DRAFT

ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE NO. 2022110295

KPC Coachella Specific Plan

Specific Plan No. SP-22-01
General Plan Amendment No. GPA-22-03
Change of Zone No. CZ-22-04

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Appendix A: NOP and Scoping Meeting Materials

Appendix B1: Air Quality Assessment

Appendix B2: Health Risk Assessment

Appendix C1: Biological Resources Assessment-Coachella Valley MSHCP Consistency Analysis

Appendix C2: Jurisdictional Delineation Report

Appendix C3: Off-Site Improvements – Biological and Aquatic Resources Assessment Memo

Appendix C4: Coachella Valley MSHCP Like Exchange

Appendix D1: Cultural Resources Assessment (Confidential)

Appendix D2: Archaeological Testing Report (Confidential)

Appendix E: Energy Calculations

Appendix F1: Feasibility-Level Geotechnical Evaluation

Appendix F2: Fault Investigation Report

Appendix G: Greenhouse Gas Emissions Assessment

Appendix H1: Drainage Master Plan

Appendix H2: Conceptual Water Quality Analysis

Appendix I: Acoustical Assessment

Appendix J1: Vehicle Miles Traveled Analysis

Appendix J2: Traffic Impact Analysis Report

Appendix K1: Water Supply Assessment

Appendix K2: Sewer System Study

Appendix K3: Domestic Water System Study

1.0 EXECUTIVE SUMMARY

1.1 PURPOSE

The purpose of this Draft Environmental Impact Report (Draft EIR) is to inform decision-makers, representatives of affected and responsible agencies, the public, and other interested parties of the potential environmental effects that may result from the implementation of the KPC Coachella Specific Plan Project (Project).

This Draft EIR for the Project was prepared to: (1) identify the potential environmental impacts of the Project utilizing the revised CEQA Appendix G Environmental Checklist Form (2025); (2) discuss alternatives to the Project; and (3) propose mitigation measures that will avoid, offset, or minimize significant environmental impacts of the Project. This document was prepared in conformance with the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000, et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000, et seq.). More specifically, this summary has been prepared in accordance with the California Public Resources Code, Section 21061 and CEQA Guidelines Section 15123.

1.2 PROJECT SUMMARY

PROJECT LOCATION

The Project site is located at the eastern entrance of the City of Coachella (City); see **Exhibit 3-1: Regional Vicinity**. The Project site is approximately three miles east of the City center in the foothills of the Little San Bernardino Mountains, with views across the Coachella Valley to the San Jacinto and Santa Rosa Mountains. The Project site is bounded by the Little San Bernardino Mountains to the north, the city of Indio to the northwest, Interstate 10 (I-10) to the south and west, and unincorporated Riverside County to the east and north; see **Exhibit 3-2: Local Vicinity**.

PROJECT DESCRIPTION

The Project proposes the development of a new master planned community on approximately 2,807 acres located at the eastern entrance of the City. The Project would provide a mixture of land uses intended to create a vibrant cohesive entrance to the City, with five villages (A-E) and neighborhoods that are unique, yet compatible with, surrounding existing and planned neighboring areas. The Project would provide new additional commercial, residential, educational, employment, and recreational opportunities for residents and visitors within the City. A proposed entertainment center in Village B is anticipated to be a regional attractor, attracting local and regional visitors.

The Project proposes the following main land uses:

- A mixture of residential product types, including an active adult/senior-oriented village, totaling approximately 9,538 dwelling units;

- Approximately 305 acres of commercial areas, which include mixed-use, entertainment center and performing arts theater, entertainment venue, and hotel rooms;
- A college/university overlay to allow for institutions of higher learning with an emphasis on healthcare;
- Approximately 71 acres of school uses (3 elementary schools and 1 middle school);
- Approximately 379 acres of parks, greenways, and amenity centers;
- Approximately 179 acres of circulation uses, including arterials, major, and secondary roadways;
- Approximately 68 acres of Agricultural Production areas;
- Approximately 770 acres of natural open space, including drainage channels and trails;
- Approximately 91 'not a part' acres.

The Project proposes two connection points to the existing roadways within the City. The main entry into the Project would be via the planned Avenue 50 and Interstate 10 interchange directly to the south. Additionally, the extension of Vista Del Norte from the west would provide access to Dillon Road and the rest of the City. The Project would also include the construction or improvement of various off-site infrastructure, including extending utilities, water facilities, sewer lines, drainage facilities.

Additionally, the Project includes the adoption of the KPC Coachella Specific plan in addition to other related entitlements such an Environmental Review, Development Agreement, Tentative Tract Map, Zone Change, and General Plan Map and Text Amendment. These actions are described in greater detail in EIR **Section 3.0: Project Description** and the **KPC Coachella Specific Plan**. Project background and objectives are also discussed in **Section 3.0**.

1.3 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Areas of concern and topics identified during the scoping period include:

- Assessment of biological resources and impacts
- Joint Project Review process with the Coachella Valley Conservation Commission
- School siting
- Increase in student population
- Tribal consultation
- Overcrowding (population)
- Consistency with Regional Transportation Plan/Sustainable Communities Strategy

1.4 SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The following table is a summary of significant impacts and proposed mitigation measures associated with the Project as identified in this EIR. Refer to **Sections 4.1** through **4.16** for a detailed description of the environmental impacts and mitigation measures for the Project. All impacts of the Project can be mitigated to less than significant levels with the exception of aesthetics, air quality, greenhouse gas emissions, geology and soils, noise, and public services (for subsequent project-level and cumulative impacts to library services).

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Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
Section 4.1 Aesthetics		
Impact 4.1-3 Would the Project 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 points). If the Project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Significant and Unavoidable	The Project incorporates, in its design, open space preservation, land use transitions, landscaping, revegetation, screening, and other Project Design Features to avoid substantial degradation of public views, consistent with applicable Municipal Code requirements. Additionally, the Project complies with Specific Plan design guidelines and zoning regulations governing scenic and aesthetic quality, and no additional reasonable or feasible mitigation has been identified.
Impact 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?	Less than Significant with Mitigation Incorporated	**MM AES-1:** During Project construction and long-term operation, the Project shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light during the hours of dawn and dusk when many wildlife species are most active. Ensure that all lighting for Project is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in lighting trespass including glare onto other properties—including any areas of the adjacent Desert Tortoise and Linkage Conservation Area—or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). Use LED lighting with a correlated color temperature of 3,000 Kelvins or less, properly dispose of hazardous waste, and recycle lighting that contains toxic compounds with a qualified recycler. **MM AES-2: Photometric Study**. Prior to the approval of any Site Plans for any phase of development(s) associated with the Specific Plan that is adjacent to a residential land use or other sensitive land use (e.g., hospital, school, or park uses), the applicant shall submit to the City of Coachella Development Services Department a photometric (lighting) study (to include parking areas, accessway lights (i.e., walkways, stairways, platforms and other small areas),

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		external security lights, lighted signage, and recreational lighting) providing evidence that the Project light sources do not spill over to sensitive adjacent off-site properties in accordance with the Coachella Municipal Code and the CVMSCHP, where applicable. All Project-related outdoor lighting, including but not limited to, street lighting, building security lighting, parking lot lighting, and landscaping lighting shall be shielded to prevent spillover of light to adjacent properties. All recreational lighting shall be fully shielded. Shielding requirements and time limits shall be identified on construction and grading plans for each phase of development.
Section 4.2 Air Quality		
Impact 4.2-1 Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Significant and Unavoidable	Feasible mitigation measures are proposed to less the severity of impacts; however the residual significance of this impact would be significant and unavoidable. **MM AQ-1:** The Project shall utilize "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits (i.e., have a lower VOC content than what is required) put forth by SCAQMD's Rule 1113 for all architectural coatings. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Prior to issuance of a building permit, the City Engineer shall confirm that plans include the following specifications: • All architectural coatings will be super-compliant low VOC paints. • Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paints. • Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors. • For water-based paints, clean up with water only. Whenever

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain. Set aside the can of cleanup water and take it to the hazardous waste center (www.cleanup.org). • Use compliant low-VOC cleaning solvents to clean paint application equipment. • Keep all paint- and solvent-laden rags in sealed containers to prevent VOC emissions. • Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable. • Use high-pressure/low-volume paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency. **MM AQ-2**: Prior to the issuance of grading permits, the City Engineer shall confirm that the Grading Plan, Building Plans and Specifications require all construction contractors to incorporate the following measures to minimize construction emissions. These features shall be included in applicable bid documents and included on the grading plans. • All off-road diesel-powered construction equipment greater than 50 horsepower meets California Air Resources Board Tier 4 Final off-road emissions standards or incorporate CARB Level 3 Verified Diesel Emission Control Strategy (VDECS) (to reduce PM emissions by at least 85 percent or to achieve PM emissions levels of 0.01 grams per brake-horsepower-hour or less, per Title 13, California Code of Regulations, Sections 2700-2710). Requirements for Tier 4 Final equipment and the option for Level 3 VDECS shall be included in applicable bid documents and

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Impact	Level of Significance	Mitigation Measures
		successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) shall be provided to the City at the time of mobilization of each applicable unit of equipment. This equipment shall be used when commercial models that meet the construction needs of the Project are commercially available from local suppliers/vendors. The determination of commercial availability of such equipment shall be made by the City, based on applicant-provided evidence from expert sources, such as construction contractors in the region. • Construction equipment shall be properly maintained according to manufacturer specifications. • All diesel-powered construction equipment, delivery vehicles, and delivery trucks shall be turned off when not in use. On-site idling shall be limited to three minutes in any one hour. • Construction on-road haul trucks shall be model year 2010 or newer if diesel-fueled. • Information on ridesharing programs shall be made available to construction employees. • During construction, lunch options shall be provided on-site. • A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints per SCAQMD Standards. • All construction contractors shall be provided information on the South Coast Air Quality Management District Surplus Off-road Opt-In "SOON" funds which provides funds to accelerate cleanup

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Impact	Level of Significance	Mitigation Measures
		of off-road diesel vehicles. • The Project shall demonstrate compliance with SCAQMD Rule 403 concerning fugitive dust and provide appropriate documentation to the City of Coachella. • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, unpaved access roads) shall be watered three times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet-power vacuum street sweepers at least once per day. The use of dry-power sweeping shall be prohibited. • All vehicle speeds on unpaved roads, driveways, or driving surfaces shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. • Building pads shall be laid as soon as possible after grading, unless seeding or soil binders are used. • A publicly visible sign shall be posted with the telephone number and the name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The phone number of the SCAQMD shall also be visible to ensure compliance. **MM AQ-3:** Develop a qualifying Commute Trip Reduction (CTR)/Transportation Demand Management (TDM) plan to reduce mobile GHG emissions for all uses. The TDM plan shall be approved by the City of Coachella prior to the issuance of building permits and

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		incorporated into the Project's Codes Covenants and Restrictions (CC&Rs). The TDM plan shall discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. The following measures shall be incorporated into the TDM plan: **TDM Requirements for Non-Residential Units:** • The Project Applicant shall consult with the local transit service provider on the need to provide infrastructure to connect the Project with transit services. Evidence of compliance with this requirement may include correspondence from the local transit provider(s) regarding the potential need for installing bus turnouts, shelters, or bus stops at the site. • The portion of the TDM plan for non-residential uses shall include, but not be limited to the following potential measures: ride-matching assistance, preferential carpool parking, flexible work schedules for carpools, half-time transportation coordinators, providing a web site or message board for coordinating rides, designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles, and including bicycle end of trip facilities. This list may be updated as new methods become available. Verification of this measure shall occur prior to building permit issuance for the commercial uses. **TDM Requirements for Residential Units** • Owner-Occupied Units. Upon a residential dwelling being sold or offered for sale, the Project Applicant shall notify and offer to the buyer or prospective buyer, as soon as it may be done, materials describing public transit, ridesharing, and nonmotorized commuting opportunities available in the vicinity of the Project. Such information shall be transmitted no later

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		than the close of escrow. This information shall be submitted to the City of Coachella for review and approval, prior to the issuance of the first certificate of occupancy. • Rental Units. Upon a residential dwelling being rented or offered for rent, the Project Applicant shall notify and offer to the tenant or prospective tenant, materials describing public transit, ridesharing, and nonmotorized commuting opportunities in the vicinity of the development. The materials shall be approved by the City of Coachella. The materials shall be provided no later than the time the rental agreement is executed. This information shall be submitted to the City of Coachella Planning Division for review and approval, prior to the issuance of the first certificate of occupancy. **MM AQ-4:** The installation of wood-burning and natural gas devices shall be prohibited in all residential developments. The purpose of this measure is to limit emissions of ROG, NO_X, particulate matter, and visible emissions from wood-burning and natural gas devices used for primary heat, supplemental heat, cooking, or ambiance. All residential ovens and stoves shall be electric. This prohibition shall be noted on the deed and/or lease agreements for future property owners/tenants to obey. **MM AQ-5:** Prior to the issuance of occupancy permits, the Planning Division shall confirm that the Project's Codes Covenants and Restrictions (CC&Rs) and/or tenant lease agreements include contractual language that all landscaping equipment used on-site shall be 100 percent electrically powered. All residential and non-residential properties shall be equipped with exterior electrical outlets to accommodate this requirement. This requirement shall be included in the third-party vendor agreements for landscape services for the building owner and tenants, as applicable.

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Impact	Level of Significance	Mitigation Measures
		MM AQ-6: Prior to the issuance of occupancy permits, the Planning Division shall confirm that the Project's CC&Rs and/or tenant lease agreements include contractual language that all cleaning products used in public spaces will be U.S. EPA Safer Choice certified. This requirement shall be included in the third-party vendor agreements for the building owner and tenants, as applicable.
Impact 4.2-2 Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	Significant and Unavoidable	**MMs AQ-1** through **AQ-6**
Impact 4.2-3 Would the Project expose sensitive receptors to substantial pollutant concentrations?	Less than Significant with Mitigation Incorporated	**MM AQ-7:** Prior to the issuance of occupancy permits, the Planning Department shall confirm that buildings include air filtration systems that use MERV 13 filters or greater. **MM AQ-8:** Prior to the issuance of building permits, the Planning Department shall confirm that Phase 2 and Phase 3 residences meet the following setbacks: • Phase 2 residences shall be located more than 120 feet from the Project boundary facing the I-10 freeway. • Phase 3 residences shall be located more than 180 feet from the Project boundary facing the I-10 freeway. A project specific Health Risk Assessment shall be required if Phase 2 residences are located within 120 feet of the Project boundary facing the freeway or if Phase 3 residences are located within 180 feet from the Project boundary facing the freeway. The Health Risk Assessment shall demonstrate that health risks from exposure to freeway exhaust do not exceed SCAQMD's thresholds at these locations. Residential dwelling units that exceed SCAQMD's 10 in one million cancer risk threshold shall implement mitigation

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		measures to reduce impacts below the threshold.
Section 4.3 Biology		
Impact 4.3-1 Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Less than Significant with Mitigation Incorporated	**MM BIO-1: Desert Tortoise Salvage or Surveys.** Prior to the issuance of a grading permit, the Project applicant will retain a qualified biologist to conduct preconstruction surveys for the desert tortoise. If desert tortoise are found, the Project applicant shall notify the USFWS 45 days prior to the issuance of any grading permit to allow the USFWS to salvage adult tortoises. If the USFWS is not able to salvage desert tortoise, the Project applicant will salvage desert tortoise per current USFWS desert tortoise clearance survey protocol. Construction on the Project site would not occur until the tortoises are salvaged. **MM BIO-2: Burrowing Owl.** In accordance with CDFW's Staff Report on Burrowing Owl Mitigation, two preconstruction take avoidance surveys should be conducted prior to any vegetation removal, ground disturbance, or similar activity as follows: *No less than thirty days prior to the onset of ground disturbance, a qualified biologist shall survey the construction limits of the Project and 500-foot buffer for the presence of burrowing owls and occupied nest burrows, in accordance with the Staff Report on Burrowing Owl Mitigation. A final survey shall be conducted within 24 hours prior to ground disturbance.* *If nesting and/or activity is present at any burrow site, then the active burrow shall be protected until nesting activity has ended to ensure compliance with Section 3503.5 of the California Fish and Game Code. Nesting activity for burrowing owls normally occurs from February 1 to August 31. To protect any burrow site, the following restrictions on construction are required between*

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		February 1 to August 31: *1) Clearing limits will be established a minimum of 300 feet in any direction from any occupied burrow; and* *2) Access and surveying will not be allowed within 50 feet of any occupied burrow. Any occupied burrows found during the survey efforts shall be mapped on the construction plans and an ESA avoidance buffer shall be established. Construction during the non-nesting season can occur only at the sites if a qualified biologist has determined that the burrows are no longer active. If an active burrow is observed during the non-nesting period, the burrow site will be monitored by a qualified biologist, and when the owl is outside the burrow entrance, the biologist will flush any owl to open space areas. The biologist will then excavate the burrow site with tools or fill the burrow with soil so owls cannot return to the burrow site.* Any relocation efforts would be coordinated with the CDFW and/or USFWS. If a burrowing owl is found to be present during the breeding season (February 1 to August 31), no ground disturbance would begin within the occupied area until after the breeding season (i.e., after August 31) and/or until the burrowing owl have completed their nesting activities. Generally, a 300- to 500-foot buffer around nesting owls during construction activities would be implemented. **MM BIO-3: Nesting Birds.** To avoid direct impacts to raptors and/or native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance would occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, a qualified avian biologist would conduct a preconstruction survey to determine the presence or

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		absence of nesting birds in the proposed area of disturbance. The pre-construction survey would be conducted three calendar days prior to the start of construction activities (including removal of vegetation). If nesting birds are observed, a letter report or mitigation plan in conformance with applicable state and federal law (i.e., appropriate follow-up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) would be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan would be submitted to CDFW and/or USFWS, as applicable, for review and approval and implemented to the satisfaction of the agency(ies). The Project biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not observed during the pre-construction survey, no further mitigation is required.
Impact 4.3-2 Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S Fish and Wildlife Service?	Less than Significant with Mitigation Incorporated	**MM BIO-4:** The Project Applicant will submit a request for an AJD to the USACE to be analyzed based on the regulatory framework in place at the time of the request to determine if waters of the U.S. occur off-site. In the event that off-site jurisdictional aquatic resources meet the definition of Waters of the U.S./State, the Project Applicant would be required to submit a permit with the USACE and compensatory mitigation would be required by the regulatory agencies to offset the impacts.
Impact 4.3-5 Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant with Mitigation Incorporated	See **MM AES-1** above.

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Impact	Level of Significance	Mitigation Measures
Impact 4.3-6 Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	Less than Significant with Mitigation Incorporated	See **MM AES-1** above.
Section 4.4 Cultural Resources		
Impact 4.4-1 Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	Less than Significant with Mitigation Incorporated	**MM CUL-1: Construction Monitoring – Built Historical Resources.** A qualified cultural resources monitor would be present during all earthmoving activities within 100 feet of the Historic Coachella Canal (P-33-5705). The monitor would work under the direct supervision of a cultural resources professional who meets the Secretary of the Interior's Professional Qualification Standards for Architectural History and/or Archaeology (Project Archaeologist). Should any previously unidentified features or artifacts associated with the canal be inadvertently discovered during earthmoving activities, the monitor would be empowered to temporarily halt or redirect construction work within 100 feet of any find until the find can be assessed and evaluated by the Project Archaeologist, as required in **MM CUL-2**. Should any unanticipated physical impacts occur to the known and recorded portion of the canal, ground-disturbing activities will halt within 100 feet of the canal. The Project Archaeologist will immediately notify the City Planner and identify the extent and nature of the impact, as well as to discuss any needed corrective action. **MM CUL-2: Inadvertent Discoveries.** Prior to the commencement of Project implementation, the Project Archaeologist will conduct a Worker Environmental Awareness Program (WEAP) training for all on-site personnel related to cultural resources for the Project. The training will provide an overview of how to identify cultural

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		resources within the Project area and the process to follow in the case of inadvertent discovery. All personnel that access the site must undergo this training, to include any personnel that engage with the Project after the initial WEAP training is provided. In the event that cultural resources are discovered during Project implementation, all earthwork and ground-disturbing activities will halt within 100 feet of the discovery. The City Planner and Project Archaeologist will immediately be notified, and the Project Archaeologist will identify whether the resource is potentially significant and, therefore, requires further evaluation. If the cultural resources are Native American in origin (i.e., prehistoric), the Agua Caliente Band of Cahuilla Indians (Consulting Tribe) must be immediately contacted and consulted regarding potential significance and treatment of the resource. For any potential significant cultural resources, the Project Archaeologist will make recommendations to the City Planner on the measures that will be implemented to avoid or mitigate impacts the newly discovered resource. Recommendations from the Project Archaeologist and/or additional measures required by the City may include the addition of archaeological monitoring for all remaining ground-disturbing activities. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Subsequent disposition of significant prehistoric archaeological material, such as reburial or curation by a qualified repository within the County, will be agreed upon by the City and Consulting Tribe. Any significant historic archaeological material shall be curated at a public, non-profit institution with a research interest in the materials within the County, if such an

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. All identified cultural resources will be recorded on appropriate CA DPR 523 series forms and evaluated for CEQA significance in accordance with the applicable code sections. All findings will be included within a Monitoring Report drafted by the Project Archaeologist and submitted to the City and Consulting Tribe for review. Final copies of the Monitoring Report will be submitted to the City, Consulting Tribe, and Eastern Information Center (EIC). See also **MM TCR-1** below.
Impact 4.4-2 Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than Significant with Mitigation Incorporated	**MM CUL-3: Archaeological Monitoring.** A qualified archaeological monitor would be present during all earthmoving activities within 100 feet of P-33-15151 and KIM1905-P-9. The monitor would work under the direct supervision of a cultural resources professional who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology (Project Archaeologist). The monitor would be empowered to temporarily halt or redirect construction work within 100 feet of any find until the find can be assessed and evaluated by the Project Archaeologist in consultation with the Consulting Tribe, as required in **MM CUL-2**.
Impact 4.4-3 Would the Project disturb any human remains, including those interred outside of formal cemeteries?	Less than Significant with Mitigation Incorporated	**MM CUL-4: Human Remains.** For discoveries of Native American human remains, PRC Section 5097.98 and HSC Section 7050.5 will be followed. If human remains are encountered, all ground-disturbing activities will halt within 100 feet of the find. The human remains, along with any associated grave goods and associated burial and sacred items, will remain in place until the procedures as outlined in PRC Section 5097.98 and HSC Section 7050.5 are completed.

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Impact	Level of Significance	Mitigation Measures
Section 4.5: Energy		
Impact 4.5-1 Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	Less than Significant with Mitigation Incorporated	See **MM GHG-1**, **MM GHG-2**, and **MM GHG-5** below.
Impact 4.5-2 Would the Project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	Less than Significant with Mitigation Incorporated	See **MM GHG-2** below.
Section 4.6 Geology and Soils		
Impact 4.6-1 Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	Significant and Unavoidable	**MM GEO-1: Specific Plan-wide Geologic and Geotechnical Reports and Geotechnical Evaluation Recommendations**. Prior to approval of any project, a final geotechnical study for shall be completed by the project applicant. These studies shall be prepared by qualified geologist and submitted for review and approval to the City of Coachella (City) Engineer in accordance with Coachella Municipal Code Section 17.44.030. The location and scope of each final geotechnical report shall be tiered off of the two geotechnical reports prepared for the overall site, Feasibility-Level Geotechnical Evaluation (Petra Geosciences, Inc., March 23, 2023) and the Fault Investigation Report (Kenney GeoScience., January 2022. The final geotechnical report for each future development project shall delineate the precise locations of all active faults and shall determine the appropriate building setbacks and restricted use zones within the planning area. Prior to issuance of grading permits, the City Engineer shall confirm that all grading and construction plans incorporate and comply with the recommendations included

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Impact	Level of Significance	Mitigation Measures
		in the final specific geotechnical report. Design, grading, and construction would adhere to all of the seismic requirements incorporated into the latest California Residential Code and California Building Code and the requirements and standards contained in the applicable chapters of the City of Coachella Municipal Code, as well as appropriate local grading regulations, and the specifications of the project geotechnical consultant, including but not limited to those related to seismic safety, as determined in the final area-specific geotechnical studies prepared in association with all future development project conditions, subject to review by the Director of the City of Coachella Development Services Department, or designee, prior to the issuance of any grading permits. An outline of the applicable recommendations is listed below, and a detailed explanation of each item is provided in the Conclusions and Recommendations section of Appendix F1. • Recommendations for grading plan review; • Recommendations for building restriction zones; • Recommendations for excavation and soil material and suitability for use as fill and backfill, including options for fill slope, building pad, street, and utility trench backfill; • Recommendations for low-density surface soils and compressibility; • Recommendations to evaluate the potential for earthquake-induced dry sand settlement; • Recommendations for expansion potential; • Recommendations for Earthwork including adjustments; site clearing and grubbing; pre-watering, ground preparation; recompacting of fault investigation trench backfill (if applicable); observation of ground preparation to be observed, tested, and

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		approved by the project geotechnical consultant and/or engineering geologist prior to fill placement; settlement monitoring; benching; mixing; disposal of oversize rock; and for cut/fill area processing and transitions; and shrinkage/bulking • Recommendations for haul roads; • Recommendations for slope construction; • Recommendations for Post-Grading Considerations which include utility trenches, pad drainage, water quality management plans, and slope landscaping and maintenance; • Recommendations for preliminary foundation designs; • Recommendations for Retaining Wall Design, Exterior Concrete Flatwork, and preliminary pavement design; • Recommendations for Corrosivity Screening. An outline of the applicable recommendations is listed below, and a detailed explanation of each item is provided in the Conclusions and Recommendations section of Appendix F2. • Recommendations for Fault Setbacks from Holocene-active and Age-Undetermined Faults. • Proposed Project Development Mitigation - Utility Lines, and construction of habitable, essential and critical structures
Impact 4.6-2 Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?	Less than Significant with Mitigation Incorporated	See **MM GEO-1** above.

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Impact	Level of Significance	Mitigation Measures
Impact 4.6-3 Would the Project directly or indirectly cause potential substantial adverse effects?	Less than Significant with Mitigation Incorporated	See **MM GEO-1** above.
Impact 4.6-4 Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?	Less than Significant with Mitigation Incorporated	See **MM GEO-1** above.
Impact 4.6-5 Would the Project result in substantial soil erosion or the loss of topsoil?	Less than Significant with Mitigation Incorporated	See **MM GEO-1** above.
Impact 4.6-6 Would the Project be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than Significant with Mitigation Incorporated	See **MM GEO-1** above.
Impact 4.6-7 Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than Significant with Mitigation Incorporated	See **MM GEO-1** above. **MM GEO-2: Expansive Soils.** Prior to issuance of grading permits, laboratory testing for expansive soils shall be completed by a qualified geotechnical engineer and submitted as a report the City of Coachella for review and approval by the City Engineer, in addition to the final geotechnical report. If expansive soils are found within the area of proposed foundations, soil mitigation measures such as excavation of expansive soils and replacement with nonexpansive compacted fill; additional remedial grading; utilization

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		of steel reinforcing in foundations; nonexpansive building pads; presoaking; and drainage control devices to maintain a constant state of moisture shall be included in the final foundation design recommendations during construction. Final foundation design recommendations shall be provided by the project geotechnical consultant on a lot-by-lot basis and shall be based on the actual expansion potentials; and weighted plasticity indices of the soil and bedrock materials underlying each individual lot. Via the covenants, conditions, and restrictions (CC&Rs), the Project Applicant/Owners shall advise homeowners and property occupants about maintaining drainage conditions to direct the flow of water away from structures so that foundation soils do not become saturated. During construction, the project engineer shall verify that expansive soil mitigation measures recommended in the final foundation design recommendations are implemented, and the City Building Official shall conduct site inspections prior to occupancy of any structure to ensure compliance with the approved measures.
Impact 4.6-9 Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	Less than Significant with Mitigation Incorporated	**MM GEO-3: Paleontological Construction Monitoring and Compliance Program**. The following measures will be implemented to reduce potential impacts to paleontological resources to less than significant: • Retain a Qualified Paleontologist. Prior to initial ground disturbance, the Applicant shall retain a project paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology standards for Qualified Professional Paleontologist, to direct all mitigation measures related to paleontological resources.

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Impact	Level of Significance	Mitigation Measures
		• Paleontological Mitigation and Monitoring Program. After project design has been finalized to determine the precise extent and location of planned ground disturbances, and prior to construction activity, a qualified paleontologist will prepare a Paleontological Mitigation and Monitoring Program to be implemented during ground disturbance activity for future proposed projects. This program will outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications. The program will be prepared in accordance with the standards set forth by current Society of Vertebrate Paleontology guidelines. • Paleontological Worker Environmental Awareness Program (WEAP). Prior to the start of construction, the project paleontologist or his or her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be presented at a preconstruction meeting that a qualified paleontologist shall attend. In the event of a fossil discovery by construction personnel, all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. If it is determined that the fossil(s) is (are) scientifically significant, the qualified paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources. • Paleontological Monitoring. Ground disturbing construction activities (including grading, trenching, foundation work, and other excavations) in areas mapped as high paleontological

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		sensitivity should be monitored on a full-time basis by a qualified paleontological monitor during initial ground disturbance. Areas mapped as low to high paleontological sensitivity shall be monitored by project-specific qualified paleontological monitor when ground-disturbing activities exceed five feet in depth, because underlying sensitive sediments could be impacted. Areas considered to have an undetermined paleontological sensitivity shall be inspected and further assessed if construction activities bring potentially sensitive geologic deposits to the surface. The Paleontological Mitigation and Monitoring Program shall be supervised by the project paleontologist. Monitoring should be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources. The duration and timing of the monitoring would be determined by the project paleontologist. If the project paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new or unforeseen deeper ground disturbances are required, and reduction or suspension will need to be reconsidered by the Supervising Paleontologist. Ground disturbing activity that does not exceed five feet in depth would not require paleontological monitoring. • Salvage of Fossils. If fossils are discovered, the project paleontologist or paleontological monitor shall recover them. Fossils shall be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the paleontologist will have the authority to temporarily

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		direct, divert, or halt construction activity to ensure that the fossil(s) will be removed in a safe and timely manner. • Preparation and Curation of Recovered Fossils. Once salvaged, the project paleontologist will ensure that significant fossils would be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the Western Science Center), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist. Field collection and preparation of fossil specimens would be performed by the project paleontologist with further preparation as needed by an accredited museum repository institution at the time of curation. • Final Paleontological Mitigation Report. Upon completion of ground disturbing activity (and curation of fossils, if necessary) the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration, and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
Section 4.7 Greenhouse Gas Emissions		
Impact 4.7-1 Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? **Impact 4.7-2** Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Significant and Unavoidable	See **MMs AQ-1** through **AQ-6** above. **MM GHG-1:** Prior to the issuance of each building's occupancy permit, the Project Applicant shall be required to install solar photovoltaic (PV) panels or other source of renewable electricity generation on-site, based on the maximum roof area available for solar (i.e., solar-ready zone). The solar-ready zone shall comply with Section 110.10 of the 2022 California Energy Code and shall comply with access, pathway, ventilation, and spacing requirements, and exclude skylight area. All single-family homes shall provide 25 percent of projected electricity demand via on-site solar; multifamily and nonresidential projects shall provide 50 percent of projected energy demand via on-site solar (e.g., rooftop, carports, etc.). The final PV generation facility size requires approval by Imperial Irrigation District (IID) or applicable electric utility. IID's Rule 21 governs operating and metering requirements for any facility connected to IID's distribution system. Should IID limit the off-site export, the proposed Project may utilize a battery energy storage system (BESS) to lower off-site export while maintaining on-site renewable generation to offset consumption. The electrical system and infrastructure must be clearly labeled with noticeable and permanent signage. The schedule of photovoltaic system locations may be updated as needed. **MM GHG-2:** Prior to the issuance of Phase 1, Phase 2, Phase 3, Phase 4, Phase 5, and Phase 6 building permits, the Project Applicant or successor in interest shall provide documentation to the City of Coachella demonstrating the following: • The Project shall be designed consistent with 2022 CALGreen

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		Tier 2 standards or incorporate measures that would result in an equivalent reduction. • The installation of natural gas in all residential uses shall be prohibited. • The Project shall provide facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A4.106.8.2 (Residential Voluntary Measures) of the 2022 CALGreen Code. Each single-family home shall include one low power Level 2 EV charging receptacle at minimum. • The Applicant shall coordinate with the City of Coachella and SunLine Transit Agency to ensure that bus pad and shelter improvements are incorporated, as appropriate. **MM GHG-3:** The development (Phase 1, Phase 2, Phase 3, Phase 4, Phase 5, and Phase 6) shall divert a minimum of 75 percent of landfill waste. Prior to issuance of certificate of occupancy for each planning area, a recyclables collection and load area shall be constructed in compliance with the City standards for Recyclable Collection and Loading Areas. **MM GHG-4:** For residential projects, all major applicant provided appliances (e.g., dishwashers, refrigerators, clothes washers and dryers, and water heaters) provided/installed shall be Energy Star certified or of equivalent energy efficiency where applicable. Prior to the issuance of the certificate of occupancy, the City of Coachella shall verify that the Project's Codes Covenants and Restrictions (CC&Rs) and/or tenant lease agreements require use of Energy Star® certified or equivalent appliances. This requirement shall be verified by the Planning and Building Department during plan check.

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
Section 4.8 Hazards and Hazardous Materials		
Impact 4.8-2 Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than Significant with Mitigation Incorporated	**MM HAZ-1: Soil Management Plan (SMP).** Prior to issuance of a grading permit or trenching or subsurface excavation for utilities or roadway infrastructure, the Master Developer, Site Developer, or Lead Agency, as applicable, shall retain a qualified environmental consultant to prepare a SMP that details procedures and protocols for on-site management of soils containing potentially hazardous materials. The SMP shall include, but not be limited to: • Land use history, including description and locations of known contamination; • The nature and extent of previous investigations and remediation at the site; • Identified areas of concern at the site, in relation to proposed activities; • A listing and description of institutional controls, such as applicable City ordinances and other local, state, and federal regulations and laws that would apply to the project; • Names and positions of individuals involved with soils management and their specific role; • An earthwork schedule; • Requirements for site-specific Health and Safety Plans (HSPs) to be prepared by all contractors at the Project site. The HSP should be prepared by a Certified Industrial Hygienist and would protect on-site workers by including engineering controls, personal protective equipment, monitoring, and security to prevent unauthorized entry and to reduce construction related hazards. The HSP should address the possibility of encountering

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		subsurface hazards including hazardous waste contamination and include procedures to protect workers and the public; • Hazardous waste determination and disposal procedures for known and previously unidentified contamination, including those associated with any soil export activities, if applicable; • Requirements for site specific techniques at the site to minimize dust, manage stockpiles, run on and run-off controls, waste disposal procedures, etc.; and • Copies of relevant permits or closures from regulatory agencies. **MM HAZ-2:** If potentially contaminated soil is identified during site disturbance activities for the Project, as evidenced by discoloration, odor, detection by instruments, or other signs, a qualified environmental professional shall inspect the site, determine the need for sampling to confirm the nature and extent of contamination, and provide a written report to the Master Developer, Site Developer, or Lead Agency, as applicable, stating the recommended course of action based on applicable regulations or other standards for handling and disposal (consistent with the required SMP), and remediation or removal of contaminated soils (e.g., DTCS's residential screening levels). Depending on the nature and extent of contamination, the qualified environmental professional shall have the authority to temporarily suspend construction activity at that location for the protection of workers or the public. If, in the opinion of the qualified environmental professional, substantial remediation may be required, the Master Developer, Site Developer, or Lead Agency, as applicable, shall contact representatives of the Riverside County Fire Department and/or DTSC for guidance and oversight and shall comply with all performance standards and requirements of the respective agency for proper removal and disposal of contaminated materials.

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
Section 4.9 Hydrology and Water Quality		
Impact 4.9-1 Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less than Significant with Mitigation Incorporated	**MM HYD-1: NPDES Compliance.** Prior to commencing grading, the Project Applicant shall comply with applicable construction water quality regulations including the NPDES General Construction Permit, which shall be obtained from the Regional Water Quality Control Board. This process requires that the applicant electronically submit Permit Registration Documents (PRDs) prior to commencement of construction activities in the Storm Water Multiple Application and Report Tracking System (SMARTS). PRDs consist of the NOI, Risk Assessment, Post-Construction Calculations, a Site Map, the SWPPP, a signed certification statement by the Legally Responsible Person, and the first annual fee. The required SWPPP must be submitted to the City, identifying specific actions and BMPs to prevent stormwater pollution during construction activities. The SWPPP shall identify a practical sequence for BMP implementation, site restoration, contingency measures, responsible parties, and agency contacts. The SWPPP shall include but not be limited to the following elements: a. Comply with the requirements of the State of California's most current Construction Stormwater Permit. b. Temporary erosion control measures shall be implemented on all disturbed areas. c. Disturbed surfaces shall be treated with erosion control measures during the October 15 to April 15 rainy season. d. Sediment shall be retained on-site by a system of sediment basins, traps, or other BMPs. e. The construction contractor shall prepare Standard Operating Procedures for the handling of hazardous materials on the construction site to eliminate discharge of materials to storm

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		drains. f. BMP performance and effectiveness shall be determined either by visual means where applicable (e.g., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination (such as inadvertent petroleum release) is required by the RWQCB to determine adequacy of the measure. g. In the event of significant construction delays or delays in final landscape installation, native grasses or other appropriate vegetative cover shall be established on the construction site as soon as possible after disturbance, as an interim erosion control measure throughout the duration of construction. h. Prior to the issuance of the first grading permit, the Project Applicant shall submit the Final Tentative Tract Map that includes the water quality BMPs for approval by the City Engineer. The City Engineer shall ensure that all applicable water quality standards are met before approving the SWPPP. **MM HYD-2: Water Quality Management Plan.** The Project Applicant shall prepare a Final Project-Specific WQMP with an Operations & Management (O&M) Plan for submittal together with the associated grading and improvement plans which must be approved prior to the issuance of a building or grading permit. These documents shall be prepared in accordance with applicable City (Coachella) and County (Riverside) water quality requirements, for review and approval by the City, including the following: • Site Design BMPs; • Source Control BMPs; • Treatment Control BMPs;

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		• BMP Sizing; • Equivalent Treatment Control Alternatives; • Regionally-Based Treatment Control BMPs; and • O&M Responsibility for Treatment Control BMPs.
Impact 4.9-3 Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?	Less than Significant with Mitigation Incorporated	See **MM HYD-1** and **MM HYD-2** above.
Impact 4.9-4 Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would sustainably increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less than Significant with Mitigation Incorporated	See **MM HYD-1** and **MM HYD-2** above.
Impact 4.9-5 Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less than Significant with Mitigation Incorporated	**MM HYD-3: Municipal Code Compliance**. Prior to the issuance of any grading or building permit, the Project will submit and have approved a WQMP to the City engineer on a form provided by the City. The WQMP would identify all BMPs that will be incorporated into the Project to control stormwater and non-stormwater pollutants during and after construction and shall be revised as necessary during the life of the Project. The WQMP shall demonstrate compliance with applicable City and County drainage plans, policies, design guidelines and regulations

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		including, but not limited to the City of Coachella Municipal Code Chapter 13.16, Water Quality Control.
Impact 4.9-7 Is the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	Less than Significant with Mitigation Incorporated	See **MM HYD-1** and **MM HYD-2** above.
Section 4.11 Noise		
Impact 4.11-1 Would the 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?	Less than Significant with Mitigation Incorporated	**MM NOI-1:** Prior to issuance of building permits, detailed project-specific acoustical studies for projects within Villages A through E based on architectural plans shall be prepared by a qualified acoustical consultant to demonstrate compliance with General Plan Policy 1.2. The project-specific acoustical studies shall be submitted to the City's Development Services Department to demonstrate that all residential units would meet the City's 70 dBA exterior noise standard and 45 dBA interior noise standard to the satisfaction of the Development Services Director. This mitigation measure complies with the applicable sections of the California Building Code (Title 24 of the California Code of Regulations). The necessary noise reduction may be achieved by implementing noise control measures at the receiver locations such as placing barriers between noise sources and receivers or enclosing loud equipment. The required noise attenuation measures shall be incorporated into the applicable building plans and specifications. **MM NOI-2:** Prior to issuance of building permits, detailed project-specific Noise Assessment for projects with Villages A through E shall be prepared, for submittal and approval of the City of Coachella Development Services Department, which demonstrates on-site placement of stationary noise sources at commercial uses would not exceed noise standards established in the City of Coachella General Plan and City of Coachella Municipal Code

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		Section 7.04.030. The Noise Assessment shall verify that stationary noise sources (e.g., loading dock facilities, mechanical equipment, and parking lots) are adequately shielded and/or located at an adequate distance from on-site and off-site sensitive receptors and residences in order to comply with noise regulations established by the City of Coachella.
Section 4.13 Public Services		
Impact 4.13-1 Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire Protection?	Less than Significant with Mitigation Incorporated	**MM PS-1: Funding for Permanent Fire Station.** Upon issuance of the 1st on-site Precise Grading Permit associated with the access road improvements, the Master Developer shall provide a bond to the City sufficient to secure construction of a permanent fire station within the Project. The amount of the bond shall be determined based on the costs for a permanent facility as outlined in the then-current City's Fee Nexus Study, but in no event shall exceed an amount equal to the cost to build a typical (non-headquarter) fire station completed during the last ten (10) years in the Coachella Valley. This would allow for the development of the Fire Station, acquisition of the required equipment and tentative staffing during the early development phases and prior to vertical construction beginning. A fully operational (i.e., built, equipped, and staffed) fire station shall be constructed before Developer is permitted to commence with the release of the 1st (non-utility/infrastructure) occupiable Building Permit and allowing vertical construction. The Fire Station would require an Advanced Life Support Fire Engine staffed 24 hours per day, 365 days per year. See also **MM TRF-2** and **MM TRF-6** below.

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
Impact 4.13-5 Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Other public facilities?	Significant and Unavoidable (for project-level and cumulative impacts to library services)	The applicant would be required to pay Development Impact Fees on behalf of the Project, including Library Facilities Impact fees. Revenue from these DIFs would supplement the City's general fund, along with the Project's future tax contributions, which the City may allocate at its discretion. No additional feasible mitigation measures are available to address impacts related to the need for new library facilities. Therefore, impacts would remain significant and unavoidable.
Section 4.14 Transportation		
Impact 4.14-1 Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant with Mitigation Incorporation	**MM TRF-1**: Prior to commencing grading, the Applicant shall develop and implement a Parking and Staging Plan for all phases of construction to require that all Project-related parking occurs on-site or in pre-designated off-site parking areas. The Staging Area shall maintain through park access for motor vehicles, bicycles, and pedestrians. At least 60 days prior to start of site mobilization, the Applicant shall submit the Plan to each affected jurisdiction for review and approval. **MM TRF-2**: Prior to construction grading, the Applicant shall submit for review and approval a Construction Traffic Control Plan (TCP) to the Cities of Coachella and Indio, County of Riverside, and Caltrans jurisdictions in the area as required as part of the encroachment permit or related approval process. The TCP shall address, at minimum, the following issues: a. Controlling construction traffic flow by use of a flag person at construction site entrances on public roads; b. Signage, lighting, and traffic control device placement if

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		required; c. Need, if any, for construction work hours and arrival/departure times outside of peak traffic periods; d. Maintaining access for emergency vehicles; e. Advanced notice to local agencies, transit providers, school districts, and emergency service providers regarding the anticipated schedule, location, and duration of any temporarily reduced through lanes, including clear plans for temporary detours and alternate routes, if applicable; f. Main through access in each direction on any public road; g. Maintain access to adjacent properties during the construction; h. Specify construction related haul routes for any material import/export; i. Timing of heavy equipment and building materials deliveries; and j. Identify specific contractor training and related safety procedures for construction vehicles exiting and entering work areas from public roads.
Impact 4.14-2 Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	Less than Significant with Mitigation Incorporated	**MM TRF-3:** The applicant will implement a marketing strategy to promote the project site employer's Commute Trip Reduction (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 and GHG emissions. Since 100% of employees will be eligible for the program, the Project can get a maximum VMT reduction of up to 4.00%.

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		MM TRF-4: The applicant will implement a ridesharing program and establish a permanent transportation management association with funding requirements for employees. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT and GHG emissions. Since 100% of employees will be eligible for the program, the Project can get a maximum VMT reduction of up to 4.00%. Based on the above, after the Project implements the combination mitigation measures of T-7 and T-8, the VMT reduction is 7.84%.
Impact 4.14-3 Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant with Mitigation Incorporated	See **MM TRF-1** and **MM TRF-2** above.
Impact 4.14-4 Would the project result in inadequate emergency access?	Less than Significant with Mitigation Incorporated	**MM TRF-5:** Prior to issuance of any building, or grading permit, the Project Applicant will prepare a Master Natural Disaster Preparedness Plan for the entire Project area and subsequent neighborhood-specific Natural Disaster Preparedness Plans, for each Village and proposed Phases of construction. The Natural Disaster Preparedness Plans, at minimum, would include but is not limited to the following elements: • Means of reporting fires, earthquakes, and other public safety emergencies. • Evacuation procedures and emergency escape route assignments. • Procedures for employees or emergency personnel who remain to operate critical operations before they evacuate. • Accounting for all employees and residents after an emergency

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		evacuation has been completed. • Rescue and medical duties for on-site employees and residents. • Names or job titles of persons who can be contacted. • A description of the alarm system to be used to notify employees (including disabled employees) to evacuate and/or take other actions. The alarms used for different actions should be distinctive and might include horn blasts, sirens, or even public address systems. • The site of an alternative communications center to be used in the event of an emergency. • The site of an alternative communications center to be used in the event of a fire or explosion. The Natural Disaster Preparedness Plans would be implemented by the Project Applicant/Site-specific Contractor during the Project's construction and implemented by the City of Coachella and site-specific employer, and HOA during the Project's operational phase. **MM TRF-6:** Project construction will not commence until completion of the I-10/Avenue 50 Interchange and the extension of Vista Del Norte is completed in order to provide two points of access to the Project site. See also **MM TRF-2** above.
External Network Year 2045 with Project Additional Recommended Improvements	The listed improvements have been identified to offset the effect of Year 2045 traffic and Project traffic and improve Levels of Service to an	**TRANS-1:** For any off-site improvements noted below, if not constructed or fully funded by others, the Project Applicant shall pay a fair share fee. For City of Coachella improvements, this fair share payment shall be at time of building permit issuance. For improvements in other jurisdictions, the Project Applicant or City of Coachella shall enter into an MOU with the affected jurisdiction(s)

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
	acceptable range and/or to pre-Project conditions for Year 2045 With Project traffic conditions.	regarding fair share payment timing. The Project Applicant's fair share payment to a jurisdiction other than City of Coachella shall only be made if there is an established mechanism for receiving the funds and ensuring the funds are directly allocated toward the identified improvement in a timely manner. **TRANS-2: Intersection 9. Jackson Street at Avenue 50 (City of Indio):** • Install a traffic signal and design for eight-phase operation with protective left-turn phasing for all approaches. • Stripe crosswalks across all four legs. **TRANS-3: Intersection 10. Jackson Street at Avenue 52 (City of Indio):** • Install a traffic signal and design for five-phase operation with protective left-turn phasing for Avenue 52. • Stripe crosswalks across all four legs. **TRANS-4: Intersection 13. Golf Center Parkway at I-10 Westbound Ramps (City of Indio/ Caltrans):** • Widen and/or restripe the east leg to provide an exclusive westbound left-turn lane. • Modify the existing traffic signal. **TRANS-5: Intersection 14. Golf Center Parkway at I-10 Eastbound Ramps (City of Indio/ Caltrans):** • Widen and/or restripe the south leg to provide an exclusive northbound right-turn lane. • Modify the existing traffic signal.

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Impact	Level of Significance	Mitigation Measures
		TRANS-6: Intersection 16. Golf Center Parkway/Lorraine Street at Highway 111 (City of Indio): • Widen and/or restripe the west leg to provide for a second exclusive eastbound left-turn lane. • Widen and restripe the north leg to provide an exclusive southbound left-turn lane and a second northbound departure lane. • Convert existing five-phase operation traffic signal to six-phase operation with protective left-turn phasing for eastbound and westbound traffic on Highway 111 and split-phasing on Golf Center/Lorraine Street. **TRANS-7: Intersection 19. Calhoun Street at Avenue 52 (Riverside County):** • Install a traffic signal and design for two-phase operation. • Stripe crosswalks across all four legs. **TRANS-8: Intersection 22. Van Buren Street at Avenue 52 (City of Coachella):** • Widen and restripe the east leg to provide a westbound through lane. • Widen and restripe the west leg to provide a second westbound departure lane. • Modify existing traffic signal. **TRANS-9: Intersection 32. Cesar Chavez Street at Avenue 52 (City of Coachella):** • Widen and restripe the west leg to provide an exclusive eastbound left-turn lane.

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		• Widen and restripe the east leg to provide an exclusive westbound left-turn lane. • Convert existing six-phase operation traffic signal to eight-phase operation with protective left-turn phasing for all approaches. **TRANS-10: Intersection 34. Grapefruit Boulevard at Leoco Lane (City of Coachella):** • Widen and/or restripe the north leg to provide an exclusive southbound right-turn lane. **TRANS-11: Intersection 36. Dillon Road at Vista Del Norte (City of Coachella):** • Widen and restripe the east leg to provide two exclusive westbound left-turn lanes. • Install a traffic signal and design for eight-phase operation. • Stripe crosswalks on all four legs. **TRANS-12: Intersection 37. Dillon Road at I-10 Westbound Ramps (City of Coachella/Caltrans):** • Install a traffic signal and design for three-phase operation. • Stripe crosswalks across west and east legs. **TRANS-13: Intersection 38. Dillon Road at I-10 Eastbound Ramps (City of Coachella/Caltrans):** • Install a traffic signal and design for three-phase operation. • Stripe crosswalks across west and east legs. **TRANS-14: Intersection 40. Magnolia Street/Tyler Street at Avenue 50 (City of Coachella):** • Widen and restripe the east leg to provide an exclusive

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		eastbound left-turn lane. • Install a traffic signal and design for three-phase operation with protected/permissive left-turn phasing for westbound Avenue 50. • Stripe crosswalks across all four legs. **TRANS-15: Intersection 46. Tyler Street at 50th Avenue (City of Coachella):** • Widen and restripe the south leg to provide a second exclusive northbound right-turn lane and a third southbound departure lane. • Widen and restripe the west leg to provide an exclusive eastbound right-turn lane. • Widen and restripe the east leg to provide two exclusive westbound left-turn lanes and a second eastbound departure lane. • Install a traffic signal and design for three-phase operation with split phasing for all approaches. • Stripe crosswalks across south and east legs. **TRANS-16: Intersection 47. Tyler Street at SR-86 (City of Coachella/Caltrans):** • Widen and restripe the south leg to provide two exclusive northbound left-turn lanes, a northbound through lane, and a second southbound departure lane. • Widen and restripe the north leg to provide an exclusive southbound left-turn lane, a second southbound through lane, a second exclusive southbound right-turn lane, and a second

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		northbound departure lane. • Widen and restripe the west leg to provide a second exclusive eastbound left-turn lane and a third westbound departure lane. • Widen and restripe the east leg to provide a third westbound through lane. • Modify the existing traffic signal and provide southbound and eastbound right-turn overlap phasing. **TRANS-17: Intersection 49. Polk Street at 50th Avenue (City of Coachella):** • Widen and restripe the east leg to provide an exclusive westbound left-turn lane. • Install a traffic signal and design for three-phase operation with protected/permissive left-turn phasing for westbound 50th Avenue. • Stripe crosswalks across all four legs. **TRANS-18: Intersection 50. Polk Street at Avenue 52 (City of Coachella):** • Widen and restripe the north leg to provide an exclusive southbound right-turn lane. • Widen and restripe the west leg to provide an exclusive eastbound left-turn lane and a second westbound departure lane. • Widen and restripe the east leg to provide a westbound through lane. • Install a traffic signal and design for three-phase operation.

