, and no revisions are needed in the Final EIR. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

**Response to Comment E-36-64**

The commenter states that HRA traffic data shows 15,327 daily car trips and 6,553 daily truck (2-4 axel) truck trips exposing residents to diesel exhaust from these trips. While it is true that the Development Project would add numerous vehicle and truck trips to the vicinity, according to Appendix C-2 HRA, and Appendix C-4 Supplemental Memorandum with TRUs & HRA, impacts from

DPM from truck diesel exhaust would be less than significant. Refer to response to Comment D-6-2 for additional discussion regarding the updated HRA analysis and impacts.

**Response to Comment E-36-65**

The comment requests that the AERMOD an HARP data be summarized in understandable terms. The Modeling and technical report information is provided as appendices to the EIR. The data contained in those appendices is summarized and explained in the Draft EIR, per CEQA requirements. The comment does not raise any CEQA issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

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'24 JAN 30 3:29PM

Elenor Williams
4811 Bermuda Dunes Ave
Banning Ca
San Gabes.
I live on the corner
across from the RV
parking
Trucks, people walking
by look over my
fence, noise traffic
sliders from Bedroom
bath and Kitchen
face north wall
I have lived here
for ten years
My husband died
in the year 2021
I am by myself
Elenor Williams

E-37-1

## Response to Letter E-37

Winoa Williams
January 30, 2024

### Response to Comment E-37-1

The comment states non-specific concerns about truck and traffic noise. Please refer to the response to Comment E-2-1. The comment is noted and will be provided to the City staff and elected officials for consideration. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR and no further response is required.

**From:** Ron Roy
**To:** Adam Rush
**Subject:** Sunset Crossroads Specific Plan Comment Letter
**Date:** Tuesday, January 30, 2024 5:09:01 PM
**Attachments:** Ron Roy Kim Floyd Sunset Crossroads Comment Letter NOP March 1 2021.pdf

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Attn: Adam Rush, M.A. AICP
Community Development Director

From: Ron Roy, Beaumont Resident
35161 Hogan Dr. Beaumont, Ca. 92223

Re: Sunset Crossroads Project Draft Environmental Impact Report
Public Notice Date: December 15,2023

Dear Mr. Rush.

Please include the following comment letter which was submitted in 2021 during the NOP scoping period, as a comment letter for this DEIR.

Thank you
Ron Roy

March 1, 2021

City of Banning
Community Development Department
c/o Sandra Calderon, Project Coordinator
99 E. Ramsey Street
Banning, Ca. 92220
Email addresses for online public comments:
scalderon@banningca.gov or arush@banningca.gov

Dear Ms. Calderon:

Re: Notice of Preparation (NOP) for the for the Draft Environmental Impact Report for the Sunset Crossroads Project (SCH #2021020011).

We appreciate this opportunity to comment on this NOP. We have several concerns and questions we want addressed in the Draft Environmental Impact Report (DEIR), but probably most of our concerns are about Global Warming, Climate Change, Greenhouse Gas Pollution and Air Pollutant emissions. These concerns can be read below and we expect this project to do everything possible to eliminate and mitigate these problems in our non-attainment area. E-38-1

After reviewing the NOP scoping meeting held February 18, 2021 we realized that more needed to be done. Notice of the Scoping meeting was inadequate. E-38-2

The city failed to adequately notify the public about the NOP scoping meeting, the NOP contents, and the EIR deadlines and requirements. E-38-3

The Pandemic drastically curtailed public participation in the public scoping meeting. E-38-4

The City of Banning Website did not and does not provide adequate or reasonable public access to the notice of the NOP Scoping meeting, the NOP, the NOP presentation. There was no announcement of the meeting or the NOP on the city websites homepage. No summary, no copy of the NOP notice, no meeting information, including phone or visual login. Moreover, after clicking on Agendas and Minutes, the Sunset Crossroads project is not listed, whereas other projects (Butterfield Specific Plan) and agendas are listed. The view within Agenda and Minutes link/page is very poorly constructed, focusing on archived material rather than current events. It does not show a calendar of meetings, of any kind. E-38-5

Moreover, the Sunset Crossroads scoping meeting failed to provide proper presentation, discussion, and content of the EIR. The Presentation itself was deeply flawed. During introduction Scoping Meeting Comments and the Introduction and Description of the Project Site, the Powerpoint Presentation misled the audience with a picture of a location E-38-6

that is not a part of the project. Also the wrong slides were repeatedly displayed throughout the presentation which confused the audience. Examples follow below: Also, the proposed realignment of Sun Lakes Blvd. is not a part of the project. Sun Lakes Blvd capacity and safety conditions will be severely impacted by the additional traffic and pollution of the proposed projects commercial, industrial, logistics, and other uses.

E-38-6 Cont

During the presentation of the proposed project areas, the presenter used the wrong slide, instead showing the existing conditions of the area rather than the proposed project area (color-coded and approximately 19 project areas). So, a viewer could easily be misled that the project would, in fact, be preserving the existing natural open space as depicted in an arial photo, rather than the developed land per the color-coded project areas.

E-38-7

Again, wrong slides were used when describing the square footages of the proposed logistical/industrial uses and project actions.

E-38-8

Even at the end of the presentation, the Community Development director commented that the slides were not visible.

The visual presentation was, in fact, one of the poorest we have ever witnessed, so egregiously inaccurate, and misleading that the Scoping meeting needs to be rescheduled to present a fair and accurate portrait and portrayal of the project, its impacts and the process.

E-38-9

For a project this size, arguably the largest commercial/industrial project in the history of the city, it is deeply troubling, and undemocratic that there were zero members of the public in the auditorium or online during the scoping meeting. This is most likely due to the pandemic prohibitions or discouragements of traditionally held public meetings, and flawed notification process.

E-38-10

Environmental justice requires informed "public participation." What is described above does not qualify. This project has been considered for a number of years. The pandemic has severely depressed public participation. A growing body of consensus indicates that the pandemic should be largely under control by early 2022. The initiation of the EIR process should wait until the community can physically and safely attend the scoping meeting at city hall. The recent attempt to do this remotely has failed drastically. Moreover, the majority of Banning's population are people of color: Latino/Hispanic origin, African American, Native American (project very near Morongo Indian Reservation), and Asian. How can you truly have public participation without all documents related to the Sunset Crossroads available in both English and Spanish? The same is true for all meetings. There must be enough headsets and interpreters for everyone to know what is said by everyone else at all meetings related to the Sunset Crossroads Project. In the Kettleman City case, the California Superior Court ruled that "meaningful involvement in the CEQA process was effectively precluded by the absence of Spanish translations."

E-38-11

E-38-12

E-38-13

We strongly recommend that you begin the NOP process anew because the City's failure to translate crucial documents and meetings has effectively excluded many residents from

E-38-14

exercising their statutory right to participate in the decision-making process. We also expect all documents related to the Sunset Crossroads to avoid highly technical language and to make them comprehensible to the average Banning Area resident.

E-38-14 Cont

We also believe the NOP document provided to the public did not provide enough information and was misleading. The information does not "provide sufficient information describing the project and the potential environmental effects to enable responsible agencies to make a meaningful response. At a minimum, the information shall include: (c) Probable environmental effects of the project." (CA Code of Regulation EIR Process Section 15082)

E-38-15

The NOP the City provided does not address potential environmental impacts or even an easily understood location and number of homes that will be impacted. The Sun Lakes retirement project is adjacent to the project. Yet no discussion of the project impacts on this large retirement community are included. Sun Lakes is an exclusive senior community with its entire population representing sensitive receptors subject to adverse health effects from diesel exhaust and other forms of air pollution. (1)

E-38-16

E-38-17

The NOP does not address the impacts on traffic, national security concerns arising from the Pass corridors "region of national security designation", large scale truck traffic, diesel or particulate pollution. Impact on nearby sensitive receptor communities (such as Sun Lakes retirement), Banning Airport, nearby environmental holdings, etc.

E-38-18

For all of the above reasons, the we strongly believes that the Sunset Crossroads NOP process needs to be improved, then recirculated to all agencies and organizations, as well as to members of the public. We also believe that for such a large and regionally significant project that all interested parties need more than 30 days to submit comments.

E-38-19

The DEIR must have a traffic analysis of Banning's streets and, probably, those of neighboring cities where there is a blockage on I10 and local arterials. The traffic analysis needs to show what improvements will be made to make affected roads safer? Or to handle an explosive growth of big-rig truck traffic, caused by thousands of trucks on local roads each day. Since the majority of warehouses have peak times during the year—such as getting ready for the opening of schools and the holiday season—the traffic analysis as well as all others such Air Quality/ Greenhouse Gas must show the worst-case scenario.

E-38-20

Also the project does not take into consideration, how it will interact with alternative methods of transportation, such as rail, bus, cycling and pedestrian (see: Caltrans Alternative Transportation Program: https://dot.ca.gov/programs/local-assistance/fed-and-state-programs/active-transportation-program) , including proposed transit projects that will traverse or be near the project site. These transit projects include the Coachella Valley San Gorgonio Pass Corridor Rail [1]Service (https://www.rctc.org/projects/coachella-valley-san-gorgonio-pass-corridor-rail-corridor-service-project/ see also:

E-38-21

https://railroads.dot.gov/environment/environmental-reviews/coachella-valley-san-gorgonio-pass-corridor-investment-plan), Sunline/Pass Transit Commuter Bus Service, Amtrak thruway, and proposed alternative bike/pedestrian transit route through the project site. These alternative transit methods have been shown to significantly reduce, traffic congestion, air and noise pollution, and increase safety, and public health (1.) E-38-21 Cont

The DEIR must address the impact of the project on the San Gorgonio Pass Area of Critical Infrastructure (see: https://www.cisa.gov/sites/default/files/publications/niac-transportation-resilience-final-report-07-10-15-508.pdf ) E-38-22

The DEIR must include those projects that will add to the cumulative impacts of the Sunset Crossroads. This must include not only the projects approved but not yet built, but also those that are in the pipeline but not yet approved. These projects cannot be limited to ones within Banning but must include all those in neighboring communities/lands that will impact the same road systems and air quality that the Sunset Crossroads will impact, or the DEIR will be inadequate. E-38-23

