

6. Significant Unavoidable Adverse Impacts

At the end of Chapter 1, *Executive Summary*, is a table that summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. Mitigation measures would reduce the level of impact, but the following impacts would remain significant, unavoidable, and adverse after mitigation measures are applied:

Air Quality

- **Impact 5.3-2.** From Phase 2 onwards, operational activities of the proposed project would generate peak daily emissions in exceedance of the SCAQMD daily thresholds for reactive organic gases (ROG), nitrous oxides (NO_x), carbon monoxide (CO), Respirable Coarse Particulate Matter (PM₁₀), and Respirable Fine Particulate Matter (PM_{2.5}). Implementation of Mitigation Measure 3-6 would reduce operation-related criteria air pollutants and encourage and accommodate use of alternative-fueled vehicles, multimodal transportation, and energy efficient technology. However, despite adherence to mitigation, Impact 5.3-2 would remain significant and unavoidable.
- **Impact 5.3-4.** The Rancho San Geronimo Specific Plan would result in a substantial increase in growth compared to what was identified in the City's General Plan and would exceed SCAQMD's regional operational thresholds. As a result, the proposed project could potentially exceed the assumptions in the regional air quality management plan (AQMP) and would not be considered consistent. Mitigation measures applied for Impacts 5.3-1 and 5.3-2 and the design and regulatory standards of the Specific Plan would reduce the project's regional construction-related and operational phase criteria air pollutant emissions to the extent feasible. However, given the potential increase in growth and associated increase in criteria air pollutant emissions, the project would be potentially inconsistent with the assumptions in the AQMP. Thus, Impact 5.3-4 would remain significant and unavoidable.

Greenhouse Gas Emissions

- **Impact 5.7-1.** Development in accordance with the proposed project would generate GHG emissions in exceedance of SCAQMD's Tier 4 performance targets. Implementation of Mitigation Measures 7-1 through 7-3 and Project Design Features 7-1 through 7-5 would reduce GHG emissions from stationary and mobile sources to the extent feasible. Additionally, Mitigation Measures 3-1 through 3-6 detailed in Section 5.3, *Air Quality*, would also encourage and accommodate use of alternative-fueled vehicles, multimodal transportation, and energy efficient technology that would help reduce vehicle miles traveled and GHG emissions. However, due to the magnitude of GHG emissions associated with the proposed project, Impact 5.7-1 would remain significant and unavoidable.

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Noise

- **Impact 5.11-1.** Noise from construction activities from implementation of projects within the Specific Plan area could result in substantial impacts to sensitive receptors. Mitigation Measure 11-1 would reduce potential noise impacts during construction to the extent feasible. However, due to the potential for construction to occur in close proximity to sensitive receptors, there would be a substantial noise increase over existing ambient noise levels. Although temporary construction barriers would reduce construction noise levels to the City's interior noise standard (of 55 dBA for 15 minutes or below) for residences and schools within 71 feet of construction activities, there would still be the potential for a readily perceptible noise increase at sensitive receptors in the vicinity of the project over the years the project is constructed. Therefore, impacts would be significant and unavoidable.
- **Impact 5.11-3.** Noise-sensitive uses would be exposed to elevated traffic noise levels that would result in substantial impacts. No individual mitigation measure and no combination of feasible or practical mitigation measures are available to reduce project-generated traffic noise to less than significant levels. Thus, traffic noise impacts are significant and unavoidable.

Population and Housing

- **Impact 5.12-1.** Buildout of the proposed Specific Plan would introduce up to 9,038 residents, which would exceed SCAG's population projections for the City in 2040 by approximately 1,041 residents. There are no feasible mitigation measures to reduce impacts of population growth. Thus, Impact 5.12-1 would be significant and unavoidable.

Transportation and Traffic

- **Impact 5.15-1.** The project in combination with cumulative development would cause a significant impact at intersections under the jurisdiction of the cities of Banning and Beaumont and Caltrans. With implementation of program improvements combined with the improvements listed in Mitigation Measures 15-1 to 15-7 at impacted study area intersections, the intersections would operate within acceptable levels of service. However, the primary responsibility for approving and/or completing certain improvements outside of Banning lies with agencies other than the City of Banning (i.e., City of Beaumont, Caltrans). Thus, there is potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the City of Banning's control (e.g., the City cannot undertake or require improvements outside of Banning's jurisdiction). Therefore, this impact would remain significant and unavoidable.
- **Impact 5.15-2.** The project in combination cumulative development would cause a significant impact at several freeway mainline segments and on freeway off-ramps on the I-10 freeway. High occupancy vehicle (HOV) lanes and general use lanes would be required to improve freeway mainline operations. However, these improvements would require approval from Caltrans as the owner/operator of I-10. Caltrans currently does not have a funding mechanism for development projects to contribute to fair share fees to implement improvements on Caltrans facilities. Therefore, the City of Banning or the property

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owner/developer would not be able to guarantee the implementation of these measures. Thus, impacts would be significant and unavoidable.

Improvements would also be required at several freeway ramps—No. 21, Sunset Avenue (NS) at I-10 EB Ramps (EW); No. 33, 8th Street (NS) at I-10 WB Ramps (EW); and No. 34, 8th Street (NS) at I-10 EB Ramps (EW). However, the improvements would require approval from Caltrans as the owner/operator of these freeway ramps. Caltrans currently does not have a funding mechanism for development projects to contribute fair share fees to implement improvements on Caltrans facilities. Therefore, the City of Banning or the property owner/developer would not be able to guarantee the implementation of these measures. Therefore, impacts would be significant and unavoidable.

- **Impact 5.15-3.** The project in combination with cumulative development would result in freeway segments and intersections in the CMP network exceeding LOS standards. Similar to Impact 5.15-1, several roadway improvements would be required outside the City's jurisdiction. Thus, there is potential that significant impacts may not be fully mitigated. Impacts would therefore be significant and unavoidable.

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