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		• Stripe crosswalks across the north and west legs. **TRANS-19: Intersection 51. SR-86 at Avenue 52 (City of Coachella/Caltrans):** • Widen and restripe the south leg to provide a third northbound through lane and a third southbound departure lane. • Widen and restripe the north leg to provide a third southbound through lane and a third northbound departure lane. • Widen and restripe the west leg to provide an exclusive eastbound left-turn lane, an eastbound through lane, and a second westbound departure lane. • Widen and restripe to provide an exclusive westbound left-turn lane, a westbound through lane, an exclusive westbound right-turn lane, and a second eastbound departure lane. • Modify the existing traffic signal to provide westbound right-turn overlap phasing. **TRANS-20: Intersection 52. Fillmore Street at Avenue 50 (City of Coachella):** • Widen and restripe the south leg to provide an exclusive northbound left-turn lane. • Widen and restripe the west leg to provide a shared eastbound through/right-turn lane and a second westbound departure lane. • Widen and restripe the east leg to provide an exclusive westbound left-turn lane, a westbound through lane, and a second eastbound departure lane. • Install a traffic signal and design for five-phase operation with protected/permissive left-turn phasing for westbound Avenue

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
		50. • Stripe crosswalks across all four legs. **TRANS-21: Intersection 53. Fillmore Street at Avenue 52 (City of Coachella):** • Install a traffic signal and design for two-phase operation. • Stripe crosswalks across all four legs.
Section 4.15 Tribal Cultural Resources		
Impact 4.15-1 Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: • Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k) or • A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code (PRC) § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native	Less than Significant with Mitigation Incorporated	**MM TCR-1: Tribal Monitoring**. Prior to the commencement of any ground-disturbing activity within the Project site, the Project applicant shall retain a Native American Monitor (Tribal Monitor) approved by the Agua Caliente Band of Cahuilla Indians (Consulting Tribe). A copy of the executed contract will be submitted to the City of Coachella Planning and Building Departments prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal Monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground-disturbing activities are defined as activities that may include, but are not limited to, pavement removal, potholing or augering, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the Project site. The Tribal Monitor would be empowered to temporarily halt or redirect construction work within 100 feet of any find until the find can be assessed and evaluated by the Project Archaeologist in consultation with the Consulting Tribe, as required in MM CUL-2. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction

Table 1-1: Summary of Significant Impacts and Mitigation Measures

Impact	Level of Significance	Mitigation Measures
American Tribe?		activities, locations, soil, and any cultural materials identified. Monitoring will end when all ground-disturbing activities within the Project site are completed, or when the Consulting Tribe indicates that all upcoming ground-disturbing activities within the Project site have little to no potential for impacting tribal cultural resources.
Section 4.16 Utilities and Service Systems		
Impact 4.16-1 Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation or which could cause significant environmental effects?	Less than Significant with Mitigation Incorporated	See **MMs BIO-1** through **BIO-3** and **MMs HYD-1** through **HYD-3** above.

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1.5 ALTERNATIVES TO THE PROJECT

This subsection summarizes the project alternatives described in **Section 6.0, Alternatives to the Proposed Project**. CEQA requires that "an EIR shall 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 but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (State CEQA Guidelines Section 15126.6 (a). **Section 6.0** identifies potential alternatives to the proposed Project and evaluates them, as required by CEQA.

Alternatives Rejected from Further Consideration

Section 15126.6(c) of the State CEQA Guidelines permits the elimination of an alternative from detailed consideration due to: Failure to meet most of the basic project objectives; infeasibility; and inability to avoid significant environmental impacts. The following alternatives have been rejected from further consideration:

Alternative Site Alternative

CEQA Guidelines Section 15126.6(f)(2)(A) notes the following concerning alternative project locations:

- The key question and first step in alternative location analysis is whether any of the significant effects of the Project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. The majority of the proposed Project's significant effects are related to the scale of the Project, not its location. For instance, an alternative location would also be redeveloped, changing the scale/make-up of the alternative site in a manner similar to the proposed Project.
- CEQA Guidelines Section 15126.6(f) requires consideration of an Alternative Site that the Project Applicant would be reasonably able to acquire, control, or gain access to develop. The CEQA Guidelines section also posits that the alternative location chosen should substantially reduce or avoid potential environmental impacts. In the case of the proposed Project, an alternative site is not considered applicable or feasible, as the Project Applicant does not control other undeveloped property not already planned for development of similar size within the City or in the immediate area. Additionally, the City lacks developable sites that are approximately commensurate in size to the Project. Further, an alternative site in a comparable location would not be likely to substantially reduce any potential impact created by Project implementation. For the above reasons, the Alternative Site Alternative was rejected from further consideration and is not discussed further.

Mojave Desert Tortoise Conservation Area Alternative

Based on public comments received during the NOP scoping period, an alternative was considered which would involve the reduction of specific development areas throughout the Project site which would intersect or fall within Desert Tortoise Conservation Area lands. This would be done to preemptively avoid the areas with higher densities of tortoises and higher quality habitat, and ensure these areas are

consistent to conservation lands that would remain in a natural state north, northeast, and east of the Project area. These undeveloped areas within the Project area would be designated as natural open space areas. This alternative, however, would be necessitated by the presence of designated Desert Tortoise Conservation Areas within the Project site, or the identified presence of desert tortoise within the Project site. The Project site is adjacent to, but not within or intersecting with currently designated Desert Tortoise Conservation Areas. Additionally, desert tortoise were not encountered during field visits. Additionally, the biological resources assessment conducted for the Project identified suitable habitat for the tortoise within the area which is already managed by the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). Impacts to desert tortoise would therefore be addressed through coordination with the CVMSHCP. Bolstering this, mitigation is proposed in the EIR which requires the retention of a qualified biologist to conduct preconstruction surveys for the desert tortoise. If desert tortoise is found, the Project applicant shall notify the USFWS 45 days prior to the issuance of any grading permit to allow the USFWS to salvage adult tortoises. If the USFWS is not able to salvage desert tortoise, the Project applicant will salvage desert tortoise per current USFWS desert tortoise clearance survey protocol. Construction on the Project site would not occur until the tortoises are salvaged (see MM BIO-1).

However, due to the lack of current determination of Project lands within Desert Tortoise Conservation Areas (See Appendix C) and the lack of identified locations harboring desert tortoise, the Project is unable to analyze this alternative with any certainty. Actions to reduce or modify the Project boundary based on potential occurrence of desert tortoise would be speculative and would otherwise not be feasibly accomplished based on limited knowledge of desert tortoise location within the Project site. Therefore, in accordance with CEQA Guidelines Section 15126.6(c), this alternative has been removed from further consideration due to its infeasibility. However, this EIR includes MMs which are aimed at ensuring adequate coordination with state and local agencies, including the Coachella Valley Conservation Commission.

Alternative 1: "No Project / No Build" Alternative

Consistent with State CEQA Guidelines Section 15126.6, the "No Project" Alternative assumes that the existing land uses and condition of the Project site at the time the Notice of Preparation (NOP) was published (November 14, 2022) would continue to exist without changes. The setting of the Project site at the time the NOP was published is described as part of the existing conditions noted throughout **Section 4.0** of this Draft EIR, with respect to individual environmental issues and forms the baseline of the impact assessment of the proposed project. Under the Alternative 1, no development would occur and the Project site would remain in its current undeveloped state.

All topics anticipated to cause a less than significant impact, less than significant with mitigations, or a significant and unavoidable impact would be eliminated under Alternative 1. However, the implementation of Alternative 1 is not under consideration, as it fails to meet the Project objectives; does not address future housing needs and RHNA allocation as identified in the City's Housing Element Update; and is inconsistent with local land use plans as identified in the in the City's General Plan. In addition, a No Project/No-Build alternative would not preclude the Project site from being developed in the future. The

City is precluded from downzoning existing residentially zoned land without identifying replacement housing and upzoning other sites, pursuant to SB 330.

Alternative 2: "No Project / Existing Zoning and General Plan" Alternative

Alternative 2 would allow decision-makers the ability to compare the impacts of approving the Project with impacts of not approving the Project by maintaining the existing zoning and general plan land use designations of the Project area, simulating development as established by the Project site's existing zoning standards.

Alternative 2 is estimated to have a greater impact compared to the proposed Project for all environmental topics except aesthetics, land use and planning, and population and housing. Overall impacts would increase compared to the proposed Project. Alternative 2 fails to meet two of the eight Project objectives. Alternative 2 would meet six objectives.

The feasibility of Alternative 2 is speculative because we cannot currently conclude the exact extent of public service impacts as public service demand (such as library usage) varies between households and cannot be accurately predicted. Additionally, Alternative 2 is anticipated to cause a greater impact to the evaluated resources compared to the proposed Project and would therefore worsen environmental conditions. Therefore, this Alternative is not under consideration at this time.

Alternative 3: "Reduced Density" (20 Percent Reduction) Alternative

Alternative 3 focuses on redesigning the Project to reduce the overall density by 20 percent, and subsequently, reduce the Project's overall development capacity.

Alternative 3 is anticipated to generally cause a less than or equivalent level of impact. Areas such as energy, geology, greenhouse gas emissions, hazardous materials, and hydrology are anticipated to be reduced under Alternative 3 due to the direct relationship between the decrease in housing development. Topics requiring services, grading, and disturbance of natural resources would generally be equivalent to the proposed Project.

Overall, while Alternative 3 would generally meet most of the Project objectives, it would not provide the quantity and variety of housing and employment opportunities desired by the applicant and City, would hinder the City's ability to meet its RHNA goals, and would hinder the viability of implementing the new I-10 interchange, which is an essential circulation improvement for the Coachella Valley. In addition, although this alternative would generally reduce the Project's significant impacts due to the 20 percent density reduction, it would not eliminate all of the Project's unavoidable significant impacts. Based on the above, and considering that this alternative would not fulfill the Project's objectives to the greatest extent possible, this alternative is not under consideration at this time. Nonetheless, this alternative is considered the Environmentally Superior Alternative.

Environmentally Superior Alternative

CEQA requires an EIR to identify the environmentally superior alternative. The environmentally superior alternative is the one that would result in the fewest or least significant environmental impacts. The context of an environmentally superior alternative is based on the consideration of several factors including the reduction of environmental impacts to a less than significant level, the project objectives, and an alternative's ability to fulfill the objectives with minimal impacts to the existing site and surrounding environment. Alternative 1: "No Project / No Build" is an environmentally superior alternative because it would eliminate all of the potentially significant impacts of the proposed Project. However, while the "No Project / No Build" Alternative is environmentally superior, it is not capable of meeting any of the basic objectives of the proposed Project. Section 15126.6(e)(2) of the State CEQA Guidelines states that if the "No Project" alternative is found to be environmentally superior, "the EIR shall also identify an environmentally superior alternative among the other alternatives."

Therefore, the environmentally superior alternative to the proposed Project is the one that would result in the fewest or least significant environmental impacts while meeting most (or all) of the basic Project objectives. As discussed above, based on the evaluation undertaken, Alternative 3: "Reduced Density" is the environmentally superior alternative. However, Alternative 3 would not avoid all of the significant and unavoidable impacts related to aesthetics, air quality, geology and soils, greenhouse gas emissions, public services, or noise. Also, by reducing the density of the Project by approximately 20 percent, the reduced density would not fulfill certain objectives to the same degree as the proposed Project. As previously stated, Alternative 3 would not meet the Project objectives to the extent of the proposed Project.

Table 1-2: Comparison of Alternatives and Environmental Considerations

Topic	Project Impact Conclusion	Alternative 1 "No Project/No Build" Alternative	Alternative 2 "No Project/Existing Zoning and General Plan" Alternative	Alternative 3 "Reduced Density" Alternative
Aesthetics	Significant and Unavoidable	–	+	=
Air Quality	Significant and Unavoidable	–	+	+
Biological Resources	Less than Significant with Mitigation Incorporated	–	+	=
Cultural Resources	Less than Significant with Mitigation Incorporated	–	+	=
Energy	Less than Significant	–	+	–
Geology and Soils	Significant and Unavoidable	–	-	–
Greenhouse Gas Emissions	Significant and Unavoidable	–	+	=
Hazards and Hazardous Materials	Less than Significant with Mitigation Incorporated	–	+	–
Hydrology and Water Quality	Less than Significant with Mitigation Incorporated	–	+	–
Land Use and Planning	Less than Significant	+	–	=
Noise	Significant and Unavoidable	–	+	=
Population and Housing	Less than Significant	+	–	=

Table 1-2: Comparison of Alternatives and Environmental Considerations

Topic	Project Impact Conclusion	Alternative 1 "No Project/No Build" Alternative	Alternative 2 "No Project/Existing Zoning and General Plan" Alternative	Alternative 3 "Reduced Density" Alternative
Public Services	Significant and Unavoidable	–	+	=
Transportation	Less than Significant with Mitigation Incorporated	–	+	=
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	–	+	=
Utilities and Service Systems	Less than Significant with Mitigation Incorporated	–	+	-
Attainment of Project Objectives	Meets all of the Project Objectives	Meets none of the Project Objectives	Meets some of the Project Objectives	Meets all of the Project Objectives, but not to the same degree as the Project

Notes:
A minus (-) sign means the Project Alternative has reduced impacts when compared to the Project/is environmentally superior.
A plus (+) sign means the Project Alternative has increased impacts when compared to the Project/is environmentally inferior.
An equal sign (=) means the Project Alternative has similar impacts when compared to the Project/is environmentally equivalent.

2.0 INTRODUCTION

This Draft Environmental Impact Report (EIR) is prepared for the KPC Coachella Specific Plan Project (Project) in compliance with the California Environmental Quality Act (CEQA). CEQA requires local and state agencies to identify the significant environmental impacts of a proposed project and to avoid or mitigate those impacts, if feasible, through mitigation measures or project alternatives. The CEQA Guidelines are located within the California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387 (CCR or CEQA Guidelines), while the CEQA statute is codified as Public Resources Code Sections 21000-21189.57 (PRC or CEQA Statute). For purposes of CEQA review and compliance for this Project, the City of Coachella (City) serves as the Lead Agency.

The Project site is located in the City of Coachella, in the eastern portion of Coachella Valley north of Interstate 10 (I-10). The Project site is approximately three miles northeast of the City center in the foothills of the Little San Bernardino Mountains and is bounded by the San Bernardino Mountains to the north, I-10 and the City of Coachella to the south and west, and unincorporated Riverside County to the east and north; see **Exhibit 3-2: Local Vicinity**. The Project proposes the following land uses:

- A mixture of residential product types, including an active adult/senior-oriented village, totaling approximately 9,538 dwelling units;
- Approximately 305 acres of commercial areas, which include mixed-use, entertainment center and performing arts theater, entertainment venue, and hotel rooms;
- A college/university overlay to allow for institutions of higher learning with an emphasis on healthcare;
- Approximately 71 acres of school uses (3 elementary schools and 1 middle school);
- Approximately 379 acres of parks, greenways, and amenity centers;
- Approximately 179 acres of circulation uses, including arterials, major, and secondary roadways;
- Approximately 68 acres of Agricultural Production areas;
- Approximately 770 acres of natural open space, including drainage channels and trails; and
- Approximately 91 'not a part' acres[1]

The Project would be constructed in six phases. The actual phasing sequence and timeframe for development may vary depending on market conditions.

2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

According to CEQA Guidelines Section 15121 and PRC Section 21061, the purpose of an EIR is to provide detailed information to public agency decision-makers and the public on the environmental effects of a proposed project. Accordingly, this Draft EIR reviews the existing conditions at and in the vicinity of the Project site; identifies and analyzes the potential environmental impacts; and recommends feasible

[1] Approximately 91 acres in the central portion of the Project area are owned by others and are designated as "Not a Part" on the land use plan for the Project. These three areas are identified in **Exhibit 3-6: Land Use Plan** and **Table 3-3: Plan Areas Summary**.

mitigation measures or Project alternatives to reduce or avoid significant adverse environmental effects, as described in **Section 3.0: Project Description**, **Section 4.0: Environmental Impact Analysis**, and **Section 6.0: Alternatives to the Proposed Project**. The potential impacts evaluated include both temporary construction-related effects and the long-term effects of development, operation, and maintenance of the Project, as described in **Section 4.0: Environmental Impact Analysis**.

The intent of this Draft EIR is to evaluate and where feasible, avoid or mitigate the Project's potential environmental impacts utilizing site and Project-specific detailed plans, technical studies, and related information that is available. This Draft EIR will be used by the City as the Lead Agency, other responsible and trustee agencies, interested parties, and the general public to evaluate the potential environmental impacts of the Project (refer to **Section 3.7: Required Agency Approval**, for a list of anticipated responsible and trustee agencies and Project approvals).

Therefore, this Draft EIR is intended to serve as the primary environmental document for all entitlements associated with the Project, including all discretionary approvals requested or required to implement the Project. The City, as the Lead Agency, can approve subsequent actions without additional environmental documentation unless otherwise required by Section 21166 of the CEQA Statute and Section 15162 of the CEQA Guidelines. The CEQA Statute specifies the following in Section 21166:

When an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs:

(a) Substantial changes are proposed in the project, which will require major revisions of the environmental impact report.

(b) Substantial changes occur with respect to the circumstances under which the project is being undertaken, which will require major revisions in the environmental impact report.

(c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

Additionally, Section 15162 of the CEQA Guidelines specifies:

(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

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

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

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

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

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

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

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

2.2 COMPLIANCE WITH CEQA

According to the CEQA Guidelines Section 15064(f)(1) and CEQA Statute Section 21100, preparation of an EIR is required whenever a project may result in a significant effect on the environment. An EIR is an informational document used to inform public agency decision-makers and the general public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the Project that could feasibly attain most of the basic objectives of the Project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project. CEQA requires that state and local government agencies consider the environmental effects of projects over which they have discretionary authority before taking action on those projects.

This Draft EIR identifies and analyzes the environmental effects of the Project to the degree of specificity appropriate to the current proposed actions, as required by Section 15146 of the CEQA Guidelines. The analysis considers the activities associated with the Project in order to determine the short-term and long-term environmental effects associated with their implementation. This Draft EIR discusses both temporary and permanent impacts and direct and indirect impacts of the Project, in addition to cumulative impacts associated with other past, present, and reasonably foreseeable future projects.

Based on significance criteria, the effects of the Project are categorized as either “no impact,” “less than significant,” “less than significant with mitigation incorporated,” or “significant unavoidable” (refer to **Section 4.0: Environmental Impact Analysis**). Mitigation measures are recommended for potentially significant impacts, to avoid or lessen, to the extent feasible and possible, the Project’s environmental impacts. In the event the Project results in significant unavoidable impacts even with implementation of feasible mitigation measures, the decision-makers may approve the Project based on a “Statement of Overriding Considerations.” This determination requires the decision-makers to balance the benefits of the Project to determine if they outweigh identified unavoidable impacts.

CEQA Guideline Section 15093 provides the following:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

2.3 NOTICE OF PREPARATION/EARLY CONSULTATION

In compliance with the CEQA Guidelines, the City provided opportunities for various agencies and the public to participate in the environmental review process. During preparation of the Draft EIR, efforts were made to contact various federal, state, regional, and local government agencies, and other interested parties to solicit comments on the scope of review in this document. This included the distribution of a Notice of Preparation (NOP) to various responsible agencies, trustee agencies, and interested parties. Pursuant to CEQA Guidelines Section 15082 and CEQA Statute Section 21092, the City circulated the NOP directly to public agencies (including the State Clearinghouse Office of Planning and Research), sent a mailing to property owners within 300 feet of the Project boundary and property owners of The Villas at the Vineyards, and provided notice to members of the public who had requested such notice. In addition, the NOP was also uploaded to CEQANet, and the environmental documents were made available to the public on the City's website. The NOP was distributed on November 14, 2022, with the 30-day public review period concluding on December 14, 2022. A copy of the NOP is included in **Appendix A: Notice of Preparation and Scoping Materials**.

PUBLIC SCOPING MEETING

The City included a notice of a public scoping meeting for the Project with the NOP referenced above. An in-person public scoping meeting was held on November 21, 2022, at the Coachella Civic Center, 53990 Enterprise Way, Coachella, California 92236. The purpose of the scoping meeting was to obtain comments from the public and agencies regarding the scope of the environmental document.

No official oral comments were received during the Scoping Meeting. However, a representative from CAL FIRE expressed concern regarding response times from existing facilities. A total of 21 comment letters were received in response to the NOP within the review period. The NOP comment letters received during the NOP review period, and Scoping Meeting Materials are included in **Appendix A: Notice of Preparation and Scoping Materials**.

Areas of concern and topics identified during the scoping period include:

- Assessment of biological resources and impacts
- Joint Project Review process with the Coachella Valley Conservation Commission
- School siting
- Increase in student population
- Tribal consultation
- Overcrowding
- Consistency with Regional Transportation Plan/Sustainable Communities Strategy

NATIVE AMERICAN CONSULTATION

Senate Bill (SB) 18, further discussed in **Section 4.15: Tribal Cultural Resources**, requires local governments to consult with Native American tribes prior to making certain planning decisions, and to provide notice to tribes at certain key points in the planning process. The intent of SB 18 is to provide Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting and mitigating impacts to cultural resources.

Assembly Bill (AB) 52, also further discussed in **Section 4.15**, requires that the lead CEQA agency consult with California Native American tribes that have requested consultation for projects that may affect tribal cultural resources. The lead CEQA agency shall begin consultation with participating Native American tribes prior to the release of a negative declaration, mitigated negative declaration, or EIR. Under AB 52, a project that has potential to cause a substantial adverse change to a tribal cultural resource constitutes a significant effect on the environment unless mitigation reduces such effects to a less than significant level.

The City sent AB 52 and SB 18 notification to representatives of the following tribes on December 12, 2022:

- Twenty-Nine Palms Band of Mission Indians
- Agua Caliente Band of Cahuilla Indians
- Augustine Band of Cahuilla Indians
- Cabazon Band of Mission Indians
- Cahuilla Band of Indians
- Los Coyotes Band of Cahuilla Indians
- Morongo Band of Mission Indians
- Ramona Band of Cahuilla Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseno Indians
- Torres-Martinez Desert Cahuilla Indians

Lucy Padilla, with the Agua Caliente Band of Cahuilla Indians, responded with a letter on January 18, 2023, with a request for various Project materials. The City met with the Tribe on January 30, 2023, and provided

the requested materials on February 7, 2023. No further coordination has occurred to date and consultation is closed. No response was received from any of the other contacted tribes.

The results of the Project's cultural resources studies, along with the information received through the SB 18/AB 52 consultation process, are discussed in **Section 4.4: Cultural Resource** and **Section 4.15: Tribal Cultural Resources**.

STAKEHOLDER CONSULTATION

In addition to required CEQA consultation through the NOP Scoping process and SB 18/AB 52 consultation, the City and Project Applicant engaged in extensive stakeholder consultation following the release of the NOP in November 2022. This stakeholder outreach included focused consultation with agencies from which the Project Applicant would require permits or approvals, including but not limited to:

- Coachella Valley Conservation Commission
- Desert Sands Unified School District
- Coachella Valley Unified School District
- Riverside County Fire Department/CAL FIRE
- U.S. Fish and Wildlife Service
- California Department of Fish and Wildlife

2.4 ENVIRONMENTAL REVIEW PROCESS

PUBLIC REVIEW OF THE DRAFT EIR

Per CEQA Guidelines Section 15105, the public review period for a Draft EIR shall not be less than 30 days, nor should it be longer than 60 days except under unusual circumstances. This Draft EIR will be circulated for a 45-day public review period.

The public is invited to comment in writing on the information contained in this document. Interested agencies and members of the public are invited to provide written comments on the Draft EIR. The Draft EIR is available to the general public for review on the City's website at:

https://www.coachella.org/departments/development-services/environmental-reviews

The Draft EIR is also available at the locations listed below:

- Development Services Counter – Planning Division, City of Coachella, 53990 Enterprise Way, Coachella, CA 92236
- Coachella Library, 1500 Sixth Street, Coachella, CA 92236
- CEQAnet at https://ceqanet.opr.ca.gov/ (State Clearing House No. 2022110295)

Comment letters should be sent to:

City of Coachella
Development Services Department
Attn: Ms. Kendra Reif, Community Development Director
53990 Enterprise Way
Coachella, CA 92236
Email: kreif@coachella.org

FINAL EIR

Upon completion of the 45-day Draft EIR public review period, the City will evaluate all written comments received during the public review period on the Draft EIR. Pursuant to CEQA Guidelines Section 15088, the City will prepare written responses to comments raising environmental issues with the adequacy or accuracy of the information provided. Pursuant to CEQA Guidelines Section 15132 (Contents of Final Environmental Impact Report), the Final EIR will be prepared and will include:

(a) The Draft EIR or a revision of the draft;

(b) Comments and recommendations received on the Draft EIR either verbatim or in summary;

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR; and

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and

(e) Any other information added by the Lead Agency.

Additionally, pursuant to CEQA Guidelines Section 15088 (Evaluation of and Response to Comments), the City will respond to all comments and, after the Final EIR is completed, the City will provide a written response to each public agency on comments made by that public agency at least ten days prior to certifying the EIR.

CERTIFICATION OF THE FINAL EIR

The Draft EIR, as revised by the Final EIR, will be considered by the City Council for certification, consistent with CEQA Guidelines Section 15090, which states:

Prior to approving a project, the Lead Agency shall certify that:

(1) The final EIR has been completed in compliance with CEQA;

(2) The final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project; and

(3) The final EIR reflects the Lead Agency's independent judgment and analysis.

Regarding the adequacy of an EIR, according to CEQA Guidelines Section 15151, "An 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. 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. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

PROJECT CONSIDERATION

After certification of the Final EIR, the City Council may consider approval of the proposed Project. A decision to approve the Project would be accompanied by specific, written findings, in accordance with CEQA Guidelines Section 15091.

2.5 FORMAT OF THE EIR

This Draft EIR is organized into eight sections:

Section 1.0 **Executive Summary**, provides a project summary and summary of potentially significant environmental impacts, and proposed mitigation measures and Project alternatives.

Section 2.0 **Introduction**, provides CEQA compliance information.

Section 3.0 **Project Description**, provides Project history, as well as the environmental setting, Project characteristics and objectives, phasing, and anticipated permits and approvals that may be required for the Project.

Section 4.0 **Environmental Impact Analysis**, provides a discussion of the existing conditions for each of the environmental impact areas. This section also describes methodologies for significance determinations, identifies both short-term and long-term environmental impacts of the Project, recommends mitigation measures to reduce the significance of environmental impacts, and identifies any areas of potentially significant and unavoidable impacts. This section also includes a discussion of cumulative impacts that could arise as a result of Project implementation.

Section 5.0 **Other CEQA Considerations**, summarizes unavoidable significant impacts, and discusses significant irreversible environmental changes, growth-inducing impacts, and energy conservation, in accordance with CEQA Guidelines *Appendix F*.

Section 6.0 **Alternatives to the Proposed Project**, describes potential Project alternatives, including alternatives considered but rejected from further consideration, the No Project Alternative, various Project Alternatives, and identifies the Environmentally Superior Alternative.

Section 7.0 **Effects Found Not to Be Significant** describes potential impacts that have been determined not to be significant.

Section 8.0 **EIR Consultation and Preparation** identifies the CEQA Lead Agency and EIR preparation team.

2.6 RESPONSIBLE AND TRUSTEE AGENCIES

LEAD AGENCY

City of Coachella

For this Project, the City is the Lead Agency under CEQA. This Draft EIR has been prepared in accordance with the CEQA Statute and the CEQA Guidelines. CEQA requires lead agencies to consider potential environmental effects that may occur with implementation of a project and to avoid or substantially lessen significant effects to the environment when feasible. When a project may have a significant effect on the environment, the agency with primary responsibility for carrying out or approving the project (the Lead Agency) is required to prepare an EIR.

Trustee, Responsible, and Cooperating Agencies

Other federal, state, and local agencies are involved in the review and approval of the Project, including those agencies designated as trustee and responsible agencies under CEQA. Under CEQA, a trustee agency is a state agency that has jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. A responsible agency is an agency, other than the lead agency, that has responsibility for carrying out or approving a project. Responsible and trustee agencies are consulted by the CEQA lead agency to ensure the opportunity for input and also review and comment on the Draft EIR. Responsible agencies also use the CEQA document in their decision-making.

The Project includes infrastructure improvements that may require consultation and permits from agencies such as the United States Army Corps of Engineers (USACE), Coachella Valley Conservation Commission, California Department of Fish and Wildlife, Coachella Valley Water Authority, Imperial Irrigation District, and Southern California Edison (SCE). There may be several other agencies other than these listed that may require permits, approvals, and/or consultation in order to implement various elements of the Project. A full list of all applicable agencies is listed in **Section 3.6: Required Agency Approval**.

2.7 INCORPORATION BY REFERENCE

Pertinent documents relating to this Draft EIR have been cited in accordance with CEQA Guidelines Section 15148 or have been incorporated by reference in accordance with CEQA Guidelines Section 15150, which encourages incorporation by reference as a means of reducing redundancy and the length of environmental reports. The following documents are hereby incorporated by reference into this Draft EIR and are available for review online. Information contained within these documents has been utilized for various sections of this Draft EIR.

Coachella General Plan Update. The City of Coachella, along with its City Council, adopted the Coachella General Plan Update on April 22, 2015. The Coachella GP constitutes the City's long-term plans, goals, and objectives for development within the City's jurisdiction. The Coachella GP addresses a broad range of issues relating to the City's physical, economic, and social development. It contains an evaluation of existing conditions and provides the long-term goals and policies necessary to guide growth and

development in the direction that the community desires. The Coachella GP serves as a decision-making tool to guide future growth and development decisions.

The General Plan consists of eight elements:

- Land Use and Community Character
- Mobility
- Community Health and Wellness
- Safety
- Sustainability and the Natural Environment
- Infrastructure and Public Services
- Noise
- Housing Element

The Coachella GP was used throughout this Draft EIR since it contains policies and regulations relevant to the Project. This document is available for review on the City's website at:

https://www.coachella.org/departments/general-plan-2035

Coachella General Plan Update Final Environmental Impact Report (SCH #2009021007). The Coachella General Plan Update Environmental Impact Report (General Plan EIR) analyzed the potential environmental impacts that would result from implementation of the Coachella General Plan Update. The Planning Area for the General Plan EIR encompassed 18,564 acres of City land and 14,755 acres within the City's sphere of influence. The General Plan EIR was used in this Draft EIR as a source of baseline data and cumulative impacts for buildout of the City:

https://cityofcoachellageneralplanupdate.weebly.com/final-eir.html

Coachella Municipal Code. The Coachella Municipal Code (Coachella MC) regulates land use and activities within the City's jurisdiction including, zoning regulations (codified in Title 17). Coachella MC Title 17 is the primary tool for implementing the City's General Plan's goals, objectives, and policies. The Coachella MC is referenced throughout this Draft EIR to establish the Project's baseline requirements according to the City's municipal code regulations. The Coachella MC can be accessed online at:

https://library.municode.com/ca/coachella/codes/code_of_ordinances

Riverside County General Plan. The County of Riverside adopted the County of Riverside General Plan in 2015. The General Plan serves as a blueprint for growth and development. The County of Riverside General Plan primarily focuses on the unincorporated area - territory that is not located within a city - but also addresses regional services and facilities provided by the County such as regional parks, roads, and flood control facilities. As part of its General Plan, the County includes the following 10 elements: 1) Land Use; 2) Circulation; 3) Multipurpose Open Space; 4) Safety; 5) Noise; 6) Housing; 7) Air Quality; 8) Healthy Communities; and 10) Administration. This document is available for review on the County's website at:

https://planning.rctlma.org/riverside-county-general-plan

Riverside County General Plan Final Environmental Impact Report (SCH #2009041065). The Riverside County General Plan Environmental Impact Report analyzed the potential environmental impacts that would result from implementation of the County's General Plan. The planning area for the General Plan

EIR encompassed roughly 6,500 square miles of County land. Buildout presented in the General Plan EIR is as follows: Dwelling units at 520,737; population at 1,701,910, workers at 763,477; and jobs at 254,219. This document is available for review on the County's website at:

https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015

Coachella Valley Multiple Species Habitat Conservation Plan (MSHCP) Environmental Impact Report/Statement (SCH # 2000061079). This joint EIR/EIS evaluates the potential for environmental effects from the Coachella Valley MSHCP. The document evaluates the potential environmental consequences and impacts associated with implementation of the proposed MSHCP; evaluates the alternatives at an equal level of detail, provides mitigation measures for environmental effects identified as significant; addresses cumulative and growth inducing effects that could result from implementation of the proposed MSHCP; and provides enough data to enable decision-makers to make an informed decision whether to approve the proposed MSHCP. This document is available for review on the Commission's website at:

https://cvmshcp.org/plan-documents/#annual-reports

3.0 PROJECT DESCRIPTION

3.1 PURPOSE

The City of Coachella (City), as Lead Agency under the California Environmental Quality Act (CEQA) has prepared this Draft Environmental Impact Report (EIR) for the KPC Coachella Specific Plan Project (Project). The purpose of the Project Description is to provide an accurate, stable, and finite description of the Project to allow for meaningful review by local, state, and federal reviewing agencies, decision-makers, and interested parties. CEQA Guidelines Section 15124 (14 California Code of Regulations [CCR] Section 15124) requires a project description to contain the following:

1. The precise location and boundaries of the proposed project shown on a detailed map and along with a regional location map;
2. A clearly written statement of the objectives of the proposed project including the underlying purpose of the project and project benefits. The statement of objectives must be detailed enough to allow a Lead Agency the opportunity to develop and evaluate project alternatives;
3. A description of the proposed project's technical, economic, and environmental characteristics, along with engineering and public service facilities details; and
4. A statement describing the intended uses of the EIR, including a chronological list of all necessary approvals and a roster of other agencies that may use the document, a list of required permits and approvals, and a list of related consultation and environmental review necessary under local, state, and federal laws, regulations, and policies.

An adequate project description need not be extensive, but it must be sufficient to allow for review and evaluation of the possible environmental impacts of a proposed project.

3.2 PROJECT OVERVIEW

The Project, commonly referred to as "KPC Coachella," includes adoption of the KPC Coachella Specific Plan. In addition to the KPC Coachella Specific Plan adoption, other related Project entitlements include an Environmental Review, Development Agreement, Tentative Tract Map, Zone Change, and General Plan Map and Text Amendment. The Project also includes the construction or improvement of various off-site infrastructure, including extending utilities, water facilities, sewer lines, drainage facilities, and the extension of Vista Del Norte across the Coachella Canal to the Project site. A new Avenue 50 Interchange with I-10 is also proposed: however, not as part of this Project.

Each of the specific Project entitlement applications and associated supporting documents (i.e., KPC Coachella Specific Plan, Tentative Tract Map, Development Agreement, etc.) are hereby incorporated by reference into this EIR and are available for review in the City of Coachella Development Services Department located at 53990 Enterprise Way, Coachella, California 92236.

The purpose of this Draft EIR for the Project is to review the existing conditions at and in the vicinity of the Project site; identify and analyze the potential environmental impacts; and suggest feasible mitigation measures or alternatives to reduce significant adverse environmental effects, as described in this section and **Section 6.0: Alternatives to the Proposed Project**. This Project entails the construction of a maximum of 9,538 residential dwelling units, as well as a maximum of 305 acres of commercial development which includes a maximum of 844 multiple-family dwelling units. In addition, 395 acres of parks, greenways, and amenity centers; 68 acres of agricultural production; and 754 acres of drainage and other open space are included in the KPC Coachella Specific Plan. The KPC Coachella Specific Plan would also include 179 acres of right-of-way/streets. The Project also proposes a Wellness University Overlay District in Planning Area A-5 intended to allow for medically-related educational facilities to be developed in this area should the market provide the opportunity for it. In total, the KPC Coachella Specific Plan consists of approximately 2,807 acres. Development and full buildout of the Project is expected to occur in six phases over a period of 20 years, starting in 2025 with anticipated Project completion by 2045. However, note that actual phasing sequence and years may vary depending on market conditions.

3.3 PROJECT OBJECTIVES

The objectives for the Project outline the structure for implementing the overall vision of the Project. These objectives are important in ensuring both the success of the Project and the benefit to the City:

- Enhance circulation in the Project area by providing a new connection via the extension of Vista Del Norte into the Project site, dedicating ROW necessary for the proposed Avenue 50/I-10 interchange improvements, and contributing the Project's fair share to planned Circulation Element improvements in the cities of Coachella and Indio and to other jurisdictions in the area as required;
- Enhance infrastructure to serve the Project by construction and upsizing on- and off-site water and sewer infrastructure;
- Provide a variety of housing opportunities (single-family residential and multi-family residential as part of the mixed-use component) to serve the existing and future housing needs in the City of Coachella, consistent with the goals and policies established in the Coachella General Plan Land Use, Housing, Community Health and Wellness, and Safety Elements;
- Provide new employment opportunities in the area;
- Plan for new educational opportunities, including new schools and higher education;
- Provide a variety of open space opportunities, including planned and programmed neighborhood parks, passive recreation corridors, and a trail system that increases connectivity both within and outside of the Project area; and
- Provide an opportunity for commercial development to serve existing and planned development in the vicinity of the Project area to reduce vehicle trips.

3.4 PROJECT LOCATION

The Project site is within the City, located at the eastern entrance; see **Exhibit 3-1: Regional Vicinity**. The Project site is approximately three miles east of the City center in the foothills of the Little San Bernardino

Mountains, with views across the Coachella Valley to the San Jacinto and Santa Rosa Mountains. The Project site is bounded by the Little San Bernardino Mountains to the north, the City of Indio to the northwest, Interstate 10 (I-10) and the City of Coachella to the south and west, and unincorporated Riverside County to the east and north; see **Exhibit 3-2: Local Vicinity**.

REGIONAL PLANNING CONTEXT

The Southern California Association of Governments (SCAG) is the nation's largest metropolitan planning organization (MPO), representing six counties, 191 cities and more than 19 million residents. SCAG is currently the MPO of six of the ten counties in southern California, serving Imperial County, Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County.

The SCAG Regional Council adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024 RTP/SCS or Connect SoCal) on April 4, 2024. The 2024 RTP/SCS includes goals and policies applicable to transportation and land use projects. The Project's consistency with the 2024 RTP/SCS goals and policies are discussed in **Section 4.2: Air Quality**, **Section 4.14: Transportation**, and briefly in **Section 4.10: Land Use and Planning**.

Additionally, the Coachella Valley Association of Governments (CVAG) is a partner agency to SCAG. The Project is located in the Coachella Valley and the City of Coachella is a member agency to CVAG, which is the subregional planning agency for the Coachella Valley.

The County is within the South Coast Air Basin (SCAB) which is under South Coast Air Quality Management District (SCAQMD) jurisdiction. The SCAB includes portions of San Bernardino County, Los Angeles County, and Riverside County, and the entirety of Orange County. SCAQMD is the entity responsible for mitigating emissions from stationary, mobile, and indirect sources. SCAQMD utilizes a sequence of Air Quality Management Plans (AQMPs) that contain rules and regulations directed at attaining the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQA). Refer to the proposed AQMP discussion within **Section 4.2: Air Quality.**

3.5 PROJECT SETTING

The following provides an overview of the existing physical and environmental conditions of the Project site. Additional details are provided within the respective sections of the Draft EIR.

The Project site consists of 57 vacant parcels; see **Table 3-1: Project Site Parcels** and **Exhibit 3-3: Existing Parcels**.

Table 3-1: Project Site Parcels

Parcel ID Number					
603-140-013	603-170-009	603-200-008	603-200-024*	603-210-003	697-280-016
603-140-016	603-170-010	603-200-009	603-200-026*	603-210-004	697-280-017
603-140-017	603-180-002	603-200-012	603-200-027*	603-210-005	697-280-018
603-160-005	603-190-004	603-200-013	603-200-028*	603-210-006	707-320-018
603-160-006	603-200-001	603-200-016*	603-200-029	603-210-007	707-320-019
603-160-007	603-200-002	603-200-017	603-200-030*	603-210-008	707-320-020
603-160-008	603-200-003	603-200-018	603-200-031*	603-210-009	707-330-003
603-160-009	603-200-005	603-200-019*	603-200-032	603-210-010	
603-160-012	603-200-006	603-200-020*	603-210-001	603-210-012	
603-160-013	603-200-007	603-200-021*	603-210-002	603-210-013	

* - Approximately 91 acres in the central portion of the Project area are owned by others and are designated as "Not a Part" on the land use plan for the Project.

EXISTING LAND USES

The Project site is located in the northeast corner of the City, surrounded entirely by undeveloped desert land and a small amount of agricultural use. I-10 runs east to west along the entire length of the southern border of the Project site. Further south, across I-10, is undeveloped land which is currently entitled as part of the La Entrada Specific Plan. Agricultural uses across the Coachella Canal, which runs northwest/southeast and comes up to form the western boundary of the Project site. The Project site is approximately 2,807 (conceptual)[1] acres on an undisturbed, open, hilly, and undeveloped desert area with minimal vegetation, except for small native trees, shrubs, and annual grassland. Broad natural drainage corridors traverse the Project site diagonally.

The areas north of the Project site include a triangular swath of agricultural land, a transfer facility and compost operation operated by Burrtec Waste Industries, and the foothills of the Little San Bernardino Mountains. A Southern California Edison (SCE) utility easement runs northwest to southeast through the northeast portion of the Project site and the easement continues on beyond the Project site. Additionally, two separate gas pipeline easements further north run roughly parallel to the SCE easement through the site. The eastern boundary of the Project site runs along the eastern boundary line for the City. The Project site is approximately three miles to the east of the City's downtown business district.

EXISTING GENERAL PLAN DESIGNATIONS AND ZONING

The Project site is presently largely composed of one General Plan land use designation, Resort District, which allows for residential, lodging, recreational, and support retail and commercial services. Theme parks, sports venues and specialized entertainment uses are also allowed within this designation.[2] This designation is proposed to be modified through a General Plan Amendment, so the general plan

[1] Approximately 91 acres in the central portion of the Project area are owned by others and are designated as "Not a Part" on the land use plan for the Project.

[2] City of Coachella. 2015. Figure 4-23, General Plan Designation Map, of the Coachella General Plan Update 2035. https://www.coachella.org/home/showpublisheddocument/8407/637818910797370000 (accessed September 2022).

designation and zoning are consistent (to Specific Plan). Note a small portion of the Project site along the utility easement corridor and Coachella Canal is designated as Open Space. The existing zoning within the Project site is Resort District (R-D) and Open Space.[3] The zoning is proposed to be modified through a Zone Change. The existing land use and zoning on the Project site and surrounding parcels are provided on **Table 3-2: Project Site and Surrounding Parcels Existing Land Use and Zoning**. A Zone Change and General Plan Map and Text Amendment are proposed. The approved Specific Plan project site would be designated on the City's General Plan Land Use Map and Zoning Map as the KPC Coachella Specific Plan.

Table 3-2: Project Site and Surrounding Parcels Existing Land Use and Zoning

Location	General Plan Land Use Designations	Official Existing Zoning
Project Site	Resort District Open Space	Resort District (R-D) Open Space (OS)
North	Open Space Open Space Rural (Riverside County) Public Facilities (Riverside County)	Open Space (OS) Watercourse, Watershed, Conservation Area (W-1) (Riverside County) Natural Assets (N-A) (Riverside County) Controlled Development Areas (W-2-10) (Riverside County)
South	La Entrada Specific Plan Rural Rancho Open Space Open Space Rural (Riverside County)	Specific Plan Open Space (OS) General Commercial (C-G) Controlled Development Areas (W-2-10) (Riverside County)
East	Open Space Open Space Rural (Riverside County)	Open Space (OS) Controlled Development Areas (W-2-10) (Riverside County)
West	Open Space Regional Retail District	Open Space (OS) Regional Commercial (R-C)

Sources: City of Coachella. 2015. Figure 4-23, General Plan Designation Map, of the Coachella General Plan Update 2035. https://www.coachella.org/home/showpublisheddocument/8407/637818910797370000 (accessed September 2022); City of Coachella. 2023. Official Zoning Maphttps://www.coachella.org/home/showpublisheddocument/9303/638282914790930000(accessed August 2023); Riverside County. 2021. Western Coachella Valley Area Plan. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-GPA-2022-Compiled-WCVAP-4-2022-rev.pdf (accessed October 2025); Riverside County. 2021. Eastern Coachella Valley Area Plan. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-GPA-2022-Compiled-ECVAP-4-2022-rev.pdf (accessed August 2023); Riverside County. 2022. Map My County. https://gis1.countyofriverside.us/Html5Viewer/?viewer=MMC_Public (accessed September 2022); Riverside County. 2022. Ordinance No. 348. https://planning.rctlma.org/Portals/14/Ord348Update/348.4978/Ord.%20348%20Clean%20Version.pdf?ver=2022-03-02-162154-373 (accessed September 2022).

Refer to **Exhibit 3-4: Existing General Plan Land Use** for existing land use designation map and **Exhibit 3-5: Existing Zoning** for existing zoning map. Once approved, the KPC Coachella Specific Plan would guide the future development of the Project site.

[3] City of Coachella. 2023. Official Zoning Map. https://www.coachella.org/home/showpublisheddocument/9303/638282914790930000 (accessed August 2023).

ENVIRONMENTAL SETTING

Aesthetics/Visual

The Project site is approximately three miles east of the City of Coachella (City) center in the foothills of the Little San Bernardino Mountains, with views across the Coachella Valley to the San Jacinto and Santa Rosa Mountains. The 2,807-acre Project site is located immediately north of Interstate 10 (I-10), east of Dillion Road at the east end of Vista Del Norte, and northeast of the All-American Canal in the City. The Project site is characterized by undeveloped desert terrain, including rocky ridges and dry washes, that slope from the northeast to the southwest. Existing on-site vegetation consists of small, scattered shrubs, creosote, ocotillo, and small dispersed trees.

Agriculture

The Project site is comprised of undisturbed, open, hilly, and undeveloped desert area with minimal vegetation, except for small native trees, shrubs, and annual grassland. The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as mapped on the Important Farmland Finder maintained by the California Department of Conservation.[4]

Biology

A Biological Resources Assessment (BRA)/MSCHP Consistency Analysis and Jurisdictional Delineation (JD) Report was prepared for the Project by Rocks Biological Consulting. The BRA and JD reports are included as **Appendix C**. As a part of the BRA prepared for the Project, species and habitat information was gathered from relevant databases for the nine USGS quadrangles surrounding the Project site to determine which species and/or habitats would be expected to occur on-site. The literature review revealed 43 special-status species (13 plants, 30 animals) with the potential to occur within or immediately adjacent to the Project site. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the Project site has a potential to support a multitude of species that are found regionally. See Appendix D of the BRA (Draft EIR **Appendix C**) for a complete list. Refer to **Section 4.3: Biological Resources** and the JD in **Appendix C**, for further discussion.

A portion of the Project site is located in the East Indio Hills Conservation Area (EIHCA). Improvements to Vista Del Norte would occur within the EIHCA. The CVMSCHP states that "local roadways (less than 74 feet in width and no more than one through travel lane in each direction) which are either: (1) approved as part of a development proposal or (2) dedicated, or offered for dedication, for public use, are Covered Activities."[5] According to the Specific Plan, Vista Del Norte, within the EIHCA, is proposed as a four-lane divided roadway within an approximately 80-foot-wide right-of-way. Therefore, the Project is inconsistent with the CVMSHCP. Because the Project is not consistent, a Like Exchange was conducted. According to the MSHCP "Like Exchanges are changes proposed by a Permittee to modify the boundary of one or more Conservation Areas in exchange for reducing or modifying the boundary of a Conservation Area. A Like

[4] Department of Conservation. 2016. California Important Farmland Finder Map. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed September 2022).

[5] Coachella Valley Conservation Commission. 2016. CVMSHP. Chapter 7.0: Take Authorization for Covered Activities and Term of Permit. Page 17. https://cvmshcp.org/Plan-Documents/14-CVAG-MSHCP-Plan-Section-7-0.pdf (accessed July 2023).

Exchange must result in equal or greater benefits to Covered Species and conserved natural communities as compared to those benefits analyzed in the Plan."[6] For the Project to offset impacts related to biological resources (64.67 acres) within the EIHCA, the Project Applicant donated 100 acres of land, under private ownership by the Applicant, to be included in the Dos Palmas Conservation Area (DPCA). See **Section 4.3** for further discussion.

Climate

The Project site is located in the Colorado Desert region of southern California, which has an arid climate. Temperatures range from 46 degrees to over 112 degrees Fahrenheit. Prevailing winds typically come from the south and east. Rainfall in the Project site is seasonal, with the largest amounts of rainfall occurring during the months of November through January. In addition, thunderstorms occur during the summer months (typically August) that generate short-term rainstorms with occasional flooding.

Drainage/Hydrology

Elevations across the Project site range from approximately 500 feet to approximately 1,250 feet above mean sea level (msl). Surface drainage is generally by sheet flow and directed toward the southwest.[7] The Project site lies in a relatively flat area at the base of the Little San Bernardino Mountains. On the Project site there are several northeast-southwest running ridges cut by adjacent flat alluvial drainage ways. The Project site is generally flatter towards the northeast portion of the Project site, with most slopes ranging between zero and ten percent. Steeper slopes are concentrated along the western and southern portions of the Project site.

Drainage within the Project site is defined primarily by the series of northeast-southwest running ridges which shape the alluvial drainage channels that have the potential to carry large amounts of water runoff during large storm events. Water collects further to the northeast of the Project site in the Little San Bernardino Mountains where it sheet flows into the Project site and funnels into the existing drainage channels. Due to the rocky, compacted nature of the soil along the ridges and minimal plant material, there is little opportunity for infiltration during large storm events. Surface water then flows in a southwesterly direction, under I-10 and through the La Entrada Project site, until it terminates at the Eastside Dike, then flows southeasterly to Wasteway No. 2, which conveys the water to the Whitewater River and ultimately to the Salton Sea.