The Sunset Crossroads will have significant impacts to nearby wildlife and nature areas. The DEIR must show what type of buffer Sunset Crossroads will provide to protect these natural resources. There are several threatened/endangered species near the project site, as well as others that fall under the protection of Western Riverside County's Multi-Species Habitat Conservation Plan (MSHCP) (see: https://www.wrc-rca.org )– both plants and animals (see: https://rctlma.org/Portals/0/mshcp/volume2/mammals.html) Please note that the Pass Area cities of Calimesa, Beaumont, and Banning are Member Agencies of the WRC-RCA (see: https://www.wrc-rca.org/about-rca/members/) The DEIR must also show the impact the project will have on the Whitewater River Watershed From https://www.rcwatershed.org/2020/06/the-story-of-the-whitewater-river-watershed/ see (https://www.google.com/maps/d/u/0/viewer?mid=1PXdmz0PCytUm-N96RKyB1JxPJE0&ll=33.74211710407155%2C-116.46735726562503&z=9 ) and the Coachella Valley Multihabitat Species Conservation Plan-CVMHCP (see: https://cvmshcp.org). The toxic diesel emissions will float above these areas and settle on the habitat, plants, animals and ponds. The DEIR will be inadequate if it does not explain the impacts of these toxic emissions on the habitat, plants, animals and water resources of these areas because environmental stresses impact each species in a different way, the DEIR must explain how toxic diesel emissions and other environmental stressors such as light and noise impact each of the species covered by the MSHCP as well as the Stephens Kangaroo Rat, pocket mouse, burrowing owl for at least a ten-year period. E-38-24 E-38-25 E-38-26 E-38-27

The DEIR must show all county and city trails within five miles of the project and how the project will facilitate their interconnection as well as where it will cause a breakage in the trail system. How will the project accommodate public transit and make sure the proper decision makers provide it for this area of the city? This is a major requirement to gain points under LEED certification, and Sunset Crossroads must make sure that the workers have easy access to this form of transportation. Bike trails also need to be totally integrated into the Sunset Crossroads Specific Plan. They should be Class 1 bike paths to protect the riders from the 18-wheelers. They should also be integrated into any regional E-38-28 E-38-29 E-38-30 E-38-31

plans as well as a slowly improving City plan. (See Caltrans Active Transportation: https://dot.ca.gov/programs/local-assistance/fed-and-state-programs/active-transportation-program) E-38-31 Cont

Since building near sensitive receptors is considered unacceptable because of the toxic diesel emissions, the DEIR must analyze the health impacts on the well-being of warehouse workers within the Sunset Crossroads Specific Plan. E-38-32

The DEIR needs to show how building all warehouses to each level of LEED certification (certified through Platinum) reduces both the short-term and long-term environmental impacts of the project. E-38-33 The DEIR also needs to give a definition of "modern high-cube logistics facilities" to be used throughout the Specific Plan. E-38-34 Any economic analysis must include the efforts which are underway to establish mega-warehouse complexes, in San Bernardino Valley, off Interstate 15 in the Adelanto and Barstow areas in San Bernardino County; E-38-35 The cost of improving the infrastructure to an acceptable Level of Service for the public needs to be factored into the same economic analysis; and the fact that a new railroad spur might have to be built, and additional freight rail traffic will impact the UPRR transcontinental rail corridor through the San Gorgonio Pass. E-38-36

The DEIR must show how toxic runoff from the project will be handled. E-38-37 The document must first identify what toxic runoff will be expected from warehouses and quantify it. The project needs to show what will be its impact on the water supply, sustainability, groundwater, runoff, pollution and/or diversion or division of the flow of water through 2 major watersheds that abut near or on the project site: The San Gorgonio headwaters of the Santa Ana River Watershed (see: https://www.waterboards.ca.gov/santaana/ and https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/docs/maps/RWQCB_BPmap_BUandGWMGMTZNS.pdf) and the Colorado River Basin (see: Colorado River Basin Regional Water Quality Control Board) https://www.waterboards.ca.gov/coloradoriver/ and https://www.waterboards.ca.gov/coloradoriver/about_us/docs/rb7boundary.pdf, the San Gorgonio Pass Subbasin(see https://www.sgpgsas.org , the Beaumont Basin: (https://beaumontbasinwatermaster.org) and the Whitewater River Watershed (see: http://content.rcflood.org/NPDES/WhitewaterWS.aspx). E-38-38 The DEIR needs to explain the problems presented by this as well as the solution. The reliance of our area on ground water is becoming more and more evident. What will the project do to avoid decreasing the amount of ground water these acres within the Specific Plan area presently provide? The DEIR needs to explain the net decrease of ground water as a result of the Sunset Crossroads Project. We expect the city and the project developer via the DEIR to have proof that there will be at least a 20-year supply of water -- after build-out E-38-39

Your NOP should have mentioned that the consumption of electricity by all these warehouses "would generate air pollutant emissions." We expect all Sunset Crossroads buildings to match or exceed the Gold LEED certification. E-38-40 Through the installation of solar panels and other LEED ideas, you could avoid generating air pollutants with the electricity you consume. The DEIR must also explain what other aspects of the project will be "green" and if they are going to be required or just included to the "greatest extend possible," which E-38-41

mean very little. Agreeing to require that at least 90% of your off-road construction equipment meet Tier III standards would also significantly help our non-attainment city and county. Continuing to pave over prime agricultural lands as well as those of local and state importance must be mitigated. Having locally grown products also cuts down on the climate change problems mentioned above and below. Developers in the area have donated to the Riverside Land Conservancy to help mitigate for the loss of agricultural lands and natural areas and open space. Please consider how your project will seriously mitigate your impacts to agriculture and the Pacific Flyway.

E-38-41 Cont

E-38-42

You should also make sure your parking provides ample reserved spaces for several form of cars using alternative fuels. The parking areas also need to be made of porous material to help with ground water recharge and to lessen run off.

E-38-43

E-38-44

Since some of Sunset Crossroads truck routes will likely pass by schools and their playgrounds, the we expect the NOP to explain what requirements will be placed on the tenants as well as the truckers who will deliver/pickup products for your warehouse to avoid this very toxic situation. How will Sunset Crossroads increase the toxic level of any school within 1,500 feet of designated truck routes within Banning, Cabazon and nearby cities? The project's distance from homes needs to be easily understood as well as all the paths trucks could take to the warehouse. How will you protect the workers from breathing toxic diesel emissions throughout their workday? What equipment, including gardening equipment, will you make sure is electric instead of diesel or gasoline in order to lessen pollution and better protect the workers? The DEIR needs to explain how noise barriers used during the construction and use of the warehouse could lessen impacts identified in the Initial Study. Impacts to our local streets as well as our very crowded freeways need to be explained so the average citizen will understand. The DEIR -- not just appendices -- needs to show the length of trips and the routes the diesel trucks will be taking when driving to and from the warehouse. We need to know the maximum number of trucks that will use these warehouses each workday and not just after the first year, but when the warehouse is being used to its maximum capacity. Also, what kind of 100% renewable (Ex: electricity, hydrogen) fueling/refueling, recharging infrastructure will be built on-site to support the heavy duty truck fleets going in-and-out of the facilities.

E-38-45

E-38-46

E-38-47

E-38-48

E-38-49

The land should not be disked for at least six months prior to doing a Burrowing Owl survey. Otherwise, many will believe you are just making it difficult on this special animal as well as making it more likely that it will be listed as endangered. We believe the DEIR will be inadequate unless our concerns and issues found throughout this letter are thoroughly addressed within the DEIR document. The same precautions should apply to other threatened or endangered species known to be found in the project area.

E-38-50

**I. THE DEIR MUST ADEQUATELY ADDRESS THE IMPACTS OF GLOBAL WARMING AND CLIMATE CHANGE**

As a potential significant impact, the Draft EIR must thoroughly evaluate alternatives and mitigation measures that would reduce the Project's greenhouse gas emissions. Curbing greenhouse gas emissions to limit the effects of climate change is one of the most urgent challenges of our time. Fortunately, the California Environmental Quality Act ("CEQA"), Cal. Pub. Res. Code §§ 21000 et seq., 14 Cal. Code Regs. § 15000 et seq. ("Guidelines"), set forth a clear and mandatory process to address the Project's greenhouse gas and global warming impacts. This letter sets forth how this analysis should be completed. E-38-51

A. THE DEIR MUST ADEQUATELY SET FORTH THE THREAT OF GREENHOUSE GAS POLLUTION AND GLOBAL WARMING

The DEIR should discuss the grave threats posed by global warming to California and the world. Current scientific consensus on climate change has now determined that the link between greenhouse gas emissions and global warming is highly certain. In California, elected leaders, through Executive Order S-03-05 and the California Global Warming Solutions Act of 2006 (AB 32), have also squarely linked greenhouse gases with global warming. E-38-52

In order to conform to CEQA's informational mandates and properly inform the public and decision makers of the significance of the Project's contribution to greenhouse gases, the DEIR must first adequately discuss the threat posed by greenhouse gas emissions and avoid minimizing or discounting the severity of global warming's impacts. See Guidelines § 15151. See, e.g., Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal. ("Laurel Heights I"), 47 Cal.3d 376, 392 (1988) (EIR is intended "to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action."); Guidelines § 15151 (requiring an EIR be detailed, complete, and reflect a good faith effort at full disclosure). A discussion of global warming impacts need not be lengthy, but should, at a minimum, convey the magnitude of the threat posed by global warming to humans and the environment. For the City's convenience, a scientific background on global warming and the specific threats posed to California is provided below. E-38-53

The IPCC now states with "very high confidence" that most of the warming observed over the past 50 years is the result of human generation of greenhouse gases, including carbon dioxide, methane, and nitrous oxide[2] (IPCC 2007a). The rapid warming observed since the 1970s has occurred in a period when the increase in greenhouse gases has dominated over all other factors (IPCC 2007a). The largest known contribution to global warming is from carbon dioxide (IPCC 2007a). Fossil fuel combustion is responsible for more than 75% of human caused carbon dioxide emissions with the remainder due to land-use change (primarily deforestation) (IPCC 2007a). The global atmospheric concentration

[2] IPCC, 2007: Summary for Policymakers, in CLIMATE CHANGE 2007: THE PHYSICAL SCIENCE BASIS,
CONTRIBUTION OF WORKING GROUP I TO THE FOURTH ASSESSMENT REPORT OF THE INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE at 4 (Susan Solomon et al. eds., Cambridge Univ. Press 2007) at 2-3. "Very high confidence" is defined at "at least a 9 out of 10 chance of being correct." Id. at 3 n.7.

of carbon dioxide has increased from a pre-industrial value of about 280 parts per million (ppm) to 379 ppm in 2005, a level that has not been exceeded during the past 650,000 years (during which carbon dioxide concentrations remained between 180 and 300 ppm). (IPCC 2007a; Canadell et al. 2007). In 2006, carbon dioxide concentrations reached a new high of 381.2 ppm (World Metrological Organization 2007). As greenhouse gas concentrations increase, more heat reflected from the earth's surface is absorbed by these greenhouse gases and radiated back into the atmosphere and to the earth's surface.[3] Consequently, the higher the level of greenhouse gas concentrations, the larger the degree of warming experienced.

E-38-53 Cont

At current growth rates and continued reliance on fossil fuels, atmospheric concentrations of carbon dioxide would likely exceed 1,000 ppm by the end of the century, resulting in an average global temperature increase of more than 5°C (United Nations Foundation & Sigma XI 2007). This is equivalent to the change in temperature since the last ice age – an era in which Europe and North America was under more than one kilometer of ice (United Nations Foundation & Sigma XI 2007). The growing consensus among climate scientists is that the threshold for dangerous climate change, whereupon a potential "tipping point" is reached and ecological changes become dramatically more rapid and out of control, is estimated at a temperature increase of around 2°C from pre-industrial levels, or an atmospheric concentration of carbon dioxide of approximately 450 ppm (United Nations Foundation & Sigma XI 2007; IPCC 2007c). In 2006, Dr. James E. Hansen, Director of the NASA Goddard Institute for Space Studies, and NASA's top climate scientist, stated: "In my opinion there is no significant doubt (probability > 99%) that . . . additional global warming of 2° C would push the earth beyond the tipping point and cause dramatic climate impacts including eventual sea level rise of at least several meters, extermination of a substantial fraction of the animal and plant species on the planet, and major regional climate disruptions" (Hansen et al. 2006). More recently however, given the recent unpredicted and extreme rate of loss of arctic ice observed in 2007, Dr. Hansen concluded that "the safe upper limit for atmospheric CO2 is no more than 350 ppm" (McKibben 2007). Moreover, according to Hansen, just 10 more years of "business-as-usual" global emissions will make it difficult, if not impossible, to keep atmospheric concentrations of greenhouse gases at levels necessary to avoid a temperature increase above 2°C (Hansen et al. 2007).

E-38-53 Cont

Keeping the climate within the 2°C threshold requires significant reductions in the world's greenhouse gas emissions. To reach this objective, it is estimated that developed countries would have to target an emissions peak between 2012 and 2015, with 30 percent cuts by 2020 and 80 percent cuts from 1990 levels by 2050 (United Nations Foundation & Sigma XI 2007). In recognition of need for immediate action, California has committed itself though Executive Order S-3-05 and the California Global to reduce the state's emissions to 1990 levels by 2020 and by 80% reductions from 1990 levels by 2050. Ca. Health & Safety Code § 38550; Cal. Executive Order S-3-05 (2005).

[3] Greenhouse gases have a warming effect because, when solar radiation is reflected by the earth, greenhouse gases capture this thermal radiation and reradiate it back to earth, much like the effect of a common garden greenhouse resulting in the "greenhouse effect."

The costs of taking no action to reduce greenhouse gas emissions far outweigh the costs of stabilizing emissions. The Stern Review of the Economics of Climate Change, a comprehensive report commissioned by the British government, recently concluded that allowing current emissions trajectories to continue unabated would eventually cost the global economy between 5 to 20 percent of GDP each year within a decade, or up to $7 trillion, and warned that these figures should be considered conservative estimates (Stern 2006). By contrast, measures to mitigate global warming by reducing emissions were estimated to cost about one percent of global GDP each year, and could save the world up to $2.5 trillion per year (Stern 2006). The Stern Report determined that if no action is taken to control greenhouse gas emissions, each ton of CO2 emitted causes damage worth at least $85 (Stern 2006).

E-38-53 Cont

ii. Impacts to California from Global Warming

Climate change poses enormous risks to California. Scientific literature on the impact of greenhouse gas emissions on California is well developed.[4] The California Climate Change Center ("CCCC") has evaluated the present and future impacts of climate change to California and the project area in research sponsored by the California Energy Commission and the California Environmental Protection Agency (Cayan et al. 2007). The severity of the impacts facing California is directly tied to atmospheric concentrations of greenhouse gases (Cayan et al. 2007; Hayhoe et al. 2004). According to the CCCC aggressive action to cut greenhouse gas emissions today can limit impacts, such as loss of the snow pack to 30%, while a business as-usual approach could result in as much as a 90% loss of the snowpack by the end of the century. As aptly noted in a report commissioned by the California EPA: Because most global warming emissions remain in the atmosphere for decades or centuries, the choices we make today will greatly influence the climate our children and grandchildren inherit. The quality of life they experience will depend on if and how rapidly California and the rest of the world reduce greenhouse gas emissions (Cayan et al. 2007).

E-38-54

Some of the types of impacts to California and estimated ranges of severity – in large part dependent on the extent to which emissions are reduced – are summarized as follows:

- A 30 to 90 percent reduction of the Sierra snowpack during the next 100 years, including earlier melting and runoff.
- An increase in water temperatures at least commensurate with the increase in air temperatures.
- A 6 to 30 inch rise in sea level, before increased melt rates from the dynamical properties of ice-sheet melting are taken into account.
- An increase in the intensity of storms, the amount of precipitation and the proportion of precipitation as rain versus snow.
- Profound impacts to ecosystem and species, including changes in the timing of life events, shifts in range, and community abundance shifts. Depending on the timing

[4] Additional reports issued by California agencies are available at http://www.climatechange.ca.gov, and IPCC

and interaction of these impacts, they can be catastrophic.

- A 200 to 400 percent increase in the number of heat wave days in major urban centers.
- An increase in the number of days meteorologically conducive to ozone (O3) formation.
- A 55 percent increase in the expected risk of wildfires (Cayan et al. 2007).

By providing details as to the ranges of proposed impacts, and indicating that the higher-range of impact estimates are projected if greenhouse gas emissions continue to increase under a "business as usual" scenario, decision-makers and the public will be better informed of the magnitude of the climate crisis and the urgency with which it must be addressed.

E-38-54

Finally, the DEIR should also include a brief discussion of other laws to address climate change, including California's mandate to reduce emissions to 1990 levels by 2020 and goal of further reducing emissions to 80% below 1990 levels by 2050. Achievement of state mandated emissions reductions will be severely impeded if agencies across the state continue to approve new projects without incorporating measures to reduce the added emissions created by these.

E-38-55

B. The DEIR the Project Must Include an Inventory and Analysis of the Project's Projected Greenhouse Gas Emissions

The first step in determining a project's greenhouse gas pollution impact is to complete a full inventory of all emissions sources. In conducting such an inventory, all phases of the proposed project must be considered. See 14 Cal. Code Regs. § 15126. A basic requirement of CEQA is that "[a]n EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." 14 Cal. Code Regs. § 15151. The greenhouse gas inventory for a project must include a complete analysis of all of a project's substantial sources of greenhouse gas emissions, from building materials and construction emissions to operational energy use, vehicle trips, water supply and waste disposal.

E-38-56

A greenhouse gas inventory for the project must include the project's direct and indirect greenhouse gas emissions. See 14 Cal. Code Regs § 15358(a)(1) (Indirect or secondary effects may include effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.). Consequently, a complete inventory of a project's emissions should include, at minimum, an estimate of emissions from the following:

- Fugitive emissions of greenhouses gases, such as methane, from the proposed project;
- Emissions during construction from vehicles and machinery;
- Manufacturing and transport of building materials;

E-38-56 Cont

- Electricity generation and transmission for the heating, cooling, lighting, and other energy demands of the project;
- Water supply and transportation to the project;
- Vehicle trips and transportation emissions generated by the project;
- Wastewater and solid waste storage or disposal, including transport where applicable; and
- Outsourced activities and contracting.

Methodologies are readily available to inventory the emissions from the proposed project. In its recent white paper, CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act (Jan. 2008), the California Air Pollution Control Officers Association (CAPCOA) set forth methodologies for analyzing greenhouse gas pollution (CAPCOA 2008) The California Office of Planning and Research ("OPR") has also released technical guidance on the preferred approach for analyzing greenhouse gas emissions and climate change entitled "Technical Advisory, CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act Review" (California OPR 2008). OPR also provides references to methodologies to quantify greenhouse gas emissions. In addition to the methodologies set forth by CAPCOA and OPR, ICLEI's Clean Air/Climate Protection (CACP) software allows cities to calculate emissions reductions, track and quantify emission outputs, and develop emissions scenarios to inform the planning process.[5]

As noted in the ICLEI Climate Action Handbook, "Expertise in climate science is not necessary" to conduct an emissions inventory and compare this inventory against a forecast year (ICLEI).

"A wide range of government staff members, from public works to environment and facilities departments, can conduct an inventory" (ICLEI). ICLEI also provides technical assistance and training to local government using the CACP software. It is incumbent on the City to "disclose all it can" about project impacts and educate itself on methodologies that are available to measure project emissions. Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs ("Berkeley Jets"), 91 Cal. App. 4th 1344, 1370 (2001).