Flooding

According to the Federal Emergency Management Agency's (FEMA) National Flood Insurance Program's Flood Insurance Rate Maps (FIRM) (Map No. 06065C2260H, rev. March 6, 2018), the western portion of the Project site is located in Zone X: Areas of Minimal Flood Hazard. The eastern portion of the Project site is located on Map No. 06065C2300H (unmapped) and identified as Zone D. Zone D is comprised of areas with possible but undetermined flood hazards for which no flood hazard analysis has been

[6] Coachella Valley Conservation Commission. 2016. CVMSCHP. Chapter 6: Plan Implementation. Page 6-20. https://cvmshcp.org/Plan-Documents/13-CVAG-MSHCP-Plan-Section-6-0.pdf (accessed July 2023).

[7] Petra Geosciences. 2022. *Feasibility-Level Geotechnical Evaluation*.

conducted. Note that a flood hazard analysis for the Project was conducted as part of the Drainage Master Plan found in Draft EIR **Appendix H**.

Geology and Seismicity

The Project site is located in the Salton Trough that comprises a portion of the Colorado Desert geomorphic province. The Project site is underlain by mid- to late-Quaternary sedimentary units consisting of the (oldest to youngest) Canebrake, and Palm Spring Formation, and Ocotillo Conglomerate, as well as fluvial/alluvial deposits associated with the current drainages located on the Project site that primarily result in sand and gravel in the area. The Coachella segment of the San Andreas fault is located roughly along the trend of the All-American Canal, just to the southwest of the Project site and the Berdoo Canyon fault zone extending northwest-southeast across the central portion of the Project site. These faults are active and have accordingly been placed within a State of California Alquist-Priolo Earthquake Fault Zone. Note that extensive fault investigations have been conducted for the Project site resulting in approximately 9.7 miles of fault trench logs. See **Section 4.6: Geology and Soils** for detailed information and analysis, and Draft EIR **Appendix F** for the consulting City Geologist-approved geologic reports.

Hazards and Hazardous Materials

The Project site is comprised of undisturbed, open, hilly, and undeveloped desert area. Review of aerial imagery indicates that besides the power lines that traverse the northerly portion of the Project site, the Project site has been vacant since 1953.[8] Review of GeoTracker, EnviroStor, and the Solid Waste Information System (SWIS) database found no hazardous materials sites located on the Project site.[9,10,11] There are three solid waste facilities, operations, and/or disposal sites located approximately 1.2 miles northwest of the Project site. See **Section 4.8: Hazards and Hazardous Materials** for further analysis.

Infrastructure and Utilities

Circulation

The Project site is undeveloped and has no paved vehicle access points. The I-10 is located adjacent immediately south and west of the Project site. Vista Del Norte is located west of the Project site and currently terminates at the Coachella Canal.

Transit/Rail

The SunLine Transit Agency provides transit service to the Coachella Valley. The Project site is in the boundaries of SunLine Transit Agency Route 8.[12]There are no active freight or passenger rail lines in the Project site.

[8] NETROnline. 1953-2018. Historic Aerials. https://www.historicaerials.com/viewer (accessed September 2022).
[9] SWRCB. 2022. GeoTracker. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Coachella (accessed September 2022).
[10] DTSC. 2022. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=coachella%2C+ca (accessed September 2022).
[11] CalRecycle. 2022. SWIS. https://www2.calrecycle.ca.gov/SolidWaste/Site/Search (accessed September 2022).
[12] Sunline Transit Agency. 2025. System Map. https://www.sunline.org/images/System_Map_as_of_May_2025.pdf. Accessed October 2025.

Utilities

Water

Water services for the Project would be provided by the Coachella Water Authority (CWA). As a public water supplier in the Coachella Valley, the City and CWA maintain a close and cooperative relationship with Coachella Valley Water District (CVWD). CVWD's services include collecting water and purchase of imported water for direct use and groundwater basin replenishment, delivers irrigation and domestic water, collects and recycles wastewater, provides regional stormwater protection, replenishes the groundwater basin, and promotes water conservation.

Wastewater and Recycled Water

The City manages the Coachella Sanitary District (CSD), which operates a 4.5 MGD design capacity wastewater treatment facility. Currently, CSD discharges treated wastewater to the Coachella Valley Storm Channel. The plant is a secondary level treatment facility and has an average discharge of approximately 2.7 MGD. The water discharged from the facility is sent to drying beds in which they are dewatered and sent to landfills to be used as cover material. The City and CWA does not currently contain a recycled water system, nor do they directly use recycled water within their service area nor have plans for its direct use. The CWA does participate in CVWD's recycled water use programs and the City will have the opportunity to use recycled water in the future for irrigation as development occurs and customers become available by constructing tertiary treatment and distribution facilities to irrigation customers.[13]

Solid Waste

Burrtec Waste Industries currently provides solid waste disposal, green waste, and recycling services to residents within the City. It is anticipated that Burrtec Waste Industries would also provide solid waste disposal service to the residential, commercial, and educational uses within the Project site. Solid waste is disposed of at a variety of landfills, including the Badlands Sanitary Landfill, approximately 58 miles west of the Project site. It is anticipated that solid waste generated from land use in the Project will also be disposed of at these landfills.

Natural Gas and Electricity

The Project would be served by Southern California Gas Company (SoCalGas) and Southern California Edison (SCE). SoCalGas has a 24,000-square mile service territory through central and southern California which provides energy to approximately 21.8 million consumers through 5.9 million meters in more than 500 communities.[14] There is a high-pressure distribution line crossing Vista del Norte, west of the Project site and a transmission line crossing through the Project site.[15] There are currently 500kva/220kva/66kva Southern California Edison (SCE) Transmission towers/pole lines transitioning through the Project site on SCE Transmission Easements. These facilities provide power from both Davis Dam and Hoover Dam on the Colorado River in California/Nevada/Arizona. The SCE Transmission facilities distribute power to various

[13] Charles Marr Consulting. 2023. Water Supply Assessment Page 1-21.
[14] SoCalGas. 2022. *Company Profile*. https://www.socalgas.com/about-us/company-profile
[15] SoCalGas. 2022. *Gas Transmission Pipeline Interactive Map-Riverside*. https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=aaebac8286ea4e4b8e425e47771b8138.

Transmission Substation sites in Southern California to include Orange County/San Diego County/ Riverside County/San Bernardino County. The Transmission Easements have capacity for up to one (1) more Tower Line along with a number of underground Transmission System conduit routes, if needed.

Telecommunications

The City has granted franchises to multiple cable television, telephone, and internet services providers. Cable for the City is provided by Time Warner Cable and Frontier Fios. Telephone services are provided by AT&T, Frontier, and Sprint. Internet services in the City are provided by Time Warner: Spectrum, Frontier, and Windstream.[16]

PUBLIC SERVICES

Schools

The Project area is located within two school districts: The Desert Sands Unified School District (DSUSD) and Coachella Valley Unified School District (CVUSD). The districts currently charge developer fees on per-square-foot basis for new residential and commercial development. The Project identifies three potential elementary school and one elementary/middle school sites. If the District(s) do not want to operate the school site(s) upon Project build-out or upon written communication from the District(s) that school sites are not needed, the school sites will revert to an underlying low-density residential land use.

The Project also includes an overlay for a potential institution of higher learning in Village A. Potential uses include a public or private community college, medical, dental, optometry, or chiropractic college, or other similar educational facility.

Police Services

The Riverside County Sheriff's Department is contracted to provide law enforcement services through the Coachella Police Department. Currently, the Riverside County Thermal Sheriff Station serves the City of Coachella. The station is located on Airport Boulevard in Thermal. The Coachella Police Department Contract consists of 32 sworn officer positions. Nineteen of these positions are dedicated to the patrol division with the remaining officers dedicated to special assignments such as the Community Action Team.[17] Based on the U.S. Census Bureau's QuickFacts for Coachella, the estimated population (as of July 1, 2021) is 42,554. The current ratio of officers to residents is approximately 0.75 per 1,000 residents in the City. The City's preferred standard is 1.3 officers per 1,000 residents.[18] Police service calls will incrementally increase as a result of the potential development of the Project area.

Fire Services

Fire protection and suppression services are provided through a contract with the Riverside County Fire Department. These services include fire suppression, fire prevention, emergency medical response,

[16] City of Coachella. 2019. *Utility Companies.* https://www.coachella.org/residents/utility-companies.
[17] City of Coachella. ND. Divisions. https://www.coachella.org/departments/police-department/coachella-community-action-team-c-a-t- (accessed October 2022).
[18] City of Coachella. 2015. General Plan 2035, Chapter 9: Infrastructure and Public Services. https://www.coachella.org/home/showpublisheddocument/8423/637819141447170000 (accessed October 2022).

hazardous materials response team, urban search and rescue response team and other related fire protection and emergency services. The Fire Department maintains a fire station within the City of Coachella.

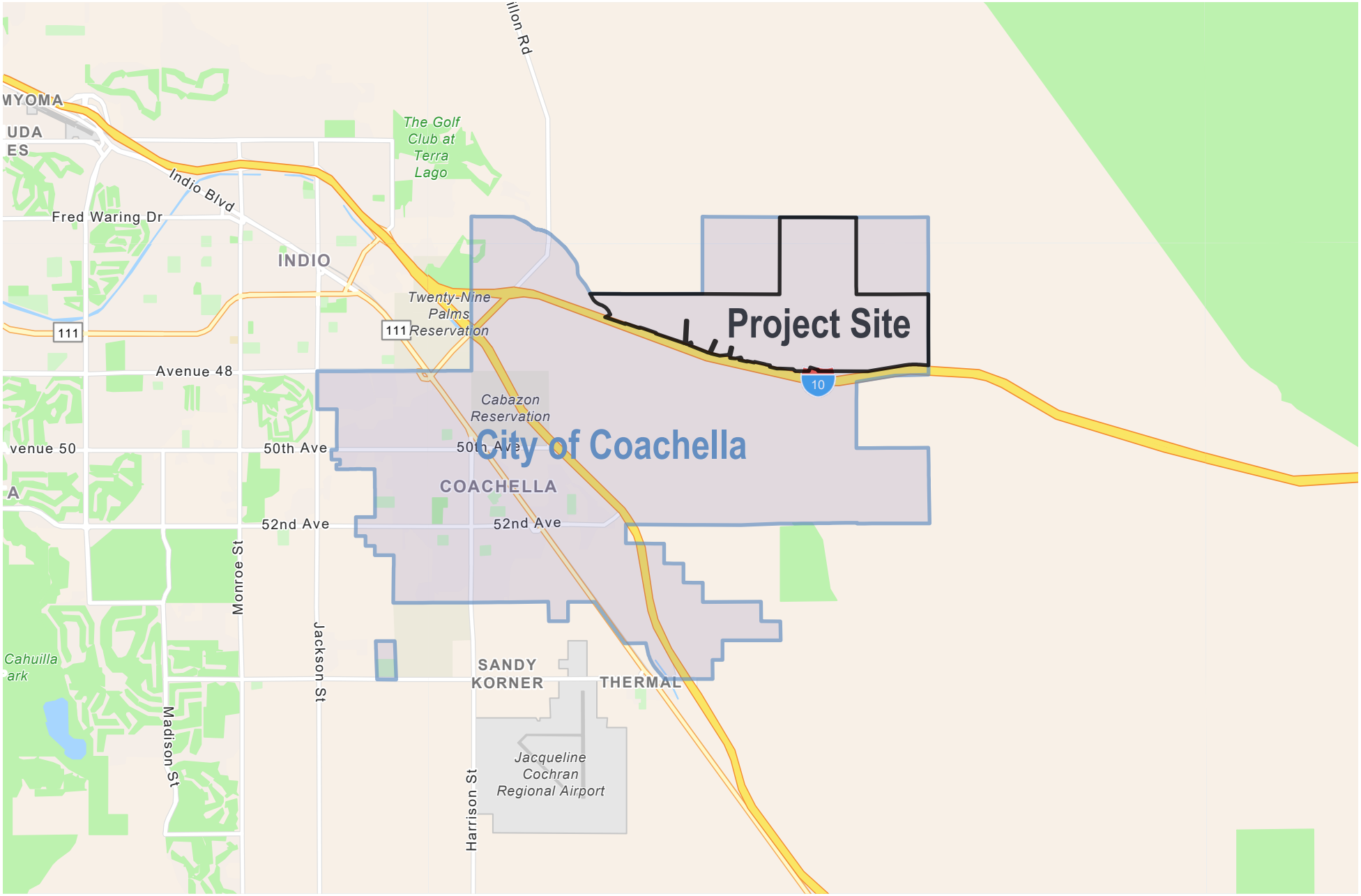
Station 79, located at 1377 Sixth Street, is the primary station that would serve the Project area. The Coachella Fire Station is staffed by 10 full-time career personnel, 1 reserve firefighter and 10 Explorer cadets. The station also has 1 City Paramedic and an Assessment Engine. Two other stations are close to Coachella, including Station No. 39 located at the Thermal Airport and Station No. 86 located at Jackson and 47th Street in Indio.

Areas within a mile radius of the station have a response time of two minutes; areas within a 2 to 5-mile radius have a response time of 3 to 5 minutes. Fire service calls would incrementally increase as a result of the future development of the Project area. A fire station would be required to serve the KPC Coachella community, with the location to be associated with one of the mixed-use planning areas. The location and size of the fire station parcel will be determined by the Fire Department when the first implementing projects within the Project site are submitted to the City.

Additionally, a fire station is planned to serve the La Entrada Specific Plan area. The La Entrada Specific Plan encompasses a 2,200-acre area within the City of Coachella and its SOI, located south of I-10 and the proposed KPC Coachella Specific Plan area. The Project would be connected to the La Entrada Specific Plan area via a planned extension of Avenue 50 and a new interchange with I-10. The La Entrada Specific Plan fire station will be planned at a site approved by the fire department and that maximizes emergency service considerations like response area, traffic, and vehicle/pedestrian circulation. The planned La Entrada fire station will be funded by revenues from approved Development Impact Fees which establish a charge per residential unit on new subdivisions for fire.[19]

[19] City of Coachella. 2013. La Entrada Specific Plan. Page 2-66 through 2-68. https://laentradacommunity.com/. (accessed May 2023).

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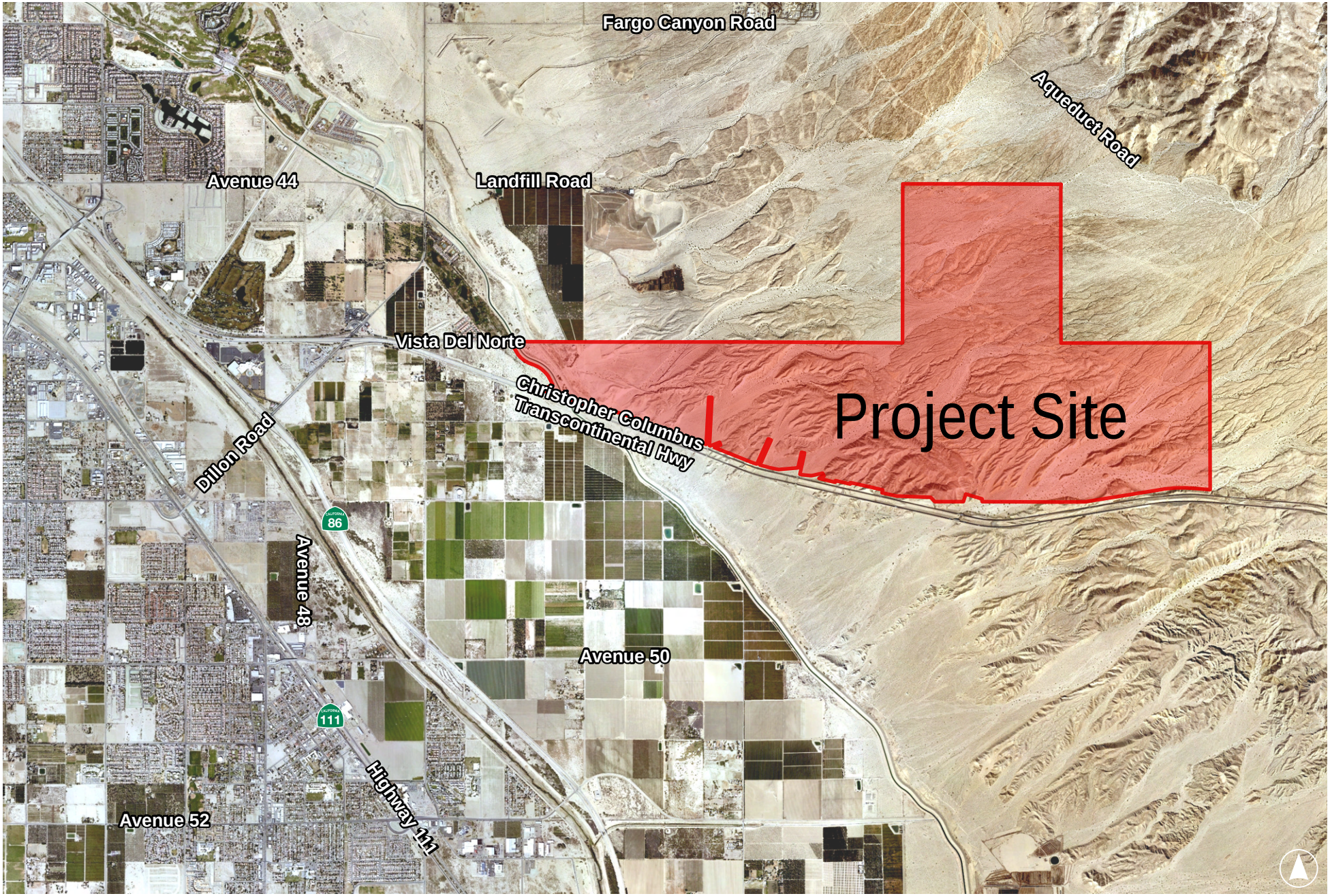
Source: ESRI World Navigation Map, 2023.

EXHIBIT 3-1: Regional Vicinity
KPC Coachella Specific Plan Project
City of Coachella

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Source: Nearmap Aerial Imagery, 2023.

EXHIBIT 3-2: Lo al Vi inity

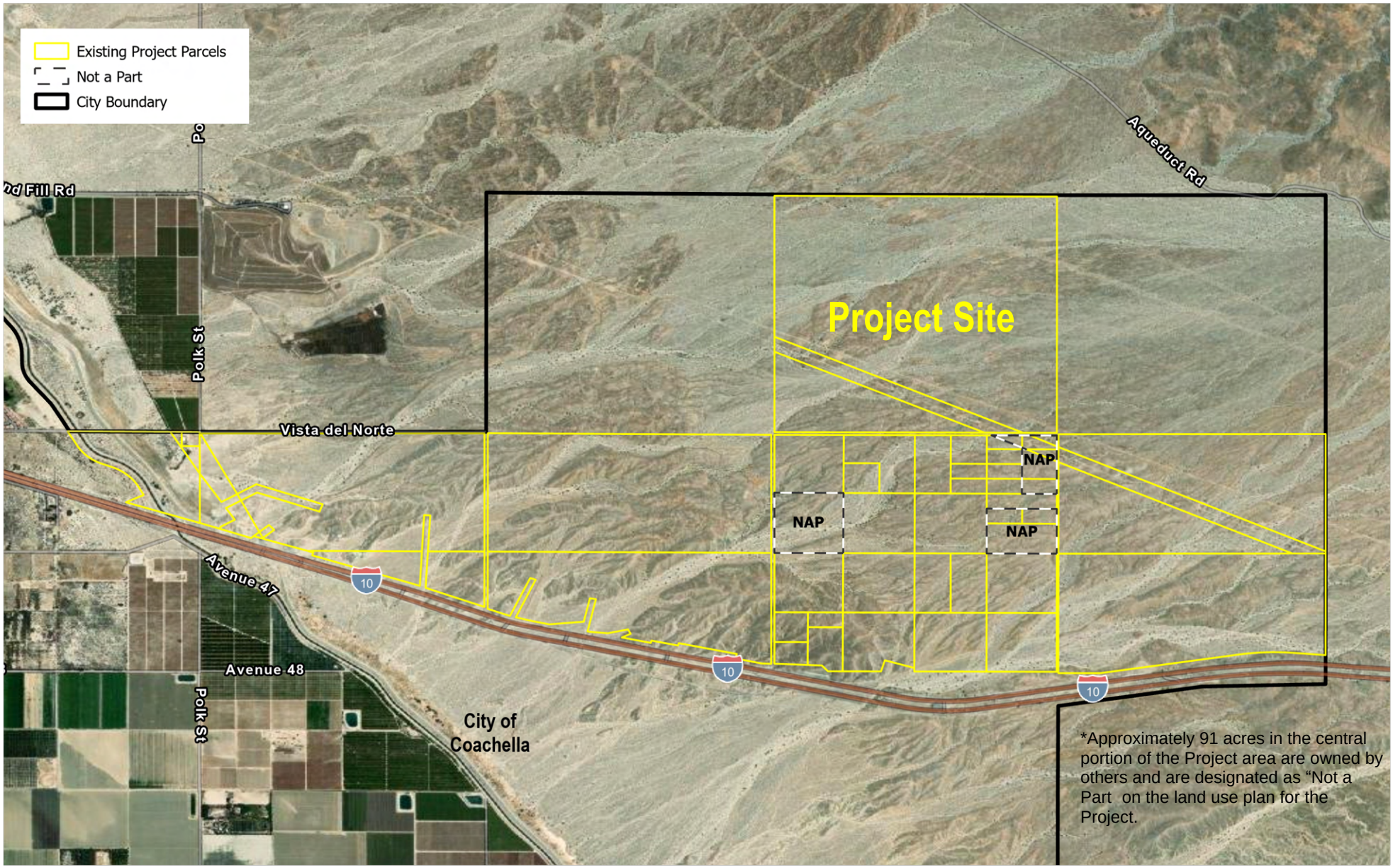
KPC Coachella Specific Plan Project

City of Coachella

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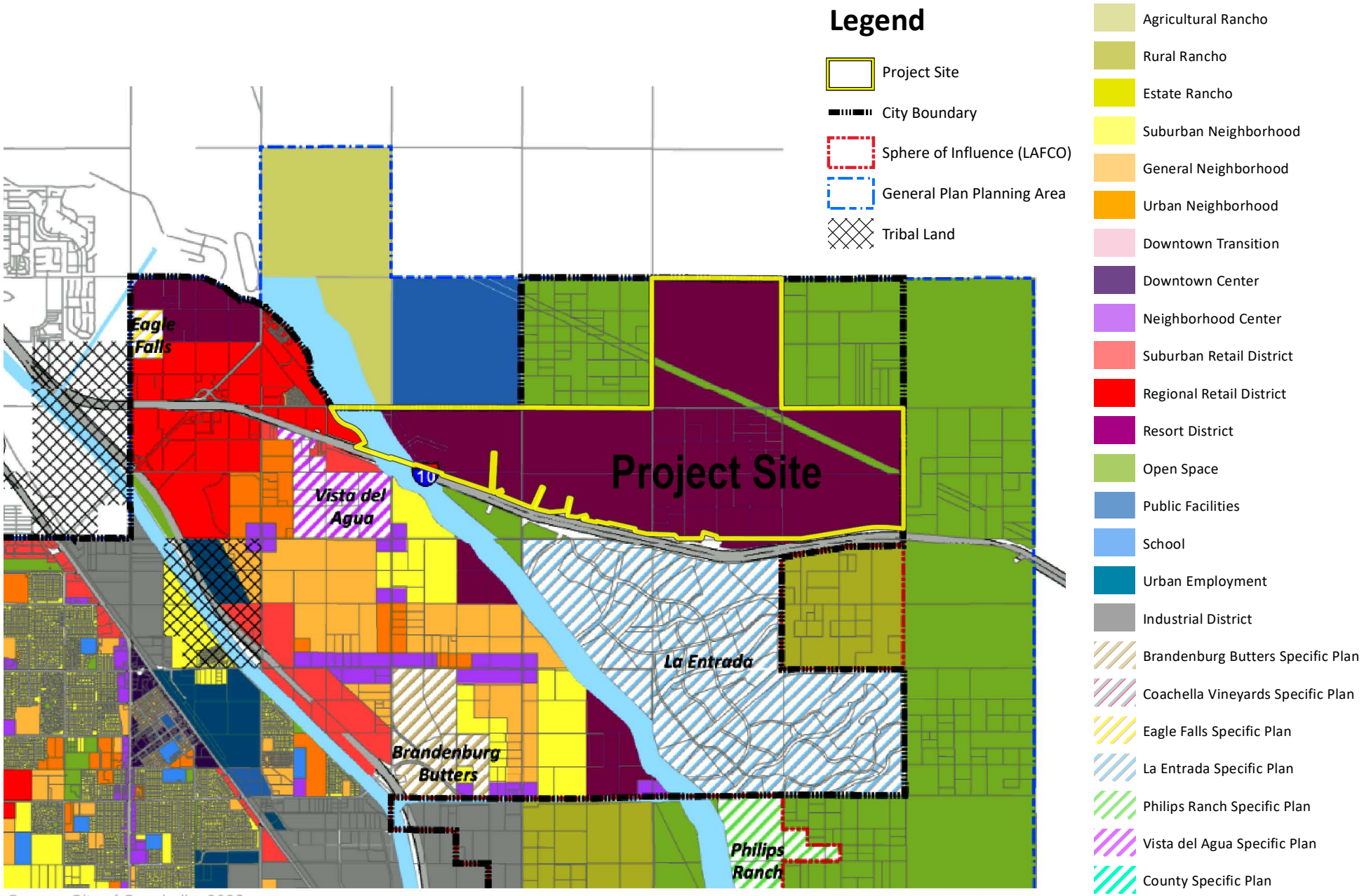
Source: County of Riverside, 2019

EXHIBIT 3-3: Existing Par els
KPC Coachella Specific Plan Project
City of Coachella

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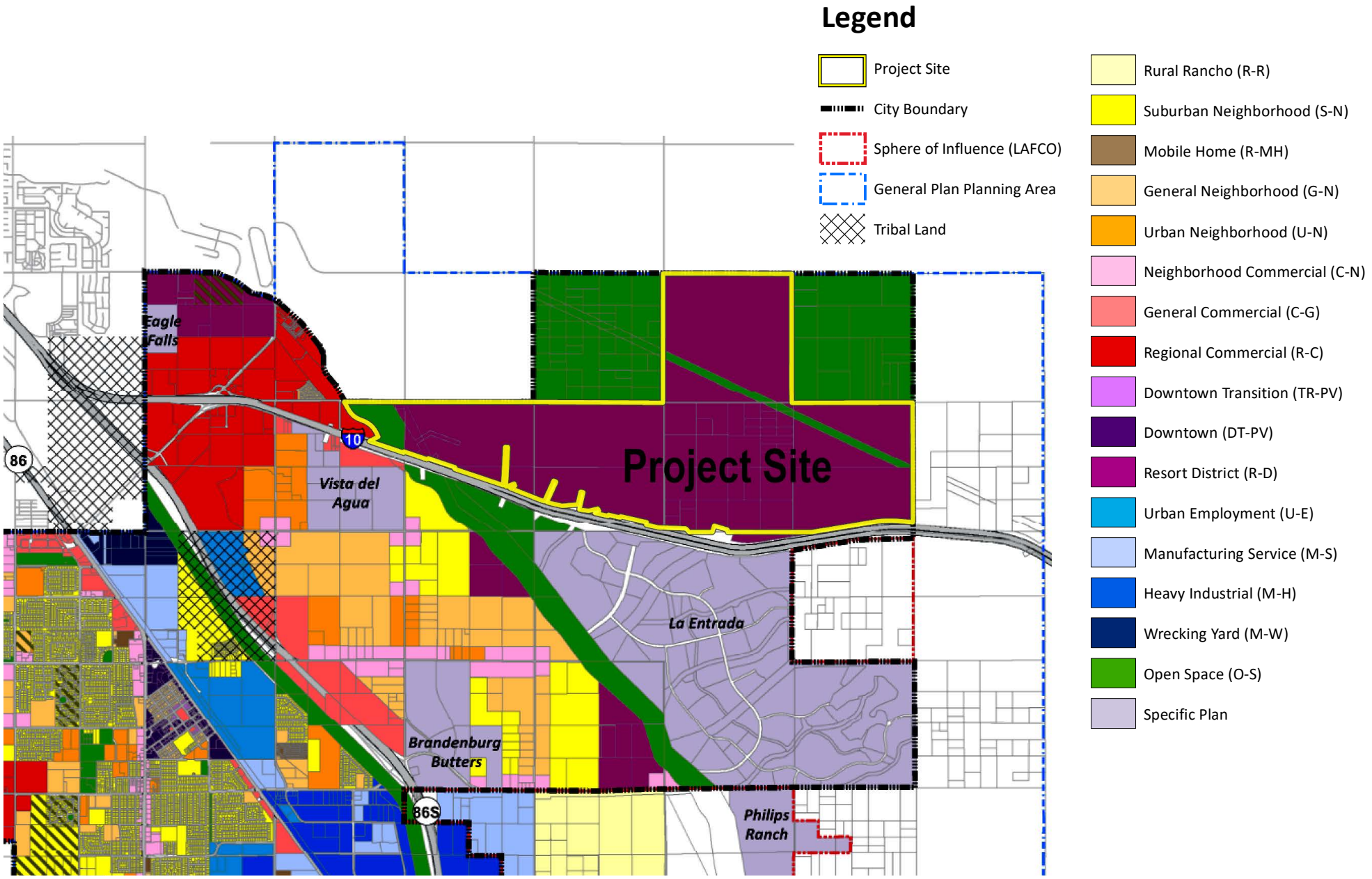
Source: City of Coachella, 2023

EXHIBIT 3-4: Existing General Plan Land Use
KPC Coachella Specific Plan Project
City of Coachella

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Source: City of Coachella, 2023

EXHIBIT 3-5: Existing Zoning

KPC Coachella Specific Plan Project

City of Coachella

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3.6 PROPOSED PROJECT

The Project is a new master planned community located at the eastern entrance to the City. This 2,807-acre (conceptual) Project would provide a mixture of land uses intended to create a vibrant, cohesive entrance to the City, with five villages (A-E) and neighborhoods that are unique, yet compatible with, surrounding existing and planned neighboring areas. The Project would provide new additional commercial, residential, educational, employment, and recreational opportunities for residents and visitors within the City. A proposed entertainment center in Village B is anticipated to be a regional attractor, attracting local and regional visitors.

The Project proposes the following primary land uses:

- A mixture of residential product types, including an active adult/senior-oriented village, totaling approximately 9,538 dwelling units;
- Approximately 305 acres of commercial areas, which include mixed-use, entertainment center and performing arts theater, entertainment venue, and hotel rooms;
- A college/university overlay to allow for institutions of higher learning with an emphasis on healthcare;
- Approximately 71 acres of school uses (3 elementary schools and 1 middle school);
- Approximately 379 acres of parks, greenways, and amenity centers;
- Approximately 179 acres of circulation uses, including arterials, major, and secondary roadways;
- Approximately 68 acres of Agricultural Production areas;
- Approximately 770 acres of natural open space, including drainage channels and trails; and
- Approximately 91 'not a part' acres.[20]

The Project proposes two connection points to the existing roadways within the City. The main entry into the Project would be via the planned Avenue 50 and Interstate 10 interchange directly to the south. Additionally, the extension of Vista Del Norte from the west would provide access to Dillon Road and the rest of the City.

LAND USE PLAN

The Land Use Plan (see **Exhibit 3-6**) is organized to promote a mixture of residential, commercial, entertainment, wellness, education, and open space uses that together form a cohesive and well-balanced community, within the five villages. The Land Use Plan identifies a series of land use mixes throughout the Project site.

Each of the five villages within the Project site has a unique composition of uses and purpose that defines the intention for that area. When considered in an overall context, the villages provide housing, commercial and entertainment opportunities, public facilities, open space, and parks/sports facilities that

[20] Approximately 91 acres in the central portion of the Project area are owned by others and are designated as "Not a Part" on the land use plan for the Project. These three areas are identified in **Exhibit 3-6: Land Use Plan** and **Table 3-3: Plan Areas Summary**.

form a well-rounded and complete community. The five villages are described in more detail below and illustrated on **Exhibit 3-7**: **Village Organization**.

Village A – Wellness Village

Village A is the westernmost village within the Project site and provides entrance to the community from surrounding neighborhoods on Vista del Norte and beyond. This village is a planned mixture of housing at different densities ranging from very low to high-density located off of the main circulation route (A Loop and B Loop) on smaller collector roads. Two elementary school sites are located in Village A.

Village A also contains a Wellness University Overlay District on top of a proposed medium density residential designation. The Wellness University Overlay District is intended to allow for a small-scale public or private institution for higher education within the Project area.

Village B – Entertainment District

Village B is the primary entrance to the Project site from the new Avenue 50 Interchange and characterized by a new entertainment center. This village is primarily planned for mixed-use and commercial uses including a portion for health and wellness-related industries. Village B is also the densest in terms of housing, with all residential parcels designated at the highest density permitted within the Project site.

Village C – Active Recreation Village

Village C is centrally located within the Project site and defined by active recreation opportunities and a mixture of low- and medium-density residential uses. A large community-serving Sports Complex and Cycling Park is planned for this area, accessible from the surrounding villages through the larger trail connections as well as the primary roadway loop. A proposed middle school is planned near the Sports Complex. The village would also contain a performing arts amphitheater.

Village D – Active Adult Community

Village D is located in the northern portion of the Project site and extends down to the edge of the east/west running utility easement. Village D is planned as an Active Adult Community and oriented away from the more intense mixed-use and entertainment areas. Village D is composed of a variety of different residential densities that allow for different housing types of single family detached housing communities, townhomes, and attached residential housing types. Pedestrian promenades along the proposed roadways would be designed to accommodate walking, biking, and other forms of exercise and would connect to the larger trail system.

Village E –Agricultural Village

Village E is located in the eastern portion of the Project site and is defined by larger residential lots and agricultural production areas such as vineyards, growing fruits, vegetables, nuts, or other goods for consumption within the community. An agricultural Education Center is proposed in the southeast portion

of the village to provide opportunities for residents and students, to learn about agricultural practices. Village E also contains an elementary school to serve families within Village E.

Refer to **Table 3-3: Plan Areas Summary** and **Exhibits 3-6: Land Use Plan** and **3-7: Village Organization**. For villages land use breakdowns see KPC Coachella Specific Plan Tables 2-2 through 2-6.

Table 3-3: Plan Areas Summary

Land Use	Gross Acres (AC)	% Area	Density (DU/AC)	Dwelling Units (DU)	FAR	Square Footage (SF)
Residential						
Very Low Density Residential	152	5.6%	1.0	153	--	--
Low Density Residential	362	13.3%	5.0	1,811	--	--
Medium Density Residential	410	15.1%	10.0	4,102	--	--
High Density Residential	102	3.7%	25.0	2,543	--	-
Residential Subtotal	**1,026**	**37.7%**	**--**	**8,608**	**--**	**---**
Commercial						
Mixed-Use	224	8.1%	10.0	727	0.25	1,864,612
Entertainment Center	27	1.0%	--	--	--	175,000
Hotel Rooms	--	--	--	--	--	375 Keys
Commercial Subtotal	**271**	**10.0%**	**--**	**727**	**--**	**2,039,612**
Open Space						
Parks, Greenways, and Amenity Centers	379	14.0%	--	--	--	--
New Agricultural Production	68	2.5%	--	--	--	--
Drainage and Other Open Space	723	26.9%	--	--	--	--
Open Space Subtotal	**1,171**	**43.1%**	**--**	**--**	**--**	**--**
Institutional						
Elementary School	38	1.4%	--	--	--	--
Middle School	33	1.2%	--	--	--	--
Institutional Subtotal	**71**	2.6	--	--	--	--
ROW/Streets	179	8.1%	--	--	--	--
Total NAP	91	3.2%	--	204	--	257,705
Specific Plan Totals	**2,807**	**±100%**	**--**	**9,538**	**--**	**2,040,518**

Source: KPC Coachella Specific Plan (Draft, September 2025, Tables 2-1 and 2-2).

Note: Dwelling unit totals within this table vary based on the density ranges provided in the fourth column and are not direct gross area times density calculations. Actual development types will differ across planning areas but total development for the Specific Plan area must not exceed the total number of dwelling units for each planning area as shown in KPC Coachella Specific Plan Tables 2-2 through 2-6.

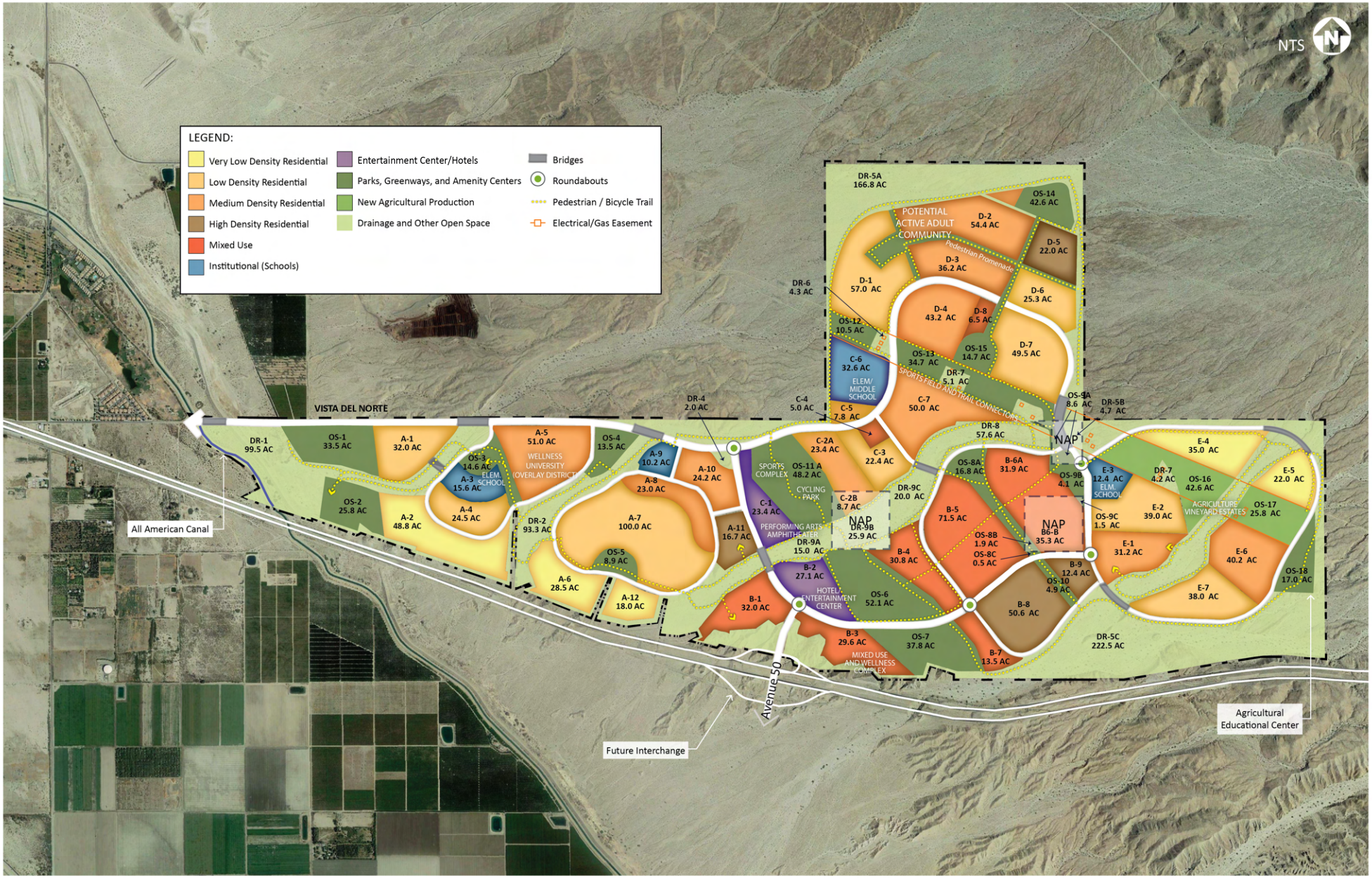
Institutional Uses

Planning areas for the various school uses discussed in this section and shown on **Exhibit 3-6: Land Use Plan** are conceptual in nature and may move to meet requirements of the relevant school district or other applicable external agency. Planning Areas designated for schools shall remain in the identified planning area and be of comparable size to the areas shown in **Exhibit 3-6**.

Proposed school uses shall have an underlying land use designation of Medium Density Residential. In the event that a proposed school site is not required for its originally intended use, such land may be available for residential development. This allows flexibility in the location and shape of school sites shown on the land use plan. The City shall consult with the applicable School Districts (Coachella Valley Unified School

District or Desert Sands School District) prior to the release of a school site for residential development. Following such consultation (if applicable), the City Council shall make a formal determination that the site is not required for the originally intended school use. Additional residential dwelling units may not result in development exceeding the total permitted number of units within the specific plan area unless permitted by an amendment of the KPC Coachella Specific Plan and analyzed through appropriate CEQA analysis to be determined in coordination with the Community Development Director or their appointee.

School sites would be placed in accordance with CCR Section 14010. Standards for School Site Selection regarding power line easements and Education Codes Sections 17212 and 17212.5, and California Administrative Code Section 4-317(e) regarding earthquake faults and special study zones.



Source: KPC Coachella Specific Plan Figure 2-3: Land Use Plan, 2025.

EXHIBIT 3-6: Land Use Plan

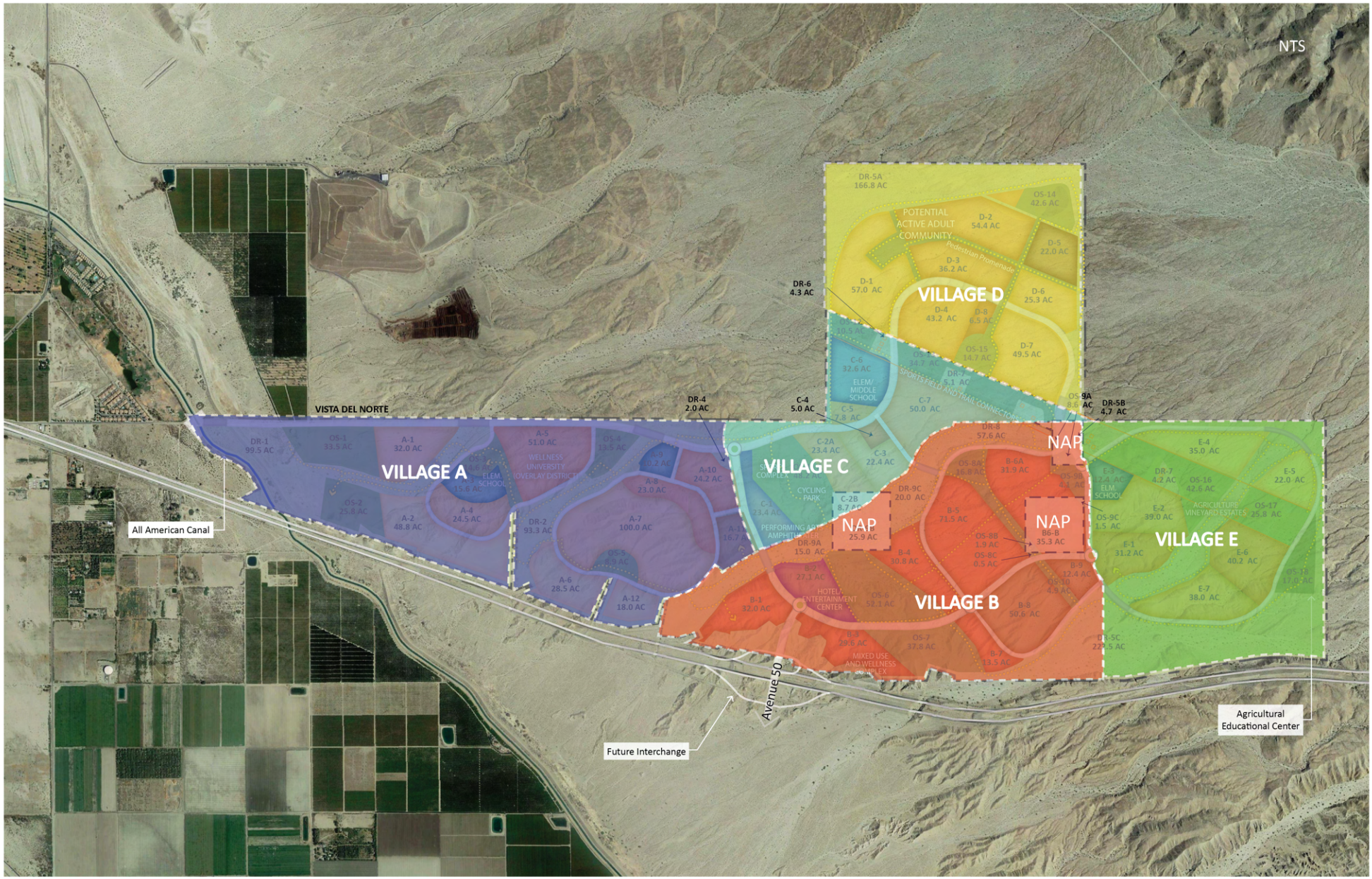
KPC Coachella Specific Plan Project

City of Coachella

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Source: KPC Coachella Specific Plan Figure 2-1: Village Organization, 2025.

EXHIBIT 3-7: Village rgani ation
KPC Coachella Specific Plan Project
City of Coachella

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SITE ACCESS

Currently, the Project site is entirely undeveloped land with no internal circulation. Primary access will be provided by an interchange on I-10 to be constructed directly to the south of the Project. Secondary access to the site will be provided from the west via Vista Del Norte, which will be expanded from the current two-lane configuration to handle the additional anticipated capacity.

CIRCULATION

Regional circulation would be provided by the new Avenue 50 Interchange with I-10, and the extension of Avenue 50 into the Project site. Avenue 50 within the Project is planned as a six-lane major arterial roadway with 14-foot wide median and off-street bike/neighborhood electric vehicle (NEV) lanes. Additional vehicle site access would be provided by an extension of Vista del Norte from the west, which connects to Dillon Road, across the Coachella Canal into the Project. The extension of Vista del Norte is planned as a four-lane major roadway. Refer to **Exhibit 3-8: Circulation Plan**.

Internal vehicle circulation is defined by several loop roads providing access to the villages of the Project. Two primary backbone road types are planned: a four-lane divided major roadway, which comprises the primary loop road and access point from Vista del Norte, and a two-lane secondary roadway. Due to the sloping topography and road curves, the two-lane collectors are designed with a center continuous center turn lane to allow for turning movements in areas with potentially limited sight distance. The planned roads cross on-site drainages through arch-culvert bridges, although the intent is to minimize disturbance to the drainage channels to be retained. Where roads cross drainages or the Coachella Canal, off-street trails are placed on-street to reduce the width of bridges.

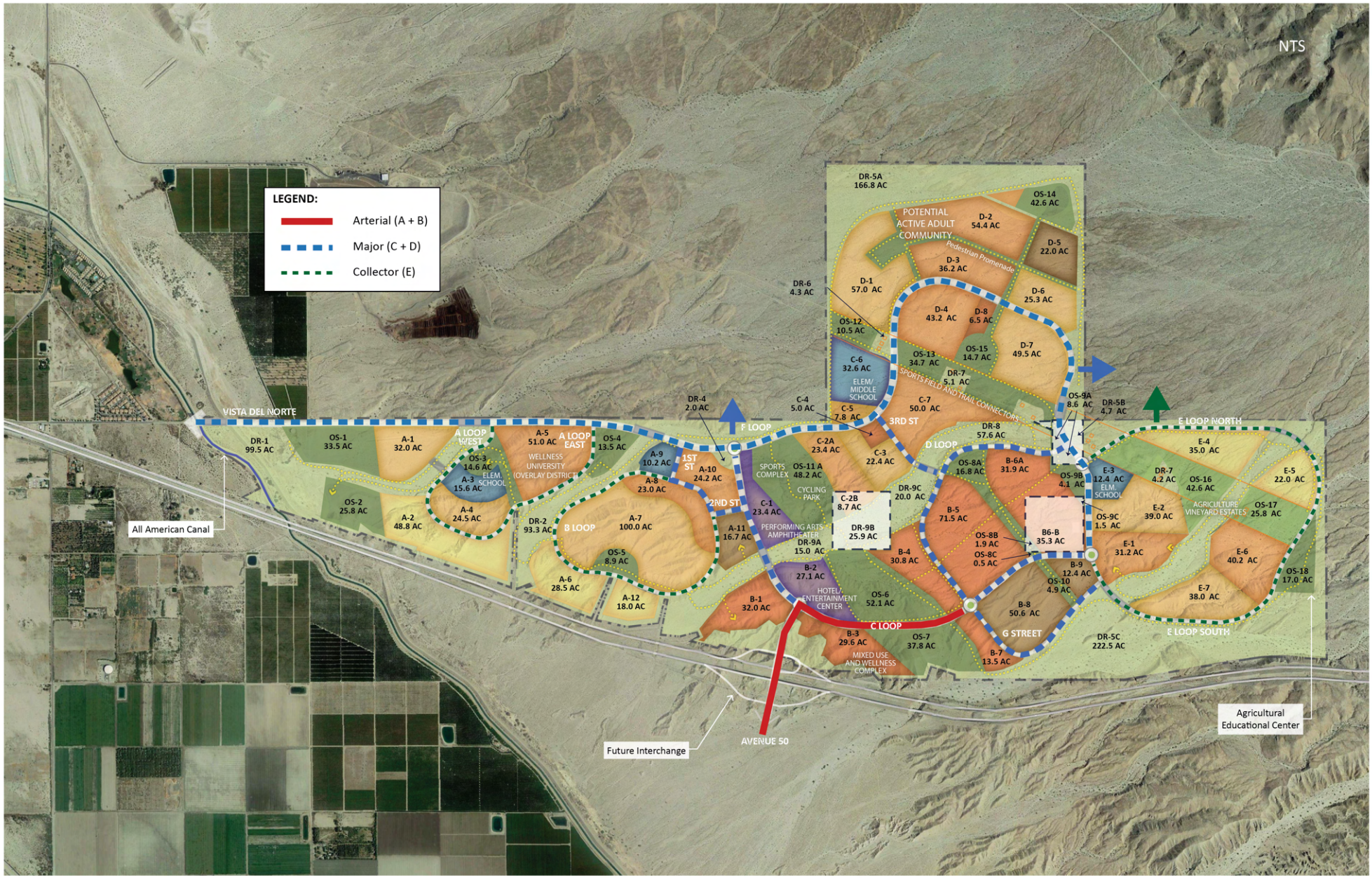
Arterials

Major Arterials within the Project are proposed as six-lane roadways and are planned to include a 14-foot-wide raised landscaped median and incorporate a 12-foot-wide improved off-street trail on both sides of the road which includes a 6-foot-wide bicycle lane and 6-foot-wide pedestrian path.

Major Arterials include Avenue 50 and a portion of C Loop fronting the proposed resort entertainment center (located north of the Avenue 50 interchange). Avenue 50 is proposed as a six-lane Major Arterial roadway that will extend northward from the planned Avenue 50 Interchange with I-10, providing access into the Project site. Avenue 50 is anticipated to provide regional access from the proposed I-10 interchange into the City and will also accommodate traffic generated by the Project and the previously approved La Entrada Specific Plan project south of the I-10.

Primary Arterials within the Project are proposed as four-lane roadways with a raised 14-foot median and 12-foot multipurpose trail. Primary Arterials comprise the backbone of the circulation network, extending from Vista Del Norte to the west through a system of loops providing access within the Project site.

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Source: KPC Coachella Specific Plan Figure 2-10: Circulation Plan, 2025.

EXHIBIT 3-8: Cir ulation Plan

KPC Coachella Specific Plan Project

City of Coachella

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Major Roadways

Major Roadways within the Project are proposed as four-lane roadways and would include a 14-foot wide raised landscaped median. In addition, the major roadways are proposed to have a 12-foot-wide bike/NEV lane, separated from the road by a 5-foot-wide shoulder and a 5-foot-wide landscaped buffer in both directions. Major roadways include Vista del Norte, which would provide access to the Project site from the west, connecting with Dillon Road.

The Project site circulation network would require crossings over the Coachella Canal and Eastside Dike to connect with the remainder of the City to the west. Canal crossings would also be required within the Project site along the drainages that transect the Project site. Major Roadways for canal crossing are proposed as four-lane roadways and include a four-foot-wide raised landscaped median. The Major Roadways for canal crossing are also proposed to include an 8-foot-wide bike/Neighborhood Electric Vehicle (NEV) lane and 6-foot-wide pedestrian path in both directions.

Major Roadways are proposed to provide primary connectivity to other roadways and pedestrian and bike paths within the Project; they provide north-south and east-west access.

Collectors

Collector roads within the Project site are proposed as two-lane roadways with a striped 12-foot-wide center turn lane and 8-foot-wide bike/NEV lanes in both directions. Collector roads are proposed to provide access to the interior planning areas and connect them with the larger circulation network. Collector roads are currently proposed in Village A and Village E where the proposed residential densities are lower. A large 8-foot-wide landscape buffer on both sides separates the pedestrian walkway from vehicular and bicycle traffic.

Local Roads

Local streets are proposed within each village to facilitate movement of vehicles and pedestrians and connect to Arterial and Collector roadways. Two types of local roads are proposed:

- A two-lane roadway with 10-foot-wide drive aisle and 7-foot-wide on-street parallel parking and no on-street bicycle facilities.
- A two-lane roadway (travel lane width from 12 to 15 feet wide) with no on-street parking or bicycle facilities.

Parking

Parking and loading within the Project site shall conform to the requirements of the Coachella Zoning Code Section 17.54 except as specified herein. Accessible parking shall be governed by government code.

Public Transportation

Public transit service within the City is provided by Sunline Transit Agency. Lines 90, 91, 95, and 111 all of which serve portions of the City. Route 90 currently runs from the downtown area north, ending on Dr. Carreon Boulevard. Route 91 runs from the City of Indio south through Coachella, Thermal, and Mecca

and ending in the One Hundred Palms area. Route 95 runs on the east side of Highway 111 from downtown Coachella to the North Shore area just north of the Salton Sea. Route 111 runs from downtown Coachella west through Palm Desert, Rancho Mirage, Cathedral City, and Palm Springs. The Project site, coupled with the proposed La Entrada Specific Plan area, provides the opportunity for the extension of the Sunline Transit Agency service area further east. Potential bus lines along Avenue 50 and Vista Del Norte would serve to increase connectivity between the Project site, La Entrada Specific Plan area, and the City. An extension of service to the Project site would expand access to housing, commercial retail, entertainment, open space, and recreational opportunities to residents around the region.

Non-Motorized Circulation

The Project site includes design elements to accommodate multiple forms of non-motorized circulation in order to increase walkability within the community and decrease the number of vehicle trips within the site. The transportation system includes:

- Twelve-foot multi-purpose trails for walking, biking, and the use of NEVs on all six-lane arterial and four-lane major roadways;
- Six-foot pedestrian walkways on all two-lane collector and local roadways;
- Eight-foot bike/NEV lanes on all two-lane collector roadways and canal crossings; and
- A large system of natural off-street trails and walkways that connect each of the villages.

Trail locations are designed to connect to the City and Coachella Valley Association of Governments (CVAG) regional trail system. The Project is also anticipated to connect to the La Entrada Specific Plan community to the south byway of a pedestrian trail running underneath the I-10. The Project could also connect to the CV Link via Avenue 50.

Multi-Purpose Trails

Off-street multi-purpose trails are used to connect the five villages within the Project site. All six-lane arterial and four-land major roadways contain separated twelve-foot multi-purpose trails on each side of the roadway that will provide connections from the west along Vista Del Norte to proposed regional Class I and Class II bike lanes shown in CVAG's Non-Motorized Transportation Plan. The Project will also include 50- to 100-foot-wide pedestrian paseos in strategic locations to further link the five villages. The paseos are comprised of bicycle/NEV travel lanes and pedestrian walkways separated from vehicular traffic by landscaping or other buffering methods. Additionally, there is an expansive network of off-street pedestrian/bicycle trails that run throughout the community. Many of these off-street trails run along the desert wash areas and connect residential neighborhoods with commercial uses, employment opportunities, parks, open space, and recreational opportunities.

Adjacent Future Interchange (Separate Project)

Proposed New Interchange on I-10. As a separate project from the KPC Project, for the last ten years, the City is pursuing the construction of a new interchange on I-10, approximately 3.4 miles (mi) east of the existing I-10/Dillon Road Interchange, at the extension of Avenue 50 to I-10. The interchange project is needed regardless of whether the Project is implemented. The existing I-10/Dillon Road Interchange, in

both its existing configuration or if improved to provide the maximum feasible capacity, cannot accommodate future traffic volume projections based on the City's General Plan land uses at build out. Substantial operational deficiencies are anticipated to occur on I-10, SR-86, Avenue 50, and Dillon Road without the proposed new interchange connection of Avenue 50 to I-10. Most of the existing development in the City and the I-10/Dillon Road Interchange are in the western part of the City. That interchange is the City's only direct point of connection to I-10. The proposed new interchange on I-10 at Avenue 50 along with upgrading Avenue 50 to a Major Street Corridor would provide many benefits to the regional and local transportation system and the City, including:

- More direct routes of travel to/from the east part of the City;
- More direct evacuation and emergency response travel routes and reduced evacuation and emergency response times;
- Reductions in vehicle miles traveled (VMT) and vehicle hours of travel in the western Coachella Valley, which would result in air quality benefits;
- Consistency with the City's General Plan Circulation Element and support of the economic vitality of the City and its residents;
- Reduction of the barrier effect of I-10 for pedestrians, bicyclists, and residents, which could provide them additional employment opportunities by reducing transportation costs and travel time for low-mobility residents;
- Access via the new interchange to commercial uses in the City would provide an economic benefit to the City that would, in turn, benefit the residents of the City;
- Elimination of the traffic operation deficiencies at the I-10/Dillon Road interchange that would occur absent the new interchange connection;
- Consistency with the provision of a balanced circulation system and reduction of out-of-direction travel; and
- Consistency with existing and proposed land uses in the City of Coachella.

In summary, as shown above, the City has determined that the proposed I-10 interchange at Avenue 50 is needed regardless of implementation of the Project.

Consideration of the Interchange in the Proposed Project. The Project considers foreseeable infrastructure improvements, such as the proposed interchange at I-10. The proposed interchange would provide one of two access points to serve the Project site (the other being Vista Del Norte to the west) and is anticipated to serve areas both north and south of I-10. As such, the Project has been designed to accommodate the future interchange and is reliant on the interchange for site access. Because the proposed interchange at I-10 and Avenue 50 is a separate project, California Environmental Quality Act (CEQA) clearance for the proposed interchange is not a part of the environmental documentation included in this EIR; separate environmental clearance is required for the proposed interchange project. A Notice of Determination was issued for the interchange project in early 2018 and 2020.

According to the I-10/Avenue 50 New Interchange IS/EA, the interchange is fully funded through final design, including being able to address all costs associated with completion of the right of way phase of the project. Identification for funding sources for the construction of the proposed interchange is currently underway.

Future grant opportunities to help fund the planned I-10/Avenue 50 Interchange Project will be pursued. Additionally, pursuant to Coachella Municipal Code (Coachella MC) Chapters 4.40, Transportation Mitigation Fee and 4.45, Development Impact Fees, the City accesses and collects transportation mitigation fees and development impact fees as a condition of a development approval to pay the costs of construction public facilities which includes, but not limited to, street facilities; and for future development projects that would result in traffic volumes in excess of capacity on regional system of streets, arterials, and highways.

The interchange project was included in SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and 2015 Federal Transportation Improvement Program (2015 FTIP) Consistency Amendment which has $62,000,000 programmed for the project. As identified in the most current 2015 FTIP, the cost estimate of $62,000,000 for the proposed interchange includes ROW, engineering, and construction.

Construction within the proposed Project area is anticipated to begin in 2026 and would be implemented over 20 years, through 2046. Construction of the proposed interchange project would be anticipated to be completed with the first phase of the Specific Plan.

The Project Traffic Impact Analysis (TIA) identified Avenue 50 at I-10 Westbound Ramps and Avenue 50 at I-10 Eastbound Ramps as future intersections. These intersections were analyzed under the Year 2045 Without Project Traffic Conditions and the Year 2045 With Project Traffic Conditions. Neither intersection had adverse LOS impacts. Both intersections were identified as external network planned improvements in the analysis; therefore, a fair share contribution was not identified for these intersections.

OPEN SPACE

Open Space and Recreation

The Project site would include approximately 1,200 acres of open space and recreation uses, including parks, greenways, amenity centers, agricultural production areas, and drainage. These spaces would provide opportunities for both active and passive recreation as well as programmed sport courts and fields for local leagues and tournaments. Village C contains a large sports complex and cycling park which connects to the Project-wide network of walking and cycling trails. New agricultural production areas are located in Village E and are intended to provide opportunities for growing fruits, vegetables, nuts, or other goods for consumption within the community. An agricultural education center is planned providing opportunity for residentials, visitors and school groups the educational aspects of agricultural practices within the region. Several drainage channels needed to facilitate the movement of water throughout the Project site run at a diagonal from northeast to southwest as well as along the perimeter of the Project site. These undisturbed open space areas are planned for hiking, walking, cycling and other activities such

as nature photography or educating residents and visitors on the local ecosystem through signage programs.

Lastly, miles of interconnected trails run through the villages and facilitate movement throughout the Project site without the need for a vehicle. These trails are in addition to sidewalks and nodes within each village. Walkability is particularly important within the Active Adult Village D, where large pedestrian promenades are proposed adjacent to local roadways.

UTILITIES AND NON-ROADWAY INFRASTRUCTURE

Drainage

Regional flows on the Project site run from the north through five alluvial drainages toward the East Side Dike, which is located at the Project site's southwestern boundary, and then farther south to Wasteway No. 2. In an effort to reduce increased runoff associated with the additional impervious hardscape areas created by the proposed development, the Project is planned to develop 20 proposed drainage basins. The basins would provide flood control and water quality benefits. The Drainage Master Plan shows that the Project would reduce the runoff volume tributary to the East Side Dike north of the I-10 Freeway. This is predominately a result of the proposed spreading basin and on-site basins proposed within the site development (see **Exhibit 3-9: Regional Channels and Proposed Mitigation Spreading Basin**).

The on-site drainage system is designed to capture, convey, and mitigate stormwater runoff from within the site development. The system is designed to provide protection for the one-percent annual chance event through a combination of street flow and a storm drainpipe system. All runoff shall receive water quality treatment in accordance with the City ordinance and MS4 permit requirements. Numerous on-site stormwater detention basins shall be designed to reduce the Project condition peak runoff flow rates and volumes to less than the existing condition. The basins would also provide dead storage to retain and infiltrate the required stormwater quality volume.

The Project would construct crossings over the Coachella Canal and East Side Dike to connect with the City. Currently, there is a 30-foot-high earthen flood control levee on the northeast side of the canal at both proposed canal crossings. Therefore, a series of reinforced concrete box culverts are proposed. For the drainage facility behind the levee, a series of concrete arch culverts are proposed. The drainage culverts behind the levee will utilize precast concrete arch sections that offer longer spans than traditional rectangular RCB sections. In addition, drainage crossings would also be required within the project area along interior street crossings. These crossings would also be concrete box or arch culverts; however, the number of cells would be determined based on projected stormwater flows for each crossing. Trail crossings within the Village Paseo would also be required and would be designed as low-flow crossings set at grade level. **Section 4.9: Hydrology and Water Quality** provides analysis of the proposed site drainage and flood control.

Water Supply

The City, and future residents and businesses within the Project area, would rely on groundwater provided by six active wells and future wells. Total firm capacity of the City's existing wells is 8,454 gpm and supplied

a total demand of 7,216 AF in 2020. On average, each well provides approximately 1,000 AFY, ranging in design capacities of 1,371 gpm to 2,323 gpm. The City's 2017 Water Master Plan calls for six new wells to be developed for the 150+ Zones by the year 2035, based on the assumed phasing of major development projects proposed at or above approximate mean sea level elevation of 30 feet.

According to the City's Water Master Plan, the Project lies within the Desert Hot Springs Subbasin and the Fargo Canyon Subarea, which has been characterized as generally low-quality water with limited yield potential. Therefore, all groundwater pumping would likely be developed within the East Whitewater River Subbasin west of the San Andreas Fault to avoid these concerns. For the purposes of the Project, it is anticipated that the conceptual sites identified by the City's Water Master Plan would be used for developing additional groundwater supply for the Project development. These sites are discussed under **Off-Site Infrastructure** below.

The following are measures that the City will maintain in order to assure the most efficient use of water resources and meet the Coachella Valley Water Management Plan (CVWMP) 2016 goals:

- Continued CVWMP program implementation, which may include treatment of Canal water for domestic use
- Maximize the use of recycled water when it becomes available to the Project for landscaped irrigation to reduce the use of groundwater for irrigation for these and other candidate non-potable water uses.

According to the Water Supply Assessment (Charles Marr Consulting, 2023), the total water demand for the Project at build out, including both potable and irrigation water, is 4,544 acre-feet per year (afy), which is dependent on conservation measures implemented by the Project. The total projected water supplies available to CVWD and the City during normal, single dry, and multiple dry water years over a 20-year projection (to the year 2045) would be sufficient to meet the water demands associated with Project build out, in addition to the City's existing and planned future uses. This determination was made based on the volume of water available in the regional aquifer, as well as the City's existing and planned local water management projects and water supply projects that would supplement and sustain regional groundwater supplies.

Sewer Concept

A sewer system study was prepared for the Project and can be found in **Appendix K**. The sewer system study makes the recommendation that the Project develop a sewer system independent of the timing of other major development projects. Primary collection of on-site wastewater for the entirety of the Project area should be based on flowing through Village A to the west and Vista Del Norte (Avenue 46). The collection system is proposed to flow from east to west and north to south. Collection within the Project site is naturally divided into three sewersheds which drain to local low points determined by the proposed land use and concept grading.

Sewershed 1 includes the highest elevations at the east side of the Project with drainage flow direction to the west and south, with its boundary separating it from Sewershed 2 by the natural drainage area defined in the land use plan as DR-8 and DR-9. In like manner, the upper reaches of Sewershed 2 starts at the next

highest elevations at the north side of the Project and flows to the west and south, with its boundary separating it from Sewershed 1 by DR-1. The primary consideration for the proposed KPC sewer system layout is to minimize pumping and natural drainage crossings. The upstream terminus of the City's East-side Trunk Sewer is located in Vista Del Norte at Meritage Lane and represents KPC sewer service direction that could accommodate 100 percent of the KPC development.

The proposed primary service (Option 1) would require extending the Vista Del Norte sewer to the east and crossing the Coachella Canal. This would require special design considerations, but should allow for gravity flow from the proposed KPC terminus in Vista Del Norte. Based on the conceptual grading plan provided for the Sewer System Study, the elevation of the western-most point of KPC in Vista Del Norte may be more than 75 feet higher than the invert of the East-side Trunk Sewer terminus.

As a second option (Option 2), the KPC sewer master plan investigates off-site sewer flow direction to the south at, or adjacent to, the future Interstate 10 interchange. The Sewer System Study introduced the concept of gravity service for Areas 1, 5 and 7, i.e., Sewershed 1. This represents Option 2, which would also require special design considerations for crossing Interstate 10. Depending on final topography and ultimate interchange configuration, this could allow for 100-percent gravity flow service for these Areas precluding the need for permanent on-site pumping in Sewershed 1. This would have the added benefit of minimizing the impacts to the upper reaches of the Eastside Trunk Sewer.[21]

Exhibit 3-10: Proposed On-site Wastewater Collection System, illustrates the sewershed configuration and proposed collection sewers and lift stations for the Project site.

Off-Site Infrastructure

Note that off-site facility locations, as depicted in **Exhibit 3-11: Off-Site Improvements**, are conceptual, subject to modification during final design and permitting. These off-site improvements would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including aesthetic, biological, and cultural resources, and avoid environmental hazards.

Domestic Water

The off-site installation and upsizing of domestic water transmission lines are proposed within existing roadway rights-of-way for Avenue 50, Avenue 48, Tyler Street, and Vista Del Norte. Planned groundwater production sites are proposed at Tyler Street and Avenue 48; Avenue 48 and Polk Street; Avenue 50 and Polk Street; and Avenue 50 and Fillmore Street. For further information see the Domestic Water System Report in Draft EIR **Appendix K** and **Exhibit 3-11: Off-Site Improvements**.

Sewer

The off-site sewer collection system proposed to serve the Project, referred to as the East-side Trunk Sewer, follows Vista Del Norte, Dillon Road, Highway 86, Avenue 48, Tyler Street, Avenue 50, and Polk Street. The off-site collection system currently consists of 12-, 15-, and 24-inch gravity sewers.

[21] Charles Marr Consulting. 2023. KPC Coachella Sewer System Study.

Upsizing of these off-site lines would be required for the Project. A second option was also considered which would include off-site sewer service through La Entrada as a potential for minimizing construction costs of upsizing the East-side Trunk Sewer and minimizing or precluding the need for on-site pumping for Areas 1, 5 and 7 (Villages B and E). For further information see the Sewer System Study in Draft EIR **Appendix K** and **Exhibit 3-11: Off-Site Improvements**.

Dry Utilities

The Project includes off-site infrastructure connections to the project site. Power would be supplied via an approximately 0.9-mile powerline extension from an existing 230 kilovolt (kV) SCE Transmission line, located along Coachella Canal Road, to the proposed Avenue 50 Interchange with I-10; refer to **Exhibit 3-11: Off-Site Improvements**. Power would cross I-10 at the proposed Avenue 50 Interchange on-ramp/off-ramp area with a transmission circuit to a new substation on the north side of I-10. That substation would then supply the Project.

This powerline extension would be pursued by Imperial Irrigation District (IID) as a separate project as the nature and extent of these improvements is not currently known, and would serve a larger area than the Project. In addition to the installation of IID's new facilities to serve the Project, it is anticipated that IID will need to relocate or rearrange portions of IID's existing transmission/distribution lines, depending on IID circuit load projections and anticipated line capacity growth. IID will also need to relocate or reconfigure some of the existing overhead 12.5 kV lines and integrate those existing facilities with the new proposed on-site electric distribution facilities.

Additionally, low voltage/data (telephone and cable television) would be extended from Dillon Road along Vista del Norte to the Project site. Natural gas would also be extended from Dillon Road along Vista del Norte to the Project site. A natural gas regulator station would be required and may be located on the south side of Vista del Norte, east of the abandoned gas station.

SUSTAINABILITY FEATURES

The Project would implement design strategies that would contribute to the Project's sustainability. The following is a list of sustainable features included in the Project as outlined in the KPC Coachella Specific Plan:

Land Use

Design of the Project site would concentrate development in lower elevation areas of the Project site in an effort to minimize grading and reduce energy to supply infrastructure services in these regions while allowing areas of higher elevations to remain as open space areas and/or low intensity residential uses. In addition, the Project would encourage nonvehicular transportation by providing a variety of pedestrian, bicycle, and NEV pathways throughout the site. The Project would also prohibit development within floodplains and allowing these areas to serve as buffers and passive recreational areas. Lastly, the Project would allow for and encourage multi-generational housing, higher density and mixed use, and Accessory Dwelling Units within appropriate residential areas of the plan, producing fewer vehicle miles traveled and ensuring that jobs, shopping and housing are located within close proximity to each other.

Landscape Design/Low-Impact Development

Landscaping within the Project site will complement the surrounding desert environment as well as provide areas for outdoor enjoyment and activity. The plant palette proposed for the Project identifies appropriate plant types that have low water requirements, minimize turf, and provide shade, and which reduce the urban heat island effect. In conjunction with the proposed landscape design, the Project proposes the use of Low Impact Development (LID) techniques to control stormwater flows on-site (see list below). LID is an ecologically friendly approach to site development and stormwater management that aims to mitigate development impacts to land, water, and air. The approach emphasizes the integration of site design and planning techniques that conserve natural systems and hydrologic functions on a site.

Walkability/Mobility

The Project would encourage walkability/biking/mobility by providing wide pedestrian pathways, trails, and sidewalks, designing development to provide an attractive pedestrian environment (i.e., storefronts set back from street, facades with large windows fronting the street, street furniture, and orienting parking to the side or back of buildings), and allowing public uses to be within walking distance of residential neighborhoods. In addition, the Project would reduce transportation-related greenhouse gas (GHG) emissions by integrating the Project, coupled with the proposed La Entrada Specific Plan area, providing the opportunity for the extension of the Sunline Transit Agency service area further east. Potential bus lines along Avenue 50 and Vista Del Norte would serve to increase connectivity between the Project site, La Entrada Specific Plan area, and the City. An extension of service to the Project site will expand access to housing, commercial retail, entertainment, open space, and recreational opportunities to residents around the region.

Solar Orientation

The Project would promote building orientation that would maximize exposure to daylight, shade south-facing windows to reduce heat gain into buildings, minimize east- and west-facing windows unless shaded, and place landscaping to provide shading and wind protection.

Energy Efficiency

The Project would also encourage energy efficiency by designing development in accordance with U.S. Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED), GreenPoint Standards, and installing light-emitting diode (LED) lighting, energy-efficient lighting, energy-efficient appliances, and solar/photovoltaic systems on 25 percent of the residences/businesses within the site.

Materials Efficiency

The Project would encourage sustainability by utilizing renewable, recycled, locally sourced, and sustainable materials as well as materials with little to no volatile organic compounds (VOCs). In addition, the Project would incorporate separation of solid wastes to achieve a goal of 75 percent diversion of construction solid wastes to landfills.

Water Efficiency

The Project would encourage water efficiency and reduce potable water demand by utilizing reclaimed water for irrigation purposes, when available, installing high efficiency plumbing and appliances that meet or exceed the California Green Building Standards Code (CALGreen Code) and reducing the amount of irrigated turf. In addition, the Project would implement a stormwater collection and conveyance system to treat runoff, provide protection within floodplains, and improve water quality. Furthermore, the Project would reduce water quality impacts by supporting the development of reclaimed water supplies in the City.

Parking

Parking and loading within the Project site shall conform to the requirements of the Coachella Zoning Code Section 17.54 except as specified. Accessible parking shall be governed by government code. In addition, the Project would reduce transportation-related greenhouse gas (GHG) emissions by integrating energy efficient practices such as electrical vehicle charging stations and rideshare provisions.

DESIGN

Architectural

The architectural concept for the Project is based on traditional southern California neighborhoods that blend various-sized single-family homes, multi-family residences, and commercial uses into one interconnected environment with a maximum building height for very low density residential to medium density residential is 35 feet, and high density residential is 55 feet; refer to KPC Coachella Specific Plan Section 3: Development Regulations. The thematic styles including Monterey, Spanish Eclectic, Cottage/Farmhouse, California Ranch, Craftsman/Bungalow, and Italianate/ Tuscan are related in form and reflect southern California aesthetics, but each has its own distinct character expressed through various architectural details, such as rooflines, finish materials, window treatments, and entry and porch features. The Project would provide contemporary interpretations of these thematic styles, which would offer a variety of choices, yet together form a cohesive community identity. Multi-family housing styles would be determined during the site planning process. The overall plan and the housing styles would be reviewed by the City through a site plan review and architectural review process prior to construction.

Streetscape

The overall streetscape design goal for Project is to create a healthy, efficient, and walkable community that promotes sustainable landscaping practices, strong pedestrian, bicycle and NEV connections; refer to KPC Coachella Specific Plan Section 4: Design Guidelines. The primary elements associated with streetscapes within the Project site consist of:

- Pedestrian and multi-use walkways/sidewalks,
- Street trees,
- Landscaped buffer areas adjacent to the sidewalk,
- Landscape setbacks, and

- Median islands where they occur.

Exterior Lighting

Lighting shall be provided throughout the community's parks and open spaces, consistent with streetscape furnishings; refer to KPC Coachella Specific Plan Section 4: Design Guidelines. Quality lighting enhances the nighttime vehicular and pedestrian experience and safety. Lighting design will help differentiate between land uses, highlight public and pedestrian-scaled spaces, provide continuity and aesthetic appeal along corridors, and encourage pedestrian and vehicular efficiency. Lighting along multi-use paths, walkways, and other areas used by pedestrians and bicyclists should be provided except in natural open space areas.

Lighting should minimize uncontrolled nighttime light and glare, light trespass, and night sky pollution with low brightness lighting fixtures utilizing warm, color corrected light sources and appropriate beam cut-off. Energy-efficient lamp technologies such as LED should be utilized along with photovoltaic sensors to turn lights off when adequate daylight is available.

Light standard styles should be consistent throughout the project yet designed to meet City standards. Alternative street light designs may be allowed, subject to approval as part of site plan review. No specific alternative street light design is proposed.

- Exterior lighting should be unobtrusive and not cause glare or spillover into neighboring properties, especially when within 100 feet of open spaces. Lighting fixtures should direct illumination downward to minimize light pollution impacts.
- Up-lighting, spot-lighting, and decorative color lighting may be appropriate for prominent buildings and features, such as hotels or entertainment venues, but illumination shall not adversely impact neighboring properties with sensitive uses, such as residential or open space areas.
- Lighting shall be provided throughout the site to create an inviting and non-threatening environment. Night lighting of public spaces shall be kept to the minimum necessary for safety and security purposes.
- The scale, materials, colors, and design detail of light posts and fixtures should reflect the desired character of the project and the architectural style of the surrounding buildings.
- Light posts shall be appropriately scaled to pedestrians near sidewalks and other areas of pedestrian circulation. Extremely tall light posts and fixtures shall be avoided. Bollard lighting is encouraged to illuminate walkways without providing spillover.
- Energy-efficient, low voltage lighting is strongly encouraged. Decorative lighting shall be low intensity.
- If security lighting is required, fixtures shall be hooded, recessed, and/or located in such a manner to only illuminate the intended area.
- Lighting shall be provided, at a minimum, in the following locations for safety and for crime prevention:
    - Parking Lots and Structures;

- Plazas or outdoor seating areas;
- All building entries;
- Refuse disposal areas (may be provided as part of parking lot lighting); and
- Walkways.

- Addresses shall be visible from streets and illuminated at night.

Community Gateways and Entry Monumentation

The Project would include entry monumentation within the Project site and would serve to define the primary and secondary entrances to individual communities and neighborhoods; refer to KPC Coachella Specific Plan Section 4: Design Guidelines.

Primary Community Gateways are located at prominent intersections within the community. Primary gateways are grand entries that establish a sense of place and clearly convey the message that residents and visitors have arrived at the KPC Coachella community.

Secondary Community Gateways would help to define the entrance to important areas within the community. They would be used to complement and reinforce architectural themes and provide wayfinding signage for residents and visitors.

Neighborhood Entrances would generally be located at the intersection of collector and local streets or at the entries to individual neighborhoods. Entry monumentation and signage would be designed to complement and enhance the vision for each neighborhood through unique architecture and materials.

3.7 PROJECT PHASING AND CONSTRUCTION

Six large scale phases are assumed (see **Exhibit 3-12** below); subsequent sub-phases would likely occur. The Project would be phased to:

- Provide an orderly build-out of the community based upon market demand; and
- Provide adequate infrastructure to service the Project.

The Project would be phased based on market demand and available infrastructure improvements needed to support development. Phases may occur concurrently so long as the associated infrastructure is provided.

The anticipated development phases, as generally shown in **Exhibit 3-12: Conceptual Phasing Plan**, include the following estimated dwelling unit counts and commercial development numbers shown in **Table 3-4: Phasing**.

Table 3-4: Phasing

Phase	Village	Dwelling Units	Commercial/Office	Other
1	Village B	349	27 acres (resort) 105.5 acres (mixed-use)	Mixed-Use and Wellness Complex Hotel/ Entertainment Center Avenue 50/I-10 Interchange Vista Delt Norte Extension
2	Village A Village C	1,438	23 acres (entertainment center)	Elementary School Entertainment Venue
3	Village A	841	0 acres	Wellness University Complex Elementary School
4	Village B	2,032 (including NAP)	138.7 acres (mixed-use including NAP)	
5	Village C Village D	3,684 (including NAP)	20 acres	Sports Complex Middle School Elementary School Active Adult Community
6	Village E	1,157	0 acres	Elementary School
Total		9,538	314 acres (including NAP)	
Project phasing is preliminary and subject to change based on market conditions and coordination with the Project area school districts.				

The ultimate pace and phasing of the development are dependent on a number of internal and external factors. As other projects and improvements in the area progress various adjustments and revisions to the Project phasing may occur. Revisions to the phasing plan shall be reviewed by the City's Development Services Department and approved administratively so long as the proposed revisions meet the intent of the Specific Plan and adequately provide for the needs of the community. Any revision to the phasing deemed consistent with the Specific Plan shall not require a specific plan amendment. Consistent with the Traffic Impact Analysis (**Appendix J**), Project buildout is projected to be 2045.

Construction of the Project, including recordation of final subdivision map(s), and design review may be progressively done in stages, provided vehicular access, public facilities, and infrastructure are constructed to adequately service the development, or as needed for public health and safety.

Raw cut associated with the Project totals 26,807,214 cubic yards (CY). Raw cut plus ten percent shrinkage would total 29,487,935 CY. Raw fill would total 29,476,325 CY. Therefore, the net cut would be 11,611 CY and the site would be nearly balanced.

3.8 APPROVALS REQUESTED AS PART OF THE PROJECT

The City is the Lead Agency under CEQA and is responsible for reviewing and certifying the adequacy of the EIR for the Project. Prior to development of the Project, discretionary permits and approvals must be obtained from local, state, and federal agencies, as listed below. It is expected that these agencies, at a minimum, would consider the data and analyses contained in this Draft EIR when making their permit determinations. The Project consists of applications for an Environmental Review, Specific Plan Adoption

(SP 22-01), Zone Change (CZ 22-04), and General Plan Map and Text Amendment (GPA 22-03). Each requested approval is discussed in additional detail below.

California Environmental Quality Act – Environmental Review - The KPC Coachella Specific Plan is considered a "Project" under CEQA. CEQA is a statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. To document the potential significant impacts this EIR is being prepared for this Specific Plan and would be certified by the City prior to adoption of the Project or any other Project entitlements. Subsequent development within the Specific Plan boundaries deemed consistent with Specific Plan standards would not require further environmental review. The City is the lead agency responsible for certification of the Project EIR. The Project is analyzed at a programmatic level under CEQA Guidelines Section 15168.

Specific Plan Adoption. SP 22-01 - Adoption of the proposed Specific Plan is a discretionary action subject to City Council approval. Adopted by Ordinance, the Specific Plan document will serve both planning and regulatory functions. This document contains the development standards and procedures necessary to fulfill these purposes. The proposed Specific Plan would implement the City's General Plan as amended. The Specific Plan would be considered by the Planning Commission and City Council and would be adopted by Ordinance and would become the zoning for the Project.

General Plan Map and Text Amendment. GPA 22-03 – The Project site is presently designated as Resort District by the General Plan, which permits for residential, lodging, recreational, and support retail and commercial services, such as theme parks, sports venues, and specialized entertainment uses. A General Plan Map and Text Amendment would change the property's land use designation from Resort District to KPC Coachella Specific Plan, to be consistent with the Project zoning.

Zone Change and Specific Plan approval. CZ 22-04 – Adoption of the proposed Specific Plan is a discretionary action subject to City Council approval. Adopted by Ordinance, the Specific Plan will serve both planning and regulatory functions. The Specific Plan document contains the development standards and procedures necessary to fulfill these purposes. The Specific Plan would implement the City's General Plan as amended. The Specific Plan would be considered by the Planning Commission and City Council and would be adopted by Ordinance and would become the zoning for the Project.

Water Quality Management Plan - The Water Quality Management Plan (WQMP) for the Project would comply with the policies presented in the City's Development Code. The WQMP would also include best practices intended to reduce potential impacts to the City's stormwater conveyance system due to the Project's stormwater discharge. The statutes and best practices presented in the WQMP would apply in the construction phase of the Project and throughout the duration of its operation.

Statement of Overriding Considerations - In accordance with CEQA Guidelines Section 15093, the Lead Agency is required to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the Lead Agency finds that the project benefits outweigh the unavoidable adverse environmental effects, the adverse effects may be deemed acceptable.

If this EIR identifies any significant, unavoidable, and unmitigable impacts, the City of Coachella, as Lead Agency, may approve the Project based on a Statement of Overriding Considerations. The Statement must be in writing and state-specific reasons supporting City action based on the final EIR or other substantial evidence in the record. Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinions supported by facts. Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment.

If the City makes a Statement of Overriding Considerations, the written Statement will be included in the record of Project approval and will be mentioned in the Notice of Determination. It will explain why the Project benefits outweigh the adverse environmental consequences identified in this EIR. The Statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091. Findings.

Other permits required for the Project may include, but are not limited to the following: issuance of encroachment permits for driveways, sidewalks, and utilities; security and parking lot lighting; demolition permits; building permits; grading permits; tenant improvement permits; and permits for new utility connections and the permits/approvals referred to in **Section 3.7**.

Applications in Process: The Applicant has submitted a draft Tentative Tract Map (TTM) and is working with the City on this application and a Development Agreement (DA), intended to be taken with the Specific Plan for consideration by the Planning Commission and City Council. The TTM and DA do not represent any physical impacts other than what is shown in the Specific Plan and addressed in the Draft EIR.

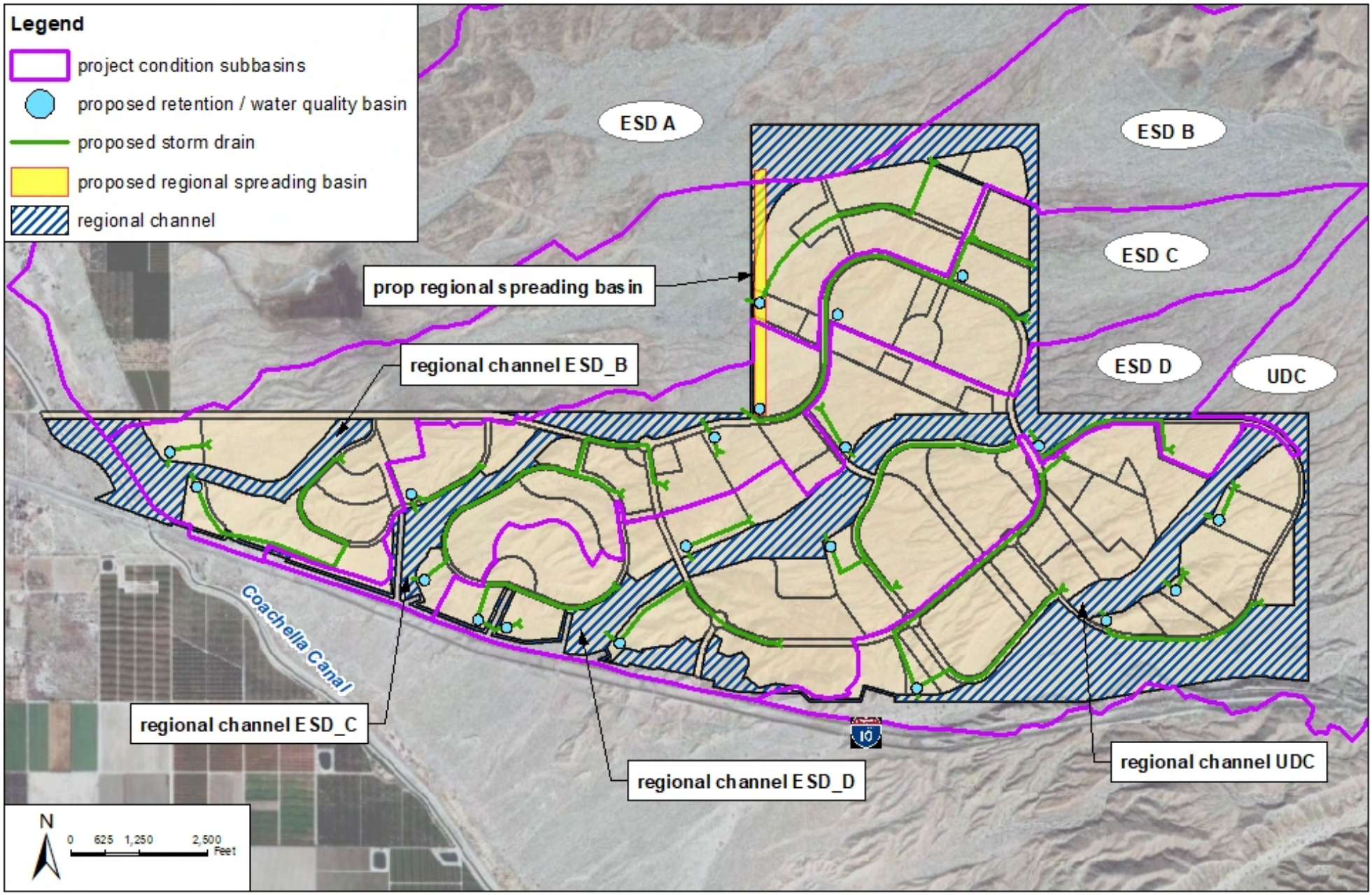
- **Tentative Tract Map (No. 37838)** – The Project's Tentative Tract Map, for financing purposes, would create the individual legal lots for Project development, formalize the parcel boundaries, and provide for public rights-of-way for Project access.
- **Development Agreement** – The Project application includes a request for a development agreement that will outline the Project's obligations and improvements, phasing and timing of improvements, fee credits and reimbursements, vesting, and other related City and Applicant responsibilities.

3.9 ANTICIPATED PERMITS AND APPROVALS REQUIRED

Section 15124 (d) of the State CEQA Guidelines requires that an EIR project description include a list of permits and other approvals required to implement a proposed project, the agencies expected to use the EIR in their decision-making, and related environmental review and consultation requirements. The anticipated approvals required to implement the Project are identified below in **Table 3-5: Agency Approvals for the Proposed Project**, by agency:

Table 3-5: Agency Approvals for the Proposed Project

Agency	Approval/Permit
California Department of Fish and Wildlife (CDFW)	• Approval of a streambed authorization agreement pursuant to Section 1602 of the California Fish and Game Code if impacting streambed (if necessary).
City of Coachella	• **Final EIR Certification** • **Specific Plan Approval and Adoption** • **General Plan Amendment** • **Zone Change** Future Permits, Approvals from the City • Development Agreement • Financing/Conveyance Tentative Tract Map • Tentative Tract Map • Building Plans/Permits • Grading Plans/Permits • Certificates of Occupancy • Infrastructure Plans/Permits • Local Jurisdiction Encroachment Permit • Landscape Plan • Drainage Plan • Water and Sewer Plan • Site Development Plan • Water Quality Management Plan • Approval of agreement for water and sewer facilities
Regional Water Quality Control Board (RWQCB)	• National Pollutant Discharge Elimination System Permit • Approval of a Water Quality Certification under Section 401 of the Clean Water Act (if necessary)
South Coast Air Quality Management District	• Dust Control Plan, and other permits as necessary
United States Army Corps of Engineers (USACE)	• Approval of permits under Section 404 of the Clean Water Act to alter Waters of the United States (if necessary)
Imperial Irrigation District	• Dry Utility Plans
California Public Utilities Commission	• Permit to Construct to relocate existing IID facilities (if necessary)
Bureau of Reclamation	• Coachella Canal Crossings
Coachella Valley Water District	• Regional Master Plan of Drainage • Canal Crossings
Caltrans	• Connection to Proposed Caltrans Right-of-Way (Interchange)
Coachella Water Authority	• Water and Sewer Plans • Irrigation Plans
RCTC/CVAG	• RCTC/CVAG Funding for Roads and Bridges



Source: Q3 Consulting, 2024

EXHIBIT 3-9: egional C annels and Proposed itigation Spreading Basin

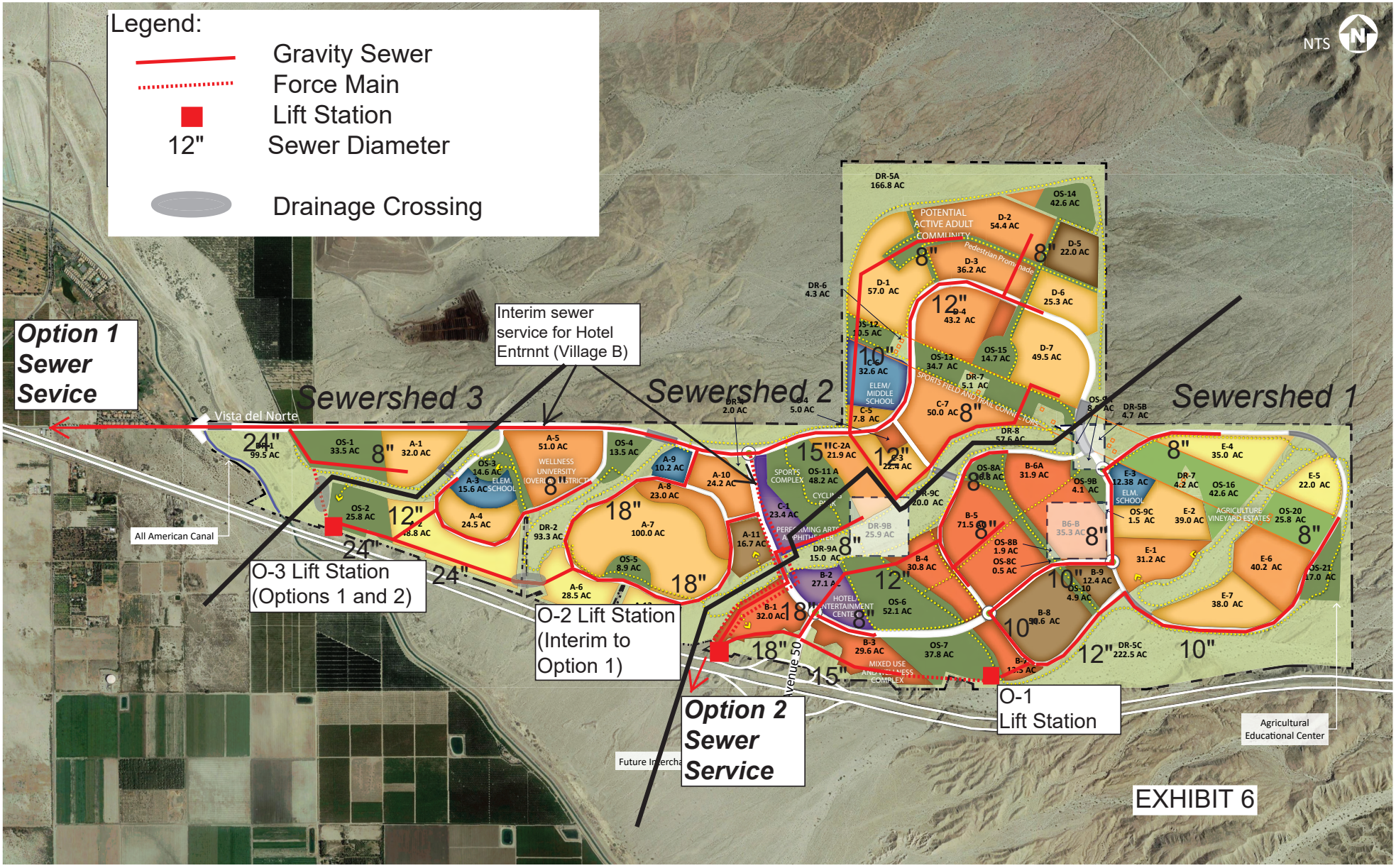
KPC Coachella Specific Plan Project

City of Coachella

Not to scale

Kimley»Horn

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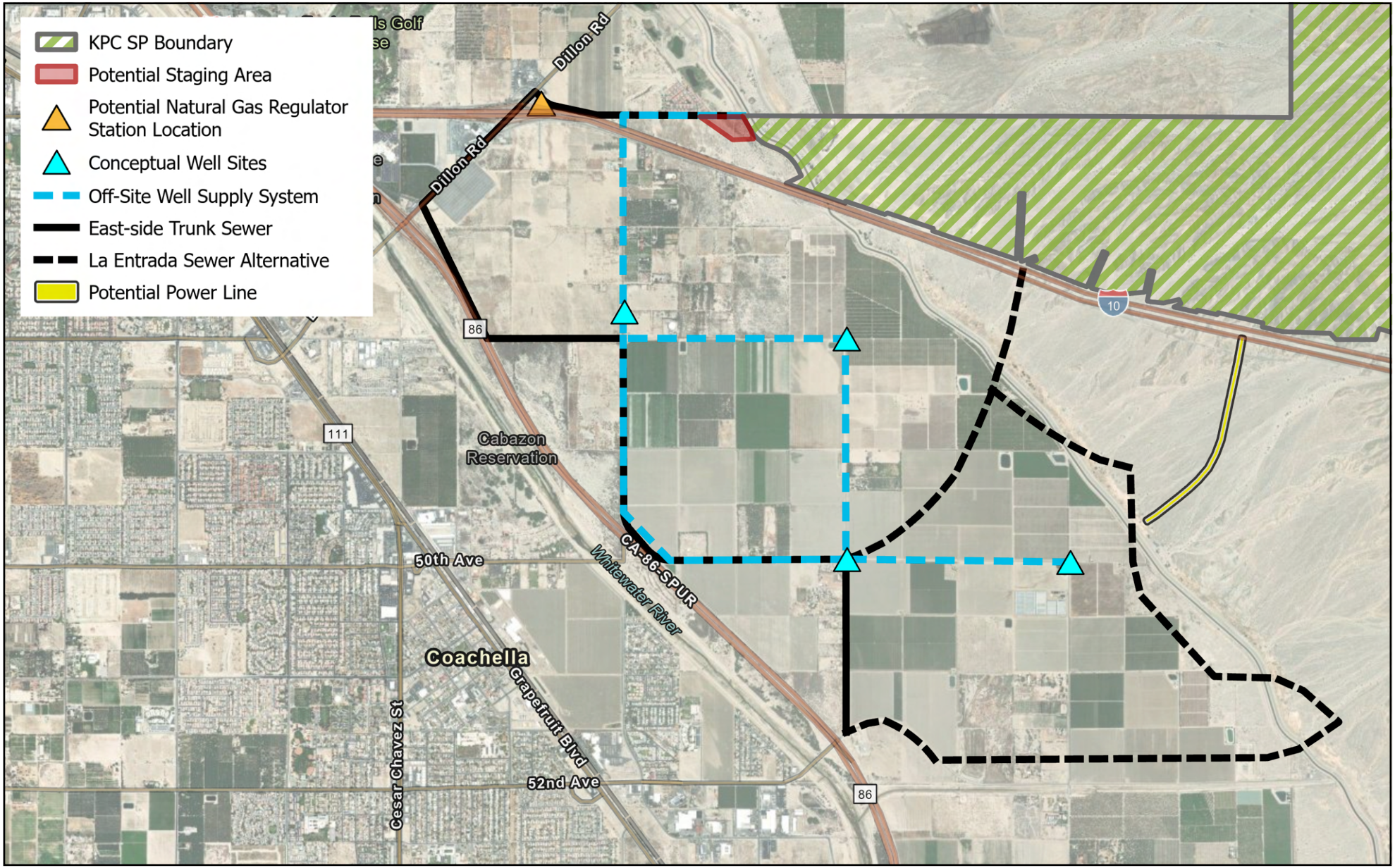


Source: Charles Marr Consulting, October 2022

EXHIBIT 3-10: Proposed n-Site aste ater Colle tion System
KPC Coachella Specific Plan Project
City of Coachella

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Source: ESRI Aerial Imagery, 2023.

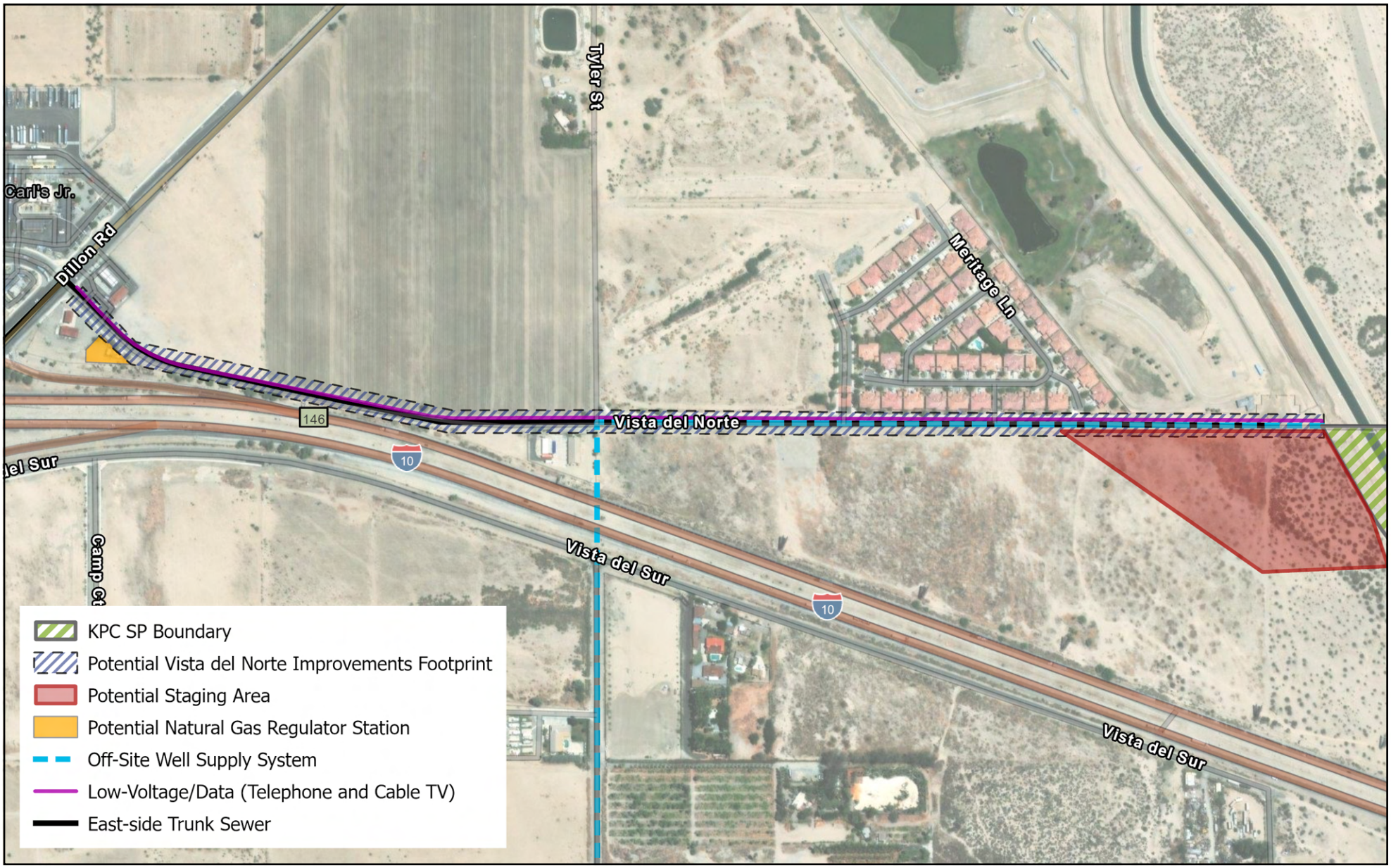
EXHIBIT 3-11A: Off-Site Improvements

KPC Coachella Specific Plan Project

City of Coachella

Not to scale

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Source: ESRI Aerial Imagery, 2023.