E-38-56 Cont

As with any other project under CEQA, the baseline used for analyzing the impacts of a project is the existing on the ground environmental conditions at the time of the NOP. See Environmental Planning & Information Council v. County of El Dorado (EPIC), 131 Cal.App.3d 350, 355 (1982) (effect of general plan amendment must be compared against actual environment, not assumptions in existing general plan). Accordingly, the DEIR

[5] ICELI's Clean Air/Climate Protection software is available at http://www.cacpsoftware.org/ ICLEI-Local
Governments for Sustainability is an international association of more than 650 local governments. Cities, counties, towns and villages around the world are members of ICLEI. ICLEI's mission is to improve the global environment through local action. On the issue of global warming, for example, ICLEI provides resources, tools, peer networking, best practices, and technical assistance to help local governments measure and reduce greenhouse gas
emissions in their communities.

should compare emissions from existing conditions with those that would result from the development of theproject, as well as those that would occur under any proposed alternative scenarios. Because the Project envisions development over a long period, the EIR should also provide data on the trajectory for emissions in the planned community and under each proposed alternative in five-year increments. Without a complete inventory, the DEIR cannot adequately inform the public and decision-makers about the Project's impacts. Similarly, without a complete inventory and analysis of greenhouse gas emissions that will result from the project, there is simply no way that

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The EIR can then adequately discuss alternatives, avoidance, and mitigation measures to reduce those impacts.

C. THE DEIR MUST ADDRESS THE IMPACT GLOBAL WARMING WILL HAVE ON THE PROJECT

California's temperatures are expected to rise "dramatically" over the course of this century (Cayan 2007). These factors will impact the planned project, as well as exacerbate its own environmental impacts.

E-38-57

The rise in temperatures resulting from global warming will create a more conducive environment for air pollution formation (Cayan 2007). This will intensify the adverse effects the proposed project will already have on air quality in the project area and threaten residents' health (Cayan 2007). Significantly for the state, as well as the project area, is global warming's impact on water supply. The IPCC specifically identified the American West as vulnerable, warning, "Projected warming in the western mountains by the mid-21st century is very likely to cause large decreases in snowpack, earlier snow melt, more winter rain events, increased peak winter flows and flooding, and reduced summer flows" (IPCC 2007b). Recently, researches found that an increase in atmospheric greenhouse gases has contributed to a "coming crisis in water supply for the western United States" (Barnett 2008). Using several climate models and comparing the results, the researches found that "warmer temperatures accompany" decreases in snow pack and precipitation and the timing of runoff, impacting river flow and water levels (Barnett 2008). These researchers concluded with high confidence that up to 60 percent of the "climate related trends of river flow, winter air temperature and snow pack between 1950-1999" are human- induced. (Barnett 2008). This, the researchers wrote, is "not good news for those living in the western United States" (Barnett 2008).

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E-38-59

The California Center on Climate Change has also recognized the problem global warming presents to the state's water supply and predicts that if greenhouse gas emissions continue under the business-as-usual scenario, this snowpack could decline up to 70-90 percent, affecting winter recreation, water supply and natural ecosystems (Cayan 2007). Global warming will affect snowpack and precipitation levels, and California will face significant impacts, as its ecosystems depend upon relatively constant precipitation levels and water resources are already under strain (Cayan 2007). The decrease in snowpack in the Sierra Nevada will lead to a decrease in California's already "over-stretched" water supplies (Cayan 2007). It could also potentially reduce hydropower and lead to the loss of

winter recreation (Cayan 2007). All of this means "major changes" in water management and allocation will have to be made (Cayan 2007).

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Thus, global warming may directly affect the City's ability to supply clean, affordable water to the residents, or force the City to change how it will utilize water, and it may also impact other activities outside the project area, such as agriculture.

Scientists indicate that climate change will also exacerbate the problem of flooding by increasing the frequency and magnitude of large storms, which in turn will cause an increase in the size and frequency of flood events (NRDC 2007). The increasing cost of flood damages and potential loss of life will put more pressure on water managers to provide greater flood protection (NRDC 2007). At the same time, changing climate conditions (decreased snowpack, earlier runoff, larger peak events, etc.) will make predicting and maximizing water supply more difficult (NRDC 2007). These changes in hazard risk and water supply availability must be considered during environmental review.

E-38-60

Water quality, in addition to water quantity and timing, will also be impacted. Changes in precipitation, flow, and temperature associated with climate change will likely exacerbate water quality problems (NRDC 2007). Changes in precipitation affect water quantity, flow rates, and flow timing (Gleick 2000). Shifting weather patterns are also jeopardizing water quality and quantity in many countries, where groundwater systems are overdrawn (Epstein 2005). Decreased flows can exacerbate the effect of temperature increases, raise the concentration of pollutants, increase residence time of pollutants, and heighten salinity levels in arid regions (Schindler 1997).

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These are only examples of how global warming will impact the proposed project and intensify the environmental impacts the project will already have. It is not an exhaustive list.

Thus, when assessing the impact of the Project on air quality, water supply, flood hazards, and biological resources, the EIR must take into account global warming. To ignore the impact of global warming on the Project and the resources impacted by the Project would significantly understate Project impacts.

E-38-62

D. THE PROJECT'S GREENHOUSE GAS IMPACTS ARE CLEARLY SIGNIFICANT

The greenhouse gas emissions generated by a project of this size and scope will have a clearly significant cumulative impact. An impact is considered significant where its "effects are individually limited but cumulatively considerable." Guidelines § 15065(a)(3). Climate change is the classic example of a cumulative effects problem; emissions from numerous sources combine to create the most pressing environmental and societal problem of out time. Ctr. For Biological Diversity, 508 F.3d 508, 550 (9th Cir. 2007) ("the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct."); Kings County Farm Bureau v. City of

E-38-63

Hanford, 221 Cal. App. 3d 692, 720 (1990) ("Perhaps the best example [of a cumulative impact] is air pollution, where thousands of relatively small sources of pollution cause a serious environmental health problem."). While a particular project's greenhouse gas emissions represent a fraction of California's total emissions, courts have flatly rejected the notion that the incremental impact of a project is not cumulatively considerable because it is so small that it would make only a de minimis contribution to the problem as a whole. Communities for a Better Environment v. California Resources Agency. 103 Cal.App.4th 98, 117 (2002); see also Kings County Farm Bureau, 221 Cal. App. 3d at 720 ("[p]erhaps the best example of [a cumulative impact] is air pollution, where thousands of relatively small sources of pollution cause a serious environmental health problem."). In addition. there is nothing speculative about the fact that higher levels of greenhouse gas pollution will lead to greater impacts, which is why the State of California has prioritized greenhouse gas pollution reductions under AB 32. Moreover, in the analogous context of the National Environmental Policy Act (NEPA), the Ninth Circuit has already rejected the argument that "global warming is too speculative to warrant NEPA analysis." Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin., 508 F.3d at 554.

E-38-63 Cont

In addition, lack of established significance thresholds does not excuse an agency from its obligation under CEQA to determine the significance of a Project's impacts. CEQA routinely calls for an agency to evaluate impacts in the absence of thresholds or to exercise its individual discretion in determining the significance of an impact. See, e.g., Protect the Historic Amador Waterways, 116 Cal. App. 4th at 1111 (agency required to assess potential impact not listed in CEQA checklist). The development of significance thresholds is "encouraged" and not a prerequisite for an impact analysis. Guidelines § 15064.7. Indeed, as noted in the CAPCOA white paper on CEQA and Climate Change, "[t]he absence of a threshold does not in any way relieve agencies of their obligations to address GHG emissions from projects under CEQA" (CAPCOA 2008). In fact, CEQA may require additional analysis even if a project meets an adopted standard, if other evidence indicates the project may nonetheless have a significant impact. See Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners, 91 Cal.App.4th 1344, 1380-82 (2001).

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As the lead agency, CEQA requires the City to determine the significance of the Project's emissions with or without established significance thresholds. Guidelines § 15064. CAPCOA provides various means by which a lead agency can determine the significance of project emissions (CAPCOA 2008). Importantly, a universally adopted methodology is not necessary to analyze project impacts. Berkeley Keep Jets, 91 Cal.App.4th at 1370 ("the fact that a single methodology does not exist…requires the [respondent] to do the necessary work to educate itself about the different methodologies that are available."). "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data." Guidelines § 15064(b). Any determination of whether there is a fair argument that the project may have a significant impact must include the consideration of the California Global Warming Solutions Act of 2006 (AB 32), wherein the State of California recognized that "global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of

California" and required that existing levels of greenhouse gases be reduced to 1990 levels by 2020. Health & Safety Code §§ 38501(a), 38550. E-38-64 Cont

Because AB 32 establishes that existing greenhouse gas levels are unacceptable and must be substantially reduced within a fixed timeframe, any additional emissions that contribute to existing levels frustrate California's ability to meet its ambitious and critical emissions reduction mandate. Ignoring emissions from smaller sources would be neglecting a major portion of the greenhouse gas inventory. E-38-65

In accordance with the scientific and factual data, the City should adopt a zero significance threshold for the Project's greenhouse gas emissions. As noted by the Ninth Circuit in Center for Biological Diversity v. Nat'l Highway Traffic Safety Admin.:
[W]e cannot afford to ignore even modest contributions to global warming. If global warming is the result of the cumulative contributions of myriad sources, any one modest in itself, is there not a danger of losing the forest by closing our eyes to the felling of the individual trees?
508 F.3d 508, 550 (9th Cir. 2007). Accordingly, the City must unequivocally consider Project emissions to be a potentially significant impact.