EXHIBIT 3-11B: Off-Site Improvements - Vista del Norte

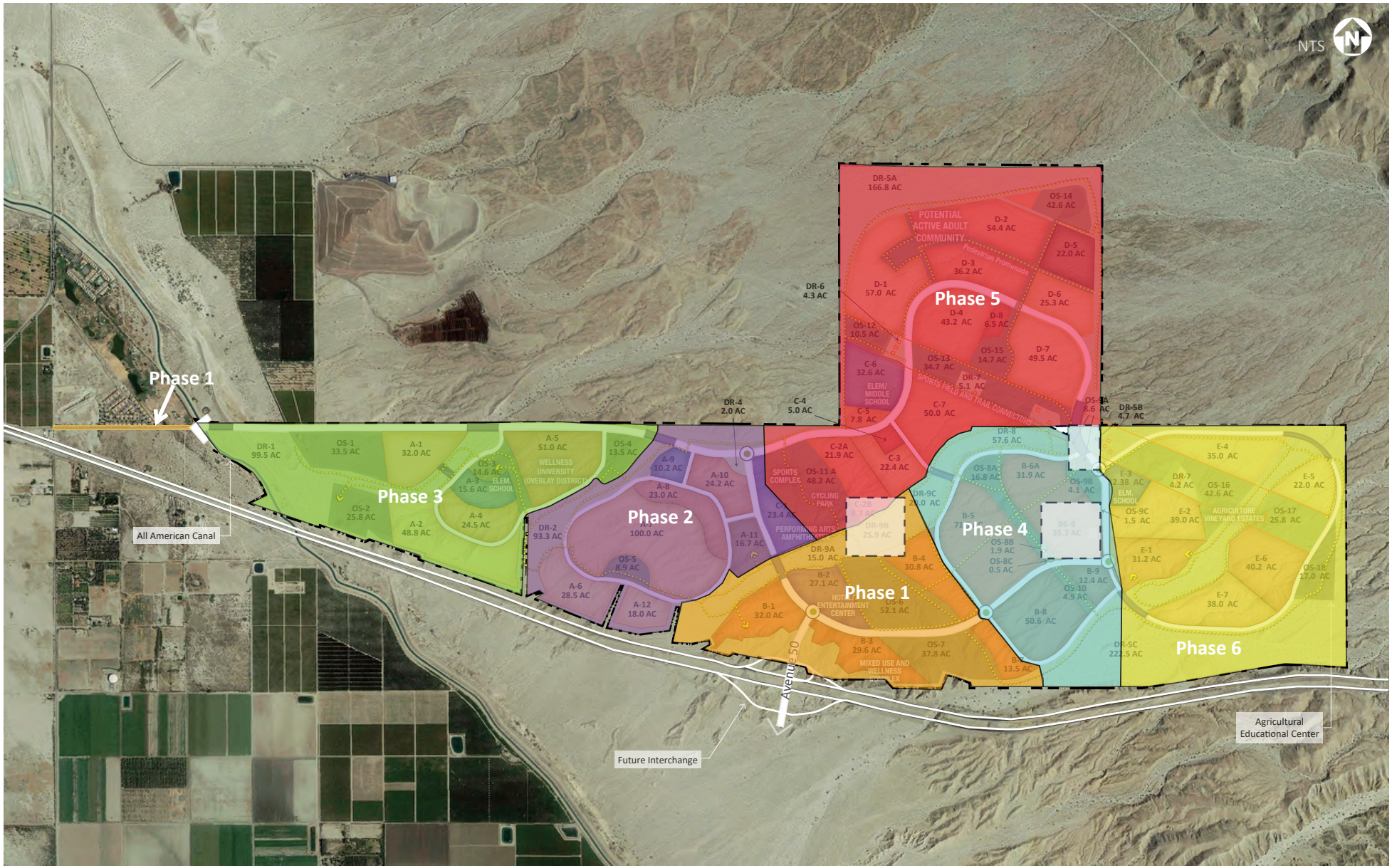
KPC Coachella Specific Plan Project

City of Coachella

Not to scale

Kimley»Horn

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Source: KPC Coachella Specific Plan Figure 5-1: Project Phasing Plan, 2025.

EXHIBIT 3-12: Conceptual P asing Plan

KPC Coachella Specific Plan Project

City of Coachella

Kimley»Horn

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4.0 ENVIRONMENTAL IMPACT ANALYSIS

Organized by environmental resource category, **Section 4.0: Environmental Impact Analysis**, provides an integrated discussion of the affected environment, including regulatory and environmental settings and environmental impacts and mitigation measures, which reduce or avoid potentially significant impacts associated with implementation of the Project.

Additional analysis and other required chapters under the California Environmental Quality Act (CEQA) are provided in **Section 5.0: Other CEQA Considerations**, which discusses mandatory findings of significance and other required CEQA topics, **Section 6.0: Alternatives to the Proposed Project**, which describes and discusses the impacts associated with three alternatives to the Project, and **Section 7.0: Effects Found Not to Be Significant**.

4.0.1 SECTION CONTENT AND DEFINITION OF TERMS

The environmental setting, impacts, and mitigation measures related to each environmental impact area are described in **Sections 4.1** through **4.16**. **Section 4.0** is organized into the following environmental topic areas:

- Section 4.1, Aesthetics
- Section 4.2, Air Quality
- Section 4.3, Biological Resources
- Section 4.4, Cultural Resources
- Section 4.5, Energy
- Section 4.6, Geology and Soils
- Section 4.7, Greenhouse Gas Emissions
- Section 4.8, Hazards and Hazardous Materials
- Section 4.9, Hydrology and Water Quality
- Section 4.10, Land Use and Planning
- Section 4.11, Noise
- Section 4.12, Population and Housing
- Section 4.13, Public Services
- Section 4.14, Transportation
- Section 4.15, Tribal Cultural Resources
- Section 4.16, Utilities and Service Systems

Agriculture and Forestry Resources, Mineral Resources, Recreation, and Wildfire are addressed in **Section 7.0: Effects Found Not to be Significant**. Each potentially significant environmental issue area is addressed in a separate EIR Section (4.1 through 4.16) and is organized into the following subsections:

- **"Environmental Setting"** provides an overview of the existing physical environmental conditions in the study area that could be affected by implementation of the Project (i.e., the "affected environment").
- **"Regulatory Setting"** identifies the plans, policies, laws, and regulations that are relevant to each resource area and describes permits and other approvals necessary to implement the Project. As noted above, the EIR needs to address possible conflicts between the Project and the requirements of federal, State, regional, or local agencies, including consistency with adopted land use plans, policies, or other regulations for the area. Therefore, this subsection summarizes

or lists the potentially relevant policies and objectives, such as from the applicable City of Coachella General Plan and Municipal Code.

- **"Standards of Significance"** provides the criteria used in this document to define the level at which an impact would be considered significant in accordance with CEQA. Significance criteria used in this EIR are based on the checklist presented in Appendix G of the State CEQA Guidelines, factual or scientific information and data, and regulatory standards of federal, State, regional, and local agencies.
- **"Project Impacts and Mitigation"** are listed numerically and sequentially throughout each section. A bold font impact statement precedes the discussion of each impact and provides a summary of each impact and its level of significance. The discussion that follows the impact statement includes the analysis on which a conclusion is based regarding the level of impact and its effect pursuant to local, state, and federal regulations and laws. Compliance with existing regulations and laws are not identified as mitigation measures.
- **"Off-Site Impacts"** identifies resource impacts associated with conceptual off-site improvements.
- **"Significant Unavoidable Impacts"** identifies environmental impacts that would remain significant even with implementation of feasible mitigation measures.
- **"Cumulative Impacts"** identifies potential environmental impacts of past, present, and reasonably foreseeable future projects, in combination with the proposed Project.
- **"References"** relied upon to write the EIR sections are listed here.

"Mitigation Measures" are recommended where feasible to avoid, minimize, offset, or otherwise compensate for significant and potentially significant impacts of the Project, in accordance with CEQA Guidelines Section 15126.4. Each mitigation measure is identified by resource area, numerically, and sequentially. For example, mitigation measures in **Section 4.2: Air Quality**, are numbered MM AQ-1, MM AQ-2, MM AQ-3, and so on. Pursuant to CEQA, the EIR also provides a brief discussion of the potentially significant impacts of a given mitigation measure, if applicable.

The level of impact of the Project is determined by comparing proposed changes associated with the Project as compared to baseline conditions, in light of the thresholds of significance identified in the EIR. Under CEQA, the existing environmental setting normally represents baseline conditions against which impacts are compared to determine significance. The environmental baseline is typically set as the date of Notice of Preparation (NOP) publication, here, November 14, 2022.

Further, CEQA Guidelines Section 15125: Environmental Setting states:

(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision-makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.

1) Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence. In addition, a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record.

Project component-specific analyses are conducted to evaluate each potential impact on the existing environment. This assessment also specifies why impacts are found to be significant, potentially significant, or less than significant, or why there is no environmental impact.

CEQA Guidelines Section 15382 and Public Resources Code (PRC) Section 21068 define a significant effect on the environment as a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is "significant." A potentially significant effect is one that, if it were to occur, would be considered a significant impact; however, the occurrence of the impact is uncertain. PRC Section 21100(b)(3) states that mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy, shall be included in the EIR. Subsection (d) of PRC Section 21100 adds that for the purposes of this section (PRC Section 21100), any significant effect on the environment shall be limited to substantial, or potentially substantial, adverse changes in physical conditions which exist within the area as defined in PRC Section 21060.5. Therefore, a "potentially significant" effect and "significant" effect are treated the same under CEQA in terms of procedural requirements and the need to identify feasible mitigation.

An EIR must describe feasible mitigation measures that could minimize or avoid a project's potentially significant environmental impacts. (CEQA Guidelines Section 15126.4(a)(1)). CEQA Guidelines Section 15364 and PRC Section 21061.1 state that "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. A "less than significant" impact is one that would not result in a substantial adverse change in the physical environment (applicable significance thresholds would not be exceeded in consideration of PDFs and existing laws, ordinances, standards, or regulations).

Both direct and indirect effects of the Project are evaluated for each environmental resource area (CEQA Guidelines Section 15126.2 and PRC Section 21065.3). Direct effects are those that are caused by the Project and occur at the same time and place. Indirect effects are reasonably foreseeable consequences that may occur at a later time or at a distance that is removed from the Project area, such

as growth-inducing effects and other effects related to changes in land use patterns, population density, or growth rate, and related effects on the physical environment.

Cumulative impacts are discussed below and throughout **Section 4.0**, at the end of each individual resource section.

Mitigation measures do not need to be proposed when there is no impact, or the impact is determined to be "less than significant" prior to mitigation (CEQA Guidelines Section 15126.4(a)(3)). Where sufficient feasible mitigation is not available to reduce impacts to a less than significant level, the impacts are identified as remaining "significant and unavoidable."

4.0.2 CUMULATIVE IMPACTS ANALYSIS

The State CEQA Guidelines Section 15355 provides the following definition of cumulative impacts:

"Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- The individual effects may be changes resulting from a single project or a number of separate projects.
- The cumulative impact from several projects is the change in the environment which results from the Project's incremental impact 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.

State CEQA Guidelines Section 15130 further addresses the discussion of cumulative impacts, as follows:

- An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.
- If the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR should briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR.
- The EIR may conclude the project's contribution to a significant cumulative impact is less than cumulatively considerable and thus is not significant if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

Pursuant to State CEQA Guidelines Section 15130(b), the discussion of cumulative impacts shall be guided by the standards of practicality and reasonableness, and should include the following elements:

1. Either:
    A. 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
    B. 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. Such plans may include: a general plan, regional transportation plan, or plans for the

reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

2. When utilizing a list, as suggested in paragraph (1) of subdivision (A), factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.
3. 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.
4. A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available.
5. A reasonable analysis of the cumulative impacts of the relevant projects, including examination of reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

To determine the Project's potential cumulative impacts, this EIR uses a summary of projections contained in an adopted plan (i.e., the City of Coachella General Plan or SCAG's Connect SoCal RTP/SCS).

4.0.3 GENERAL PLAN PROJECTIONS – CITY OF COACHELLA BUILDOUT

As noted above, CEQA allows the discussion of cumulative impacts to be based upon 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. The City of Coachella General Plan, which was adopted in April 2015, contains land use, population, and employment growth projections for the City of Coachella ("City" or "Coachella") and its sphere of influence (SOI) area at buildout in 2035. Utilizing the General Plan allows for a broad, comprehensive projection of growth within the City's planning area.

Table 4-1: General Plan 2035 Buildout Land Use and Population Projections, presents the projected maximum residential land use and population at City buildout in 2035. As indicated in **Table 4-1: General Plan 2035 Buildout Land Use and Population Projections**, at buildout in 2035, the City's housing stock is forecast to total approximately 33,469 dwelling units and population is forecast to total 135,000 persons.[1] As also shown in **Table 4-1**, **General Plan 2035 Buildout Land Use and Population Projections** the City's housing stock and population are anticipated to grow approximately by 229 percent and 220 percent, respectively, between 2022 and the Project buildout in 2035.

[1] City of Coachella. 2015. *General Plan 2035 Draft Environmental Impact Report, Section 4.13, Population and Housing, page 4.13-8.* https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.13_-_population_housing.pdf .

Table 4-1: General Plan 2035 Buildout Land Use and Population Projections

Description	Existing Conditions (2022)[1]	General Plan Buildout (2035)[2]	Estimated Future Growth (2022 - 2035)[4]
Residential Land Uses (Dwelling Units)	10,178 Dwelling Units	33,469 Dwelling Units	+23,291 Dwelling Units (+229%)
Persons per Household	4.25	4.03[3]	Not Applicable
Population (Persons)	42,158 Persons	135,000 Persons	+92,842 Persons (+220 %)

Notes:
1. State of California Department of Finance. 2022. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2022 with 2020 Census Benchmark. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2021/ (accessed October 2025).
2. City of Coachella. 2015. General Plan 2035 Draft Environmental Impact Report, Section 4.13, Population and Housing, page 4.13-8. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.13_-_population_housing.pdf (accessed October 2025).
3. 135,000 persons / 33,469 Dwelling Units = 4.03 persons per household.
4. Difference between 2035 forecast and 2022 existing conditions.

The environmental impacts resulting from General Plan buildout were evaluated in the City of Coachella General Plan Update Final Environmental Impact Report (CGPU EIR) (State Clearinghouse No. 2009021007), which was certified by City Resolution No. 2015-03 on April 22, 2015.

4.0.4 CUMULATIVE BUILDOUT ASSUMPTIONS

A key concept framing this EIR's analysis is that growth projections reflect a theoretical buildout of the proposed Project's full capacity, which, is estimated to occur in 2045, shortly before the Southern California Association of Governments' (SCAG) Growth Forecast buildout in 2050. This is not intended to represent a time frame of when growth resulting from Project implementation is anticipated to occur, but rather, is a state-mandated planning period for housing needs. The actual rate of housing development would not be under the City's control and rather would be driven by the factors that influence development.

Table 4-2: General Plan 2035 Buildout Plus Project Land Use and Population Projections, presents the projected maximum residential land use and population at City buildout in 2035 and SCAG projection buildout in 2050, both including Project buildout. As indicated in **Table 4-2**: **General Plan 2035 Buildout Plus Project Land Use and Population Projections,** the City's housing stock is forecast to total approximately 43,007 dwelling units and the City's population is forecast to total 175,537 persons in 2045 with buildout of the General Plan and the Project. The City's housing stock is forecast to total approximately 35,600 dwelling units and the City's population is forecast to total 153,080 persons in 2050 with buildout of SCAG projections and the Project. These projections represent the cumulative development assumed in this EIR.

Table 4-2: General Plan 2035 Buildout Plus Project Land Use and Population Projections

Description	General Plan Buildout (2035)[1]	SCAG Projections (2050)[3]	Proposed Project (2045)[4]	Cumulative Development with General Plan Buildout (2045)[6]	Cumulative Development with SCAG Projections (2050)[8]
Residential Land Uses (Dwelling Units)	33,469 Dwelling Units	35,600 Dwelling Units	9,538 Dwelling Units	43,007 Dwelling Units	45,138 Dwelling Units
Persons per Household	4.032	4.3	4.255	4.087	4.319
Population (Persons)	135,000 Persons	153,080 Persons	40,537 Persons	175,537 Persons	194,951 Persons

Notes:
1. City of Coachella. 2015. General Plan 2035 Draft Environmental Impact Report, Section 4.13, Population and Housing, page 4.13-8. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.13_-_population_housing.pdf (accessed October 2025).
2. 135,000 persons / 33,469 Dwelling Units = 4.03 persons per household
3. SCAG. 2024. Final Connect SoCal Demographics and Growth Forecast https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed July 2025).
4. Table 3-3: Plan Areas Summary
5. State of California Department of Finance. 2022. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2022 with 2020 Census Benchmark. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2021/ (accessed October 2025).
6. General Plan Buildout + Project
7. 35,600 * 4.3 = 153,080
8. 175,528 persons / 43,005 Dwelling Units = 4.08 persons per household
9. SCAG Projections + Project
10. 194,951 Persons / 45,138 Dwelling Units = 4.31

4.0.5 CUMULATIVE BUILDOUT APPROACH

As discussed above, this EIR uses a summary of projections contained in an adopted plan (see **Table 4-1**). **Section 4.0, Environmental Analysis**, assesses the cumulative impacts for each applicable environmental issue, and does so to a degree that reflects each impact's severity and likelihood of occurrence. As also discussed throughout **Section 4.0**, the geographic areas considered for the cumulative analyses vary according to environmental issue area and were determined based upon the Project's scope and anticipated area in which the Project could contribute to an incremental increase in cumulatively considerable impacts. Certain issues areas are most appropriately addressed at the local level, while other issue areas necessitate the consideration of regional, State, and/or national-scale implications. For example, the air quality considers the South Coast Air Basin (with discussions, where relevant, of Statewide and global conditions related to climate change). The Project's operational effects also have geographic scopes that are global (such as greenhouse gases), regional (such as air quality), and local (such as noise).

As it relates to transportation, in the Buildout Year 2045 scenario, the model assumes buildout of the entire SCAG region. This is generally consistent with General Plans and the SCAG RTP/SCS and the Buildout scenario implies that all developable vacant land has been accounted for. Thus, in essence it assumes all cumulative projects are accounted for within the traffic analysis model. In the case of the KPC Coachella Specific Plan traffic analysis, the RIVCOM traffic analysis model Buildout assumes no development in the Project area and therefore the proposed Project was added to the traffic model. Furthermore, the traffic

model was reviewed to confirm that the proposed La Entrada development was included in the Buildout scenario.

Further, the County of Riverside Transportation Analysis Guidelines (December 2020) page 11 states:

> *"Traffic projections for General Plan Build-out scenarios shall utilize RIVTAM/RIVCOM or other approved models and shall be identified in the scoping agreement. The Engineer shall use the model projections as the basis for determining turning-movement volumes for the required intersection analysis."*
>
> *"Certain large-scale Specific Plans and General Plan Amendments have the potential to create traffic deficiencies that are significantly greater than the traffic projections used in the traffic model, which may also affect the modeling assumptions. For these projects, the Transportation Department may request that the Build-out analysis utilize RIVTAM/ RIVCOM or other model approved by the Transportation Department be used to develop more detailed focused model runs in order to determine the projected Build-out traffic."*

4.1 AESTHETICS

This section examines the aesthetic and other visual resources present on the Project site and its surroundings and evaluates whether the Project would adversely impact such resources. Aesthetics and other visual resources include both natural and built-up environments. Available reference materials such as the *City of Coachella General Plan Update 2035 (GP)*, *City of Coachella General Plan Update Environmental Impact Report (GP EIR), City of Coachella Municipal Code (MC)*, and others will provide further context regarding the area's visual character and the importance of its visual resources. Impacts in this section are assessed regarding their effects on scenic vistas, scenic resources (e.g., trees, rock outcroppings, or historic buildings) within scenic highways, or the degradation of the visual quality of the area. The analysis also considers the potential effects of light and glare generation from the Project.

The Project proposes five villages that encompass future development of residential, commercial, public, educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analysis, including but not limited to an analysis of any impacts on aesthetics. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors such as proximity to scenic vistas or resources.

4.1.1 VISUAL RESOURCE TERMINOLOGY AND CONCEPTS

When viewing a landscape, people can have different responses to that landscape based on what is seen, their expectations of views, and because of proposed or current changes to the visual landscape. Viewer responses will vary based upon the viewer's values, familiarity, concern, or expectations of that landscape as well as the scenic quality. The closer a resource is to the viewer, the more dominant it is and the greater its importance to the viewer. Distance zones can be used to determine the importance of views. There are three different distance zones; the foreground – views are 0.25 to 0.5 mile from the viewer; middle ground – views extend from the foreground zone to 3 to 5 miles from the viewer; and background – views extend from the middle ground zone to the limit of visibility. Additionally, fewer viewers means less exposure, and many viewers means more exposure. Furthermore, the duration viewers are exposed to the scene or object have an effect on viewer sensitivity as well. The more narrow the view and faster one travels, the shorter the duration and the lesser the impact.[1]

The visual sensitivity of a landscape is affected by the viewing distances at which it is seen, such as close-up or far away. The visual sensitivity of a landscape is also affected by the travel speed at which a person is viewing the landscape (high speeds on a highway, low speeds on a hiking trail, or stationary at a residence). The same project feature can be perceived differently by people depending on the distance between the observer and the viewed object. When a viewer is closer to a viewed object in the landscape,

[1] Federal Highway Administration (FHWA). Guidelines for the Visual Impact Assessment of Highway Projects. 2015. Retrieved from: https://www.environment.fhwa.dot.gov/env_topics/other_topics/VIA_Guidelines_for_Highway_Projects.aspx. (accessed March 2023).

greater detail is visible, and there is greater potential influence of the object on visual quality because of its form or scale (relative size of the object in relation to the viewer). When the same object is viewed at background distances, details may be imperceptible but overall forms of terrain and vegetation are evident, and the horizon and skyline are dominant. In the middle ground, some detail is evident (e.g., the foreground), and landscape elements are seen in context with landforms and vegetation patterns (e.g., the background).

The following terms and concepts are used in the discussion below to describe and assess the aesthetic setting and Project impacts.

Scenic Vista. An area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. This includes any such areas designated by a federal, state, or local agency.

Scenic Highway. Any stretch of public roadway that is designated as a scenic corridor by a federal, state, or local agency.

Viewshed. A project's viewshed is defined as the surrounding geographic area from which the project is likely to be seen, based on topography, atmospheric conditions, land use patterns, and roadway orientations. "Project viewshed" is used to describe the area surrounding a Project site where a person standing on the ground or driving a vehicle can view the Project site.

Visual character typically consists of the landforms, vegetation, water features, and cultural modifications that impart an overall visual impression of an area's landscape. Scenic areas typically include open space, landscaped corridors, and viewsheds. Visual character is influenced by many different landscape attributes including color contrasts, landform prominence, repetition of geometric forms, and uniqueness of textures among other characteristics.

4.1.2 ENVIRONMENTAL SETTING

NATURAL SETTING

The Project site is located within the City of Coachella (City) limits approximately three miles northeast of the City center in the foothills of the Little San Bernardino Mountains, with views across the Coachella Valley to the San Jacinto and Santa Rosa Mountains. The 2,807-acre Project site is bounded by the Little San Bernardino Mountains to the north, the City of Indio to the northwest, Interstate 10 (I-10) and the City of Coachella to the south and west, and unincorporated Riverside County to the north and east (see **Exhibit 3-2: Local Vicinity**). The Project site is characterized by undeveloped desert terrain, including rocky ridges and dry washes, that slope from the northeast to the southwest. Existing on-site vegetation consists of small, scattered shrubs, creosote, ocotillo, and small dispersed trees. As discussed in further detail in **Section 4.6: Geology and Soils**, in this EIR, the Project site lies between the relatively flat-lying alluvial floor of the Coachella Valley to the west and bedrock highlands of the Little San Bernardino and Orocopia Mountains to the northeast, east, and southeast. Several southwest trending ridges of relatively low relief with intervening alluvial drainages exist within the Project site. Elevations across the site range from

approximately 500 feet above mean sea level (amsl) in the southwest to approximately 1,250 feet amsl in the northeast.

SCENIC VISTAS[2]

Scenic vistas provide valuable aesthetic resources, including expansive landscape views of the Coachella Valley, to the residents and patrons of the City and Sphere of Influence (SOI). The Coachella GP EIR notes that the landscape surrounding the Project area includes large mountains and hills that help create a scenic background for the City. The Coachella GP EIR identifies scenic views of the Mecca Hills, Santa Rosa Mountains, San Jacinto Mountains, and Little San Bernardino Mountains as scenic vistas. The Little San Bernardino Mountains lie both north and northeast of the Project area. Towards the west, the San Jacinto Mountains are visible. South of the Project area are the Santa Rosa Mountains and the Mecca Hills. Scenic vistas near the Project site include sweeping views of the Mecca Hills southeast of the site, and views of Berdoo Canyon northeast of the site. Additional scenic vistas that can be seen from within the Project site, include the Santa Rosa and San Jacinto Mountains, which can be viewed to the west and southwest of the site, and Little San Bernardino Mountains, which can be viewed to the north and northeast of the site.

VISUAL CHARACTER

According to the Coachella GP EIR, the City and its SOI have a unique visual characteristic in its scenic geographical location, agricultural and rancho history, and quality architecture of historic buildings. In addition, the visual character of the City and its SOI includes man-made features including parks, schools, commercial, residential, industrial buildings, and infrastructure such as utility lines, arterial roadways with bridges and railroad facilities. These elements interact with the natural environment to either enhance or diminish aesthetic qualities.

There are aesthetic resources with respect to current night skies and the ability to experience full moon illuminations in the undeveloped portions of the City. The predominance of light pollution and glare during evening hours as a result of the urbanization and standard street lighting will continue to diminish the region's dark sky qualities. The eastern portions of the City and the SOI areas have a predominance of agricultural open spaces, hillside areas, and undeveloped desert terrain that currently contribute little light pollution.[3]

SCENIC HIGHWAYS

There are no eligible or officially designated State scenic highways identified by the California Department of Transportation (Caltrans) within or adjacent to any of the Project site.[4] The nearest State designated highway is State Route 74 (SR-74) west of the City, approximately 16 miles west of the Project site (refer to **Exhibit 4.1-1: State Eligible Scenic Highways**).[5] The nearest State eligible scenic highway is a stretch of

[2] City of Coachella. City of Coachella General Plan 2035 – General Plan 2035 Final Environmental Impact Report. Page 4.1-5. City of Coachella. City of Coachella General Plan 2035 – General Plan 2035 Final Environmental Impact Report. (accessed October 2025).

[3] City of Coachella. City of Coachella General Plan 2035 – General Plan 2035 Final Environmental Impact Report. Page 4.1-3-4.1-4. City of Coachella. City of Coachella General Plan 2035 – General Plan 2035 Final Environmental Impact Report. (accessed October 2025).

[4] Caltrans. 2018. California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. (accessed October 2025).

[5] Ibid.

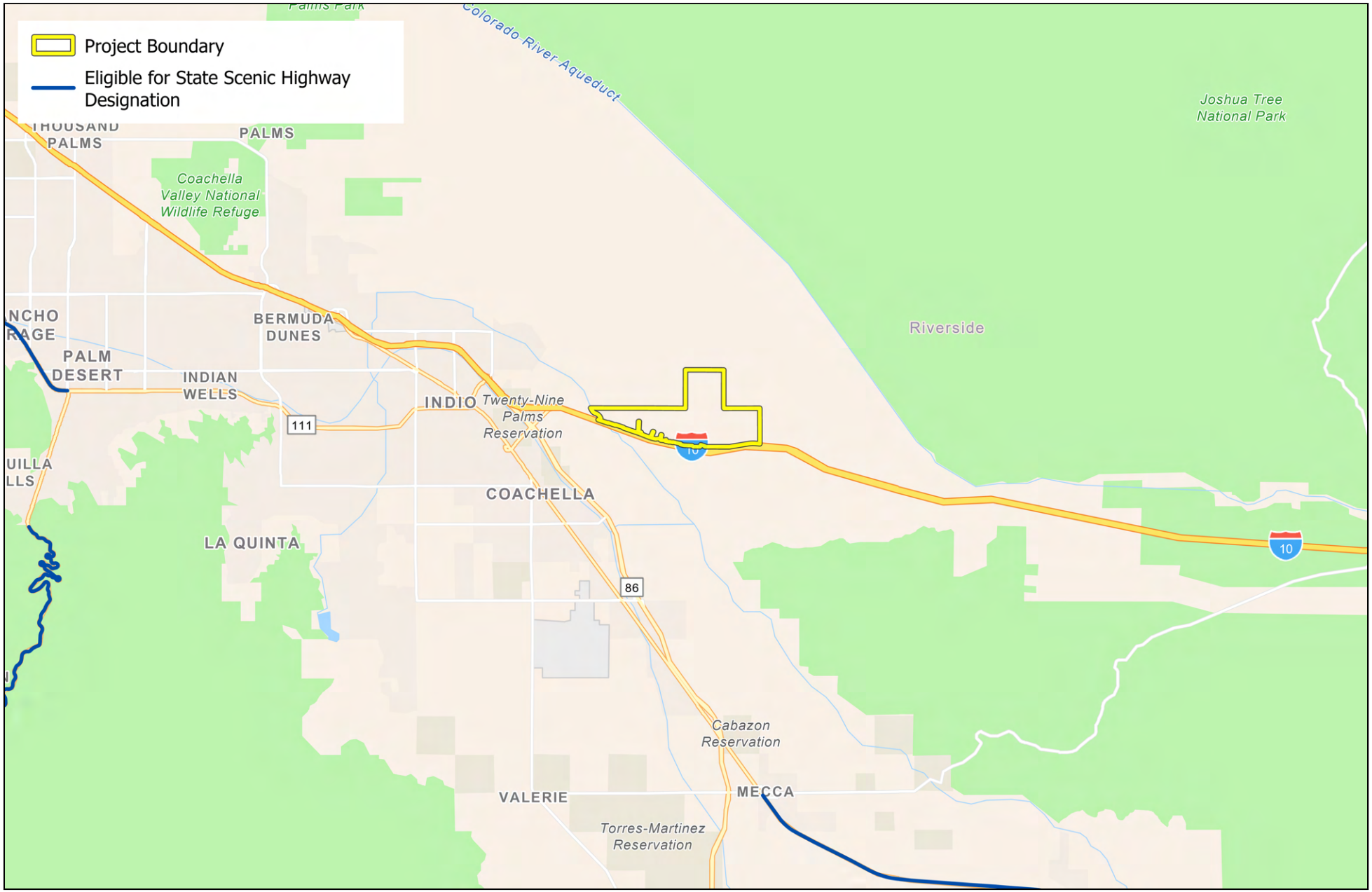
Highway 111 south of 66th Avenue, located approximately 11 miles south of the Project site. Additionally, the County of Riverside designated I-10, across the Project frontage and extending beyond the Project boundaries to the east and west along the I-10 corridor, as a County eligible scenic highway; refer to **Exhibit 4.1-2: County Eligible Scenic Highways**.[6] Although there are no highways in the Planning Area currently included on the State's Scenic Highway System, it is recognized that certain sections of old Highway 99 (now Dillon Road between Grapefruit Blvd and Interstate 10), Old Highway 86 (Harrison Street south of Grapefruit Blvd), and Old Highway 111 (Grapefruit Boulevard) represent visual corridors that provide a glimpse into the historic context of the pre-Freeway era of the eastern Coachella Valley region**.** Despite the absence of a designated 'scenic corridor' declaration, the views from these highways still serve as an aesthetic resource for the City and the region.[7]

LIGHT AND GLARE

The Project is located in a largely undeveloped area of the City, bordering I-10. There is no development on the Project site and thus no light or glare sources exist on the Project site. Nearby sources of light and glare include commercial and residential land uses situated approximately one-half mile to the west of the Project site along Vista Del Norte.

[6] County of Riverside. 2015. General Plan – Circulation Element, Figure C-8 Scenic Highways. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-2019-elements-Ch04-Circulation-072720v2.pdf. (accessed October 2025).

[7] City of Coachella. 2014. GPU Draft EIR, Aesthetics section, page 4.1-3. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.1_-_aesthetic_resources.pdf (accessed July 2025).



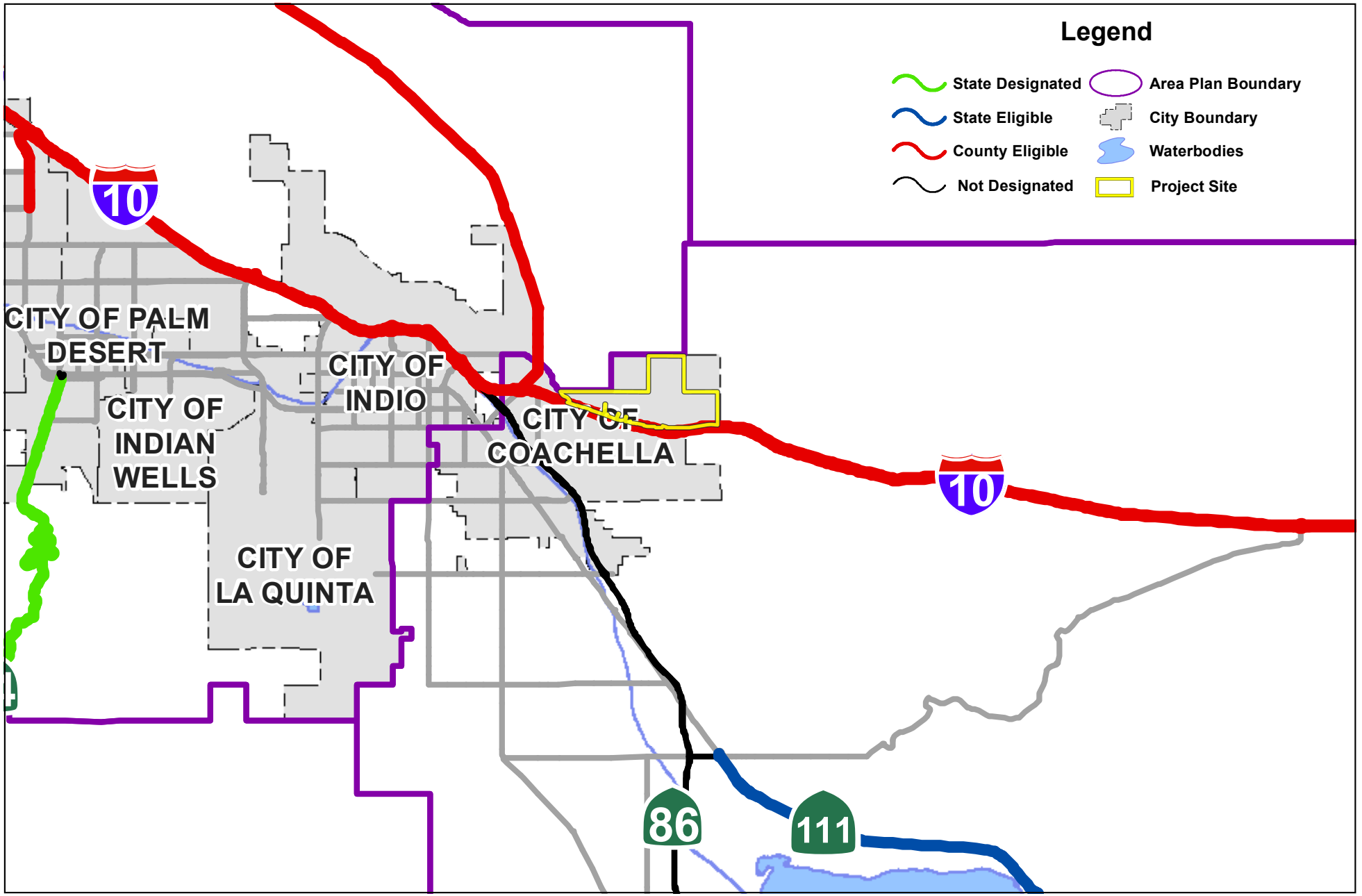
Source: California Department of Transportation, 2025.

EXHIBIT 4.1-1: State Eligible Scenic Highways
KPC Coachella Specific Plan Project
City of Coachella

Not to scale

Kimley»Horn

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Source: County of Riverside General Plan Circulation Element Figure C-8 Scenic Highways, 2020.

EXHIBIT 4.1-2: County Eligible Scenic Highways

KPC Coachella Specific Plan Project

City of Coachella

Not to scale

Kimley»Horn

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4.1.3 REGULATORY SETTING

STATE

California Department of Transportation (Caltrans)

The Project site is located adjacent to I-10 and would require off-site improvements, including a future Caltrans I-10 interchange. Caltrans manages the California Scenic Highway Program, which is intended to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. State laws governing the Scenic Highway Program are found in Streets and Highways Code, sections 260 through 263. A highway may be designated as scenic based on certain criteria, including how much of the natural landscape can be seen by travelers, the landscape's scenic quality and the extent to which development intrudes on the traveler's enjoyment of the view. The Program's Scenic Highway System List identifies scenic highways that are either eligible for designation or have already been designated as such. There are no State-designated scenic highways within or adjacent to any portion of the Project site.[8] Additionally, as shown in **Exhibit 4.1-1, State Eligible Scenic Highways**, the nearest State eligible scenic highway is a stretch of Highway 111 south of 66th Avenue located approximately 11 miles south of the Project site. Additionally, the County of Riverside designated I-10 across the Project frontage and beyond the Project boundaries to the east and west along the I-10 corridor as a County eligible scenic highway; refer to **Exhibit 4.1-2**.[9]

LOCAL

City of Coachella General Plan

The City's Land Use and Community Character Element is intended to regulate the form and character of development that will occur throughout the City through regulating and providing necessary public facilities and services to create the high quality of life desired by the residents of the City. It serves as a practical guide to City leaders, developers, business owners, and residents as they provide direction to implement new projects in the City. Goals and policies from the Land Use and Community Character Element applicable to the Project include:

Land Use and Community Character Element[10]

Goal 2 **Growth and Development. The successful transformation of Coachella from a small town into a medium-sized, full-service City that is a major economic center for the Coachella Valley.**

Policy 2.4 Natural context. Retain the City's natural infrastructure and visual character derived from topography, farmlands and waterway corridors.

[8] Caltrans. 2018. California State Scenic Highway System Map. https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed October 2025).
[9] County of Riverside. 2015. General Plan – Circulation Element, Figure C-8 Scenic Highways. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-2019-elements-Ch04-Circulation-072720v2.pdf?utm_source=chatgpt.com. (accessed July 2025).
[10] City of Coachella. 2015. Land Use and Community Character Element. https://www.coachella.org/home/showpublisheddocument/9429/638402981406830000. (accessed October 2025).

Policy 2.5 High quality construction and architecture. Require high-quality and long-lasting building materials on all new development projects in the City. Encourage innovative and quality architecture in the City with all new public and private projects.

Policy 2.6 Architectural diversity. A diversity of architectural styles is encouraged, particularly those that have their roots in the heritage of Southern California and the Desert Southwest.

Policy 2.7 Climate-appropriate design. Require architecture, building materials and landscape design to respect and relate to the local climate, topography, history, and building practices.

Sustainability and Natural Environment Element[11]

The City's Sustainability and Natural Environment Element establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces. Goals and policies from the Sustainability and Natural Environment Element applicable to the Project include:

Goal 6 **Visual Resources. A city with stunning views of the hillsides and mountains surrounding the Coachella Valley.**

Policy 6.1 View corridor preservation. Protect and preserve existing, signature views of the hills and mountains from the City.

Policy 6.4 Public facilities. Plan public facilities to take advantage of the City's mountain and hillside views.

Policy 6.5 Dark sky. Limit light pollution from outdoor sources, especially in rural, hillside and mountain areas, and open spaces, to maintain darkness for night sky viewing.

Goal 10 **Passive Open Space. Preserved open space areas that represent significant aesthetic, cultural, environmental, economic and recreational resources for the community.**

Policy 10.8 Preservation of natural land features. Preserve significant natural features and incorporate into all developments. Such features may include ridges, rock outcroppings, natural drainage courses, wetland and riparian areas, steep topography, important or landmark trees and views.

City of Coachella Municipal Code

The City of Coachella Municipal Code (Coachella MC) contains several provisions that are expressly designed to identify and limit aesthetic impacts as projects are undergoing review by the City. Specifically, the following provisions of the Coachella MC regulate impacts related to aesthetics, light, and glare throughout all areas of the City:

Section 7.04.070 – Noise Control: Construction Activities. No person shall perform, nor shall any person be employed, nor shall any person cause any other person to be employed to work for which a building

[11] City of Coachella. 2015. Sustainability and Natural Environment. https://www.coachella.org/home/showpublisheddocument/8419/637819141150600000. (accessed October 2025).

permit is required by the city in any work of construction, erection, demolition, alteration, repair, addition to or improvement of any building, structure, road or improvement to realty except between the hours as set forth as follows:

October 1st through April 30th

- Monday—Friday: 6:00 a.m. to 5:30 p.m.; Saturday: 8:00 a.m. to 5:00 p.m.; Sunday: 8:00 a.m. to 5:00 p.m.; Holidays: 8:00 a.m. to 5:00 p.m.

May 1st through September 30th

- Monday—Friday: 5:00 a.m. to 7:00 p.m.; Saturday: 8:00 a.m. to 5:00 p.m.; Sunday: 8:00 a.m. to 5:00 p.m.; Holidays: 8:00 a.m. to 5:00 p.m.

Emergency work and/or unusual conditions may cause work to be permitted with the consent of the city manager, or his or her designee, upon recommendation of the building director or the City engineer.

Section 16.28.150(L) - Improvements and Grading: Minimum Requirements. Street lighting facilities shall be provided in accordance with the council's policy for the area of the city where the subdivision is located. Lighting shall be adequate to permit proper policing of the subdivision and shall be so screened or otherwise designed as not to interfere with views from the hillsides of the City.

Section 17.54.010(K) - Off-Street Parking and Loading: Parking Requirements. Lighting. Parking area lighting is not always required; however, if lighted parking areas are required parking areas, such lighting fixtures shall be located, with hoods provided and adjusted, so as to preclude the direct glare of the light from shining onto property or streets.

Section 17.56.010(J)(2)(e) - Signs: Signs. Glare From Signs. Illuminated signs shall be designed in such a manner as to avoid undue glare or reflection of light onto private property in the surrounding area or right-of-way and shall be erected and located in a manner satisfactory to the director of community development. The intensity of lighting of signs may be reviewed in the field by the director of community development who may require the reduction of intensity.

Section 17.36.030 (F) and (H) (Specific Plan District) – Standards for building coverage, light and air orientation, building height, sign placement and design, yard requirements, open spaces, off-street parking, and screening for specific plan uses and other specified standards shall be governed by the development standards set forth in the specific plan and subsequent documents. All electrical and telephone facilities, fire alarm conduits, street light wiring, cable television, and other wiring, conduits or facilities shall, where feasible, be placed underground. Electric and telephone facilities shall be installed in accordance with standard specifications of the serving utilities.

Section 17.36.140(6) (Site plan and subdivision map review) –

A. The purpose of a site plan is to provide the city with a detailed development plan that utilizes the development standards defined in the specific plan. The following criteria shall be applied to all portions of the specific plan requiring site plan review:

1. A topographic map or sufficient detail to show all cuts and fills, precise drainage and flood-control proposals, and boundary data;
2. Detailed site plan, showing lot or site dimensions; traffic and pedestrian circulation; location, widths, grades and types of improvements proposed for all streets, parking areas, driveways, walkways, trails, utilities and other public improvements; building height, location, size and proposed use; yards and space between buildings and distances from property lines and right-of-ways, walls, fences to include location, height and materials; location, size and height of all signs; and loading areas;
3. Building plans and elevations (typical);
4. A landscape, staking and irrigation plan;
5. A tentative subdivision map shall be submitted, if applicable, showing precise divisions of the land for sale or lease of individual property, if any, as provided in the State Map Act and the city's subdivision ordinance;
6. Location and dimensions of public or quasi-public areas, including, but not limited to, schools, parks, playgrounds and parking areas. The area of required open space and parks shall be based on this code in effect at the time of tentative map filing;
7. A statement setting forth a program for installation and continued maintenance of parking areas; location and general design of lighting, courts, public and private grounds, landscaping, streets, utilities, parks, playgrounds or public or quasi-public community buildings and facilities.

B. Within forty-five (45) days following acceptance of the application for site plan approval, and after all environmental certifications have been obtained, the planning commission may approve, conditionally approve or disapprove the proposed site plan, and shall notify the applicant of its action.

C. An appeal of the planning commission action may be made to the city council by the applicant in accordance with the appeal procedure of this district.

Section 17.62.010 (C - 17) (Site Plans) –Prior to or concurrent with an application for building permit, a site plan shall be filed with the planning director and shall indicate, among other things, the lighting, including the location, general nature, and hooding devices, if any.

Coachella Valley Multiple Species Habitat Conservation Plan

Section 4.5 Land Use Adjacency Guidelines

With regard to lighting, the CVMSCHP states “For proposed Development adjacent to or within a Conservation Area, lighting shall be shielded and directed toward the developed area. Landscape shielding or other appropriate methods shall be incorporated in project designs to minimize the effects of lighting

adjacent to or within the adjacent Conservation Area in accordance with the guidelines to be included in the Implementation Manual."[12]

4.1.4 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning aesthetics. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

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

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

c) 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; or

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

METHODOLOGY AND ASSUMPTIONS

The Project is evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning aesthetics. This analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

Approach to Analysis

This analysis of impacts on aesthetic resources examines the proposed Project's temporary (i.e., construction) and permanent (i.e., operational) effects based on significance criteria/threshold's application outlined above. For each criterion, the analyses are generally divided into two main categories: (1) temporary impacts; and (2) permanent impacts. Each criterion is discussed in the context of Project components that share similar characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

[12] CVCC. 2016. Section 4.0 Establishment of the MSHCP Reserve System, page 4-177. https://cvmshcp.org/Plan-Documents/11-CVAG-MSHCP-Plan-Section-4-0.pdf (accessed October 2025).

The baseline conditions and impact analyses are based on conditions at the time of Notice of Preparation release (November 2022); project-specific technical studies, including those prepared after November 2022; review of Project maps and drawings; field observations and analysis of aerial and ground-level photographs; review of current regulatory framework, beyond the time of NOP release; and review of various data available in public records, including local planning documents. The determination that a project component would or would not result in "substantial" adverse effects on scenic resources or visual character considers the site's aesthetic resource value and the severity of the project component's visual impact (e.g., the nature and duration of the impact). For example, a project component resulting in a severe impact on a site with a low aesthetic resource value would result in a less than significant impact concerning scenic or visual character. In other words, new conspicuous structures or visual changes in areas with a low aesthetic resource value may not necessarily result in substantial adverse effects on visual resources.

Visual sensitivity can be described as viewer awareness of visual changes in the environment and is based on the viewers' perspective while engaging in activities from public areas near a Project site. The proposed Project site is visible to various users. The sensitivity of those users to changes within a Project site varies with the type of use, length of time that the viewer would be within a Project site's zone of visual influence (ZVI), and the viewer's distance from a Project site. Viewers of a Project site include nearby residents, and recreational users, travelers, and commuters within a project's ZVI.

Project Design Features

- Location of higher-intensity mixed-use, entertainment center, and higher-density multi-family residential dwellings centrally in proximity to the planned Avenue 50/I-10 Interchange;
- Transition to medium density, low density, and very-low density single-family residential beyond the core comprised of mixed-use, entertainment center, and high density residential;
- Strategically located parks, greenways, and amenity centers to provide active and passive recreational facilities;
- A well-maintained landscape program that defines and projects a quality community image and attracts new residents and visitors;
- A landscape program that appropriately screens parking lots, trash enclosures, delivery areas, equipment buildings, and other similar elements from public views;
- A vibrant streetscape plan that reinforces the sense of place and creates transportation corridors that are aesthetically pleasing and provide a comfortable environment for alternate modes of transportation to connect and co-exist; and
- Conserving over 750 acres of natural open space in association with drainages that traverse the Project site.
- Mass-graded areas would be revegetated at the completion of the mass grading process, pursuant to the City's Municipal Code.

4.1.5 PROJECT IMPACTS AND MITIGATION

Impact 4.1-1: Would the project have a substantial adverse effect on a scenic vista?

Level of Significance: Less Than Significant

A scenic vista is an area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. A scenic vista can be categorized as either containing a panoramic view or focal view. Panoramic views are typically associated with vantage points that provide a sweeping geographic orientation not commonly available (e.g., skylines, valleys, mountain ranges, or large bodies of water). Focal views are typically associated with views of natural landforms, public art/signs, and visually important structures, such as historic buildings.

There are no City-designated scenic vistas identified in the City's GP. However, the GP Draft EIR identifies sweeping views of the Mecca Hills in the eastern portion of the City/SOI as scenic. In addition, scenic vistas outside the City/SOI, but visible from the City/SOI include the Santa Rosa and San Jacinto Mountains, which can be viewed to the west and southwest of the City/SOI, and Little San Bernardino Mountains, which can be viewed to the north and northwest of the City/SOI. The Little San Bernardino Mountains extend to the north-northeast of the Project site. The City also considers open space and agricultural areas visual resources because they provide visual relief from urbanized areas and provide views for motorists, pedestrians, and residents.