E. THE DEIR MUST ANALYZE AND ADOPT ALL FEASIBLE MITIGATION MEASURES TO REDUCE THE PROJECT'S GREENHOUSE GAS EMISSIONS

In addition to thoroughly evaluating project alternatives, because it is clear that the project's greenhouse gas emissions will cumulatively contribute to global warming, "the EIR must propose and describe mitigation measures that will minimize the significant environmental effects that the EIR has identified." Napa Citizens for Honest Gov't v. Napa County Bd. Of Supervisors, 91 Cal.App.4th 342, 360 (2001). CEQA requires that agencies "mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." Pub. Res. Code § 21002.1(b). Mitigation of a project's significant impacts is one of the "most important" functions of CEQA. Sierra Club v. Gilroy City Council, 222 Cal.App.3d 30, 41 (1990). Therefore, it is the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects." Pub. Res. Code § 21002. Importantly, mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development." Federation of Hillside & Canyon Ass'ns v. City of Los Angeles, 83 Cal.App.4th 1252, 1261 (2000). E-38-66

To the extent that the project moves forward as planned, there are many mitigation measures the City can consider, as described below. This is not an exhaustive list and the EIR should explore these and all other feasible mitigation measures that will reduce the project's greenhouse gas emissions (CAPCOA 2008; California Office of the Attorney General 2008). E-38-66 Cont

1. Land Use Measures Reducing Traffic Flow

The development plan for the proposed project should incorporate public transit into the project design and should attempt to facilitate the use of public transit. (California Office of the Attorney General 2008). Additionally, the EIR should analyze ways of including pedestrian and bicycle only streets and plazas within the development and create routes that will allow residents to reach the commercial center, schools and parks by public transportation, bicycling and walking. E-38-67

2. Land Use and Energy

The EIR should consider mitigation measures that will ensure the planned community will use energy efficiently and conservatively. In doing so, it should analyze incorporating "green building" in the development. Green buildings are those buildings that lower energy consumption, use renewable energy, conserve water, harness natural light and ventilation, use environmentally friendly materials and minimize waste (Commission for Environmental Cooperation 2008). E-38-68

Buildings create environmental impacts throughout their lifecycle, from the construction phase to their actual use to their eventual destruction (Commission for Environmental Cooperation 2008). In the United States, buildings account for 40 percent of total energy use, 68 percent of total electricity consumption, and 60 percent of total non-industrial waste (Commission for Environmental Cooperation 2008). Buildings also significantly contribute to the release of greenhouse gases. In the U.S. they account for 38 percent of total carbon dioxide emissions (Commission for Environmental Cooperation 2008). More specifically, residential buildings cause up to 1,210 megatons of carbon dioxide, while commercial building create approximately 1,020 megatons (Commission for Environmental Cooperation 2008). This is because buildings require a lot of energy for their day to day operations. Most of the coal-fired power plants – one of the biggest sources of greenhouse gas emissions – slated for development in the United States will supply buildings with the energy they need. In fact, 76 percent of the energy these plants produce will go to operating buildings in the U.S. (Commission for Environmental Cooperation 2008).

Using green building techniques, however, can substantially reduce buildings' influence in increasing greenhouse gas emissions. Green buildings help reduce the amount of energy used to light, heat, cool and operate buildings and substitute carbon-based energy sources with alternatives that do not result in greenhouse gas emissions (Commission for Environmental Cooperation 2008). Currently green buildings can reduce energy by 30 percent or more and carbon emissions by 35 percent. (Commission for Environmental Cooperation 2008). The technologies available for green building are already in wide-use and include "passive solar design, high-efficiency lighting and appliances, highly efficient ventilation and cooling systems, solar water heaters, earthen/sod landscaped roofs, insulation materials and techniques, high-reflectivity building materials and multiple glazing (IPCC 2007c). Additionally, the U.S. Green Building Council (USGBC), a private, nonprofit corporation, has established a nationwide green building rating system, called E-38-68 Cont

Leadership in Energy and Environmental Design ("LEED"). The LEED standard supports and certifies successful green building design, construction and operations. It is one of the most widely used and recognized systems, and to obtain LEED certification from the USGBC, project architects must verify in writing that design elements meet established LEED goals. E-38-68 Cont

Specific mitigation for the greenhouse gas emissions generated by the Project's energy consumption include, but are not limited to:

- Analyzing and incorporating the U.S. Green Building Council's LEED (Leadership in Energy and Environmental Design) or comparable standards for energy efficient building during pre-design, design, construction, operations and management. E-38-69
- Designing buildings for passive heating and cooling, and natural light, including building orientation, proper orientation and placement of windows, overhangs, skylights, etc.; E-38-70
- Designing buildings for maximum energy efficiency including the maximum possible insulation, use of compact florescent or other low-energy lighting, use of energy efficient appliances, etc. E-38-71
- Reducing the use of pavement and impermeable surfaces; E-38-72
- Requiring water re-use systems; E-38-73
- Installing light emitting diodes (LEDs) for traffic, street and other outdoor lighting E-38-74
- Limiting the hours of operation of outdoor lighting E-38-75
- Maximizing water conservation measures in buildings and landscaping, using drought tolerant plants in lieu of turf, planting shade trees; E-38-76
- Ensure that the Project is fully served by full recycling and composting services; E-38-77
- Ensure that the Project's wastewater and solid waste will be treated in facilities where greenhouse gas emissions are minimized and captured. E-38-78
- Installing the maximum possible photovoltaic array on the building roofs and/or on the project site to generate all of the electricity required by the Project, and utilizing wind energy to the extent necessary and feasible; E-38-79
- Earthen/sod landscaped roofs can save energy, reduce neighborhood temperatures, and protect human health and regulate the effect on the temperature of underlying roof surfaces and building interiors, reducing the energy needed for building cooling and the effects of the urban heat island effect. E-38-80
- Installing solar water heating systems to generate all of the Project's hot water requirements; E-38-81
- Installing solar or wind powered electric vehicle and plug-in hybrid vehicle charging stations to reduce emissions from vehicle trips. E-38-82

3. Mitigation Related to Project Construction

- Utilize recycled, low-carbon, and otherwise climate-friendly building materials such as salvaged and recycled-content materials for building, hard surfaces, and non-plant landscaping materials; E-38-83
- Minimize, reuse, and recycle construction-related waste; E-38-84

- Minimize grading, earth-moving, and other energy-intensive construction practices; E-38-85
- Landscape to preserve natural vegetation and maintain watershed integrity; E-38-86
- Utilize alternative fuels in construction equipment and require construction equipment to utilize the best available technology to reduce emissions. E-38-87

4. Transportation Mitigation Measures

- Encourage and promote ride sharing programs through such methods as a specific percentage of parking spaces for ride sharing vehicles; E-38-88
- Create a car sharing program within the planned community; E-38-89
- Create a light vehicle network, such as a neighborhood electric vehicle (NEV) system; E-38-90
- Provide necessary facilities and infrastructure to encourage residents to use low or zero-emission vehicles, for example, by developing electric vehicle charging facilities and conveniently located alternative fueling stations; E-38-91
- Provide a shuttle service to public transit within and beyond the planned community;• Incorporate bicycle lanes and routes into the planned community's street systems. E-38-92

5. Carbon Offsets

After all measures have been implemented to reduce emissions in the first instance, remaining emissions that cannot be eliminated may be mitigated through offsets. Care should be taken to ensure that offsets purchased are real (additional), permanent, and verified, and all aspects of the offsets should be discussed in the EIR. As demonstrated by the Office of the Attorney General offsets are a feasible CEQA mitigation measures[6] once all feasible mitigation measures have been adopted to reduce the Project's carbon footprint and produce energy using renewable sources. E-38-93

## II. THE EIR MUST CONSIDER A REASONABLE RANGE OF ALTERNATIVES

The EIR must consider a meaningful analysis of reasonable alternatives to the Project in order to lessen or avoid the Project's significant impacts. CEQA mandates that significant environmental damage be avoided or substantially lessened where feasible. Pub. Res. Code § 21002; Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d). A rigorous analysis of reasonable alternatives to the project must be provided to comply with this strict mandate. "Without meaningful analysis of alternatives in the EIR, neither courts nor the public can fulfill their proper roles in the CEQA process." Laurel Heights Improvement Ass'n v. Regents of University of California, 47 Cal.3d 376, 404 (1988). Moreover, "[a] potential alternative should not be excluded from consideration merely because it 'would impede to E-38-94

[6] The California Attorney General's Office has adopted CEQA settlements calling for the auditing, reduction, and
offsetting of greenhouse gas emissions related with a Project demonstrating that offsets are a feasible way to reduce
a Project's negative environmental effects on global warming. See
http://ag.ca.gov/newsalerts/release.php?id=1466&category=global%20warming See generally
http://ag.ca.gov/globalwarming/ceqa.php

some degree the attainment of the project objectives, or would be more costly" even when that alternative includes Project development on an alternative site. Save Round Valley Alliance v. County of Inyo, 157 Cal. App. 4th 1437, 1456-57 (2007) (quotations omitted). In analyzing the no-project alternative, the EIR must discuss the need for this project and whether the uses that would potentially utilize the Project can be accommodated in existing areas. As CAPCOA states in its white paper, one way local governments can avoid significant increases in greenhouse gas emissions and help solve the problem of global warming is to "facilitate more efficient and economic use of the lands" already developed within the community (CAPCOA 2008). Reinvesting in existing communities is "appreciably" more efficient than new development and may even result in a net reduction of greenhouse gases (CAPCOA 2008). The EIR should consider an alternative that relies more on higher-density mixed commercial/residential development projects on existing disturbed lands in order to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and encourage efficient delivery of services and goods (Office of the California Attorney General 2008).

E-38-94 Cont

An analysis of alternatives should also quantify the estimated greenhouse gas emissions, quantified impacts to biological resources, water resources-including water quality and water availability, as well as traffic resulting from each proposed alternative. Selecting an alternative site closer to rail availability would be ideal.

E-38-95

CONCLUSION

Thank you for your attention to these comments. We expect all growth inducing as well as cumulative direct and indirect impact to be fully addressed in the DEIR. We look forward to working with the City to assure that the EIR conforms to the requirements of CEQA to assure that all significant impacts to the environment are fully analyzed, mitigated or avoided. We wish to be placed on the mailing list for all future notices and documents regarding this project. Please mail all notices to:

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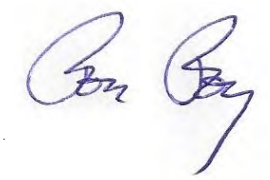
Thank you,



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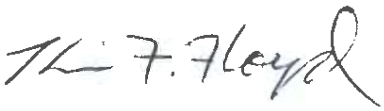
Ron Roy



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Kim Floyd

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## Response to Letter E-38

Ron Roy
January 30, 2024

**Response to Comment E-38-1**

The comment expresses gratitude for the opportunity to comment on the NOP and indicates that most concerns are related to global warming, climate change, GHG emissions, and air pollutant emissions. The comment is acknowledged. No further CEQA concerns are raised, and no revisions to the EIR are required.

**Response to Comment E-38-2**

The comment indicates that noticing for the scoping meeting held in February 2021 was inadequate. Noticing for the scoping meeting was done in accordance with CEQA requirements. The materials, including the presentation and notices, were posted on the City's website in advance of the meeting. CEQA does not require specific levels of participation, only noticing. No revisions to the scoping meeting materials or EIR are required.

**Response to Comment E-38-3**

The comment indicates that noticing for the scoping meeting held in February 2021, as well as the contents of the NOP and EIR requirements, was inadequate. Refer to response to Comment E-38-2. While issues with the presentation were acknowledged, the adequacy of the materials and noticing for meaningful engagement did satisfy requirements. Many letters, including this one, were received in response to the scoping meeting, indicating that meaningful engagement was achieved. No revisions to the scoping meeting materials or EIR are required.

**Response to Comment E-38-4**

The comment indicates that the pandemic curtailed participation in the NOP meeting held in February 2021. While the pandemic limited in-person meetings during this time, the meeting provided opportunities for participation to the best of the City's ability, while meeting state and federal requirements limiting in-person gatherings during that period. Meeting materials were provided online for review and comment. The meeting was held in a virtual forum, and links to the meeting were provided in the notices and on the City's website. No revisions to the scoping meeting materials or EIR are required.

**Response to Comment E-38-5**

The comment expresses concern regarding the organization and availability of information related to the NOP meeting and materials on the City's website. Refer to response to Comment E-38-3 regarding issues with the scoping meeting presentation materials. No revisions to the scoping meeting materials or EIR are required.

**Response to Comment E-38-6**

The comment indicates that the City and project team failed to provide information regarding the EIR, and states that the presentation at the scoping meeting was flawed. Refer to response to Comment

E-38-3 regarding issues with the scoping meeting presentation materials. No revisions to the scoping meeting materials or EIR are required.

**Response to Comment E-38-7**

The comment states that the presentation at the scoping meeting was flawed and misled viewers by showing the existing project site instead of the proposed planning areas. Refer to response to Comment E-38-3 regarding issues with the scoping meeting presentation materials. No revisions to the scoping meeting materials or EIR are required.

**Response to Comment E-38-8**

The comment states that the Community Development Director acknowledged the slide presentation was not clear. Refer to response to Comment E-38-3 regarding issues with the scoping meeting presentation materials. No revisions to the scoping meeting materials or EIR are required.

**Response to Comment E-38-9**

The comment requests that the scoping meeting be rescheduled and revised to be clearer to the viewers. Despite the logistical issues that occurred at the scoping meeting, the project team received nine (9) comment letters on the NOP and has addressed comments received in these letters within the Draft EIR, as noted in the responses below. No revisions to the EIR are required.

**Response to Comment E-38-10**

The comment questions the lack of public participation during the scoping meeting held in February 2021. While the pandemic presented challenges to public participation in these types of meetings, by February 2021, the standard format for such meetings was well established. Members of the public could virtually attend the meeting without leaving their home or join from a library computer if they did not have internet access at home. Noticing for the meeting satisfied all CEQA requirements. CEQA only requires noticing, not participation. No revisions to the EIR are required.

**Response to Comment E-38-11**

The comment states the noticing and scoping requirements were not met. Refer to response to Comment E-38-10. No revisions to the EIR are required.

**Response to Comment E-38-12**

The comment states that all documents related to the project should be available in English and Spanish due to the racial composition of the population of Banning. All materials were available in Spanish if requested. According to the U.S. Census Bureau (Quick Facts, Banning California, 2023), a large percentage of the population in Banning is white (48.8 percent). No revisions to the scoping meeting materials or EIR are required.

**Response to Comment E-38-13**

The comment states that to have adequate participation, sufficient headsets and translators for all participants are needed. Translators were available at the scoping meeting as needed. If requested, documents related to the project could be provided in Spanish. No revisions to the EIR are required.

**Response to Comment E-38-14**

The comment recommends that the NOP process be redone due to the lack of translated documents. See the response to Comment E-38-13. No revisions to the EIR are required.

**Response to Comment E-38-15**

The comment states that the NOP document provided insufficient information, and points to CA Code of Regulation EIR Process Section 15082, requiring, "sufficient information describing the project and the potential environmental effects to enable responsible agencies to make a meaningful response. At a minimum, the information shall include: (c) Probable environmental effects of the project." This is an incomplete selection of text from the regulation and relates to the environmental document itself (Draft EIR), not the NOP. The NOP requires general information of the project, and states that further environmental documentation is forthcoming. The NOP seeks to obtain public input to inform the environmental analysis. No revisions to the EIR are required.

**Response to Comment E-38-16**

The comment states the NOP should have included potential environmental impacts including the number and location of impacted homes. Refer to response to Comment E-38-15. No revisions to the EIR are required.

**Response to Comment E-38-17**

The comment indicates that the NOP did not include a discussion of impacts to the Sun Lakes community. Refer to response to Comment E-38-15. No revisions to the EIR are required.

**Response to Comment E-38-18**

The comment indicates the NOP did not include discussion of the traffic impacts, national security, pollution, the Banning Airport, and sensitive receptors. Refer to response to Comment E-38-15. No revisions to the EIR are required.

**Response to Comment E-38-19**

The comment states that, for the reasons listed in Comments E-38-15 through E-38-18, the NOP process should be revised and recirculated. Refer to response to Comment E-38-15. No revisions to the EIR are required.

**Response to Comment E-38-20**

The comment states that the Draft EIR should include a detailed traffic analysis including heavy truck traffic. The comment also indicates that this analysis should include an Air Quality/Greenhouse Gas analysis documenting the worst-case scenario. Appendix J-2 of the Draft EIR provides the detailed traffic analysis requested in this comment and informs Section 4.17 of the Draft EIR. Appendix C-1 and Appendix C-3 provide the Air Quality technical Report and GHG Analysis for the Draft EIR and inform Section 4.3 Air Quality and Section 4.8 Greenhouse Gas Emissions of the Draft EIR. No revisions to the EIR are required.

**Response to Comment E-38-21**

The comment states that the project does not analyze how the project will interact with alternative modes of transportation in the Pass region. Refer to Appendix B Specific Plan for a discussion of the bike lanes and bike rack facilities that will be included as part of the Development Project. No bus service is currently planned for the Development Site. The City may consider bus service to the Development Site or vicinity in the future. The Development Project would not preclude facilities for bus service in the future, if determined necessary by the City. No rail service is planned for the Pass region currently. As with bus services, the Development Project would not preclude potential development of rail facilities in the region in the future. No revisions to the EIR are required.

**Response to Comment E-38-22**

The comment suggests the Draft EIR must include discussion of the impacts to City and regional infrastructure. Section 4.19 of the Draft EIR provides a detailed discussion of infrastructure that will be built as part of the Development Project, as well as potential impacts to existing infrastructure because of the Development Project. No revisions to the EIR are required.

**Response to Comment E-38-23**

The comment states that the Draft EIR must include a discussion of the cumulative impacts to the region from this and other projects in the region. Chapter 6.0 Cumulative Impacts of the Draft EIR provides a detailed discussion of the potential cumulative impacts from the Development Project and all current and foreseeable future projects in the City and Pass region. No revisions to the EIR are required.

**Response to Comment E-38-24**

The comment states that the Development Project will have significant impacts to wildlife and suggests that the analysis should show buffers to reduce impacts to wildlife at the Development Site. Section 4.4 of the Draft EIR provides a detailed discussion of the biological resources at the Development Site. As discussed in Section 4.4, with the Development Project as designed, including the open space and passive park areas on the western portion of the Development Site, and with implementation of mitigation measures BIO MM-1 through BIO MM-15, implementation of the Development Project would have a less than significant impact on biological resources. No revisions to the EIR are required.

**Response to Comment E-38-25**

The comment indicates that several threatened or endangered species occur in the Development Project vicinity. Refer to response to Comment E-38-24. No revisions to the EIR are required.

**Response to Comment E-38-26**

The comment states that the Draft EIR must identify potential impacts to the Whitewater River watershed and the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). Section 4.10 of the Draft EIR provides a detailed discussion of potential impacts to hydrology and aquatic resources, including the Whitewater River watershed. The Development Site is located within the Western Riverside MSHCP, not the Coachella Valley MSHCP. Refer to response to Comment A-4-7 for

discussion regarding compliance with CVMSHCP requirements, despite the Development Project not being within the CVMSHCP. Section 4.4 Biological Resources provides a detailed discussion of the Development Project's consistency with the WRMSHCP. No revisions to the EIR are required.

**Response to Comment E-38-27**

The comment states the Draft EIR must provide an analysis of potential impacts from diesel emissions from the Development Project, and consistency with the MSHCP. Section 4.3 Air Quality, Section 4.8 GHG Analysis, and Appendix C-2 Health Risk Assessment provide detailed analysis of the impacts from diesel emissions. Section 4.4 Biological Resources provides a detailed analysis of the Development Project's consistency with the WRMSHCP. No revisions to the EIR are required.

**Response to Comment E-38-28**

The comment states that the Draft EIR must show all trails within five (5) miles of the Development Site and show how the project will facilitate their interconnection or break them up. There is no CEQA requirement for such an analysis. That said, there are no established trails within the Development Site, or in the immediate vicinity of the Development Site. Section 4.16 Recreation of the Draft EIR provides a discussion of the recreational facilities in the City and region, and Appendix B Specific Plan provides a discussion of the park and walking path facilities that will be included on the western portion of the Development Site. No revisions to the EIR are required.

**Response to Comment E-38-29**

The comment asks how the Development Project will connect to regional transit and asks how it will become LEED certified. Refer to response to Comment E-38-21. No revisions to the EIR are required.

**Response to Comment E-38-30**

The comment states that the Development Project must provide employees with access to public transportation. Refer to response to Comment E-38-21. No revisions to the EIR are required.

**Response to Comment E-38-31**

The comment states that "bike paths" and "bike trails" should be integrated into the Specific Plan, specifically requesting Class I bike lanes. Appendix B Specific Plan of the Draft EIR includes Class II bike lanes along Sunset Avenue and Lincoln Street and bike rack facilities at designated locations within the Development Site. No revisions to the EIR are required.

**Response to Comment E-38-32**

The comment states that the Draft EIR must provide an analysis of the health impacts form emissions on workers within the warehouse facilities in the Development Project. Appendix C-2 of the Draft EIR provides a health risk assessment from anticipated uses at the Development Site during construction and operation. This health Risk Assessment also informs the conclusions in Section 4.3 Air Quality of the Draft EIR. No revisions to the EIR are required.