As previously identified, the visual setting of the Project site is characterized by undeveloped desert terrain, including rocky ridges and dry washes, that slope from the northeast to the southwest. The Project site is approximately three miles northeast of the City center near the foothills of the Little San Bernardino Mountains, with views across the Coachella Valley to the San Jacinto and Santa Rosa Mountains. The foothills of the Little San Bernardino Mountains forms the northern border of the Project site, the City of Indio borders the northwest, and unincorporated Riverside County borders to the east. I-10 and the City forms the border to the south and west of the Project site with undeveloped desert terrain surrounding the Project site. Development associated with the Project would occur along the middle ground slopes leading up to the Little San Bernardino Mountains.

The KPC Coachella Specific Plan establishes building height limits for each land use designation. **Table 4.1-1: Land Use Height Limitations** summarizes the height limitations for each proposed land use. Proposed residential uses throughout the Project site would have views of the Little San Bernardino Mountains and the Coachella Valley. Views from the Coachella Valley floor toward the Project site would consist of the views of Project development and the Little San Bernardino Mountains. The topography of the surrounding area is of a higher elevation than that of the Project site. Implementation of the grading standards and design standards in the Specific Plan would prevent a skyline development from blocking public vantage points. In addition to the grading and development standards in the Specific Plan, the Project would include approximately 379 acres of parks, greenways, and amenity centers;[13] 68 acres of

[13] An "amenity center" is a recreational facility, including, but not limited to, clubhouse, swimming pool(s), playground, and open space, operated for the exclusive use of private residents or neighborhood groups and their guests, typically not open to the general public.

agricultural production; and 770 acres of drainage and other open space uses that would preserve scenic views not only from the Project, but also looking toward and beyond the Project site.

Table 4.1-1: Land Use Height Limitations

Land Use	Heigh Limitations (feet)
Very Low Density Residential	35
Low Density Residential	35
Medium Density Residential	35
High Density Residential	55
Mixed Use	55
Entertainment Center	85
Source: Kimley-Horn. 2023. KPC Coachella Specific Plan, Table 3-2 and Table 3-4.	

Additionally, four massing models of the Project site depicting the proposed development are shown on **Exhibit 4.1-3a** through **Exhibit 4.1-3i** and are discussed below. The depiction of the site with the Specific Plan development is intended to show the overall massing and extent of the development of the altered site, with consideration of the design parameters contained in the Specific Plan. **Exhibit 4.1-3a** through **Exhibit 4.1-3i** is a massing model of the proposed development plan, and it shows the before and after conditions to evaluate if and how the development could impact scenic views. The massing model considered the proposed grading plan with each use type overlaid. Each use type that has a vertical element is represented with a colored 3D shape extruded to the maximum building height presented in **Table 4.1-1**.

Exhibit 4.1-2 depicts the following four key viewpoints:

1. Westbound 1-10 (east side of site) looking northwest across site from the north side of I-10 (KV-1); see **Exhibit 4.1-3b** and **Exhibit 4.1-3c.**
2. Public right-of-way by The Villas at the Vineyards, north of Vista Del Norte, looking east across site (KV-2); see **Exhibit 4.1-3d** and **Exhibit 4.1-3e**.
3. Eastbound 1-10 (west side of site) looking northeast across site from the south side of I-10 (KV-3); see **Exhibit 4.1-3f** and **Exhibit 4.1-3g.**
4. Sierra Vista Park in Coachella looking northeast (view from Valley floor) (KV-4); see **Exhibit 4.1-3h** and **Exhibit 4.1-3i.**

Exhibit 4.1-3b and **Exhibit 4.1-3c, Key Viewpoint (KV)-1**. KV-1 depicts a view of the Project site from the east side of the site, from westbound 1-10 looking northwest across site from the north side of I-10. Viewer exposure from this location is high. As shown in **Exhibit 4.1-3b** and **Exhibit 4.1-3c**, the extent of the disturbance area would occur along the valley floor. Existing steel lattice electricity towers, which traverse the Project site and are significantly taller than the majority of the proposed development as viewed from I-10, are visible in the foreground and encroach into background views of the mountains; their presence already obstructing existing views of the Little San Bernardino Mountains in the background. The existing undulating topography of the surrounding valley area obscures future Project buildings. Therefore, Project implementation would not have a significant effect on a scenic vista from this viewpoint as the view is already obstructed.

Exhibit 4.1-3d and **Exhibit 4.1-3e, Key Viewpoint (KV)-2.** KV-2 depicts a view of the Project site from the public right-of-way by The Villas at the Vineyards, north of Vista Del Norte, looking east across the Project site. Viewer exposure from this location is moderate, although this location is at a lower elevation than the Project site. As shown in **Exhibit 4.1-3d** and **Exhibit 4.1-3e**, the extent of the disturbance area would occur along the low-lying hills in the middle ground of the Project area. The Specific Plan contains design parameters that are intended to guide orderly development, achieve a high level of design quality, reflect features that are unique to the area, ensure compatibility among adjoining land uses, and unify all of the elements that form the Project. This includes height restrictions for each type of land use as summarized previously in **Table 4.1-1**. As depicted in **Exhibit 4.1-3d** and **Exhibit 4.1-3e**, existing steel lattice electricity towers are visible. Along with the natural topographic features, the electricity towers are the dominant visual feature. Additionally, an existing levy largely obstructs views of the Little San Bernardino Mountains from this public viewpoint and would largely obstruct views of proposed structures as shown in **Exhibit 4.1-3e**. Land uses proposed under the Specific Plan looking east across the site consist primarily of high-density residential uses, entertainment center, and open space uses. As noted in **Table 4.1-1**, high density residential uses have a maximum permitted height of 55 ft and would be located primarily in the central portion of the site within the higher elevations of the Project site. Additionally, the Specific Plan's entertainment center use has an 85-foot height limitation; therefore, limiting the potential for obstruction of views of any scenic vistas as shown in **Exhibit 4.1-3e**, which displays the visible Project extent. Therefore, development envisioned under the proposed Specific Plan would not obstruct already very-limited existing views of the Little San Bernardino Mountains visible from this vantage point. Although background views of the mountains would not be encroached upon by the proposed development of the Specific Plan, middle ground views would change from its existing condition (i.e., natural desert terrain and habitat) to a developed condition with structures and open space. While partial obstruction of the low-lying hills may occur with development of structures proposed under the Specific Plan, existing views of the mountains would not be substantially affected by development of the site. Furthermore, as previously identified there are no city-designated scenic vistas identified in the City's General Plan. Therefore, Project implementation would not have a significant effect on a scenic vista from this viewpoint.

Exhibit 4.1-3f and **Exhibit 4.1-3g, KV-3**. KV-3 depicts a view of the Project site from the south side of eastbound 1-10 (west side of site) looking northeast across site. Viewer exposure from this location is low. As shown in **Exhibit 4.1-3f** and **Exhibit 4.1-3g**, the extent of the disturbance area would occur along the low-lying hills in the middle ground of the site. As shown in **Exhibit 4.1-3f**, existing views of the mountains from KV-3 are obstructed by existing steel lattice towers, intermittent as vehicles traveling along the I-10, and billboards posted along the I-10. Topography associated with the Little San Bernardino Mountains has largely flattened out toward the eastern extent of view and would not obstruct views of any scenic vistas. Therefore, it is reasonable to assume that development envisioned under the proposed Project would not obstruct existing views from this vantage point. As background views of the mountains are currently obstructed by existing steel lattice towers and billboards posted along I-10, and are intermittent as vehicles traveling along the I-10, implementation of the Project development features would not substantially alter views of the lower foothills. The overall view of the mountains in the background would not be substantially affected by the development of the site. Furthermore, there are no City-designated

scenic vistas identified in the City's General Plan. Therefore, Project implementation would not have a significant effect on a scenic vista from this viewpoint.

Exhibit 4.1-3h and **Exhibit 4.1-3i, KV-4**. KV-4 depicts a view of the Project site from Sierra Vista Park in Coachella looking northeast (view from Valley floor). Viewer exposure from this location is low. As shown in **Exhibit 4.1-3h** and **Exhibit 4.1-3i**, the simulated extent of the disturbance area would occur along the low-lying hills in the foreground immediately adjacent to the eastbound lanes of I-10. All proposed land use types are depicted in the view simulation presented in **Exhibit 4.1-3i**, minimally obstructing views of the Little San Bernardino Mountains in the background from this vantage point. The majority of the Project's buildings would be "low-profile" as viewed from this vantage point. Topography associated with the Little San Bernardino Mountains has largely flattened out toward the eastern extent of view and the buildings projection would be minimal in the scope of the mountain backdrop. Additionally, existing views from this vantage point are currently obstructed by existing fencing and utility poles. While obstruction of views would occur, the overall view of the mountains in the background would not be substantially affected by development of the Project site; as view corridors would be preserved through drainage areas proposed as part of the Specific Plan development. Furthermore, as previously identified there are no City-designated scenic vistas identified in the City's General Plan. Therefore, Project implementation would not have a significant effect on a scenic vista from this viewpoint.

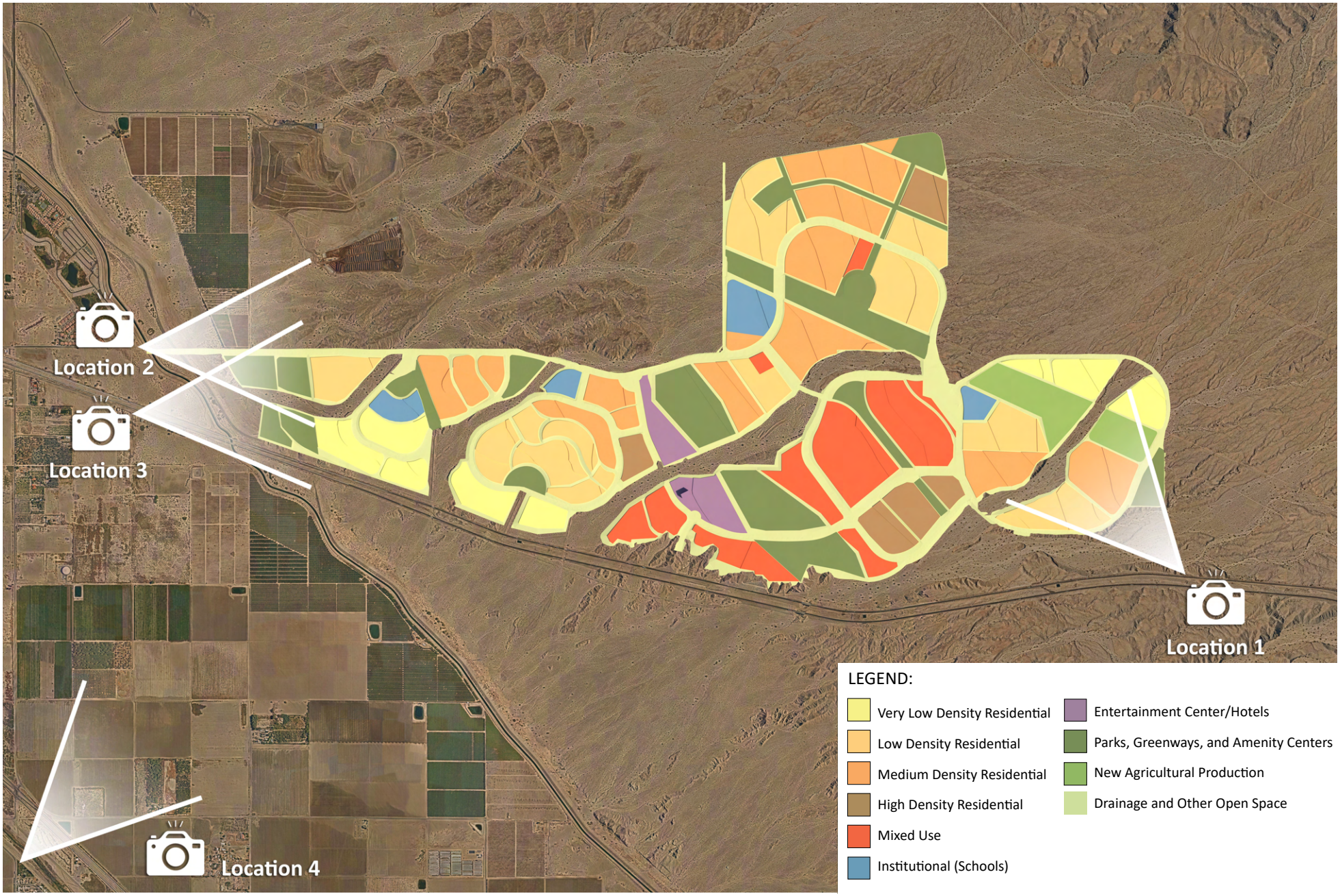


EXHIBIT 4.1-3a: Photo Massing Location Map

KPC Coachella Specific Plan Project

City of Coachella

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*Photos taken on June 15, 2023

EXHIBIT 4.1-3b: Before for Location 1
KPC Coachella Specific Plan Project
City of Coachella

Kimley»Horn

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*Photos taken on June 15, 2023

**Visible Project Extent = Extent of Project visible to viewer at this location; See Exhibit 4.1-2a for the legend, correlating building colors to their associated land use type.

EXHIBIT 4.1-3c: After for Location 1

KPC Coachella Specific Plan Project

City of Coachella

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*Photos taken on June 15, 2023

EXHIBIT 4.1-3d: Before for Location 2
KPC Coachella Specific Plan Project
City of Coachella

Kimley»Horn

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*Photos taken on June 15, 2023

**Visible Project Extent = Extent of Project visible to viewer at this location; See Exhibit 4.1-2a for the legend, correlating building colors to their associated land use type.

EXHIBIT 4.1-3e: After for Location 2

KPC Coachella Specific Plan Project

City of Coachella

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*Photos taken on June 15, 2023

EXHIBIT 4.1-3f: Before for Location 3
KPC Coachella Specific Plan Project
City of Coachella

Kimley»Horn

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*Photos taken on June 15, 2023
**Visible Project Extent = Extent of Project visible to viewer at this location; See Exhibit 4.1-2a for the legend, correlating building colors to their associated land use type.

EXHIBIT 4.1-3g: After for Location 3
KPC Coachella Specific Plan Project
City of Coachella

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*Photos taken on June 15, 2023

EXHIBIT 4.1-3h: Before for Location 4
KPC Coachella Specific Plan Project
City of Coachella

Kimley»Horn

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*Photos taken on June 15, 2023
**Visible Project Extent = Extent of Project visible to viewer at this location; See Exhibit 4.1-2a for the legend, correlating building colors to their associated land use type.

EXHIBIT 4.1-3i: After for Location 4
KPC Coachella Specific Plan Project
City of Coachella

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CONSTRUCTION

The Project includes the development of residential, entertainment center, mixed-use, institutional, and park uses, over six phases. Construction of the Project would include mass grading of the site in phases followed by the associated construction of roadways, homes, commercial, and institutional buildings, entertainment facilities, and utilities. Trenching and installation of water and wastewater pipelines, and dry utilities, and the construction of the major drainage facilities would also occur. The Grading Standards in the Specific Plan as described above would be required for each grading plan submitted for development approval. The Project would include the excavation of approximately 26,807,214 cubic yards of earth. Per the Specific Plan (Section 2.6), grading would be on a phased basis to minimize export and grading quantities by phase. Portions of the modified site landscape would be visible from the public vantage points from motorists traveling east-west on I-10 south of the Project site. The Grading Standards are part of the Project (Project Design Features) and would serve to partially reduce potential significant aesthetic impacts of the Project and effects on scenic vistas looking across the Project site.

Implementation of the Project would result in temporary visual changes due to grading and other construction activities. Potential short-term construction impacts would result from the Project through the presence of construction equipment and materials. Upon completion of each phase of development, equipment and construction materials would no longer be present on those parts of the Specific Plan site. As a Project Design Feature, mass-graded areas would be revegetated at the completion of the mass grading process, pursuant to the City's Municipal Code and the Specific Plan. Furthermore, the activities associated with short-term construction would not obstruct or significantly affect a scenic vista. With adherence to the Project Design Features and the City's Municipal Code as described above, construction impacts would be less than significant.

OPERATIONS

Refer to **Exhibit 4.1-3a** through **Exhibit 4.1-3i**. Publicly available vantage points of the scenic vistas from or near the Project site are limited due to the vacant, undeveloped nature of the land surrounding the Project to the south, east, and north. Views to the north, northeast, and east of the Project site of the Little San Bernardino Mountains are minimally obstructed by Project structures for motorists traveling east-west on I-10 south of the Project site. For residents west of the Project site associated with The Villas at the Vineyards, views of the same mountains are already largely obstructed by the presence of the levee located east of the Coachella Canal (see **Exhibit 4.1-3e**). The Project includes development of approximately 2,807 acres of vacant land that would include a mix of residential, entertainment center, mixed-use, institutional, and park uses to serve residents and surrounding communities. The residential component of the Project would include a maximum of 9,538 residential dwelling units, as well as a maximum of 305 acres of mixed-use development which includes a maximum of 844 multiple-family dwelling units. In addition, 379 acres of parks, greenways, and amenity centers; 68 acres of agricultural production; and 770 acres of drainage and other open space. Each component of development shall be required to comply with the maximum building height limitations set forth in the Specific Plan and Coachella Municipal Code. Building heights for very low, low, and medium density residential would not exceed 35 feet in height and high density residential uses would not exceed 55 feet in height. Residential

development comprises approximately 40 percent of development on the approximately 2,807-acre Project site, but would not be of such a height as to substantially disrupt views of scenic vistas. According to the Specific Plan, entertainment center uses have an 85-foot height limit. Additionally, mixed-use uses have a 55-foot height limit. Commercial uses comprise only 10 percent of the Project site, of which only two percent is for entertainment center uses. Because of the existing natural topography and structures that already obstruct views of surrounding resources, the entertainment center structures would not substantially disrupt views of scenic vistas. Additionally, the Project site is adjacent to two eligible County Scenic Highways: I-10 to the south of the Project site, and Dillon Road to the west of the Project site. Both eligible scenic highways offer views of the Little San Bernardino Mountains and the Mecca Hills. The Mecca Hills are located southeast of the Project site across I-10. Additionally, as depicted in KV-1 through KV-4, while limited obstruction of views would occur, the overall view of the mountains in the background would not be substantially affected by development of the site. Also, view corridors would be preserved through drainage areas proposed as part of the Specific Plan development. Furthermore, as previously identified there are no City-designated scenic vistas identified in the City's General Plan. Therefore, the Project would not substantially obstruct views of scenic vistas from publicly available vantage points, such as the eligible County scenic highways. Additionally, design elements include overlooks at strategic points in the development to capture and preserve scenic vistas, as well as preserving over 700 acres of natural open space.

Development within Village B of the Project site has potential to obstruct views of the Little San Bernardino Mountains from I-10. However, as depicted in KV-2, KV-3, and KV-4 of **Exhibit 4.1-3d** through **Exhibit 4.1-3i**, motorists on I-10 are traveling at high speeds (70 miles per hour), resulting in low visibility to the identified scenic vista and low viewer sensitivity. While passengers are afforded views of the mountains to the north, existing views are somewhat limited due to the proximity between I-10 and the hills and other topographic features located on the Project site. The existing topography relative to views from this location would largely obscure future project buildings, thus limiting encroachment into views of the Little San Bernardino Mountains. In addition, future development in the Project area would also be required to comply with existing General Plan goals and policies and applicable mitigation measures from the General Plan EIR, as listed above in **Section 4.1.1**. The Project would align with the policies of Goal 2 by retaining visual character derived from topography and waterway corridors; including high quality construction and diverse architecture; and designing Project elements to respect and relate to the local climate, topography, history, and building practices. The Project would align with the policies of Goal 6 by preserving view corridors through the preservation of waterway corridors through the site; planning public/institutional facilities to take advantage of mountain and hillside views; and limiting light pollution. Lastly, the Project would align with the policy of Goal 10 by preserving natural land features including natural drainage ways. Henceforth, the Project would not have a substantial adverse effect on a scenic vista; therefore, a less than significant impact would occur. In summary, due to the existing conditions, and compliance with existing General Plan and proposed Project design features, impacts to scenic vistas would be less than significant.

OFF-SITE IMPACTS

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site circulation and utility improvements would involve grading and construction equipment. Although visible from I-10, the grading and other construction-related activity would be temporary and would not obstruct a scenic vista. Construction screening would also be required for off-site improvements. The off-site impact areas are spread out and smaller in scale; therefore, minimizing adverse impacts on scenic vistas; see **Exhibit 3-11: Off-Site Improvements** for additional detail. Therefore, Project off-site impacts would not have a substantial adverse effect on a scenic vista; and a less than significant impact would occur.

Additionally, the off-site powerline improvements were included in the footprint of the biological and cultural resources surveys completed for the Project. Impacts resulting from the construction of these powerlines would be consistent with the impacts of other powerline construction and would not create unique circumstances such that the impacts would be any other than those expected. There are existing powerlines in the general vicinity and these uses would not be out of the ordinary.

Mitigation Measures

No mitigation is necessary.

Impact 4.1-2: Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Level of Significance: No Impact

CONSTRUCTION AND OPERATIONS

See **Section 4.4, Cultural Resources** for additional information on historical resources within the site. Impacts to trees are addressed in **Section 4.3, Biological Resources**, and impacts are less than significant levels. The Project does include rock outcroppings, although many of these are retained in higher elevations or proposed open space areas within the development. However, no designated or eligible state scenic highway traverses the Project site or are in the vicinity. The nearest State Designated Scenic Highways is SR-74, which is approximately 16 miles west from the Project site.[14] Due to distance and topography, the Project is not visible from the State Designated Scenic Highway portion of SR-74. Importantly, the Project site is void of trees and there are no historic buildings present on the Project site. Therefore, the construction and operations of the Project would not damage scenic resources (i.e., trees, rock outcroppings, or historic buildings) within a state scenic highway resulting in no impact.

OFF-SITE IMPACTS

No state scenic highways traverse the off-site improvement areas or are located in their vicinity. Refer to Impact 4.1-2 above for details on the nearest state scenic highway. No impact would occur.

[14] State of California. 2018. California State Scenic Highway System Map. https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. (accessed October 2025).

Mitigation Measure

No mitigation is necessary.

Impact 4.1-3: ***Would the project, 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?***

Level of Significance: Significant and Unavoidable

CONSTRUCTION

Project development would substantially alter the existing visual character and quality of the site. Existing undeveloped desert terrain that currently characterizes the Project site would be developed into a master-planned community over six phases. The approximately 2,80-acre Project entails the construction of a maximum of 9,538 residential dwelling units; a maximum of 305 acres of mixed-use development which includes a maximum of 844 multiple-family dwelling units; entertainment uses; 379 acres of parks, greenways, and amenity centers; 68 acres of agricultural production; and 770 acres of drainage and other open space. The Project would also include 179 acres of right-of-way/streets.

Construction would include mass grading in six phases, with subsequent grading for individual tracts within the Specific Plan as permit approval occurs. Mass grading would be followed by construction of roadways, residential, commercial, institutional, and mixed-use buildings, and supporting uses. The visual character of the Project site would substantially change. Implementation of Project Design Features and adherence to the KPC Coachella Specific Plan design guidelines would avoid, reduce, offset, or otherwise minimize identified potential adverse visual impacts of the Project. However, even with adherence to these guidelines and Project Design Features, the visual impacts remain significant and unavoidable.

OPERATIONS

Project implementation and operation would allow for new development within currently undeveloped open space, which would result in permanent alteration of the existing landforms and visual quality in the area. The Project would involve mass grading, landform alteration, and the development of 9,538 dwelling units, parks, mixed-use development, and access roads; refer to **Table 3-3: Plan Areas Summary**.

The Project site is currently undeveloped and is characterized as natural desert terrain. Natural desert terrain surrounds the Project to the north, east and south across I-10; therefore, it is not unique to the Project area. Implementation of the Project would result in the development of the site with residential, mixed-use and entertainment center, commercial, institutional, and open space uses. Visual impacts associated with changes to the general character of the Project site (e.g., loss of open desert area), the components of the visual settings (e.g., landscaping and architectural elements), and the visual compatibility between site uses and adjacent land uses would occur. The significance of visual impacts is inherently subjective because individuals respond differently to changes in the visual characteristics of an

area. The Project site is undeveloped and is largely surrounded by undeveloped properties. Agricultural and residential uses are located to the west of the Project site across the Coachella Canal and I-10 is located to the south of the Project site. The proposed development would change the character of the vacant Project site to an urbanized setting. Although the Project site is presently composed of two General Plan land use designations, Resort District, which allows for residential, lodging, recreational, and support retail and commercial services (including theme parks, sports venues, specialized entertainment uses, and acknowledges that the site is slated for development at some point in the future (therefore not considered to be an aesthetic resource in its current undeveloped state), the development of the site as proposed would, nonetheless, result in a substantial change in visual character; refer to **Exhibit 4.1-3b** through **Exhibit 4.1-3i**. Note a small portion of the Project site along the utility easement corridor is currently designated Open Space.

The Project would adhere to the KPC Coachella Specific Plan, which includes development standards and design guidelines to minimize visual impacts, such as those concerning building height restrictions, lighting standards, screening, and improved landscaping; see KPC Coachella Specific Plan Chapters 3 and 4.

This 2,807-acre Project would include a maximum of 9,538 residential dwelling units; a maximum of 305 acres of commercial development which includes approximately 2,040,518 square feet of development and a maximum of 844 multiple-family dwelling units; 379 acres of parks, greenways, and amenity centers; 68 acres of agricultural production; 770 acres of drainage and other open space; and 179 acres of right-of-way/streets. The Project would include fencing and landscaping to prevent trespass and provide visual aid to the environment. The Project's operational fencing would adhere to the KPC Coachella Specific Plan's height standards and design guidelines detailed in KPC Coachella Specific Plan Chapter 3: Development Regulations and Chapter 4: Design Guidelines which are designed to minimize potential visual impacts. KPC Coachella Specific Plan Chapter 3: Development Regulations includes the following design guidelines for fencing:

- Fences on lots with a single or attached one-family dwelling in any planning area shall conform to the development regulations established in the zoning code section 17.60 except as provided in Section 3.2.6 of KPC Coachella Specific Plan Chapter 3: Development Regulations.
    - Within front yard setback: 36 inches maximum
    - Within side or rear yard setback or along/behind corner lot size yard setback: 6 feet maximum
    - Fences that exceed the height requirement in the municipal code require a variance, unless the height is required by a federal, state, or local requirement or for mitigation purposes.
    - Fence height shall be measured from existing grade. When the difference in grade along a common property line exceeds two feet, any fence along the common property line shall not exceed more than six feet in height.
    - Arbors, trellises, and other lightweight ornamental landscape elements are allowed within a required yard with a maximum height of 9 feet.

- Where fences or walls are located on retaining walls, the height of the retaining wall shall be considered as part of the overall height of the fence or wall. Walls or fences with a minimum spacing of five feet may be considered separate structures for purposes of measuring overall height. In a rear yard condition adjacent to a natural or manufactured slope the fences as measured from the uphill side may be erected or replaced on top of the retaining walls and the combined fence and retaining wall height shall not exceed nine feet from the lower side.

KPC Coachella Specific Plan Chapter 4: Design Guidelines includes the following design guidelines for fencing:

- Fences and walls used throughout the Specific Plan area shall be constructed using high-quality materials and consistent with the aesthetic of adjacent architecture and landscape.
- Street-adjacent and perimeter wall and fence design, location, and height shall reflect the character and overall aesthetic of the project and shall be consistent in quality and color palette.
- Fences and walls along collector streets and project perimeters shall not exceed six feet in height unless required for noise attenuation based on acoustical analysis.
- Perimeter and street-adjacent walls and fences shall be constructed of attractive, durable, and low maintenance materials, including but not limited to precast concrete with textured or stone finishes, wrought iron, or tubular steel.
- Fences and walls along streets should include three levels of landscaping: groundcover, shrubs and low plantings, and trees.
- Residential rear and side yard fences and walls shall not exceed six feet in height, except as required for sound attenuation. Residential fences may be constructed of masonry, vinyl coatings, tubular steel, or a combination of these materials.
- Front yard walls and fences shall be constructed using high-quality materials such as tubular steel or masonry. Front yard walls and fences may vary for visual interest but shall be complementary and retain a harmonious overall aesthetic.
- Landscaping shall be required along walls and fences to break up the massing and provide greenery throughout the Project. Long walls and fences (generally greater than 30 feet) uninterrupted by trees or other landscaping are not allowed along streets and adjacencies with parks, trails, and other common spaces.

The KPC Coachella Specific Plan includes design guidelines for development of the Project site to be consistent with the visual character of development throughout the City. Design guidelines within the KPC Coachella Specific Plan include architectural guidelines and design criteria, which specify the architectural style and ornamentation of the proposed residential buildings as well as form, height, massing, materials, and colors for the nonresidential buildings. Further, landscape design guidelines have been included to ensure that landscaping of public spaces is complementary to the proposed development and surrounding environment.

The KPC Coachella Specific Plan Chapter 3: Development Regulations includes the following design guidelines for landscaping:

- Commercial Standards
    - Open and landscaped areas shall be provided around buildings and shall be employed to highlight primary entrances. A minimum of one plaza/gathering space shall be provided in each commercial center.
    - A landscaped area not less than fifteen (15) feet wide shall be maintained along any property line to the extent it abuts a street, except at approved driveways.
    - Parking lot landscaping shall be provided, with a parking lot tree ratio of one tree for every six (6) parking spaces.
- A landscaped buffer five feet in width shall be provided between a drive-through lane and a street, driveway, or property lines.
- Within an individual village with separate designated parking spaces for RVs in common areas, or as a conditional use associated with mini-storage within mixed use areas. Six-foot-high perimeter walls shall be required and will be screened with landscaping.

The KPC Coachella Specific Plan Chapter 4: Design Guidelines includes the following design guidelines for landscaping:

- Landscaping throughout the Project site would be compatible with the character of the Coachella Valley, with specific goals to include:
    - A planting and irrigation program that employs water conservation measures through use of drought-tolerant plant material, water-conserving irrigation systems and practices, and the use of reclaimed water if and when it becomes available.
    - A landscape program that reinforces the principles of Low Impact Development (LID) for storm drainage, water infiltration and groundwater recharge for the project.
    - A well-maintained landscape program that defines and projects a quality community image and attracts new residents and visitors.
    - A landscape program that appropriately screens parking lots, trash enclosures, delivery areas, equipment buildings, and other similar elements from public views.
    - A landscape plan for parks and recreation areas that provides appropriate activities and facilities provides shade, and adds color and texture.
    - A vibrant streetscape plan that reinforces the sense of place and creates transportation corridors that are aesthetically pleasing and provide a comfortable environment for alternate modes of transportation to connect and co-exist.
    - Encourage the use of edible plant materials in common open spaces.

In addition, the Project also includes approximately 770 acres of open space intended to remain in its natural condition, which would preserve the existing character of portions of the Project site. Implementation of the Project would also include neighborhood parks and desert wash paseos along the various drainage ways that would include viewing areas open to all community members to enjoy scenic views of nearby scenic vistas such as the Little San Bernardino Mountains from the Project site.

Additionally, these open space areas would preserve opportunities for distant views of the Mecca Hills and Santa Rosa Mountains from the Project site after Project implementation.

Although the proposed land use plan incorporates open space areas and retention of the natural drainage courses on the site for stormwater management, development of the 2,807-acre site would permanently alter the visual conditions by changing the existing natural desert terrain into an approximately 2,807-acre master-planned community. The changes may potentially degrade the visual character or quality of the site and its surroundings resulting in a significant adverse impact.

While the Project would incorporate specific Project Design Features, grading guidelines, and design guidelines intended to avoid, reduce, offset, or otherwise minimize identified potential adverse impacts of the Project, development of the Project would not retain the existing visual character of the site and would be built in a nonurbanized area, resulting in a significant impact per CEQA. Therefore, Project-related visual character impacts would be significant and unavoidable.

OFF-SITE IMPACTS

Refer to analysis above. The off-site improvement areas are spread out to the west and southwest of the Project site and not concentrated in a single area. The off-site improvements are also smaller in scale and predominantly would occur in already disturbed areas. Therefore, the off-site improvements would not substantially degrade the existing visual character or quality of public views of the sites and their surroundings, and less than significant impact would occur.

Mitigation Measures

The Project incorporates, in its design, open space preservation, land use transitions, landscaping, revegetation, screening, and other Project Design Features to avoid substantial degradation of public views, consistent with applicable Municipal Code requirements. Additionally, the Project complies with Specific Plan design guidelines and zoning regulations governing scenic and aesthetic quality, and no additional reasonable or feasible mitigation has been identified.

Impact 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?

Level of Significance: Less Than Significant with Mitigation Incorporated

Currently, the Project site has no existing sources of light or glare, and there are no existing streetlights or signalized intersections immediately adjacent to the site. Although I-10 runs along the southern boundary of the Project site, this is not a lighted portion of the interstate.

CONSTRUCTION

Consistent with Coachella MC Section 7.04.070, Construction Activities, construction hours would be limited to the following periods:

- **October 1st through April 30th**
    - Monday—Friday: 6:00 a.m. to 5:30 p.m.
    - Saturday, Sunday, Holidays: 8:00 a.m. to 5:00 p.m.
- **May 1st through September 30th**
    - Monday—Friday: 5:00 a.m. to 7:00 p.m.
    - Saturday, Sunday, and Holidays: 8:00 a.m. to 5:00 p.m.

Therefore, construction activities would not be conducted during nighttime hours and there would be no impact on adjacent uses from construction lighting, equipment, or other activities. However, lighting at night for the active construction areas would be necessary for safety and security. Consistent with the Specific Plan, security lighting fixtures would be hooded, recessed, and/or located in such a manner to only illuminate the intended area(s). In addition, the Project would implement **MM AES-1**, which ensures that during Project construction and long-term operation, the Project shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light during the hours of dawn and dusk when many wildlife species are most active. Impacts would be less than significant based on compliance with the Coachella MC and **MM AES-1**.

OPERATIONS

The Project would introduce new light sources that are typical of urban development projects such as street and parking lot lighting, landscape lighting, illuminated signs, exterior lighting on lamps and buildings, and automobile lighting (i.e., headlights). New sources of light associated with the Project include mixed-use, residential, and institutional lighting on the buildings; lighting associated with entertainment uses; security lighting in the carports and in parks, garages, and parking areas; and vehicle lights from Project-related traffic. Future residential, commercial, mixed-use, institutional, and park uses would require the installation of outdoor lighting necessary for recreation maintenance, public safety, and security. While the Project would add new lighting sources to the Project area, the number and type of lighting sources is not anticipated to substantially differ from that commonly utilized at similar developments within the City. However, because the Project site and the immediate surrounding area are relatively undeveloped with little to no existing light sources a substantial amount of light and glare sources is anticipated where none previously existed.

All building and landscape lighting would be consistent with the lighting standards set forth in the Specific Plan and designed to meet City standards as well as the CVMSCHP Land Use Adjacency Guidelines. The KPC Coachella Specific Plan Chapter 4: Design Guidelines include the following design guidelines for lighting:

- Lighting should be provided throughout the community's parks and open spaces, consistent with streetscape furnishings. Quality lighting enhances the nighttime vehicular and pedestrian experience and safety. Lighting design would help differentiate between land uses, highlight public and pedestrian-scaled spaces, provide continuity and aesthetic appeal along corridors, and encourage pedestrian and vehicular efficiency. Lighting along multi-use paths, walkways, and

other areas used by pedestrians and bicyclists should be provided except in natural open space areas.

- Lighting should minimize uncontrolled nighttime light and glare, light trespass, and night sky pollution with low brightness lighting fixtures utilizing warm, color corrected light sources and appropriate beam cut-off. Energy-efficient lamp technologies such as LED should be utilized along with photovoltaic sensors to turn lights off when adequate daylight is available.
- Light standard styles should be consistent throughout the project yet designed to meet City standards. Alternative street light designs may be allowed, subject to approval as part of site plan review. No specific alternative street light design is proposed.
- Exterior lighting should be unobtrusive and not cause glare or spillover into neighboring properties, especially when within 100 feet of open spaces. Lighting fixtures should direct illumination downward to minimize light pollution impacts.
- Up-lighting, spot-lighting, and decorative color lighting may be appropriate for prominent buildings and features, such as hotels or entertainment venues. Prior to the approval of any Site Plans for any future development(s) associated with the Specific Plan, the applicant shall submit to the City of Coachella Development Services Department a photometric (lighting) study providing evidence that the Project light sources do not spill over to adjacent off-site properties in accordance with the Coachella Municipal Code and the CVMSCHP.
- Lighting shall be provided throughout the site to create an inviting and non-threatening environment. Night lighting of public spaces shall be kept to the minimum necessary for safety and security purposes.
- The scale, materials, colors, and design detail of light posts and fixtures should reflect the desired character of the project and the architectural style of the surrounding buildings.
- Light posts shall be appropriately scaled to pedestrians near sidewalks and other areas of pedestrian circulation. Extremely tall light posts and fixtures shall be avoided. Bollard lighting is encouraged to illuminate walkways without providing spillover.
- Energy-efficient, low voltage lighting is required. Decorative lighting shall be low intensity.
- If security lighting is required, fixtures shall be hooded, recessed, and/or located in such a manner to only illuminate the intended area.
- Lighting shall be provided, at a minimum, in the following locations for safety and for crime prevention:
    - Parking Lots and Structures;
    - Plazas or outdoor seating areas;
    - All building entries;
    - Refuse disposal areas (may be provided as part of parking lot lighting); and
    - Walkways.
- Addresses shall be visible from streets and illuminated at night.

Additionally, on-site landscaping would reduce glare and would screen light sources to reduce the visual impact of lighting from buildings and parking lots. Light pollution, also known as "sky glow," is an adverse effect of man-made light. The term is often used to denote urban sky glow (brightening of the night sky due to man-made lighting) but also includes glare (intense and blinding light) and light trespass (light falling where it is not wanted or needed; spill light). In many cases, sky glow is visible from great distances, particularly in evenings when there is moisture in the air. The Project is adjacent to the Desert Tortoise and Linkage Conservation Area, and the Project would implement **MM AES-1**, which ensures that during Project construction and long-term operation, the Project shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light during the hours of dawn and dusk when many wildlife species are most active. **MM AES-1** also ensures that all lighting for Project is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in lighting trespass including glare onto other properties—including any areas of the adjacent Desert Tortoise and Linkage Conservation Area—or upward into the night sky.

Project lighting would adhere to the Section 4 Design Guidelines presented in the KPC Coachella Specific Plan, as listed above, which would require lighting to minimize uncontrolled nighttime light and glare, light trespass, and night sky pollution with low brightness lighting fixtures utilizing warm, color corrected light sources and appropriate beam cut-off. Project lighting would also adhere to the requirements contained in the City's Zoning Code: Section 16.28.150(L) (Improvements and Grading); Section 17.56.010(J)(2)(e); (Signs); Section 17.54.010 (Off-Street Parking and Loading); Section 17.36.030(F) and (H); Section 17.36.140(7) (Specific Plan District); and Section 17.62.010(17) (Site Plans). These measures are uniformly applied to all development in the City. Project-related lighting would be consistent with the City Zoning Code and would be shielded to avoid light spillage and glare off the Project site. As such, adherence to these measures would be mandatory and enforceable upon approval of the Project plans. Adherence to the City's Zoning Code would ensure that any building or parking lighting would not significantly impact adjacent uses. Furthermore, **MM AES-1** provided below would further reduce potential spillover light-related impacts of the Project beyond the requirements identified in the Coachella MC. There are no dark skies or other ordinances regarding night lighting that would be applicable to the Project site and land uses, however the CVMSHCP Land Use Agency Guidelines includes lighting standards which require lighting be shielded and directed toward the developed area when adjacent or within a Conservation Area. Landscape shielding or other appropriate methods shall be incorporated in project designs to minimize the effects of lighting adjacent to or within the adjacent Conservation Area. Therefore, impacts associated with this issue would be mitigated to a less than significant level based on compliance with the Coachella MC and **MM AES-1**. Additionally, final design would be sensitive to nearby residential uses, locating active, lighted facilities away from residential uses to the extent possible. Furthermore, **MM AES-2** requires that a Photometric Study be conducted for future development(s) associated with the Specific Plan, and that the lighting be designed to avoid the spillover of light from the Project site to adjacent properties. **MM AES-2** would reduce potential light-related impacts of the Project beyond the requirements identified in the Coachella MC.

New traffic signal improvements would be added as a part of the Project at the future intersections of internal roads, namely arterials. Traffic signals are not intended to provide on street lighting and are of an intensity that is much less than the typical streetlight. Traffic signals are also fitted with shielding to direct

light toward a specific lane while blocking the view of the vehicles in lanes moving in other directions. By comparison, high pressure sodium lighting typically found in street lighting produces approximately 9,500 lumens or greater. Typical light-emitting diode (LED) traffic signal lights produce approximately 850 lumens. Due to the lower intensity of the lights used in the traffic signals and the use of shielding on the traffic signals to prevent the light from spreading lighting impacts from the placement of new traffic control devices would be less than significant. No mitigation is required.

The Specific Plan proposes several potential roundabout locations around the major 4-lane roadway that makes up the internal loop road. These locations facilitate the movement of traffic off of the major roadway and onto secondary and local roadways. Roundabouts substitute the need for traffic signals or all-way stop signs.

The Project proposes many active and passive recreational uses including a sports complex and additional sports fields. Lighting would be needed in the form of tall fixtures strategically placed to illuminate the sports fields. Section 4.9 of the Specific Plan identifies exterior lighting standards and states that light standard styles should be consistent throughout the Project and designed to meet City standards. The Specific Plan states that exterior lighting should be unobtrusive and not cause glare or spillover into neighboring properties, especially when within 100 feet of open spaces. Lighting fixtures should direct illumination downward to minimize light pollution impacts. Furthermore, **MM AES-2** requires that photometric (lighting) studies be conducted prior to the approval of any Site Plans for any future development(s) associated with the Specific Plan.

Exterior surfaces of proposed structures within the entertainment center, residential, and mixed-use planning areas would be finished with a combination of architectural coatings, trim, and/or other building materials such as stucco, wood, concrete, and brushed metal. The Project is not expected to substantially increase the amount of daytime glare in the Project area.

Through adherence to **MM AES-2**; Coachella MC Sections 16.28.150(L), 17.56.010(J)(2)(e), 17.54.010, 17.36.030(F) and (H), 17.36.140(7), and 17.62.010(17); and Design Guidelines presented in the KPC Coachella Specific Plan, impacts would be less than significant with mitigation incorporated.

OFF-SITE IMPACTS

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site circulation and utility improvements would involve grading and construction equipment. Although visible from I-10, the grading and other construction-related activity would be temporary and would be consistent with Coachella MC Section 7.04.070, Construction Activities. Off-site infrastructure, including extending utilities (e.g., water facilities, sewer lines, drainage facilities, electric powerlines, telecommunications, and natural gas infrastructure) would also include the installation of associated lighting where necessary for operational safety or public access. Structures and facilities associated with the off-site improvements would be subject to the same lighting standards and regulations as the Project, including shielding, orientation, and brightness controls, therefore resulting in a less than significant impact. Any new off-site lighting would be designed to prevent light trespass onto adjacent properties,

minimize nighttime glare, and limit upward light spill in accordance with applicable municipal code and dark-sky principles. In addition, said structures and facilities would be constructed to minimize glare by using anti-reflective and light-dampening materials.

These off-site improvements would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including aesthetic resources.

Mitigation Measures

MM AES-1 During Project construction and long-term operation, the Project shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light during the hours of dawn and dusk when many wildlife species are most active. Ensure that all lighting for Project is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in lighting trespass including glare onto other properties—including any areas of the adjacent Desert Tortoise and Linkage Conservation Area—or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). Use LED lighting with a correlated color temperature of 3,000 Kelvins or less, properly dispose of hazardous waste, and recycle lighting that contains toxic compounds with a qualified recycler.

MM AES-2 **Photometric Study**. Prior to the approval of any Site Plans for any phase of development(s) associated with the Specific Plan that is adjacent to a residential land use or other sensitive land use (e.g., hospital, school, or park uses), the applicant shall submit to the City of Coachella Development Services Department a photometric (lighting) study (to include parking areas, accessway lights (i.e., walkways, stairways, platforms and other small areas), external security lights, lighted signage, and recreational lighting) providing evidence that the Project light sources do not spill over to sensitive adjacent off-site properties in accordance with the Coachella Municipal Code and the CVMSCHP, where applicable. All Project-related outdoor lighting, including but not limited to, street lighting, building security lighting, parking lot lighting, and landscaping lighting shall be shielded to prevent spillover of light to adjacent properties. All recreational lighting shall be fully shielded.

Shielding requirements and time limits shall be identified on construction and grading plans for each phase of development.

4.1.6 CUMULATIVE IMPACTS

When evaluating cumulative aesthetic impacts, several factors must be considered. The cumulative study area for aesthetic impacts is the viewshed that includes the Project site and surrounding areas. The context in which a project is being viewed will also influence the aesthetic impact's significance. The contrast a project has with its surrounding environment may be reduced by the presence of other cumulative projects. If most of an area is or is becoming more urbanized, the contrast of a project with the natural surroundings may be less since it would not stand out in contrast as much. In order for a cumulative aesthetic impact to occur, the proposed cumulative project's elements need to be seen

together or in proximity to each other. If the projects were not near each other, the viewer would not perceive them in the same scene.

As stated previously, the viewshed from the Project site facing west-southwest would include the Coachella Canal and the City, and facing south is I-10, as well as the Santa Rosa and San Jacinto Mountains located to the southwest, the Mecca Hills and Orocopia Mountains to the southeast, and the Little San Bernardino Mountains to the north and east.

As illustrated by **Exhibit 4.1-3b** through **Exhibit 4.1-3i**, the Project site would change from a largely undeveloped condition characterized by vacant desert terrain to a master-planned community. The overall visual character of the Project site would be substantially altered with development of the Project site. While the existing character of the Project site would be substantially changed compared to existing conditions, the site design (including grading), landscaping, open space preservation, and architectural design would adhere to design guidelines established in the KPC Coachella Specific Plan which are intended to avoid, reduce, offset, or otherwise minimize identified potential adverse impacts of the proposed Project or provide significant benefit to the community and/or to the physical environment. Despite the incorporation of Project Design Features and the KPC Coachella Specific Plan grading plans and design guidelines, impacts related to the change in visual character would be significant and unavoidable as no feasible mitigation is available to reduce impacts to visual character. Compliance with the Specific Plan Design Guidelines would not be sufficient to reduce those significant and unavoidable impacts related to visual character. The La Entrada Specific Plan EIR project, located on the south side of I-10 from the Project, was also found to have a significant unavoidable adverse impact related to visual character. Therefore, cumulatively, a significant unavoidable impact as it relates to visual character would occur.

The Project would introduce new sources of light and glare to the Project area. Impacts were found to be less than significant with mitigation incorporated. However, the Project would not incorporate more intense lighting than what is currently planned for with the La Entrada Specific Plan across I-10. Additionally, nearby related projects such as the La Entrada Specific Plan may combine with the Project to result in cumulative visual impacts. Although the proposed Project would result in a cumulatively considerable contribution to nighttime lighting conditions given that the Project site and surrounding areas do not currently emit substantial amounts of nighttime light, there are no adjacent sensitive land uses that would be adversely impacted by the introduction of those new light sources and glare. Projects associated with both specific plans would be required to adhere to the lighting standards and guidelines presented in the respective specific plans as well as City standards. **MM AES-1 and 2** are also applicable to the proposed Project, and minimize impacts associated with lighting on sensitive lands. Therefore, the Project would not contribute to a cumulatively significant impact associated with light and glare.

Although the Project would contribute to nighttime lighting conditions given that the Project site and surrounding areas do not currently emit substantial amounts of nighttime light, there are no adjacent sensitive land uses that would be adversely impacted by the introduction of those new light sources and glare, with the implementation of mitigation. Therefore, the Project would not contribute to a cumulatively considerable impact to scenic vistas, scenic resources, or lighting and glare. With that, a

perimeter wall surrounds The Villas at the Vineyards development off Vista Del Norte, reducing impacts on existing sensitive receptors. Not only would the perimeter wall minimize impacts, but so would the presence of the levee east of the Coachella Canal, largely separating the Project site from land uses to the west across the canal. As shown in **Exhibit 4.1-3e**, views of the Project site are very minimal from the west side of the Coachella Canal near The Villas at the Vineyards.

4.1.7 SIGNIFICANT UNAVOIDABLE IMPACTS

The KPC Coachella Specific Plan would result in significant unavoidable adverse Project and cumulative impacts as it relates to visual character because there are no feasible mitigation measures to reduce impacts associated with a change in visual character to a less than significant impact.

4.1.8 REFERENCES

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4.2 AIR QUALITY

This section describes the existing air quality setting and evaluates potential impacts on air quality as they relate to the KPC Coachella Specific Plan (Project). Information given in this section is based on resource information obtained from available public resources including, but not limited to, the City of Coachella (City) General Plan (Coachella GP). Detailed air quality calculations are provided in **Appendix B1: Air Quality Assessment** and **Appendix B2: Health Risk Assessment** (HRA).

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts from GHG emissions. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors, such as the proximity or presence of emissions emitting land uses.

4.2.1 ENVIRONMENTAL SETTING

CLIMATE & METEOROLOGY

The California Air Resources Board (CARB) divides the State into 15 air basins that share similar meteorological and topographical features. The Project site is located within the Salton Sea Air Basin (SSAB), which is immediately east of the San Jacinto Mountains. Meteorological conditions are largely attributable to the low desert geographic setting and the mountains surrounding the region that isolate the Coachella Valley from moderating coastal influences and create a hot and dry low-lying desert condition. As the desert heats up a large area of thermal low pressure develops, which draws dense, cooler coastal air through the narrow San Gorgonio Pass and into the valley, generating strong winds that cross the most active fluvial (water-related) erosion zones in the valley. These strong winds sweep up, suspend and transport large quantities of sand and dust, reducing visibility, damaging property, and constituting a significant health threat. The region is also subject to seasonal northeasterly Santa Ana winds that are associated with high pressure parked over Nevada and the four corners region.

The Coachella Valley portion of the SSAB is typical of a low desert climate, with summer temperatures that frequently exceed 110°F and drop into the 20's during winter. The valley floor historically receives an average of four to six inches of rainfall per year with greater precipitation at higher elevations.

Air inversions, where a layer of stagnant air is trapped near the ground and is loaded with pollutants from motor vehicles and other sources, occasionally occur in the Coachella Valley due to local geological and climatic conditions. Inversions create conditions of haziness caused by suspended water vapor, dust, and a variety of chemical aerosols. Due to local climactic conditions, inversion layers generally form 6,000 to 8,000 feet above the desert floor.