**Response to Comment E-38-33**

The comment states that the Draft EIR must show how building the warehouse facilities on the Development Site to LEED certification standards would affect environmental impacts. As discussed in Appendix B Specific Plan, the Development Project would be designed to operate efficiently and to state and local standards of operation. LEED certification is not anticipated at this time but would not be precluded if pursued in the future. No revisions to the EIR are required.

**Response to Comment E-38-34**

The comment states that the Draft EIR should define "modern high-cube logistics facilities." Chapter 3.0 Project Description provides a description of the uses within the Specific Plan, including the warehouses (logistics facilities). Section 4.1 Aesthetics of the Draft EIR provides visual representations of these facilities. No revisions to the EIR are required.

**Response to Comment E-38-35**

The comment states that an economic analysis include warehouse projects as far away as the San Bernardino Valley and Adelanto. The Draft EIR, including Chapter 3.0 Project Description and Section 4.14 Population and Housing, provides an economic analysis discussion of the Development Project on the City and region. However, the requested areas of the San Bernardino Valley and Adelanto are well outside the regional boundaries needed for this analysis. The environmental and economic analysis conducted for the Project, as appropriate, correctly assesses the local and regional impacts associated with the Project, based on the characteristics of the Project itself, the community context, the economic and demographics conditions of San Gorgonio Pass region, and the physical environment. The Draft EIR is not the appropriate vehicle for assessing the potential economic conditions of development activity occurring elsewhere.. No revisions to the EIR are required.

**Response to Comment E-38-36**

The comment states that a new railroad spur would be required due to the Development Project and would create additional freight traffic on the existing railroad track adjacent to the Development Site. The Development Project has no current connection to the existing railway line, nor does the Project include any provision for rail spurs, stations or facilities for the delivery of goods via train.. Goods deliveries to the Development Site would come via heavy trucks from Interstate 10. No revisions to the EIR are required.

**Response to Comment E-38-37**

The comment states that potential toxic runoff from the warehouse uses needs to be identified and quantified in the Draft EIR. While exact uses at the warehouse facilities is unknown at this time, Section 4.9 Hazardous Materials of the Draft EIR provides an analysis of reasonably expected potential hazardous materials on the Development Site during construction and operation and provides mitigation measures and best practices to prevent spills of potentially toxic materials into the environment or on-site drainage features. With those mitigation measures and best management practices, impacts would be less than significant. No revisions to the EIR are required.

**Response to Comment E-38-38**

The comment states that the Draft EIR must evaluate the proposed project's impacts on water supply and water pollution. Appendix K Water Supply Assessment of the Draft EIR provides an evaluation of the water supply in the Banning and San Gorgonio Pass region, and the proposed project's impact on the water supply, including groundwater. Section 4.9 Hazardous Materials and Section 4.10 Hydrology discuss potential impacts on watersheds related to water demand and pollution from the Development Project. No revisions to the EIR are required.

**Response to Comment E-38-39**

The comment asks for an analysis of the Development Project's impact on groundwater in the region. Section 4.10 Hydrology discusses potential impacts on groundwater. No revisions to the EIR are required.

**Response to Comment E-38-40**

The comment states that the NOP should have indicated that the warehouse uses, "would generate air pollutant emissions" and expects all buildings on the Development Site to match or exceed gold LEED certification. At the time the NOP was prepared, such an analysis had not been conducted, as that is part of the EIR evaluation process conducted after the NOP. Please refer to Section 4.3, Air Quality and Section 4.8, Greenhouse Gas Emissions of the Draft EIR for an analysis of the projected emissions form the Development Project as well as Section 4.0 of the Final EIR which provides the results of the supplemental air quality, health risk, and greenhouse analysis. There is no CEQA requirement for LEED certification. No revisions to the EIR are required.

**Response to Comment E-38-41**

The comment states that the Draft EIR should identify "green" features of the Development Project and how they will be implemented. The comment goes further to suggest at least 90 percent of off-road construction equipment meet Tier III standards. Appendix B Specific Plan and Chapter 3.0 Project Description of the Draft EIR identify design features of the Development Project that will reduce environmental impacts related to GHG emissions and energy efficiency. Further, the mitigation measures identified in Table 1.B in Chapter 1.0 Executive Summary of the Draft EIR provide further improvements in efficiency and GHG emission reductions. Mitigation Measure MM AIR-1 in Section 4.3 Air Quality of the Draft EIR states, "During construction of the proposed Development Project, the Project contractor shall ensure all 50 horsepower or more off-road diesel-powered construction equipment is powered with California Air Resources Board (CARB) certified Tier 4 Final engines or the equivalent" This requirement is more stringent than Tier 3 standards. No revisions to the EIR are required.

**Response to Comment E-38-42**

The comment states that the Draft EIR should address how the Development Project will mitigate for impacts to agricultural lands of local and state importance and impacts to the pacific flyway. The Development Site has not been actively farmed or ranched in many years, and no active Williamson Act contracts exist within or in the vicinity of the Development Site, as identified in Section 4.2.6.2 of the Draft EIR. Impacts to potential migratory birds are addressed in Section 4.4 Biological Resources of the Draft EIR. There or no ponds or other standing water features within or in the vicinity of the

Development Site. Some songbirds, such as Grasshopper Sparrows, are known to migrate through the area and may occur on the Development Site. As designed, the western portion of the Development Site will be retained as open space and passive park land, and the existing drainage features will be retained. This will retain habitat for potential migrating songbirds along the pacific flyway. With these design features, and implementation of monitoring mitigation measures identified in Section 4.4 of the Draft EIR, impacts would be less than significant. No revisions to the EIR are required.

**Response to Comment E-38-43**

The comment states that the parking areas should include parking for vehicles of alternative fuel types. While electric vehicle charging stations are likely to be a part of the Development Project, the exact number and location of those stations is not determined at this time. However, design of the Development Project would not preclude installation of electric vehicle charging stations in the future. Please refer to Section 3.6 Energy Efficiency Development Criteria in Appendix B Specific Plan of the Draft EIR. Section 4.8 Greenhouse Gas Emissions of the Draft EIR identifies 350 as the minimum number of electric vehicle charging stations to be provided. Other vehicle fuel types such as hydrogen, may be accommodated at the refueling station located on the northeast portion of the Development Project in the future, though no hydrogen refueling infrastructure exists in the vicinity currently. No revisions to the EIR are required.

**Response to Comment E-38-44**

The comment states that parking areas should be made of porous material to improve groundwater recharge. While the actual material of the parking areas will be determined during final design and construction, drainage basins designed to capture runoff for settlement and groundwater recharge have been incorporated into the design of the Development Project (Draft EIR, Section 4.10.6.3). No revisions to the EIR are required.

**Response to Comment E-38-45**

The comment states that the Draft EIR must identify and mitigate for impacts to schools from emissions from truck routes. The MSJC campus site, located at the southeast side of the Development Site, is the only school in the vicinity of the Development Site. As analyzed in Appendix C-2 Health Risk Assessment and further discussed in Section 4.3 Air Quality of the Draft EIR, impacts from truck trips on the east side of the Development Site would be far below the threshold of significance. No revisions to the EIR are required.

**Response to Comment E-38-46**

The comment asks how the Development Project will ensure workers' safety from breathing in diesel emissions from trucks and other equipment, including gardening equipment. Workers inside the warehouse buildings would be protected through code-compliant air filtration systems. Workers outside the buildings would have passive and less than significant exposure, as documented in Appendix C-2 Health Risk Assessment. In response to public comment, the emissions totals for the Development Project were updated based on the updated CalEEMod run for truck trip lengths and the updated calculations for TRU emissions (see Final EIR Appendix C-4). Regarding the exposure of sensitive receptors to substantial pollution concentrations, the Health Risk Assessment (HRA) (original and revised (Final EIR, revised Table 4.3.Q and Final EIR, Appendix C-4) found no significant impact to

sensitive receptors. Please refer to the response to Comment A-3-18. Based on the supplemental analysis, the cancer risk to the Residential and Student Maximum Exposed Individual (MEI) slightly from 3.3 in one million to 3.8 in one million. Though increased, this risk level remains well below the health risk thresholds established by the SCAQMD and does not result in any new significant health risk impacts from those described in the Draft EIR. See the responses to Comments A-3-18 and E-36-5, As time goes on, truck emissions lessen from advancements in technology and the transition to electric truck and construction equipment fleets would further reduce worker exposure to emissions. Regarding diesel powered landscaping equipment, all new landscaping equipment is now electric, according to California law. Mitigation measures provided in Section 4.3 Air Quality will also require all landscaping equipment used on-site to be electric. No revisions to the EIR are required.

**Response to Comment E-38-47**

The comment requests that the Draft EIR explain how noise impacts would be reduced and how the noise barriers during construction would work. Since publication of the Draft EIR, modifications to the Development Project have reduced all operational noise impacts to less than significant. These changes to the Development Project include shifting Sunset Avenue an additional 17 feet (total of 42 feet) west from its current location to reduce noise impacts to the residences on the east side of the Development Site. Mitigation Measure NOI-1 (Draft EIR, Section 4.13.61, page 4.13-47 and Appendix I, page 57) describe the noise barriers required during construction and the conditions for their use. Additionally, shielding will be installed for any noise-generating equipment on the rooftops of the warehouse buildings, and wing walls will be installed on the south side of warehouse buildings along Bobcat Road to reduce noise impacts from loading dock activities at the sensitive receptors south of Bobcat Road to less than significant. Please refer to Appendix I-2 Supplemental Noise Analysis of the Final EIR. No revisions to the EIR are required.

**Response to Comment E-38-48**

The comment states that the Draft EIR, and not just the appendices, should present the truck trip lengths and routes. For purposes of the analysis in Appendices J-1 through J-3, as well as Sections 4.8 Greenhouse Gas Emissions and 4.17 Transportation of the Draft EIR, a “worst case scenario” of peak daily truck trips was used. Refer to Sections 4.8 and 4.17 of the Final EIR for discussion regarding the updated analysis regarding truck trip lengths and routes. This information is also available in Appendices C-4, C-5, and C-6 of the Final EIR. No revisions to the EIR are required.

**Response to Comment E-38-49**

The comment requests information on the kind of alternative fuel and charging infrastructure that will be available for truck fleets. While the actual composition of electric/alternative fuel truck fleets is unknown at this time, charging stations may be installed as needed during construction or during operation to support the needs of the truck fleets on site. Please refer to Section 3.6 Energy Efficiency Development Criteria in Appendix B Specific Plan of the Draft EIR. Section 4.8 Greenhouse Gas Emissions of the Draft EIR identifies 350 as the minimum number of electric vehicle charging stations. No revisions to the EIR are required.

**Response to Comment E-38-50**

The comment indicates that the Development Site property should not be disked prior to burrowing owl surveys. As discussed in Appendix D-8 Determination of Biologically Equivalent or Superior Preservation Report (DBESP), Appendix D-1 Burrowing Owl Survey Report, and Section 4.4 Biological Resources of the Draft EIR, all burrowing owl surveys were conducted during the 2020 breeding season (March 1 – August 31). No disking or other earth-disturbing activities have occurred on the Development Site in many years. No revisions to the EIR are required.

**Response to Comment E-38-51**

The comment states that the Draft EIR must evaluate alternatives and mitigation measures to reduce greenhouse gas emissions. As discussed in Section 4.8 Greenhouse Gas Emissions, the Development Project would result in significant GHG emissions. Even with implementation of mitigation measures MM GHG-1 through MM GHG-7, impacts from greenhouse gas emissions would be significant and unavoidable. Alternatives 1 through 4 would reduce GHG emissions relative to the Development Project. However, Alternatives 1 and 2 would not meet project objectives, and alternatives 3 and 4 would not reduce GHG emissions impacts to a less than significant level, despite reducing warehouse/commercial uses. No revisions to the EIR are required.

**Response to Comment E-38-52**

The comment states that the Draft EIR should discuss threats from global warming. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. No revisions to the EIR are required.

**Response to Comment E-38-53**

The comment states that the Draft EIR should discuss threats from global warming and provides a summary of information from the IPCC regarding global warming. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. No revisions to the EIR are required.

**Response to Comment E-38-54**

The comment provides a summary of the threats of global warming on California and states that the Draft EIR should discuss threats from global warming to help inform the public and decision makers. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. No revisions to the EIR are required.

**Response to Comment E-38-55**

The comment states that the Draft EIR should discuss laws meant to address global warming. Section 4.8 Greenhouse Gas Emissions, specifically Section 4.8.3 Regulatory Setting of the Draft EIR addresses the legal framework related to potential impacts from global climate change from greenhouse gas emissions. No revisions to the EIR are required. No revisions to the EIR are required.

**Response to Comment E-38-56**

The comment requests a full inventory of the Development Project's greenhouse gas emissions. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. No revisions to the EIR are required.

**Response to Comment E-38-57**

The comment continues to discuss the impacts from global climate change. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. No revisions to the EIR are required.

**Response to Comment E-38-58**

The comment continues to discuss the impacts from global climate change. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. No revisions to the EIR are required.

**Response to Comment E-38-59**

The comment continues to discuss the impacts from global climate change. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions, including water management. Please refer to Appendices H-2 (Water Quality Management Plan) and K (Water Supply Assessment of the Draft EIR. Furthermore, Sections 4.10 (Hydrology and Water Quality) and 4.19 (Utilities) provide a thorough assessment on the Project's impact on water resources, including an evaluation of current and future water supplies, and the potential availability of water for the Project during normal, dry, and multiple-dry years. No revisions to the EIR are required.

**Response to Comment E-38-60**

The comment continues to discuss the impacts from global climate change, specifically related to flooding, flood damage, hazard risk, and water supply. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. Section 4.9 Hazards of the Draft EIR also discusses potential threats from flooding, while Sections 4.10 and 4.19 assesses water management and water supply issues. Also, please refer to the response to Comment A-38-59. No revisions to the EIR are required.

**Response to Comment E-38-61**

The comment identifies water quality and quantity impacts related to global climate change. Section 4.10 Hydrology of the Draft EIR addresses water quality impacts related to the Development Project, and Appendix K Water Supply Assessment of the Draft EIR addresses water supply for the Development Project and the City of Banning. No revisions to the EIR are required.

**Response to Comment E-38-62**

The comment continues to discuss the impacts from global climate change, specifically related to air and water quality, flood hazards, and biological resources. Refer to response to Comment E-38-51.

Section 4.3 Air Quality of the Draft EIR discusses impacts on air quality as a result of the Development Project. Section 4.4 Biological Resources addresses impacts to biological resources form the project. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. Section 4.9 Hazards of the Draft EIR a addresses potential threats from flooding. No revisions to the EIR are required.

**Response to Comment E-38-63**

The comment continues to discuss the impacts from global climate change, and cites CEQA guidelines and case law related to cumulative air pollution impacts. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. No revisions to the EIR are required.

**Response to Comment E-38-64**

The comment states that the lack of significance thresholds does not preclude the Draft EIR from evaluating environmental impacts. The Draft EIR makes every reasonable effort to evaluate all potential environmental impacts within the requirements of CEQA. Without significance thresholds, as the comment suggests, it would not be possible to make a significance conclusion. CEQA does provide significance thresholds for GHG emissions, as the comment specifically raises. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. No revisions to the EIR are required.

**Response to Comment E-38-65**

The comment continues to discuss the cumulative impacts from GHG emissions and global climate change. Refer to response to Comment E-38-51. Section 4.8 Greenhouse Gas Emissions of the Draft EIR addresses potential impacts related to global climate change from greenhouse gas emissions. Section 6.0 of the Draft EIR identifies the Project's significant cumulatively considerable greenhouse. See Draft EIR Section 6.5.3 and Appendix C-3. The Draft EIR determined that significant and unavoidable GHG impact would occur. The Draft EIR clearly disclosed the significant cumulative effects of the Project, as identified by the commenter. As such, a Statement of Overriding Considerations has been prepared, pursuant to CEQA requirements. No revisions to the EIR are required.

**Response to Comment E-38-66**

The comment continues to discuss the impacts from global climate change including the requirement that Lead Agencies address the issue regardless if defined thresholds have established or not. Refer to response to Comment E-38-51. Section 4.8 (Greenhouse Gas Emissions) and Appendix C-3 of the Draft EIR provides a thorough assessment of this issue as required under CEQA. .. No revisions to the EIR are required.

**Response to Comment E-38-67**

The comment states that the Development Project should incorporate public transit and bicycle/pedestrian features into the project Design Please refer to the response to Comment Please

refer to Sunset Crossroads Specific Plan (Draft EIR Appendix B), Specific Plan Chapter 2.2, Circulation Plan, Chapter 4 Design Guidelines, et al. The Specific Plan specifically recognizes the importance of functional and safe bicycle amenities and provides a variety of bicycle facilities at locations sufficient to facilitate bicycle movement to and through the Development Site. See the response to Comments D-6-21 and D-6-36-A, and Section 4.17.6.2 of the Draft EIR. Please refer to the response to Comment D-6-27 and Section 4.17.6.2 of the Draft EIR regarding the provision of transit facilities. No revisions to the EIR are required.

**Response to Comment E-38-68**

The comment states the Development Project should include mitigation measures to increase energy efficiency of the buildings within the Development Project. Refer to response to Comment E-38-33. No revisions to the EIR are required.

**Response to Comments E-38-69 through E-38-92**

The comments provide mitigation measures to be considered in the Draft EIR. Table 1.B in Chapter 1.0 Executive Summary of the Draft EIR identifies all CEQA significance thresholds addressed within the Draft EIR, and any mitigation measures employed to reduce potential impacts from implementation of the Development Project. All feasible mitigation measures have been analyzed and incorporated as necessary. No revisions to the EIR are required.

**Response to Comment E-38-93**

The comment states that emissions that occur after all feasible mitigation is applied should be mitigated through offsets. As discussed in Section 4.8 GHG Emissions and Appendix C-3 GHG Analysis, "Reliance on carbon offsets to reduce either the Project's mobile or non-mobile emissions is also not feasible. No local program is available that meets CEQA's criteria. Offset credits must be quantifiable, additional, and verifiable. It has been determined that even offset credits purchased from CARB-approved offset project registries do not adequately ensure that purchased offset credits accurately and reliably represent actual emissions reductions or cannot guarantee that such reductions are additional to any reduction that would occur under business-as-usual operations and reductions required by law, and do not meet definition of a valid mitigation measure. See Golden Door Properties, LLC v. County of San Diego (2020) 50 Cal.App.5th 467. In addition, as the lead agency, the City of Banning is responsible for enforcing project mitigation measures that are relied upon to reduce GHG impacts and has no enforcement authority over offset credits that fund carbon reduction projects outside of the City." As such, no offsets have been incorporated into the Draft EIR analysis or applied to the significance determinations. No revisions to the EIR are required.

**Response to Comment E-38-94**

The comment cites CEQA guidelines and case law, among other sources, to substantiate the requirement for an alternatives analysis and states that an alternatives analysis be included in the Draft EIR with alternatives to the Development Project that lessen environmental impacts relative to the Development Project. Please refer to the responses to Comments D-3-35, D-6-47, E-31-16, and E-34-58 which have discuss the requirements for the selection and consideration of alternatives to the Project. Chapter 8.0 Alternatives in the Draft EIR, and as revised in Section 4.0 of the Final EIR,

proposes 4 (four) potential alternatives that lessen the intensity of impacts relative to the Development Project. No revisions to the EIR are required.

**Response to Comment E-38-95**

The comment states that an alternatives analysis should include an analysis of GHG emissions from any proposed alternatives. See the response to Comment E-38-94. Sections 8.3 through 8.6 of the Draft EIR provide a comprehensive assessment of each alternative's impact relative to the environmental issues outlined in Appendix G of the State CEQA Guidelines, including those referenced by the commenter. A quantitative analysis (e.g., air quality, energy use, greenhouse gas emissions, etc.) has been provided for these issues where quantifiable and appropriate. The discussion of and quantification of greenhouse gas impacts for the Project alternatives is further detailed in Appendix L-2 (GHG Alternatives Memorandum), which has been summarized in the analysis of each alternative No revisions to the EIR are required and no further response is necessary.

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