AIR POLLUTANTS OF CONCERN

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by State and federal laws. These regulated air pollutants are known as "criteria air pollutants" and are categorized into primary and secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO_X), sulfur dioxide (SO_2), coarse particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and lead are primary air pollutants. Of these, CO, NO_X, SO_2, PM_{10}, and $PM_{2.5}$ are primary criteria pollutants. ROG and NO_X are criteria pollutant precursors and form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. For example, the criteria pollutant ozone (O_3) is formed by a chemical reaction between ROG and NO_X in the presence of sunlight. O_3 and nitrogen dioxide (NO_2) are the principal secondary pollutants. Sources and health effects commonly associated with criteria pollutants are summarized in **Table 4.2-1: Air Contaminants and Associated Public Health Concerns.**

Table 4.2-1: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources	Human Health Effects
Particulate Matter (PM_{10} and $PM_{2.5}$)	Power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases/volatile organic compounds (ROG or VOC)[1] and nitrogen oxides (NO_X) in the presence of sunlight. Motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
Sulfur Dioxide (SO_2)	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to O_3. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Lead (Pb)	Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been motor vehicles (such as cars and trucks) and industrial sources. Due to the phase out of leaded gasoline, metals processing is the major source of lead emissions to the air today. The highest levels of lead in air are	Exposure to lead occurs mainly through inhalation of air and ingestion of lead in food, water, soil, or dust. It accumulates in the blood, bones, and soft tissues and can adversely affect the kidneys, liver, nervous system, and other organs. Excessive exposure to lead may cause neurological impairments such as seizures, mental retardation, and behavioral disorders. Even at low doses, lead exposure is associated

Pollutant	Major Man-Made Sources	Human Health Effects
	generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery manufacturers.	with damage to the nervous systems of fetuses and young children, resulting in learning deficits and lowered IQ.

[1] Volatile Organic Compounds (VOCs or Reactive Organic Gases [ROG]) are hydrocarbons/organic gases that are formed solely of hydrogen and carbon. There are several subsets of organic gases including ROGs and VOCs. Both ROGs and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation).

Source: Kimley-Horn and Associates, Inc. 2024. *Air Quality Assessment.* Page 10 – Table 2. See **Appendix B1**

Toxic Air Contaminants

Toxic air contaminants (TACs) are airborne substances that can cause short-term (acute) or long-term (i.e., chronic, carcinogenic or cancer causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

CARB identified diesel particulate matter (DPM) as a TAC. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles and gases produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, lightheadedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

Ambient Air Quality

CARB monitors ambient air quality at approximately 250 air monitoring stations across the State. These stations usually measure pollutant concentrations ten feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. Existing ambient air quality levels, historical trends, and projections near the Project are documented by measurements made by the South Coast Air Quality Management District (SCAQMD), the air pollution regulatory agency in the SSAB that maintains air quality monitoring stations which process ambient air quality measurements.

Pollutants of concern in the SSAB include O_3 and PM_{10}. The closest air monitoring station to the Project that monitors ambient concentrations of these pollutants is the Indio-Jackson Street Monitoring Station (located approximately 3.8 miles to the west). Local air quality data from 2019 to 2022 are provided in **Table 4.2-2: Ambient Air Quality Data**, which lists the monitored maximum concentrations and number of exceedances of state or federal air quality standards for each year.

Table 4.2-2: Ambient Air Quality Data

Criteria Pollutant	2020	2021	2022
Ozone (O_3) [1]			
1-hour Maximum Concentration (ppm)	0.097	0.099	0.072
8-hour Maximum Concentration (ppm)	0.084	0.078	0.069
Number of Days Standard Exceeded			
CAAQS 1-hour (>0.09 ppm)	2	2	0
NAAQS 8-hour (>0.070 ppm)	42	18	0
Carbon Monoxide (CO) [2]			
1-hour Maximum Concentration (ppm)	0.82	0.76	1.12
Number of Days Standard Exceeded			
NAAQS 1-hour (>35 ppm)	0	0	0
CAAQS 1-hour (>20 ppm)	0	0	0
Nitrogen Dioxide (NO_2) [2]			
1-hour Maximum Concentration (ppm)	0.0474	0.0356	0.0375
Number of Days Standard Exceeded			
NAAQS 1-hour (>0.100 ppm)	0	0	0
CAAQS 1-hour (>0.18 ppm)	0	0	0
Particulate Matter Less Than 10 Microns (PM_{10}) [1]			
National 24-hour Maximum Concentration	145.2	100.4	160.0
State 24-hour Maximum Concentration	53.8	100.6	160.3
State Annual Average Concentration (CAAQS=20 $\mu g/m^3$)	—	—	—
Number of Days Standard Exceeded			
NAAQS 24-hour (>150 $\mu g/m^3$)	0	0	0
CAAQS 24-hour (>50 $\mu g/m^3$)	2	5	2
Particulate Matter Less Than 2.5 Microns ($PM_{2.5}$) [1]			
National 24-hour Maximum Concentration	41.3	30.6	25.1
State 24-hour Maximum Concentration	41.3	30.6	25.1
Number of Days Standard Exceeded			
NAAQS 24-hour (>35 $\mu g/m^3$)	2	0	0

NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; ppm = parts per million.
$\mu g/m^3$ = micrograms per cubic meter; – = not measured

[1] Measurements taken at the Indio-Jackson Street Monitoring Station at 46990 Jackson Street, Indio CA 92201 (CARB# 33157)
[2] Measurements taken at the Palm Springs-Fire Station Monitoring Station at 590 E. Racquet Club Avenue, Palm Springs, CA 92262 (CARB# 33137), which is the closest monitoring station that measures CO and NO_2.

Source: Ibid. Page 12 – Table 3

Sensitive Receptors

Sensitive populations are more susceptible to the effects of air pollution than is the general population. Sensitive receptors that are in proximity to localized sources of toxics are of particular concern. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The Project site is mainly surrounded by vacant/undeveloped land uses to the north, south, and east, with a small residential community (The Villas at the Vineyards) approximately 800 feet from the westernmost edge of the Project boundary.

4.2.2 REGULATORY SETTING

FEDERAL

Federal Clean Air Act

Air quality is federally protected by the Federal Clean Air Act (FCAA) and its amendments. Under the FCAA, the United States Environmental Protection Agency (U.S. EPA) developed the primary and secondary National Ambient Air Quality Standards (NAAQS) for the criteria air pollutants including O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, and lead. Proposed projects in or near nonattainment areas could be subject to more stringent air-permitting requirements. The FCAA requires each state to prepare a State Implementation Plan to demonstrate how it will attain the NAAQS within the federally imposed deadlines.

The U.S. EPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the FCAA. If a state fails to correct these planning deficiencies within two years of Federal notification, the U.S. EPA is required to develop a Federal implementation plan for the identified nonattainment area or areas. The provisions of 40 Code of Federal Regulations Parts 51 and 93 apply in all nonattainment and maintenance areas for transportation-related criteria pollutants for which the area is designated nonattainment or has a maintenance plan. Applicable NAAQS are summarized in **Table 4.2-3: State and Federal Ambient Air Quality Standards**.

STATE

California Air Resources Board

CARB administers the air quality policy in California. The California Ambient Air Quality Standards (CAAQS) were established in 1969 pursuant to the Mulford-Carrell Act. These standards, included with the NAAQS in **Table 4.2-3**, are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility-reducing particulates, hydrogen sulfide, and sulfates.

The California Clean Air Act (CCAA) requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. These AQMPs also serve as the basis for the preparation of the State Implementation Plan for meeting federal clean air standards for the State of California. Like the U.S. EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events such as wildfires, volcanoes, etc., are not considered violations of a state standard, and are not used as a basis for designating areas as nonattainment. The applicable CAAQS are summarized in **Table 4.2-3**.

Table 4.2-3: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards[1]	National Standards[2]
Ozone (O_3) [2, 5, 7]	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm
	1 Hour	0.09 ppm (180 µg/m^3)	NA
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)
	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/m^3)	0.10 ppm[11]
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)
Sulfur Dioxide (SO_2) [8]	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)
	Annual Arithmetic Mean	NA	0.03 ppm (80 µg/m^3)
Particulate Matter (PM_{10}) [1, 3, 6]	24-Hour	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	NA
Fine Particulate Matter ($PM_{2.5}$) [3, 4, 6, 9]	24-Hour	NA	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	9 µg/m^3
Sulfates (SO_{4-2})	24 Hour	25 µg/m^3	NA
Lead (Pb) [10, 11]	30-Day Average	1.5 µg/m^3	NA
	Calendar Quarter	NA	1.5 µg/m^3
	Rolling 3-Month Average	NA	0.15 µg/m^3
Hydrogen Sulfide (H_2S)	1 Hour	0.03 ppm (42 µg/m^3)	NA
Vinyl Chloride (C_2H_3Cl) [10]	24 Hour	0.01 ppm (26 µg/m^3)	NA

Notes:
ppm = parts per million; µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; – = no information available.

[1] California standards for O_3, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter - PM_{10}, and visibility reducing particles are values that are not to be exceeded. The standards for sulfates, Lake Tahoe carbon monoxide, lead, hydrogen sulfide, and vinyl chloride are not to be equaled or exceeded. If the standard is for a 1-hour, 8-hour or 24-hour average (i.e., all standards except for lead and the PM_{10} annual standard), then some measurements may be excluded. Measurements are excluded that CARB determines would occur less than once per year on the average. The Lake Tahoe carbon monoxide standard is 6.0 ppm, a level one-half the national standard and two-thirds the State standard.

[2] National standards shown are the "primary standards" designed to protect public health. National standards other than for O_3, particulates and those based on annual averages are not to be exceeded more than once a year. The 1-hour O_3 standard is attained if, during the most recent three-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour O_3 standard is attained when the 3-year average of the 4th highest daily concentrations is 0.070 ppm or less. The 24-hour PM_{10} standard is attained when the 3-year average of the 99th percentile of monitored concentrations is less than 150 µg/m$_3$. The 24-hour $PM_{2.5}$ standard is attained when the 3-year average of 98th percentiles is less than 35 µg/m^3.

[3] Except for the national particulate standards, annual standards are met if the annual average falls below the standard at every site. The national annual particulate standard for PM_{10} is met if the 3-year average falls below the standard at every site. The annual $PM_{2.5}$ standard is met if the 3-year average of annual averages spatially-averaged across officially designed clusters of sites falls below the standard. NAAQS are set by the U.S. EPA at levels determined to be protective of public health with an adequate margin of safety.

Pollutant	Averaging Time	State Standards[1]	National Standards[2]

[4] On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm. An area will meet the standard if the fourth-highest maximum daily 8-hour O_3 concentration per year, averaged over three years, is equal to or less than 0.070 ppm. Nonattainment areas will have until 2020 to late 2037 to meet the health standard, with attainment dates varying based on the O_3 level in the area.

[5] The national 1-hour O_3 standard was revoked by the U.S. EPA on June 15, 2005.

[6] In June 2002, CARB established new annual standards for $PM_{2.5}$ and PM_{10}.

[7] The 8-hour California O_3 standard was approved by the CARB on April 28, 2005, and became effective on May 17, 2006.

[8] On June 2, 2010, the U.S. EPA established a new 1-hour SO_2 standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations. The existing 0.030 ppm annual and 0.14 ppm 24-hour SO_2 NAAQS however must continue to be used until one year following U.S. EPA initial designations of the new 1-hour SO_2 NAAQS.

[9] In February 2024, the U.S. EPA strengthened the annual $PM_{2.5}$ NAAQS from 12.0 to 9.0 µg/m^3. Areas designated "unclassifiable/ attainment" must continue to take steps to prevent their air quality from deteriorating to unhealthy levels.

[10] CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure below which there are no adverse health effects determined.

[11] National lead standards, rolling 3-month average: final rule signed October 15, 2008. Final designations effective December 31, 2011.

Source: Ibid. Page 14 – Table 4

REGIONAL

South Coast Air Quality Management District

The SCAQMD is the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that CAAQS and NAAQS are attained and maintained in the and SSAB and South Coast Air Basin (SCAB). The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The SCAQMD is also the lead agency in charge of developing the AQMP, with input from the Southern California Association of Governments (SCAG) and CARB. The AQMP is a comprehensive plan that includes control strategies for stationary and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, provides the control element for mobile sources.

The 2022 AQMP was adopted by the SCAQMD Governing Board on December 2, 2022. The 2022 AQMP builds upon measures already in place from previous AQMPs with the purpose of bringing the SCAB and SSAB into compliance with the federal 24-hour $PM_{2.5}$ air quality standard and the federal 8-hour O_3 standard. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_X technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015-8-hour ozone standard. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including SCAGs' 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS), prior to release of the 2024-2050 RTP/SCS, (herein referred to as the Connect SoCal) and updated emission inventory methodologies for various source categories.

The SCAQMD has published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Local Significance Thresholds [LST] in 2008). The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by California Environmental Quality Act (CEQA) and provides identification of suggested thresholds of significance for criteria pollutants for both construction and operation (see discussion of thresholds below). With the help of the CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how proposed and existing projects affect air quality in order to meet the requirements of the CEQA review process. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under State law as a Regional Transportation Planning Agency and a Council of Governments.

The state and federal attainment status designations for the SSAB are summarized in **Table 4.2-4: Salton Sea Air Basin Attainment Status**. The SSAB is currently designated as a nonattainment area with respect to the State O_3 and PM_{10} standards, as well as the national 8-hour O_3 and PM_{10} standards. The SSAB is designated as attainment or unclassified for the remaining CAAQS and NAAQS.

Table 4.2-4: Salton Sea Air Basin Attainment Status

Pollutant	State	Federal
Ozone (O_3) (1 Hour Standard)	Non-Attainment	Attainment
Ozone (O_3) (8 Hour Standard)	Non-Attainment	Non-Attainment (Severe)
Particulate Matter ($PM_{2.5}$) (24 Hour Standard)	–	Unclassifiable/Attainment
Particulate Matter ($PM_{2.5}$) (Annual Standard)	Attainment	Unclassifiable/Attainment
Particulate Matter (PM_{10}) (24 Hour Standard)	Non-Attainment	Non-Attainment (Serious)
Particulate Matter (PM_{10}) (Annual Standard)	Non-Attainment	–
Carbon Monoxide (CO) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Carbon Monoxide (CO) (8 Hour Standard)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2) (Annual Standard)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO_2) (24 Hour Standard)	Attainment	–
Lead (Pb) (30 Day Standard)	Unclassifiable/Attainment	–
Lead (Pb) (3 Month Standard)	–	Attainment

Pollutant	State	Federal
Sulfates (SO_{4-2}) (24 Hour Standard)	Attainment	–
Hydrogen Sulfide (H_2S) (1 Hour Standard)	Unclassified	–
Source: Ibid. Page 16 – Table 5		

The following is a list of SCAQMD rules that are required of construction activities associated with the Project:

- **Rule 401 (Visible Emissions)** – This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.
    a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
    b) All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
    c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
    d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
    e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.
- **Rule 403.1 (Dust Control in Coachella Valley)** – This rule is a supplemental rule to Rule 403 and is applicable to manmade sources of fugitive dust in the Coachella Valley. Rule 403.1 requires a Fugitive Dust Control Plan approved by SCAQMD, or an authorized local government agency, prior to the initiation of any construction/earth-moving activity. These requirements are only applicable to construction projects with 5,000 or more square feet of surface area disturbance.

- **Rule 445 (Wood Burning)** – This rule prohibits permanently installed wood-burning devices into any new development. A wood-burning device means any fireplace, wood-burning heater, or pellet-fueled wood heater, or any similarly enclosed, permanently installed, indoor or outdoor device burning any solid fuel for aesthetic or space-heating purposes, which has a heat input of less than one million British thermal units per hour.
- **Rule 1113 (Architectural Coatings)** - This rule governs the sale, use, and manufacturing of architectural coatings and limits the VOC content in paints and paint solvents. This rule dictates the VOC content of paints available for the use during the construction and operational maintenance of buildings.

LOCAL

City of Coachella General Plan

The Project site is located in the City and would be required to comply with the regulations set forth in the Coachella GP. Coachella GP elements, goals, and policies relevant to the Project are as follows:

Community Health and Wellness Element

This Element[1] establishes the City's long-term goals and policies for achieving the community's vision for health. Coachella residents value the benefits of healthy food, physical activity, healthy environments, education and strong social ties.

Goal 2	**Healthy Housing. Safe, affordable and healthy housing for every stage of life.**
Policy 2.19	Healthy building materials. Encourage property owners pursuing new developments and home renovations to use low-or non-toxic materials such as low-VOC (volatile organic compound) paint and carpet and other strategies to improve indoor air quality and noise levels (e.g., kitchen range top exhaust fans, treated windows, etc.).
Goal 8	**Educational and Community Facilities. Community facilities and school Facilities that support physical activity, civic life and social connections for residents of all ages and interests.**
Policy 8.11	Healthy school siting. Work with the school district to promote standards to protect students and staff from environmental hazards. Modify zoning to prevent schools and other sensitive receptors from being located near known or expected new stationary sources of air pollution. The specific "safe" distance from a pollution source is dependent on the source and amount of pollution releases; however, a good rule of thumb is at least 500 feet.

[1] City of Coachella. (2015). City of Coachella General Plan Update. https://www.coachella.org/home/showpublisheddocument/10698/638906775782700000(accessed October 2025).

Sustainability and Natural Environment Element

This Element[2] establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces.

Goal 11 **Air Quality. Healthy indoor and outdoor air quality through reduced, locally generated pollutant emissions.**

Policy 11.1 Sources of Pollutants. Minimize the creation of new sources of air pollutants within the City.

Policy 11.2 Land use patterns. Promote compact, mixed-use, energy efficient and transit- oriented development to reduce air pollutants associated energy and vehicular use.

Policy 11.3 Sensitive receptors. Prohibit the siting of land uses that adversely impact existing sensitive receptors, including schools, childcare centers, senior housing, and subsidized affordable housing. The minimum distance separating these uses should be 500 feet.

Policy 11.4 Public transit. Ensure that, wherever feasible, public transit is a viable and attractive alternative to the use of single occupant motor vehicles.

Policy 11.5 Single-occupant vehicle trip reductions. Provide disincentives for single-occupant vehicle trips through parking supply and pricing controls in areas where supply is limited and alternative transportation modes are available.

Policy 11.6 Neighborhood electric vehicles. Encourage developments and street systems that support the use of Neighborhood Electric Vehicles (NEV).

Policy 11.7 Active transportation. Support infrastructure and programs that encourage children to safely walk or ride a bicycle to school.

Policy 11.8 Construction-related emissions. Require construction activities, including on-site building and the transport of materials, to limit emissions and dust.

Policy 11.9 Project mitigation. The City shall utilize the CEQA process to identify and mitigate potentially significant air quality impacts associated with new development.

Policy 11.10 Traffic congestion. Design new intersections to function in a manner that reduces air pollutant emissions from stop and start and idling traffic conditions.

Policy 11.11 Health impact assessments. Develop thresholds of significance for sensitive land uses (schools, senior centers, medical facilities, and residences) in proximity to SR-86S, SR-111 and I-10 to require preparation of a health impact assessment (HIA), as part of the CEQA environmental review process, to analyze the significance of the health impact from highway adjacency and incorporate project-specific mitigation measures to reduce potential impacts.

[2] City of Coachella. (2015). City of Coachella General Plan Update – Sustainability and Natural Environment Element. https://www.coachella.org/home/showpublisheddocument/8419/637819141150600000(accessed October 2025).

Policy 11.12 Indoor air quality. Require new development to meet the state's Green Building Code for indoor air quality performance.

Policy 11.13 Healthy homes. Promote green building practices that support "healthy homes," such as low VOC materials, environmental tobacco smoke control, and indoor air quality construction pollution prevention techniques.

Policy 11.14 Alternative energy sources. Promote the development of energy sources, such as solar, wind, and geothermal, that do not emit pollution which has an adverse impact on local air quality.

Policy 11.15 Transportation demand management. Encourage employers to provide transit subsidies, bicycle facilities, alternative work schedules, ridesharing, telecommuting, work-at-home programs, employee education and preferential parking for carpools/vanpools.

Policy 11.16 Transportation management associations. Encourage commercial, retail, and residential developments to create and participate in transportation management associations.

Policy 11.17 Deliveries. Encourage business owners to schedule deliveries at off-peak traffic periods.

Policy 11.20 Regional coordination. The City shall coordinate its air quality planning efforts with other local, regional, and state agencies, and encourage community participation in air quality planning.

Policy 11.21 Air district coordination. The City shall work with the South Coast Air Quality Management District (SCAQMD) to ensure the earliest practicable attainment of federal and State ambient air quality standards.

Safety Element

This Element[3] establishes the City's long-term goals and policies for providing long-term measures that reflect the City's desire to deal effectively with natural hazards and provide a safe living environment for the community. The primary objective of the Safety Element, as the policies and actions are implemented over the next 20 years, is to make Coachella increasingly resistant to disasters and become more self-reliant, sustainable and prosperous.

Goal 6 Clean Environment. A community protected from the harmful effects of pollution and hazardous materials, hazardous waste and environmental contamination.

Policy 6.14 Proximity to pollution sources. Avoid locating new sensitive uses such as schools, child-care centers, multifamily housing, and senior housing in proximity to sources of pollution (e.g., I-10, truck routes, busy roadways and agricultural land where pesticides and chemical fertilizers are used regularly) and vice versa. Where such uses are located in proximity to sources of air pollution, use building design, construction and technology techniques to mitigate the negative effects of air pollution on indoor air quality. For

[3] City of Coachella. (2015). *City of Coachella General Plan Update – Safety Element.* https://www.coachella.org/home/showpublisheddocument/10702/638906775794200000 (accessed October 2025).

guidance consult with the South Coast Air Quality Management District, CARB's Air Quality and Land Use Handbook or other more recent scientific studies or tools.

City of Coachella Municipal Code

The Coachella Municipal Code (Coachella MC) establishes the following air quality provisions relative to the Project.[4]

Chapter 12.40 – Transportation Demand Management Program

12.40.010 – Purpose and Intent

This chapter is intended to protect the public health, welfare, and safety by reducing air pollution caused by vehicle trips and vehicle miles traveled. This chapter is intended to accomplish emission reductions by meeting requirements of Assembly Bill (AB) 1791, Section 65089(b)(3) which requires development of a trip reduction and travel demand element to the congestion management plan (CMP), and Section 65089.3(b) which requires adoption and implementation of trip reduction and travel demand ordinances by local agencies.

12.40.050 - Minimum standards.

A. All applicable new developments (nonresidential developments which employ one hundred (100) or more persons) which are owned and managed as one unit shall submit a transportation demand management plan prepared by a traffic engineer, transportation planner or other qualified professional identifying traffic impacts associated with a proposed project and including design recommendations and mitigation measures, as appropriate, to address on and off-site project impacts. Such TDM plan shall implement a trip reduction plan to reduce work-related vehicle trips by ten (10) percent from the expected number of trips related to the project (as indicated on the Trip Generation Handbook published by the Institute of Traffic Engineers). The plan shall also indicate specific strategies and guidelines to reduce the amount of trips and increase the amount of nonvehicular transportation.

B. All developers of applicable new developments and/or change of use shall be subject to required capital improvement standards as specified in this section. These standards must all be addressed to realize if they are applicable to their development. These required standards may be used to achieve the mandatory reduction of ten (10) percent in the expected number of trips related to the project. Developers of all applicable developments shall include in their project site development plan's provisions to address each of the following capital improvements:

   1. Transit facilities (on- and off-site);
   2. Bicycle facilities; and
   3. Rideshare facilities.

C. Operational standards are standards which employers, TMAs or a managing office of a development administered as one unit are subject to require to achieve the mandatory ten (10)

[4] City of Coachella. (2022). *Municipal Code.* https://library.municode.com/ca/coachella/codes/code_of_ordinances (accessed October 2025).

percent reduction in trips related to the project. These standards must be established sixty (60) days after occupancy of the development by an employer.

D. The following options may be included in the developer's TDM plan to fulfill both the capital improvement standards and the operational standards:

1. Alternate Work Schedules/Flex-Time. Incorporate alternate work schedules and flex-time programs (such as 9/80 or 4/40 work schedule);
2. Telecommuting. Establishing telecommuting or work at home programs to allow employees to work at home or at a satellite work center.
3. Bicycle Facilities. Provide bicycle parking facilities equal to five percent of the total required automobile parking spaces; and preserve two percent of the gross floor area for employee locker and shower facilities.
4. On-Site Employee Housing and Shuttles. Provide affordable on-site housing and shuttles to and from residential and work areas.
5. Preferential parking for carpool vehicles.
6. Information center for transportation alternatives.
7. Rideshare vehicle loading areas.
8. Vanpool vehicle accessibility.
9. Bus stop improvements.
10. On-site childcare facilities.
11. Availability of electrical outlets for recharging of electrical vehicles.
12. On-site amenities such as cafeterias and restaurants, automated teller machines, and other services that would eliminate the need for additional trips.
13. Airport shuttle service to hotels and spas.
14. Contributions to funds providing regional facilities such as park-and-ride lots, multi-modal transportation centers and transit alternatives in the area.
15. Incentives for mass transit usage including provision of a bus pass, additional pay, flex time or others.
16. Implementation of increased parking fees or new fees.
17. Restriction of business hours.
18. Restriction of delivery hours.
19. Provide a direct pedestrian path from the closest transit stop into the facility.
20. Provide [or] contribute up to one dollar ($1.00) per square foot to a housing subsidy fund so that affordable housing can be created closer to employer sites.
21. Develop rideshare and shuttle programs at resorts/hotels.

22. Create golf cart circulation system.
23. If an applicable development is on a current transit route, provide a transit stop, shelter, trash barrels, benches, shade and wind protection, and bus turnouts.
24. If an applicable development is not located on a current transit route, contribute to fund which will be used to provide transit amenities.
25. If an applicable development is located on a major arterial, statements 23 and 24 should be considered.
26. Provisions for the implementation of bicycle lanes; and
27. Provide other creative or innovative strategies to reduce vehicle trips. (Prior code § 31-5)

4.2.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning air quality. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in other emissions (such as those leading to odors adversely affecting a substantial number of people.

SCAQMD THRESHOLDS

The significance criteria established by SCAQMD may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if the Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality during construction and operational activities of land use development projects, as shown in **Table 4.2-5: South Coast Air Quality Management District Emissions Thresholds**.

Table 4.2-5: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors	Maximum Pounds Per Day	
	Construction-Related	Operational-Related
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55
Source: Kimley-Horn and Associates, Inc. 2024. *Air Quality Assessment*. Page 23 – Table 6. See **Appendix B1**		

LOCALIZED SIGNIFICANCE THRESHOLDS

In addition to the CO hotspot analysis, the SCAQMD developed LSTs for emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project without expecting to cause or substantially contribute to an exceedance of the most stringent CAAQS or NAAQS. LSTs are based on the ambient concentrations of that pollutant within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as residence, hospital, convalescent facility where it is possible that an individual could remain for 24 hours. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees do not typically remain onsite for a full 24 hours, but are present for shorter periods of time, such as eight hours.

LST analysis for construction is applicable for all projects that disturb five acres or less on a single day. The City of Coachella is located within SCAQMD SRA 30, Coachella Valley. **Table 4.2-6: Local Significance Thresholds for Construction/Operations** shows the LSTs for a 1-acre, 2-acre, and 5-acre project in SRA 30. Because the nearest sensitive receptors are located onsite, approximately 160 feet (50 meters) to the west of the Phase 4 Project boundary, the threshold for distances of 50 meters are listed below.

Table 4.2-6: Local Significance Thresholds for Construction/Operations

Project Size	Emissions (Maximum Pounds Per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
1 Acre	166/166	1,387/1,387	13/3	5/2
2 Acres	225/225	1,931/1,931	22/6	7/2
5 Acres	340/340	3,237/3,237	44/11	11/3
NO_X = Nitrogen Oxides; CO = Carbon Monoxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less.				
Source: Ibid. Page 24 – Table 7				

LSTs associated with all acreage categories are provided in **Table 4.2-6** for informational purposes. **Table 4.2-6** shows that the LSTs increase as acreages increase. It should be noted that LSTs are screening thresholds and are therefore conservative. The construction LST acreage is determined based daily acreage disturbed. The operational LST acreage is based on the total area of the Project site. Although the Project site is greater than five acres, the 5-acre operational LSTs are conservatively used to evaluate the Project.

METHODOLOGY

The air quality impact analysis for the Project considered the Project's construction and operational impacts. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model (CalEEMod). CalEEMod is a Statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Air quality impacts were assessed according to methodologies recommended by CARB and the SCAQMD.

Construction equipment, trucks, worker vehicles, and ground-disturbing activities associated with Project construction would generate emissions of criteria air pollutants and precursors. Daily regional construction emissions are estimated by assuming construction occurs at the earliest feasible date (i.e., a conservative estimate of construction activities) and applying off-road, fugitive dust, and on-road emissions factors in CalEEMod.

For the purposes of analyzing construction emissions, the construction activities for the five villages were modeled in separate phases (Phase 1, Phase 2, Phase 3, Phase 4, Phase 5, and Phase 6). Construction was modeled generally according to the following timeline[5]:

- Phase 1: Commence in 2025 with a 40-month duration.
- Phase 2: Commence in 2028 with a 40-month duration.
- Phase 3: Commence in 2031 with a 40-month duration.
- Phase 4: Commence in 2034 with a 40-month duration.
- Phase 5: Commence in 2038 with a 40-month duration.
- Phase 6: Commence in 2042 with a 40-month duration.

Project operations would result in emissions of area sources (consumer products, architectural coating, and landscape equipment), energy sources (natural gas usage), and mobile sources (motor vehicles from Project generated vehicle trips). Project-generated increases in operational emissions would be predominantly associated with motor vehicle use. Emissions from each of these categories are discussed below.

- **Area Sources.** Area source emissions would be generated due to consumer products, on-site equipment, architectural coating, and landscaping that were previously not present on the site. Consumer products are various solvents used in non-industrial applications, which emit VOCs during product use. These typically include cleaning supplies, kitchen aerosols, cosmetics, and toiletries. The CalEEMod default emissions rates were used to model the Project.

[5] As the Project development is speculative, a conservative worst-case construction timeline has been modeled for analysis purposes. This involves modeling emissions at the earliest feasible date. Emissions in future years (i.e., due to a later construction start date or operational opening year) would be lower due to phased-in emissions standards, inspection and maintenance requirements, and fleet turnover). Project construction that occurs at a later date than what was modeled impacts would result in lower emissions than those analyzed due to the use of more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to state regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment. As a result, Project-related construction emissions would be lower than the impacts disclosed herein. For emissions modeling purposes, conservatively analyzing the emissions using an earlier construction start date provides for a worst-case analysis and full disclosure of potential air quality impacts, as required by CEQA.

- **Energy Sources.** Energy source emissions would be generated due to electricity and natural gas usage associated with the Project. Primary uses of electricity and natural gas by the Project would be from space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. Energy source emissions were calculated in CalEEMod. No changes were made to the default energy usage consumption rates or emissions factors.
- **Mobile Sources.** Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern. NO_X and ROG react with sunlight to form O_3, known as photochemical smog. Additionally, wind currents readily transport PM_{10} and $PM_{2.5}$. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

  Project-generated vehicle emissions are based on the trip generation within the Traffic Impact Analysis (TIA) Report (**Appendix J**) and modeled using the latest version of CalEEMod. Operations emissions were calculated using emissions factors for 2028, 2031, 2034, 2038, 2042, and 2045, consistent with the opening year of each phase. The Project land use assumptions and trip generation from the TIA are summarized in **Table 4.2-7: CalEEMod Land Use and Trip Generation**. Project trip generation from the Traffic Impact Analysis is based on the Riverside County Model (RIVCOM), a traffic forecasting model provided by Western Riverside Council of Governments (WRCOG). Other operational emissions from area, energy, and stationary sources were quantified in CalEEMod based on land use activity data.

Table 4.2-7: CalEEMod Land Use and Trip Generation

Land Use Type	Building Area Modeled [1]	Modeled Acreage[2]	Daily Trips[3]
Phase 1			
Multifamily Housing (Mid-Rise)	349,000	4.50	--
Shopping Center	577,428	13.26	--
General Office Building	292,477	6.71	--
Hotel	644,500	6.00	--
Public Park	--	89.90	--
Drainage	--	117.00	--
Street / ROW	--	23.00	--
Parking Lot	--	107.00	--
Phase 1 Total	**1,863,405**	**367.37**	**20,108**
Phase 2			
Single Family Detached Housing	984,600	177.60	--
Multifamily Housing (Low-Rise)	472,200	14.75	--
Multifamily Housing (Mid-Rise)	419,000	5.51	--
School	22,990	0.53	--
Theater	217,800	5.00	--
Public Park	--	8.90	--
Drainage	--	95.30	--
Street / ROW	--	23.30	--
Parking Lot	--	19.11	--
Phase 2 Total	**2,116,590**	**350.00**	**10,168**

Land Use Type	Building Area Modeled [1]	Modeled Acreage[2]	Daily Trips[3]
Phase 3			
Single Family Detached Housing	595,800	107.47	--
Multifamily Housing (Low-Rise)	510,000	25.50	--
School	11,788	0.27	--
Public Park	--	87.40	--
Drainage	--	99.50	--
Street / ROW	--	25.06	--
Parking Lot	--	59.00	--
Phase 3 Total	**1,117,588**	**404.20**	**6,012**
Phase 4			
Multifamily Housing (Mid-Rise)	2,032,000	53.47	--
Shopping Center	758,777	17.42	--
General Office Building	252,928	5.81	--
Public Park	--	38.30	--
Drainage	--	110.77	--
Street / ROW	--	23.27	--
Parking Lot	--	122.00	--
Phase 4 Total	**3,043,705**	**371.04**	**24,071**
Phase 5			
Single Family Detached Housing	1,170,000	211.04	--
Single Family Attached Housing (Condo)	1,456,000	91.00	--
Multifamily Housing (Low-Rise)	1,331,000	43.19	--
Multifamily Housing (Mid-Rise)	38,000	1.00	--
School	129,083	2.96	--
Shopping Center	62,930	1.44	--
General Office Building	20,977	0.48	--
Public Park	--	102.00	--
Drainage	--	153.4	--
Street / ROW	--	48.33	--
Parking Lot	--	121.50	--
Phase 5 Total	**4,207,990**	**776.34**	**29,514**
Phase 6			
Single Family Detached Housing	795,600	134.00	--
Multifamily Housing (Low-Rise)	714,000	20.63	--
School	72,818	1.67	--
Public Park	--	85.40	--
Drainage	--	244.00	--
Street / ROW	--	34.00	--
Parking Lot	--	24.00	--
Phase 6 Total	**1,582,418**	**543.70**	**8,612**
Total (All Phases)	***13,831,700***	***2,807***	***98,485***

1. Building area is estimated using CalEEMod and is based on land use units (dwelling units for residential properties, number of rooms for the hotel, number of students for schools, and the number of seats for the theater).
2. Acreage for buildings estimated using CalEEMod based on land use.
3. Daily trips based on RIVCOM data in the Project Traffic Impact Analysis.

Source: Ibid. Page 26 – Table 8

As discussed above, the SCAQMD provides significance thresholds for emissions associated with Project construction and operations. The Project's construction and operational emissions are compared to the daily criteria pollutant emissions significance thresholds in order to determine the significance of a Project's impact on regional air quality.

The localized effects from the Project's on-site emissions were evaluated in accordance with the SCAQMD's LST methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

4.2.4 PROJECT IMPACTS AND MITIGATION

Impact 4.2-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Level of Significance: Significant and Unavoidable

As part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan that demonstrates the means to attain the NAAQS. The State Implementation Plan must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the state and FAAQS. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the SSAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SSAB is in nonattainment. The 2022 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2022 AQMP is a regional and multi-agency effort including the SCAQMD, the CARB, the SCAG, and the U.S. EPA. The plan's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMP.

Criteria for determining consistency with the AQMP are defined by the following indicators:

- **Consistency Criterion No. 1**: The Project will 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.
- **Consistency Criterion No. 2**: The Project will not exceed the assumptions in the AQMP or increments based on the years of the Project build-out phase.

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown in **Table 4.2-11**, and **Table 4.2-13**, even with mitigation measures (**MM**) **AQ-1** through **MM AQ-6** included, the Project would exceed operational emission standards. As shown in **Table 4.2-11,** after implementing **MM AQ-3** through **MM AQ-6**; Phase 1 operational emissions would exceed the daily threshold for ROG, NO_X, CO, and PM_{10}; Phase 2 operational emissions would exceed the daily emission threshold for ROG and NO_x; Phase 4 operational emissions would exceed the daily threshold for ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$. Phase 5 operational emissions would exceed the daily threshold for ROG, NO_X, CO, $PM_{10,}$ and $PM_{2.5}$; and Phase 6 operational emissions would exceed the daily emission threshold for ROG. As shown in **Table 4.2-13** even after applying **MMs AQ-1** through **AQ-6** the overlapping emissions from each phase would result in emissions that exceed the operational thresholds for a combination of ROG, NOx, CO, PM_{10}, and $PM_{2.5}$. Therefore, mitigated impacts related to phased construction and operations would remain significant and unavoidable. Refer to Impact 4.2-2 for more information.

Therefore, the Project would potentially contribute to an existing air quality violation. Thus, the Project is not consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project site is presently designated as "Resort District" by the General Plan which allows for residential, lodging, recreational and support retail and commercial services, theme parks, sports venues, and specialized entertainment uses. The existing zoning within the Project site is Resort District (R-D) and is consistent with the City of Coachella Zoning Map.[6] A Zone Change and General Plan Map and Text Amendment are proposed. The approved Specific Plan project site would be designated on the City's General Plan Land Use Map and Zoning Map as the KPC Coachella Specific Plan.

The Project would result in a change of land use designations not reflected in the AQMP. Therefore, the Project is conservatively assumed to generate emissions not reflected within the current 2022 AQMP regional emissions inventory for the SSAB and is considered to be inconsistent with the AQMP. Thus, the Project is not consistent with the second criterion.

As noted above (and discussed further in Threshold 4.2-2 below), Project implementation would result in air pollutant emissions that exceed SCAQMD's construction and operational emission thresholds. Although mitigation would reduce emissions by the greatest feasible amount, Project emissions levels would remain significant and would contribute to the nonattainment designations in the SSAB. Therefore,

[6] City of Coachella. 2023. City of Coachella Zoning Map. https://acrobat.adobe.com/link/review?uri=urn%3Aaaid%3Ascds%3AUS%3Ab87288e4-eb64-3614-bae7-bdd4f328766f&viewer%21megaVerb=group-discover (accessed October 2025).

the Project would be inconsistent with the AQMP, resulting in a significant and unavoidable impact despite the implementation of mitigation.

Off-Site Improvements

Off-site improvements were modeled in CalEEMod and are assumed to begin construction during the first two years of Phase 1 to support future phases of the Project. Off-site improvements include improvements to Vista del Norte, developing a construction staging area, powerlines, a natural gas regulator station, well supply system, installing low-voltage cables (telephone lines and cable), and a sewer system; refer to **Exhibit 3-11: Off-Site Improvements**. The construction of the proposed off-site improvements along with the emissions generated during the construction of Phase 1 would exceed applicable thresholds, as discussed below.

Mitigation Measures

Refer to **MMs AQ-1** to **AQ-6** in Threshold 4.2-2 below.

Impact 4.2-2: ***Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?***

Level of Significance: Significant and Unavoidable

CONSTRUCTION

Construction Emissions

Project construction would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include O_3-precursor pollutants (i.e., ROG and NO_X) and PM_{10} and $PM_{2.5}$. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

Fugitive dust emissions may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project vicinity. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.), are applicable to the Project and were applied in CalEEMod to minimize fugitive dust emissions. Plans, programs, and policies (PPP) AQ-1 requires the implementation of Rule 402 and 403 dust control techniques to minimize PM_{10} and $PM_{2.5}$ concentrations.

Construction activities would occur in multiple phases. The timing assumed for each phase is described above in **Section 4.2.3**. Construction-generated emissions associated with the Project were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. Unmitigated daily construction-generated emissions for Phases 1 through 6 are summarized in **Table 4.2-8: Unmitigated Construction Emissions**.

Table 4.2-8: Unmitigated Construction Emissions

Construction Year	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 1 Unmitigated Construction Emissions[1,2]						
Year 2025	8.54	63.91	109.00	0.17	42.61	22.86
Year 2026	39.90	81.70	146.00	0.22	17.30	5.94
Year 2027	40.00	78.10	142.00	0.22	17.00	5.66
Year 2028	31.50	22.41	39.00	0.06	2.14	1.20
Maximum	40.00	81.70	146.00	0.22	42.61	22.86
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 2 Unmitigated Construction Emissions[2]						
Year 2028	6.22	55.25	59.49	0.12	42.12	22.44
Year 2029	8.19	48.77	132.81	0.15	20.73	9.09
Year 2030	49.31	68.77	174.07	0.19	18.48	5.53
Year 2031	48.31	66.66	137.02	0.19	18.35	5.42
Maximum	49.31	68.77	174.07	0.19	42.12	22.44
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 3 Unmitigated Construction Emissions[2]						
Year 2031	5.46	45.21	52.50	0.12	41.69	22.14
Year 2032	5.54	40.66	92.79	0.12	20.49	8.87
Year 2033	31.69	59.64	128.85	0.17	10.17	3.27
Year 2034	31.50	58.90	126.82	0.17	10.10	3.20
Maximum	31.69	59.64	128.85	0.17	41.69	22.14
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 4 Unmitigated Construction Emissions[2]						
Year 2035	8.03	47.66	47.66	0.19	41.31	21.69
Year 2036	61.44	66.49	66.49	0.23	32.81	8.57
Year 2037	61.11	64.78	64.78	0.23	32.64	8.50
Year 2038	53.45	19.00	19.00	0.05	5.39	1.45
Maximum	61.44	66.49	66.49	0.23	41.31	21.69
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 5 Unmitigated Construction Emissions[2]						
Year 2038	4.54	33.20	45.96	0.12	41.05	21.46
Year 2039	73.74	55.14	168.00	0.21	41.03	10.17
Year 2040	**77.70**	65.48	216.40	0.24	41.67	10.46

Construction Year	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 2041	**75.78**	64.98	161.59	0.24	41.64	10.43
Maximum	**77.70**	65.48	216.40	0.24	41.67	21.46
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**
Phase 6 Unmitigated Construction Emissions[2]						
Year 2042	4.15	29.64	43.02	0.12	40.84	21.26
Year 2043	4.81	36.61	78.76	0.13	19.78	8.22
Year 2044	38.47	54.44	112.50	0.18	13.29	3.64
Year 2045	38.38	54.19	112.00	0.18	13.27	3.62
Maximum	38.47	54.44	112.50	0.18	40.84	21.26
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less

1. Includes emissions from construction of off-site improvements.
2. As Project development is speculative, a conservative worst-case construction timeline has been modeled for analysis purposes. This involves modeling emissions at the earliest feasible date. Emissions in future years (i.e., due to a later construction start date or operational opening year) would be lower due to phased-in emissions standards, inspection and maintenance requirements, and fleet turnover). Project construction that occurs at a later date than what was modeled impacts would result in lower emissions than those analyzed due to the use of more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to state regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment. As a result, Project-related construction emissions would be lower than the impacts disclosed herein. For emissions modeling purposes, conservatively analyzing the emissions using an earlier construction start date provides for a worst-case analysis and full disclosure of potential air quality impacts, as required by CEQA.

Source: Ibid. Page 31 – Table 9.

As shown in **Table 4.2-8**, unmitigated Phase 5 construction would exceed the daily emission threshold for ROG.

Table 4.2-8 shows that Project construction emissions would exceed the SCAQMD threshold for the O_3 precursors ROG (VOC). Most ROG emissions are generated during the architectural coatings phase of construction. **MM AQ-1** requires the Project to use "Super-Compliant" low VOC paints to reduce ROG emissions. Implementation of **MM AQ-1** would reduce construction impacts. As shown in **Table 4.2-9: Mitigated Construction Impacts**, impacts during Phase 5 construction would be reduced to less than significant levels. In addition, while not required when analyzing each Phase separately, **MM AQ-2** was included to reduce impacts from overlapping phases of construction and operations. As a result, **Table 4.2-9** also includes reductions from **MM AQ-2** which requires fugitive dust control measures and requires various exhaust reduction measures including requiring off-road construction equipment greater than 50 horsepower to meet CARB Tier 4 Final emissions standards.

Table 4.2-9: Mitigated Construction Impacts

Construction Year	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 1 Mitigated Construction Emissions[1,2]						
Year 2025	4.55	29.40	112.00	0.17	16.10	8.22
Year 2026	12.50	40.50	149.00	0.22	15.10	4.01
Year 2027	12.40	39.6	146.00	0.22	15.10	4.00
Year 2028	8.07	11.60	39.00	0.05	2.56	0.68

Construction Year	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum	12.50	40.50	149.00	0.22	16.10	8.22
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 2 Mitigated Construction Emissions[1]						
Year 2028	1.39	7.93	71.51	0.12	16.05	8.21
Year 2029	5.11	24.92	136.95	0.15	14.27	3.66
Year 2030	13.83	35.60	178.29	0.19	17.26	4.43
Year 2031	13.02	34.89	141.45	0.19	17.26	4.43
Maximum	13.83	35.60	178.29	0.19	17.26	8.21
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 3 Mitigated Construction Emissions[1]						
Year 2031	1.33	7.83	70.04	0.12	15.88	8.15
Year 2032	3.00	21.05	95.63	0.12	7.94	3.22
Year 2033	9.09	31.47	131.91	0.17	9.36	2.55
Year 2034	8.99	31.32	129.94	0.17	9.36	2.54
Maximum	9.09	31.47	131.91	0.17	15.88	8.15
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 4 Mitigated Construction Emissions[1]						
Year 2034	5.49	28.20	120.93	0.19	27.02	8.21
Year 2035	17.86	39.23	160.34	0.23	32.22	8.05
Year 2036	18.28	38.23	158.04	0.23	32.13	8.05
Year 2037	12.42	11.11	40.73	0.05	5.20	1.28
Year 2038	18.28	39.23	160.34	0.23	32.22	8.21
Maximum	5.49	28.20	120.93	0.19	27.02	8.21
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 5 Mitigated Construction Emissions[1]						
Year 2038	1.31	7.73	70.35	0.12	16.04	8.20
Year 2039	19.10	36.54	173.46	0.21	40.77	9.95
Year 2040	22.42	40.46	222.28	0.24	41.27	10.11
Year 2041	20.53	40.29	167.58	0.24	41.27	10.11
Maximum	22.42	40.46	222.28	0.24	41.27	10.11
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 6 Mitigated Construction Emissions[1]						
Year 2042	1.29	7.75	69.59	0.12	16.05	8.20
Year 2043	2.47	19.55	96.63	0.13	10.66	3.22
Year 2044	9.94	30.20	133.57	0.18	12.97	3.36
Year 2045	9.89	30.14	133.17	0.18	12.97	3.36
Maximum	9.94	30.20	133.57	0.18	16.05	8.20
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Construction Year	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less						
1. Mitigation includes the incorporation of MM AQ-1 and MM AQ-2. MM AQ-1 requires the use of "Super-Compliant" low VOC paints. MM AQ-2 requires dust control and exhaust measures including requiring off-road equipment 50 horsepower or greater to meet CARB Tier 4 Final standards. 2. Includes emissions from the construction of off-site improvements.						
Source: Ibid. Page 33 – Table 10.						

As shown in **Table 4.2-9**, after implementing **MMs AQ-1** and **AQ-2**, emissions from Phase 5 the Project would be reduced below the SCAQMD criteria pollutant thresholds. As a result, impacts from the construction of each individual phase of the Project would be less than significant.

OPERATIONAL

Operational Emissions

Project-generated emissions would be primarily associated with motor vehicle use and area sources, such as the use of landscape maintenance equipment and architectural coatings. Long-term unmitigated operational emissions attributable to the Project are summarized in **Table 4.2-10: Unmitigated Operational Emissions**. The unmitigated operational emissions from Phase 1, Phase 2, Phase 4, Phase 5, and Phase 6 would exceed SCAQMD criteria pollutant thresholds for operations. **Table 4.2-10** shows that the major source of ROG emissions are from area and mobile sources while the majority of NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions come from mobile sources.

Table 4.2-10: Unmitigated Operational Emissions

Source	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 1 Unmitigated Operational Emissions[1]						
Area Sources	**55.5**	5.63	83.40	0.04	0.52	0.49
Energy	0.43	8.06	6.30	0.05	0.62	0.62
Mobile Sources	**72.32**	**80.49**	**772.11**	1.95	**168.41**	43.60
Total	**128.25**	**94.18**	**861.81**	2.03	**169.55**	44.71
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**No**
Phase 2 Unmitigated Operational Emissions						
Area Sources	**63.84**	21.12	101.01	0.13	1.69	1.68
Energy	0.60	10.29	5.20	0.06	0.82	0.82
Mobile Sources	31.97	37.01	368.27	0.99	90.55	23.39
Total	**96.41**	**68.43**	474.49	1.19	93.07	25.89
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**No**	**No**	**No**	**No**
Phase 3 Unmitigated Operational Emissions						
Area Sources	35.68	12.30	53.51	0.08	0.98	0.98
Energy	0.30	5.20	2.23	0.03	0.42	0.42
Mobile Sources	16.68	19.77	204.40	0.58	55.73	14.36
Total	52.67	37.28	260.14	0.69	57.13	15.75
SCAQMD Threshold	55	55	550	150	150	55

Source	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 4 Unmitigated Operational Emissions						
Area Sources	**89.18**	30.09	**172.06**	0.19	2.45	2.41
Energy	0.50	8.71	4.58	0.05	0.69	0.69
Mobile Sources	**64.23**	**80.51**	**847.48**	2.47	**242.47**	**62.41**
Total	153.92	**119.31**	**1,024.11**	2.72	**245.61**	**65.52**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Phase 5 Unmitigated Operational Emissions						
Area Sources	**128.93**	50.90	228.26	0.32	4.07	4.04
Energy	1.17	20.02	8.80	0.13	1.62	1.62
Mobile Sources	**71.54**	**87.92**	**907.83**	2.66	**264.56**	**68.05**
Total	**201.63**	**158.83**	**1,144.90**	3.11	**270.24**	**73.71**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Phase 6 Unmitigated Operational Emissions						
Area Sources	49.89	16.93	76.02	0.11	1.35	1.34
Energy	0.43	7.32	3.24	0.05	0.59	0.59
Mobile Sources	19.78	25.00	253.11	0.75	75.59	19.44
Total	**70.09**	49.25	332.36	0.90	77.53	21.37
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**

Source: Ibid. Page 35 – Table 11.

As shown in **Table 4.2-10**:

- Phase 1 operational emissions would exceed the daily threshold for ROG, NO_X, CO, and PM_{10}.
- Phase 2 operational emissions would exceed the daily emission threshold for ROG and NO_x.
- Phase 3 operational emissions would not exceed the daily SCAQMD emission threshold.
- Phase 4 operational emissions would exceed the daily emission threshold for ROG, NO_X, CO, PM_{10} and $PM_{2.5}$.
- Phase 5 operational emissions would exceed the daily emission threshold for ROG, NO_X, CO, PM_{10} and $PM_{2.5}$.
- Phase 6 operational emissions would exceed the daily emission threshold for ROG.

Table 4.2-10 shows that operational emissions exceed SCAQMD thresholds and that mitigation measures are required to reduce emissions to the maximum extent feasible. The majority of ROG emissions are from mobile sources and area sources such as cleaning products, while the majority of all other emissions are from mobile sources alone. However, emissions of motor vehicles are controlled by State and Federal standards and the Project has no control over these standards.

MM AQ-3 through **MM AQ-6** have been identified to reduce operational emissions. **MM AQ-3** seeks to reduce mobile emissions by requiring the implementation of a Transportation Demand Management

(TDM) program which would reduce single occupant vehicle trips and encourage transit. **MM AQ-4** prohibits the use of any kind of wood-burning or natural gas devices in residential developments. **MM AQ-5** requires that all landscaping equipment used onsite shall be 100 percent electrically powered and **MM AQ-6** requires that all cleaning products used in public spaces be Safer Choice certified.

Table 4.2-11: Mitigated Operational Emissions

Source	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 1 Mitigated Operational Emissions[1]						
Area Sources	38.70	4.92	2.09	0.03	0.40	0.40
Energy [2]	0.39	7.06	5.57	0.04	0.45	0.54
Mobile Sources	72.32	80.50	772.00	1.95	168.41	43.60
Total	111.41	92.48	779.66	2.02	169.26	44.54
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	Yes	Yes	Yes	No	Yes	No
Phase 2 Mitigated Operational Emissions[1]						
Area Sources	48.40	20.28	8.63	0.13	1.64	1.64
Energy [2]	0.11	1.96	1.65	0.01	0.15	0.15
Mobile Sources	31.97	37.01	368.27	0.99	90.55	23.39
Total	80.48	59.25	378.55	1.13	92.34	25.17
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	Yes	Yes	No	No	No	No
Phase 3 Mitigated Operational Emissions[1]						
Area Sources	31.88	12.30	53.51	0.08	0.98	0.98
Energy [2]	0.00	0.05	0.04	0.00	0.00	0.00
Mobile Sources	16.68	19.77	204.40	0.58	55.73	14.36
Total	48.57	32.12	257.95	0.66	56.71	15.34
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	No	No	No	No	No	No
Phase 4 Mitigated Operational Emissions[1]						
Area Sources	63.17	28.65	12.19	0.18	2.32	2.32
Energy [2]	0.11	1.96	1.65	0.01	0.15	0.15
Mobile Sources	64.23	80.51	847.48	2.47	242.47	62.41
Total	127.51	111.12	861.32	2.66	244.93	64.87
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	Yes	Yes	Yes	No	Yes	Yes
Phase 5 Mitigated Operational Emissions[1]						
Area Sources	96.65	49.00	20.85	0.31	3.96	3.96
Energy [2]	0.04	0.66	0.55	0.00	0.05	0.05
Mobile Sources	71.54	87.92	907.83	2.66	264.56	68.05
Total	168.22	137.58	929.24	2.97	268.57	72.06
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	Yes	Yes	Yes	No	Yes	Yes
Phase 6 Mitigated Operational Emissions[1]						
Area Sources	38.27	16.30	6.94	0.10	1.32	1.32
Energy [2]	0.02	0.28	0.24	0.00	0.02	0.02
Mobile Sources	19.78	25.00	253.11	0.75	75.59	19.44

Source	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Total	58.06	41.58	260.28	0.86	76.93	20.78
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	Yes	No	No	No	No	No
ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less.						
1. Mitigation includes the incorporation of MM AQ-3 through MM AQ-6. **MM AQ-3** requires the implementation of a TDM program, **MM AQ-4** prohibits the use of natural gas devices, **MM AQ-5** requires all landscaping equipment used onsite shall be 100 percent electrically powered and **MM AQ-6** requires that all cleaning products be low VOC. 2. Although **MM AQ-4** prohibits natural gas in residential uses the CalEEMod outputs still included emissions from natural gas, these emissions were removed manually.						
Source: Ibid. Page 36 – Table 12.						

As shown in **Table 4.2-11**, after implementing **MM AQ-3** through **MM AQ-6** operational impacts would remain significant:

- Phase 1 operational emissions would continue to exceed the daily thresholds for ROG, NO_X, CO, and PM_{10}.
- Phase 2 operational emissions would continue to exceed the daily emission thresholds for ROG and NO_X.
- Phase 4 operational emissions would continue to exceed the daily thresholds for ROG, NO_X, CO, PM_{10} and $PM_{2.5}$.
- Phase 5 operational emissions would continue to exceed the daily thresholds for ROG, NO_X, CO, PM_{10} and $PM_{2.5}$.
- Phase 6 operational emissions would continue to exceed the daily emission thresholds for ROG.

Therefore, even after incorporating mitigation measures, operational impacts would remain significant and unavoidable.

Emissions from Overlapping Phases

In addition to comparing the Project to construction and operational thresholds, SCAQMD has also requested that a project's overlapping phase emissions be compared to the operational thresholds. **Table 4.2-12: Unmitigated Overlapping Phase Emissions** summarizes emissions from overlapping operation and construction phases, beginning with Phase 1 operations combined with Phase 2 construction and concluding with the total operational emissions from all six phases.

Table 4.2-12: Unmitigated Overlapping Phase Emissions

Construction Year	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 1 Unmitigated Operational Emissions and Phase 2 Unmitigated Construction Emissions						
Phase 1 Operational Emissions	128.25	94.18	861.81	2.03	169.55	44.71
Maximum Phase 2 Construction	49.31	68.77	174.07	0.19	42.12	22.44
Combined Overlapping Emissions	177.56	162.95	1,035.88	2.22	211.67	67.15
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	Yes	Yes	Yes	No	Yes	Yes

Construction Year	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 1 and Phase 2 Unmitigated Operational Emissions and Phase 3 Unmitigated Construction Emissions[1]						
Phase 1 Operational Emissions	128.25	94.18	861.81	2.03	169.55	44.71
Phase 2 Operational Emissions	96.41	68.43	474.49	1.19	93.07	25.89
Maximum Phase 3 Construction	31.69	59.64	128.85	0.17	41.69	22.14
Combined Overlapping Emissions	256.35	222.25	1,465.15	3.39	304.31	92.74
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Phases 1 through 3 Unmitigated Operational Emissions and Phase 4 Unmitigated Construction Emissions						
Phase 1 Operational Emissions	**128.25**	**94.18**	**861.81**	2.03	**169.55**	44.71
Phase 2 Operational Emissions	**96.41**	**68.43**	474.49	1.19	**93.07**	25.89
Phase 3 Operational Emissions	52.67	37.28	260.14	0.69	57.13	15.75
Maximum Phase 4 Construction	**61.44**	**66.49**	66.49	0.23	41.31	21.69
Combined Overlapping Emissions	**338.77**	**266.38**	**1,662.93**	4.14	**361.06**	**108.04**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Phases 1 through 4 Unmitigated Operational Emissions and Phase 5 Unmitigated Construction Emissions						
Phase 1 Operational Emissions	**128.25**	**94.18**	**861.81**	2.03	**169.55**	44.71
Phase 2 Operational Emissions	**96.41**	**68.43**	474.49	1.19	93.07	25.89
Phase 3 Operational Emissions	52.67	37.28	260.14	0.69	57.13	15.75
Phase 4 Operational Emissions	**153.92**	**119.31**	**1,024.11**	2.72	**245.61**	**65.52**
Maximum Phase 5 Construction	**77.70**	**65.48**	216.40	0.24	41.67	21.46
Combined Overlapping Emissions	**508.95**	**384.68**	**2,836.95**	6.87	**607.03**	**173.33**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Phases 1 through 5 Unmitigated Operational Emissions and Phase 6 Unmitigated Construction Emissions						
Phase 1 Operational Emissions	**128.25**	**94.18**	**861.81**	2.03	**169.55**	44.71
Phase 2 Operational Emissions	**96.41**	**68.43**	474.49	1.19	93.07	25.89
Phase 3 Operational Emissions	52.67	37.28	260.14	0.69	57.13	15.75
Phase 4 Operational Emissions	**153.92**	**119.31**	**1,024.11**	2.72	**245.61**	**65.52**
Phase 5 Operational Emissions	**201.63**	**158.83**	**1,144.90**	3.11	**270.24**	**73.71**
Maximum Phase 6 Construction	38.47	54.44	1,12.50	0.18	40.84	21.26
Combined Overlapping Emissions	**671.35**	**532.47**	**3,765.45**	9.92	**876.44**	**246.84**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Project Buildout - Phases 1 through 6 Unmitigated Operational Emissions						
Phase 1 Operational Emissions	**128.25**	**94.18**	**861.81**	2.03	**169.55**	44.71
Phase 2 Operational Emissions	**96.41**	**68.43**	474.49	1.19	93.07	25.89
Phase 3 Operational Emissions	52.67	37.28	260.14	0.69	57.13	15.75
Phase 4 Operational Emissions	**153.92**	**119.31**	**1,024.11**	2.72	**245.61**	**65.52**
Phase 5 Operational Emissions	**201.63**	**158.83**	**1,144.90**	3.11	**270.24**	**73.71**
Phase 6 Operational Emissions	**70.09**	49.25	332.36	0.90	77.53	21.37
Combined Overlapping Emissions	**702.97**	**527.28**	**4,097.81**	10.64	**913.13**	**246.95**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

Construction Year	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less.						
Source: Ibid. Page 38 – Table 13.						

As shown in **Table 4.2-12**, unmitigated emissions from overlapping phases would exceed the operational thresholds for all criteria pollutants except SO_2, resulting in a significant and unavoidable impact. **Table 4.2-13: Mitigated Overlapping Phase Emissions**, shows the emissions from overlapping phases after implementing mitigation measures **MM AQ-1** through **MM AQ-6**. **MM AQ-1** requires the Project to use "Super-Compliant" low VOC paints to reduce ROG emissions. **MM AQ-2** requires fugitive dust control measures and requires various exhaust reduction measures including requiring off-road construction equipment greater than 50 horsepower to meet CARB Tier 4 Final emissions standards. **MM AQ-3** requires the implementation of a TDM program to reduce single occupant vehicle trips and encourage transit. **MM AQ-4** prohibits the use of any kind of wood-burning or natural gas devices for all residential uses. **MM AQ-5** requires all landscaping equipment used onsite shall be 100 percent electrically powered and **MM AQ-6** requires that all cleaning products used in public spaces be Safer Choice certified.

Table 4.2-13: Mitigated Overlapping Phase Emissions

Construction Year	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 1 Mitigated Operational Emissions and Phase 2 Mitigated Construction Emissions [1, 2]						
Phase 1 Operational Emissions	**111.41**	**92.48**	**779.66**	2.02	**169.26**	44.54
Maximum Phase 2 Construction	13.83	35.60	178.29	0.19	17.26	8.21
Combined Overlapping Emissions	**125.24**	**128.08**	**957.95**	2.21	**186.52**	52.75
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**No**
Phase 1 and Phase 2 Mitigated Operational Emissions and Phase 3 Mitigated Construction Emissions [1, 2]						
Phase 1 Operational Emissions	**111.41**	**92.48**	**779.66**	2.02	**169.26**	44.54
Phase 2 Operational Emissions	**80.48**	**59.25**	378.55	1.13	92.34	25.25
Maximum Phase 3 Construction	9.09	31.47	131.91	0.17	15.88	8.15
Combined Overlapping Emissions	**200.98**	**183.2**	**1,290.12**	3.32	**277.48**	**77.94**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Phases 1 through 3 Mitigated Operational Emissions and Phase 4 Mitigated Construction Emissions [1, 2]						
Phase 1 Operational Emissions	**111.41**	**92.48**	**779.66**	2.02	**169.26**	44.54
Phase 2 Operational Emissions	**80.48**	**59.25**	378.55	1.13	92.34	25.17
Phase 3 Operational Emissions	48.57	32.12	257.95	0.66	56.71	15.34
Maximum Phase 4 Construction	18.28	39.23	160.34	0.23	32.22	8.21
Combined Overlapping Emissions	**258.74**	**223.08**	**1,576.5**	4.04	**350.53**	**93.26**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Phases 1 through 4 Mitigated Operational Emissions and Phase 5 Mitigated Construction Emissions [1, 2]						
Phase 1 Operational Emissions	**111.41**	**92.48**	**779.66**	2.02	**169.26**	44.54
Phase 2 Operational Emissions	**80.48**	**59.25**	378.55	1.13	92.34	25.17
Phase 3 Operational Emissions	48.57	32.12	257.95	0.66	56.71	15.34
Phase 4 Operational Emissions	**127.51**	**111.12**	**861.32**	2.66	**244.93**	**64.87**

Construction Year	Emissions (Maximum Pounds Per Day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Phase 5 Construction	22.42	40.46	222.28	0.24	41.27	10.11
Combined Overlapping Emissions	**390.39**	**335.43**	**2,499.76**	6.71	**604.51**	**160.03**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Phases 1 through 5 Mitigated Operational Emissions and Phase 6 Mitigated Construction Emissions [1, 2]						
Phase 1 Operational Emissions	**111.41**	**92.48**	**779.66**	2.02	**169.26**	44.54
Phase 2 Operational Emissions	**80.48**	**59.25**	378.55	1.13	92.34	25.17
Phase 3 Operational Emissions	48.57	32.12	257.95	0.66	56.71	15.34
Phase 4 Operational Emissions	**127.51**	**111.12**	**861.32**	2.66	**244.93**	**64.87**
Phase 5 Operational Emissions	**168.22**	**137.58**	**929.24**	2.97	**268.57**	**72.06**
Maximum Phase 6 Construction	9.94	30.20	133.57	0.18	16.05	8.20
Combined Overlapping Emissions	**546.13**	**462.75**	**3,340.29**	9.62	**847.86**	**230.18**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Project Buildout - Phases 1 through 6 Mitigated Operational Emissions [2]						
Phase 1 Operational Emissions	**111.41**	**92.48**	**779.66**	2.02	**169.26**	44.54
Phase 2 Operational Emissions	**80.48**	**59.25**	**378.55**	1.13	92.34	25.17
Phase 3 Operational Emissions	48.57	32.12	257.95	0.66	56.71	15.34
Phase 4 Operational Emissions	**127.51**	**111.12**	**861.32**	2.66	**244.93**	**64.87**
Phase 5 Operational Emissions	168.22	137.58	929.24	2.97	**268.57**	**72.06**
Phase 6 Operational Emissions	**58.06**	41.58	260.28	0.86	76.93	20.78
Combined Overlapping Emissions	**594.25**	**474.13**	**3,467.00**	10.3	**908.74**	**242.76**
SCAQMD Threshold	55	55	550	150	150	55
Exceed SCAQMD Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less.

1. Construction mitigation includes the incorporation of **MM AQ-1** and **MM AQ-2**. **MM AQ-1** requires the use of "Super-Compliant" low VOC paints. **MM AQ-2** requires dust control and exhaust measures including requiring off-road equipment 50 horsepower or greater to meet CARB Tier 4 Final standards.
2. Operational mitigation includes the incorporation of **MM AQ-3** through **MM AQ-6**. **MM AQ-3** requires the implementation of a TDM program, **MM AQ-4** prohibits the use of natural gas devices, **MM AQ-5** requires all landscaping equipment used onsite shall be 100 percent electrically powered and **MM AQ-6** requires that all cleaning products be low VOC.

Source: Ibid. Page 40 – Table 14.

As shown in **Table 4.2-13,** even after applying **MMs AQ-1** through **AQ-6** the overlapping emissions from each phase would result in emissions that exceed the operational thresholds. Therefore, mitigated impacts related to phased construction and operations would remain significant and unavoidable.

Off-Site Improvements

Off-site improvements were modeled in CalEEMod and are assumed to begin construction during Phase 1 to support future phases of the Project. Off-site improvements include improvements to Vista del Norte, developing a construction staging area, powerlines, a natural gas regulator station, well supply system, installing low-voltage cables (telephone lines and cable), and a sewer system; refer to **Exhibit 3-11: Off-Site Improvements**. The combined construction emissions of the proposed off-site improvements along with the daily emissions generated during the construction of Phase 1 are below the SCAQMD criteria

pollutant thresholds for construction, as shown in the tables above. Operational and overlapping phases emissions would exceed SCAQMD criteria pollutant thresholds for all pollutants except SO_2.

Plans, Programs, and Policies

PPPs are existing requirements and standard conditions that are based on local, state, or federal regulations or laws that are frequently required independently of CEQA review. Typical standard conditions and requirements include compliance with the provisions of the Building Code, SCAQMD Rules, etc. The City may impose additional conditions during the approval process, as appropriate. Because PPPs are neither Project specific nor a result of development of the Project, they are not considered to be Mitigation Measures.

PPP AQ-1 Prior to the issuance of grading permits, the City Engineer shall confirm that the Grading Plan, Building Plans and Specifications require all construction contractors to comply with South Coast Air Quality Management District's (SCAQMD's) Rules 402 and 403 to minimize construction emissions of dust and particulates. The measures include, but are not limited to, the following:

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.

PPP AQ-2 Pursuant to SCAQMD Rule 1113, the Site Developer/tenant shall require by contract specifications that the interior and exterior architectural coatings (paint and primer including parking lot paint) products used would have a volatile organic compound rating of 50 grams per liter or less.

PPP AQ-3 Require construction equipment to turn off when not in use per Title 13 of the California Code of Regulations, Section 2449.

PPP AQ-4 Limit idling time for commercial vehicles to no more than five minutes per Title 13 of the California Code of Regulations, Section 2485.

PPP AQ-5 The Project shall be designed in accordance with the applicable California Green Building Standards (CALGreen) Code (24 CCR, Part 11). The Building Official, or designee shall ensure compliance prior to the issuance of each building permit. These requirements include, but are not limited to:

- In accordance with California Title 24 Standards, buildings will be designed to have 15 percent of the roof area "solar ready" that will structurally accommodate later installation of rooftop solar panels.
- Design buildings to be water efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.
- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the California Green Building Standards Code Part 11.
- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410.1 of the California Green Building Standards Code Part 11.
- Provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles. At least eight percent of the total parking spaces are required to be designated in accordance with Section 5.106.5.2, Designated Parking for Clean Air Vehicles, of the California Green Building Standards Code Part 11.
- Provide at least six percent of the total parking spaces to facilitate future installation of electric vehicle supply equipment in accordance with Section 5.106.5.3.2, Multiple Charging Space Requirements, of the California Green Building Standards Code Part 11.

Mitigation Measures

MM AQ-1 The Project shall utilize "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits (i.e., have a lower VOC content than what is required) put forth by SCAQMD's Rule 1113 for all architectural coatings. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Prior to issuance of a building permit, the City Engineer shall confirm that plans include the following specifications:

- All architectural coatings will be super-compliant low VOC paints.
- Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paints.
- Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.
- For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain. Set aside the can of cleanup water and take it to the hazardous waste center (www.cleanup.org).
- Use compliant low-VOC cleaning solvents to clean paint application equipment.
- Keep all paint- and solvent-laden rags in sealed containers to prevent VOC emissions.

- Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable.
- Use high-pressure/low-volume paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.

MM AQ-2 Prior to the issuance of grading permits, the City Engineer shall confirm that the Grading Plan, Building Plans and Specifications require all construction contractors to incorporate the following measures to minimize construction emissions. These features shall be included in applicable bid documents and included on the grading plans.

- All off-road diesel-powered construction equipment greater than 50 horsepower meets California Air Resources Board Tier 4 Final off-road emissions standards or incorporate CARB Level 3 Verified Diesel Emission Control Strategy (VDECS) (to reduce PM emissions by at least 85 percent or to achieve PM emissions levels of 0.01 grams per brake-horsepower-hour or less, per Title 13, California Code of Regulations, Sections 2700-2710). Requirements for Tier 4 Final equipment and the option for Level 3 VDECS shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) shall be provided to the City at the time of mobilization of each applicable unit of equipment. This equipment shall be used when commercial models that meet the construction needs of the Project are commercially available from local suppliers/vendors. The determination of commercial availability of such equipment shall be made by the City, based on applicant-provided evidence from expert sources, such as construction contractors in the region.
- Construction equipment shall be properly maintained according to manufacturer specifications.
- All diesel-powered construction equipment, delivery vehicles, and delivery trucks shall be turned off when not in use. On-site idling shall be limited to three minutes in any one hour.
- Construction on-road haul trucks shall be model year 2010 or newer if diesel-fueled.
- Information on ridesharing programs shall be made available to construction employees.
- During construction, lunch options shall be provided onsite.
- A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints per SCAQMD Standards.

- All construction contractors shall be provided information on the South Coast Air Quality Management District Surplus Off-road Opt-In "SOON" funds which provides funds to accelerate cleanup of off-road diesel vehicles.
- The Project shall demonstrate compliance with SCAQMD Rule 403 concerning fugitive dust and provide appropriate documentation to the City of Coachella.
- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, unpaved access roads) shall be watered three times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet-power vacuum street sweepers at least once per day. The use of dry-power sweeping shall be prohibited.
- All vehicle speeds on unpaved roads, driveways, or driving surfaces shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- Building pads shall be laid as soon as possible after grading, unless seeding or soil binders are used.
- A publicly visible sign shall be posted with the telephone number and the name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The phone number of the SCAQMD shall also be visible to ensure compliance.

MM AQ-3 Develop a qualifying Commute Trip Reduction (CTR)/Transportation Demand Management (TDM) plan to reduce mobile GHG emissions for all uses. The TDM plan shall be approved by the City of Coachella prior to the issuance of building permits and incorporated into the Project's Codes Covenants and Restrictions (CC&Rs). The TDM plan shall discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. The following measures shall be incorporated into the TDM plan.

TDM Requirements for Non-Residential Uses:

- The Project Applicant shall consult with the local transit service provider on the need to provide infrastructure to connect the Project with transit services. Evidence of compliance with this requirement may include correspondence from the local transit provider(s) regarding the potential need for installing bus turnouts, shelters, or bus stops at the site.
- The portion of the TDM plan for non-residential uses shall include, but not be limited to the following potential measures: ride-matching assistance, preferential carpool parking, flexible work schedules for carpools, half-time transportation coordinators, providing a web site or message board for coordinating rides, designating adequate passenger loading and unloading and

waiting areas for ride-sharing vehicles, and including bicycle end of trip facilities. This list may be updated as new methods become available. Verification of this measure shall occur prior to building permit issuance for the commercial uses.

TDM Requirements for Residential Units:

- Owner-Occupied Units. Upon a residential dwelling being sold or offered for sale, the Project Applicant shall notify and offer to the buyer or prospective buyer, as soon as it may be done, materials describing public transit, ridesharing, and nonmotorized commuting opportunities available in the vicinity of the Project. Such information shall be transmitted no later than the close of escrow. This information shall be submitted to the City of Coachella for review and approval, prior to the issuance of the first certificate of occupancy.
- Rental Units. Upon a residential dwelling being rented or offered for rent, the Project Applicant shall notify and offer to the tenant or prospective tenant, materials describing public transit, ridesharing, and nonmotorized commuting opportunities in the vicinity of the development. The materials shall be approved by the City of Coachella. The materials shall be provided no later than the time the rental agreement is executed. This information shall be submitted to the City of Coachella Planning Division for review and approval, prior to the issuance of the first certificate of occupancy.

MM AQ-4 The installation of wood-burning and natural gas devices shall be prohibited in all residential developments. The purpose of this measure is to limit emissions of ROG, NO_X, particulate matter, and visible emissions from wood-burning and natural gas devices used for primary heat, supplemental heat, cooking, or ambiance. All residential ovens and stoves shall be electric. This prohibition shall be noted on the deed and/or lease agreements for future property owners/tenants to obey.

MM AQ-5 Prior to the issuance of occupancy permits, the Planning Division shall confirm that the Project's Codes Covenants and Restrictions (CC&Rs) and/or tenant lease agreements include contractual language that all landscaping equipment used onsite shall be 100 percent electrically powered. All residential and non-residential properties shall be equipped with exterior electrical outlets to accommodate this requirement. This requirement shall be included in the third-party vendor agreements for landscape services for the building owner and tenants, as applicable.

MM AQ-6 Prior to the issuance of occupancy permits, the Planning Division shall confirm that the Project's CC&Rs and/or tenant lease agreements include contractual language that all cleaning products used in public spaces will be U.S. EPA Safer Choice certified.[7] This requirement shall be included in the third-party vendor agreements for the building owner and tenants, as applicable.

[7] Ibid. Page 46.

Impact 4.2-3: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Level of Significance: Less than Significant with Mitigation Incorporated

CONSTRUCTION

Localized Construction Significance Analysis

The Project would be constructed in six phases, beginning in 2025 and concluding in 2045.

- Phase 1 of the Project is located in the center of the Project site and includes multi-family residential, shopping centers, general office buildings, a hotel, and open space. The nearest sensitive receptor to the Phase 1 construction site is a residential community building located approximately 11,250 feet (3,429 meters) to the west of the Phase 1 boundary.
- Phase 2 of the Project is located west of Phase 1 and includes single family residential, multi-family residential, a school, a theater, and open space. The nearest sensitive receptor is located onsite, in the previously constructed Phase 1 area, approximately 465 feet (142 meters) from the Phase 2 boundary.
- Phase 3 of the Project is located west of Phase 2 and includes single family residential, multi-family residential, a school, and open space. The nearest sensitive receptor is located onsite, in the previously constructed Phase 2 area, approximately 290 feet (88 meters) from the Phase 3 boundary. Offsite, the nearest sensitive receptor is a residential community located 800 feet (244 meters) to the west of the Project site.
- Phase 4 of the Project is located east of Phase 1 and includes multi-family residential, shopping centers, general office buildings, and open space. The nearest sensitive receptor is located onsite, in the previously constructed Phase 1 area, approximately 165 feet (50 meters) west of the Phase 4 boundary.
- Phase 5 of the Project is located north of Phase 1 and Phase 4 and east of Phase 2. Phase 5 includes detached single family residential, attached single family residential, multi-family residential, shopping centers, general office buildings, and open space. The nearest sensitive receptor is located onsite, in the previously constructed Phase 2 area, approximately 350 feet (107 meters) west of the Phase 5 boundary.
- Phase 6 of the Project is located east of Phase 4 and includes single family residential, multi-family residential, a school, and open space. The nearest sensitive receptor is located onsite, in the previously constructed Phase 4 area, approximately 195 feet (60 meters) west of the Phase 6 boundary.

To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 4.2-14: Equipment-Specific Grading Rates** is used to determine the maximum daily disturbed acreage for comparison to LSTs. The appropriate SRA for the localized significance thresholds is the Coachella Valley (SRA 30) since this area includes the Project. LSTs apply to NO_2, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. CalEEMod construction modeling for Phase 1 through Phase 6 anticipates that all phases will use similar equipment. Project construction during each Phase is anticipated to disturb a maximum of 8.0 acres in a single day. As the LST guidance provides thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with size of the site, the LSTs for a 5.0-acre threshold was conservatively used for this analysis.

Table 4.2-14: Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Tractors	4	0.5	8	2
	Graders	2	0.5	8	1
	Dozers	2	0.5	8	1
	Scrapers	4	1	8	4
				Total Acres Graded per Day	**8**

Source: Ibid. Page 47 – Table 15

Construction Emissions

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, only emissions included in the CalEEMod "on-site" emissions outputs were considered. **Table 4.2-15: Localized Significance of Construction Emissions** presents the maximum daily emissions during each construction activity and compares them to the appropriate LST. During Phase 1 construction the nearest sensitive receptor is located offsite, approximately 11,250 feet (3,429 meters) to the west of the Phase 1 boundary. For each subsequent phase of the Project, **Table 4.2-15** also includes the LST for the nearest onsite sensitive receptor which were constructed during previous phases. Localized emissions in **Table 4.2-15** also incorporate mitigation measures required under Threshold 4.2-2. In addition, emissions from building construction, paving, and architectural coating emissions were combined because these phases of construction are anticipated to overlap.

Table 4.2-15: Localized Significance of Construction Emissions

Construction Activity	Emissions (Maximum Pounds Per Day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Phase 1, 2025-2028				
Site Preparation	5.18	56.62	15.53	8.08
Grading	7.52	68.72	7.42	3.09
Building Construction, Paving, and Architectural Coating Combined[1]	26.04	98.23	0.35	0.34
Nearest Offsite Receptor 3,429 meters *SCAQMD Localized Screening Threshold (adjusted for*	*875*	*31,115*	*248*	*128*

Construction Activity	Emissions (Maximum Pounds Per Day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
5.0 acres at 500 meters)				
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Phase 2, 2028-2031				
Site Preparation	5.18	56.62	15.53	8.08
Grading	7.52	68.72	7.42	3.09
Building Construction, Paving, and Architectural Coating Combined[1]	25.78	98.05	0.33	0.31
Nearest Offsite Receptor 2,345 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 500 meters)	*875*	*31,115*	*248*	*128*
Nearest Onsite Receptor 142 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 142 meters)	*476*	*7,367*	*86*	*27*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Phase 3, 2031-2034				
Site Preparation	4.61	48.50	15.51	8.06
Grading	7.52	68.72	7.42	3.09
Building Construction, Paving, and Architectural Coating Combined[1]	27.41	96.34	0.39	0.38
Nearest Offsite Receptor 244 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 244 meters)	*595*	*13,249*	*132*	*50*
Nearest Onsite Receptor 88 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 88 meters)	*405*	*4,828*	*61*	*17*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Phase 4, 2034-2038				
Site Preparation	5.18	56.62	15.53	8.08
Grading	7.52	68.72	7.42	3.09
Building Construction, Paving, and Architectural Coating Combined[1]	45.50	66.75	0.29	0.21
Nearest Offsite Receptor 4,656 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 500 meters)	*875*	*31,115*	*248*	*128*
Nearest Onsite Receptor 50 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 50 meters)	*340*	*3,237*	*44*	*11*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Phase 5, 2038-2041				
Site Preparation	5.18	56.62	15.53	8.08
Grading	7.52	68.72	7.42	3.09
Building Construction, Paving, and Architectural Coating Combined[1]	25.77	98.05	0.32	0.32
Nearest Offsite Receptor 3,740 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 500 meters)	*875*	*31,115*	*248*	*128*
Nearest Onsite Receptor 107 meters SCAQMD Localized Screening Threshold (adjusted for	*434*	*5,670*	*70*	*20*

Construction Activity	Emissions (Maximum Pounds Per Day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
5.0 acres at 107 meters)				
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Phase 6, 2042-2045				
Site Preparation	5.18	56.62	15.53	8.08
Grading	7.52	68.12	7.42	3.09
Building Construction, Paving, and Architectural Coating Combined[1]	25.77	98.05	0.32	0.31
Nearest Offsite Receptor 5,770 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 500 meters)	*875*	*31,115*	*248*	*128*
Nearest Onsite Receptor 60 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 60 meters)	*357*	*3,656*	*49*	*13*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
NO_X = Nitrogen Oxides; CO = Carbon Monoxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less.				
1. Building Construction, Paving and Architectural Coating activities are scheduled to overlap, therefore emissions from these activities would occur on the same day.				
Source: Ibid. Page 48 – Table 16.				

As shown in **Table 4.2-15**, construction emissions for each phase of the Project are below SCAQMD LST. Significant impacts would not occur concerning LSTs during construction.

Localized Operational Significance Analysis

The operational LST analysis only includes on-site sources. The emissions shown in **Table 4.2-16: Localized Significance of Operational Emissions** combines mitigated onsite emissions from area and energy sources and then compares them to the appropriate LST. **Table 4.2-16** shows that the maximum daily emissions of these pollutants during operations would not result in significant concentrations of pollutants at nearby sensitive receptors.

Table 4.2-16: Localized Significance of Operational Emissions

Operations	Emissions (Maximum Pounds Per Day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Phase 1				
Onsite Operational Emissions[1]	10.85	7.08	0.85	0.85
Nearest Offsite Receptor 3,429 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 500 meters)	*875*	*31,115*	*60*	*31*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Phase 2				
Onsite Operational Emissions[1]	22.24	10.28	1.79	1.79
Nearest Offsite Receptor 2,345 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 500 meters)	*875*	*31,115*	*60*	*31*
Nearest Onsite Receptor 142 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 142 meters)	*476*	*7,367*	*21*	*6*

Operations	Emissions (Maximum Pounds Per Day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Phase 3				
Onsite Operational Emissions[1]	12.35	53.55	0.98	0.98
Nearest Offsite Receptor 244 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 244 meters)	*595*	*13,249*	*32*	*12*
Nearest Onsite Receptor 88 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 88 meters)	*405*	*4,828*	*15*	*4*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Phase 4				
Onsite Operational Emissions[1]	30.61	13.84	2.47	2.47
Nearest Offsite Receptor 4,656 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 500 meters)	*875*	*31,115*	*60*	*31*
Nearest Onsite Receptor 50 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 50 meters)	*340*	*3,237*	*11*	*3*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Phase 5				
Onsite Operational Emissions[1]	49.66	21.40	4.01	4.01
Nearest Offsite Receptor 3,740 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 500 meters)	*875*	*31,115*	*60*	*31*
Nearest Onsite Receptor 107 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 107 meters)	*434*	*5,670*	*15*	*5*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Phase 6				
Onsite Operational Emissions[1]	16.58	7.17	1.34	1.34
Nearest Offsite Receptor 5,770 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 500 meters)	*875*	*31,115*	*60*	*31*
Nearest Onsite Receptor 60 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 60 meters)	*357*	*3,656*	*12*	*3*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Project Buildout (Combined Operational Emissions)				
Onsite Operational Emissions[1]	142.29	113.32	11.44	11.44
Nearest Offsite Receptor 244 meters SCAQMD Localized Screening Threshold (adjusted for 5.0 acres at 244 meters)	*595*	*13,249*	*32*	*12*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	

NO_X = Nitrogen Oxides; CO = Carbon Monoxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less.

1. Includes mitigated onsite emissions.

Source: Ibid. Page 50 – Table 17.

LST Emissions from Overlapping Phases

In addition to comparing the Project phases to construction and operational LSTs, this analysis also compares the combine emissions against the SCAQMD LST. Due to the location of open space buffers between Project phases, most sensitive receptors would not experience emissions from both construction and operation emissions. However, combined emissions from operations and construction could occur at two locations, Phase 1 and Phase 4 (refer to **Exhibit 3-12**). Sensitive receptors located in the Phase 1 planning areas B-4 and B-7 could experience construction emissions during the construction of Phase 4, as construction would occur approximately 50 meters from receptors. Sensitive receptors located in planning area B-9 of Phase 4 could experience construction emissions during construction of Phase 6, as construction would occur approximately 60 meters from receptors. Therefore, **Table 4.2-17: Localized Significance of Overlapping Phases** identifies the combined localized emissions from onsite operational and construction emissions for both phases and compares those emissions to operational LST, which is the lower threshold of the two. As shown in **Table 4.2-17**, the combined emissions do not exceed the operational LST.

Table 4.2-17: Localized Significance of Overlapping Phases

Operations	Emissions (Maximum Pounds Per Day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Combined Phase 1 Operational Emissions and Phase 4 Construction Emissions				
Phase 1 Operational Emissions[1]	10.85	7.08	0.85	0.85
Phase 4 Construction Emissions[2]	45.50	66.75	0.29	0.21
Combined Emissions	56.35	73.83	1.14	1.06
SCAQMD Localized Screening Threshold, for 5.0 acres at 50 meters.	340	3,237	11	3
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Combined Phase 4 Operational Emissions and Phase 6 Construction Emissions				
Phase 4 Operational Emissions[1]	30.61	13.84	2.47	2.47
Phase 6 Construction Emissions[2]	25.77	98.05	0.32	0.31
Combined Emissions	56.38	111.89	2.79	2.78
SCAQMD Localized Screening Threshold, for 5.0 acres at 60 meters.	357	3,656	12	3
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

NO_X = Nitrogen Oxides; CO = Carbon Monoxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less.

1. Includes mitigated onsite emissions.
2. The highest construction emissions occur during the period where building construction, paving, and architectural coating activities are scheduled for the same day.

Source: Ibid. Page 51 – Table 18.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502). The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme O_3 nonattainment areas such as the SSAB) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new

or modified sources. The NSR Program[8] was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

NO_X and ROG are precursor emissions that form O_3 in the atmosphere in the presence of sunlight where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so O_3 may be formed at a distance downwind from the sources. Breathing ground-level O_3 can result health effects that include reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily O_3 concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggests that O_3 can make asthma symptoms worse and can increase sensitivity to asthma triggers.

According to the SCAQMD's 2022 AQMP, O_3, NO_X, and ROG have been decreasing in the southern California since 1975 and are projected to continue to decrease in the future. Although vehicle miles continue to increase, NO_X and ROG levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities have also decreased due to the use of cleaner fuels and renewable energy. The 2022 AQMP demonstrates how the SCAQMD's control strategy to meet the 8-hour O_3 standard in 2037. In addition, since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the O_3 standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards.

The SCAQMD's air quality modeling demonstrates that NO_X reductions prove to be much more effective in reducing O_3 levels and will also lead to significant improvement in $PM_{2.5}$ concentrations. NO_X-emitting stationary sources regulated by the SCAQMD include Regional Clean Air Incentives Market (RECLAIM) facilities (e.g., refineries, power plants, etc.), natural gas combustion equipment (e.g., boilers, heaters, engines, burners, flares) and other combustion sources that burn wood or propane. The 2016 AQMP identifies robust NO_X reductions from new regulations on RECLAIM facilities, non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest NO_X emissions levels achievable but there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives, such as residential and commercial furnaces, pool heaters, and backup power equipment. The AQMD plans to achieve such replacements through a combination of regulations and incentives. Technology-forcing regulations can drive development and commercialization of clean technologies, with future year requirements for new or

[8] Ibid. Page 51.

existing equipment. Incentives can then accelerate deployment and enhance public acceptability of new technologies.

There are significant challenges with correlating specific health effects that will occur as a result of a project's significant criteria for air pollutant emissions. Generally, models that correlate criteria air pollutant concentrations with specific health effects focus on regulatory decision-making that will apply throughout an entire air basin or region. These models focus on the region-wide health effects of pollutants so that regulators can assess the costs and benefits of adopting a proposed regulation that applies to an entire category of air pollutant sources, rather than the health effects related to emissions from a specific proposed project or source. Because of the scale of these analyses, any one project is likely to have only very small incremental effects which may be difficult to differentiate from the effects of air pollutant concentrations in an entire air basin. In addition, such modeling efforts are costly, and the value of a project-specific analysis may be modest in relation to that cost. Furthermore, the results, while costly to produce, may not be particularly useful. For regional pollutants, it is difficult to trace a particular project's criteria air pollutant emissions to a specific health effect. Moreover, the modeled results may be misleading because the margin of error in such modeling is large enough that, even if the modeled results report a given health effect, the model is sufficiently imprecise that the actual effect may differ from the reported results; that is, the modeled results suggest precision, when in fact available models cannot be that precise on a project level.

As discussed above, the mass emissions thresholds developed by SCAQMD and used by CEQA lead agencies throughout southern California to determine potential significance of project-related regional changes in the environment are not directly indicative of exceedances of applicable ambient air standards. Meteorology, the presence of sunlight, and other complex chemical factors all combine to determine the ultimate concentration and location of O_3 or PM. The effects on ground-level ambient concentrations of pollutants that may be breathed by people are also influenced by the spatial and temporal patterns of the emission sources. In other words, the effect on O_3 and PM concentrations from a given mass of pollutants emitted in one location may vary from the effect if that same mass of pollutants was emitted in an entirely different location in the air basin. The same effect may be observed when the daily and seasonal variation of emissions is taken into account. Regional-scale photochemical modeling, typically performed only for NAAQS attainment demonstration and rule promulgation, account for these changes in the spatial, temporal, and chemical nature of regional emissions.

Emissions from the construction and operation of the Project would vary by time of day, month, and season, and the majority of Project-related emissions, being generated by mobile sources (cars and trucks) driving to and from the site, would be emitted throughout a wide area defined by the origins and destinations of people traveling to and from the Project. As SCAQMD has stated "it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region."[9]

[9] Ibid. Page 53.

Specifically, for extremely large regional projects, the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 pounds per day of NO_X and 89,180 pounds per day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O_3. Based on its recent experiences applying regional scale models to relatively small increase in emissions, SCAQMD stated in its Amicus Brief in the Sierra Club v. County of Fresno case: "[A] project emitting only 10 tons per year of NO_X or VOC is small enough that its regional impact on ambient ozone levels may not be detected in the regional air quality models that are currently used to determine ozone levels."[10] The Brief makes it clear that SCAQMD does not believe that there must be a quantification of a project's health risks in CEQA documents prepared for individual projects. Any attempt to quantify the Project's health risks would be considered unreliable and misleading. Also, the Project does not generate anywhere near 6,620 pounds per day of NO_X or 89,190 pounds per day of ROG (VOC) emissions, which SCAQMD stated was a large enough emission to quantify O_3-related health impacts. Therefore, the Project's emissions are not sufficiently high enough to use regional modeling programs to correlate health effects on a basin-wide level.

As previously discussed, localized effects of on-site Project emissions on nearby receptors for the Project would be less than significant (refer to **Table 4.2-15** and **Table 4.2-16**). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. However, as discussed above, neither the SCAQMD nor any other air district currently have methodologies that would provide Lead Agencies and CEQA practitioners with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions. Information on health impacts related to exposure to ozone and particulate matter emissions published by the U.S. EPA and CARB have been summarized above and discussed in the Regulatory Setting section. Health studies are used by these agencies to set the NAAQS and CAAQS.

Although it may be misleading and unreliable to attempt to specifically and numerically quantify the Project's contribution to ozone formation and criteria pollutant health effects, this analysis provides extensive information concerning the Project's potential criteria pollutant health effects. While the Project is expected to exceed the SCAQMD's numeric regional mass daily thresholds for ROG and NO_X, this does not in itself constitute a significant health impact to the population adjacent to the Project and within the SSAB. The reason for this is that the mass daily thresholds are in pounds per day emitted into the air whereas health effects are determined based on the concentration of emissions in the air at particular receptor (e.g., parts per million by volume of air, or micrograms per cubic meter of air).

The NAAQS and CAAQS were developed to protect the most susceptible population groups from adverse health effects and were established in terms of parts per million or micrograms per cubic meter for the

[10] Ibid. Page 53.

applicable emissions. As stated earlier, the mass emission thresholds were established primarily in conjunction with federal permitting "major source" thresholds. If emissions were below these "de minimis" emission rates, then the Project is presumed to conform with the NAAQS.[11] While based on the status of an air basin level of attainment of the health-based NAAQS, emissions in excess of the mass emission thresholds from one project does not mean the air basin would experience measurably higher ground level concentrations, or more frequent occurrences of ground level concentrations in exceedance of standards, or delay timely attainment of a particular NAAQS.

Ozone concentrations are dependent upon a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level O_3 concentrations in relation to the NAAQS and CAAQS, none of the health-related information can be directly correlated to the pounds/day or tons/year of emissions estimated from a single, proposed project. It should also be noted that this analysis identifies health concerns related to particulate matter, CO, O_3, and NO_2. **Table 4.2-1** includes a list of criteria pollutants and summarizes common sources and effects. Thus, this analysis is reasonable and intended to foster informed decision-making. Due to the uncertainty in the relationship between project-level mass emissions and regional O_3 formation as well as limitations with currently available technical tools, the resulting health effects associated with the Project cannot be identified. Given this is speculative, no meaningful conclusion can be drawn with respect to potential health effects from the criteria pollutant emissions of the Project.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection resulting from the Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard.

The SSAB and SCAB were re-designated as attainment for CO in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD CO Hotspot Analysis, the Wilshire Boulevard and Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm Federal standard. The Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's CO Hotspot Analysis. As the CO hotspots were not experienced at the Wilshire Boulevard and Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be

[11] Ibid. Page 54.

reasonably inferred that CO hotspots would not be experienced at any vicinity intersections. Therefore, impacts would be less than significant.

Carcinogenic Risk

Construction-related activities would result in Project-generated emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); paving; application of architectural coatings; on-road truck travel; and other miscellaneous activities. For construction activity, DPM is the primary TAC of concern because it is the most potent TAC emitted from construction. Although DPM is a subset of PM_{10} exhaust, the analysis conservatively assumes all PM_{10} exhaust emissions are DPM. On-road diesel-powered haul trucks traveling to and from the construction area to deliver materials and equipment are less of a concern because they would not stay on the site for long durations. Diesel exhaust from construction equipment operating at the site poses a health risk to nearby sensitive receptors.

The operational risk analysis evaluates impacts from I-10 to future potential receptors located on the Project site. Pursuant to California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369, Case No. S213478, agencies are not required to analyze the CEQA impact of existing environmental conditions on a project's future users or residents, unless the proposed project risks exacerbate those environmental hazards or conditions that already exist. Nevertheless, the following analysis includes an operational mobile source health risk analysis as an informational item for land use decision making but is not a CEQA required analysis condition.

The pollutant concentrations modeled in AERMOD represent the exposure levels outdoors. The Office of Environmental Health Hazard Assessment (OEHHA) conservatively does not include indoor exposure adjustments for residents. However, the typical person spends the majority of time indoors rather than remaining outdoors in the same location for 24 hours a day.[12] Based on the AERMOD outputs, the highest expected annual average diesel PM_{10} emission concentrations from diesel truck traffic at the closest residential receptor on the Project site would be 0.06 $\mu g/m^3$ during the opening year of Phase 3.

Table 4.2-18: Unmitigated Carcinogenic Risk Assessment shows the unmitigated health risk for Project construction and operations[13]. Based on OEHHA Risk Assessment Guidelines, the exposure duration for a resident is 30 years, beginning with the third trimester; the exposure duration for workers is 25 years, and the exposure duration for students is nine years. The location of maximum exposure for each phase of the Project has been identified in **Table 4.2-18** and conservatively analyzed as a residential receptor which assumes 30 years of exposure, starting at the third trimester of pregnancy. In addition, the location of maximum exposure within each planning area designated as a business or school were also analyzed separately. The Project is anticipated to be developed in multiple phases. Occupation is assumed to commence following construction of each individual phase. As such, emissions from the construction of subsequent phases would overlap with emissions from I-10. The concentrations from these overlapping phases were combined in the risk calculations. Unmitigated operations would result in a maximum

[12] Kimley-Horn and Associates. (2023). *Health Risk Assessment*. Page 24.
[13] Ibid. Page 24.

incremental cancer risk of 39.143 in one million, which would exceed the SCAQMD threshold of 10 in one million.

Table 4.2-18: Unmitigated Carcinogenic Risk Assessment

Maximum Exposure	Incremental Cancer Risk (Risk per Million)				Threshold Exceeded?
	Construction	On-Site Freeway Exposure	Combined Exposure	Significance Threshold	
Off-Site Residential Receptors					
Nearest resident on Meritage Lane at Villas at Vineyards	0.12	N/A	0.12	10	No
On-Site Residential Receptors					
Phase 1 – PA B-1 Mixed Use	1.53	**19.37**	**20.90**	10	**Yes**
Phase 2 – PA A-6 Very Low Density Residential	0.59	**29.98**	**30.57**	10	**Yes**
Phase 3 – PA A-2 Very Low Density Residential	0.023	**39.12**	**39.143**	10	**Yes**
Phase 4 – PA B-8 High Density Residential	0.26	6.96	7.22	10	No
Phase 5 – PA C-2A Medium Density Residential	0.13	2.10	2.23	10	No
Phase 6 – PA E-7 Low Density Residential	N/A	6.36	6.36	10	No
On-Site Worker Receptors					
Phase 1 – PA B-1 Mixed-Use	0.03	1.75	1.78	10	No
Phase 2 – PA C-1 Entertainment	0.002	2.97	2.972	10	No
Phase 4 – PA B6A Mixed-Use	0.001	0.88	0.881	10	No
Phase 5 – PA D8 Mixed-Use	0.001	0.24	0.241	10	No
Student Receptors					
Phase 2 – PA A-9 School	0.02	0.70	0.72	10	No
Phase 3 – PA A-3 School	0.01	2.93	2.64	10	No
Phase 5 – PA C-6 School	0.002	0.98	0.98	10	No
Phase 6 – PA E-3 School	N/A	0.70	0.70	10	No
Source: Kimley-Horn and Associates, Inc. 2024. Health Risk Assessment. Page 25 – Table 3.					

Table 4.2-19: Mitigated Carcinogenic Risk Assessment shows the Project health risk for residents, workers, and students with mitigation incorporated. Mitigation required to reduce health risk impacts to less than significant levels include **MM AQ-1**, which requires the use of Tier 4 construction equipment**. MM AQ-7** requires all new buildings to use MERV 13 air filtration, or better, on space conditioning systems and ventilation systems that provide outside air to the occupiable space of a dwelling. MERV 13 air filtration systems have an average particle size removal efficiency of approximately 75 percent for 0.3 to 1.0 µg/m^3 (DPM) and 90 percent for 1.0 to 10 µg/m^3 (PM_{10} and $PM_{2.5}$) based on ASHRAE Standard 52.2. According to the U.S. EPA's Exposure Factor Handbook (2011), on average, people spend 90 percent of their time indoors. As residents are not always indoors, the filtration's overall effectiveness accounts for the time spent outdoors, which equates to approximately three hours per day. It is noted that this is a conservative assumption for the Project, as it assumes all of the time spent outdoors would occur at the Project site.

MM AQ-8 requires a construction setback along the Project boundary of Phase 2 and Phase 3 that faces I-10. It should be noted that the unmitigated risk shown in **Table 4.2-18** is based on the conceptual site plan while the mitigated health risk shown in **Table 4.2-19** assumes the houses built in Phase 2 (PA A-6) nearest to I-10 would be at least 120 feet (37 meters) from the Project boundary and houses built in Phase 3 (PA A-2) nearest to I-10 would be at least 180 feet (55 meters) from the Project boundary. Any residential buildings constructed closer than 120 feet in Phase 2 and closer than 180 feet in Phase 3 to the Project boundary facing I-10 would be required to prepare an additional HRA to ensure health impacts would not occur in these areas.

Table 4.2-19: Mitigated Carcinogenic Risk Assessment

Maximum Exposure	Incremental Cancer Risk (Risk per Million)[1]				Threshold Exceeded?
	Construction	On-Site Freeway Exposure	Combined Exposure	Significance Threshold	
Off-Site Receptors					
Nearest resident on Meritage Lane at Villas at Vineyards	0.03	N/A	0.03	10	No
On-Site Receptors					
Phase 1 – PA B-1 Mixed-Use	0.67	4.99	5.66	10	No
Phase 2 – PA A-6 [2] Very Low Density Residential	0.26	8.90	9.16	10	No
Phase 3 – PA A-2 [3] Very Low Density Residential	0.01	9.98	9.99	10	No
Phase 4 – PA B-8 High Density Residential	0.11	1.77	1.88	10	No
Phase 5 – PA C-2A Medium Density Residential	0.05	2.10	2.15	10	No
Phase 6 – PA E-7 Low Density Residential	N/A	1.62	1.62	10	No
On-Site Worker Receptors					
Phase 1 – PA B-1 Mixed-Use	0.01	0.50	0.51	10	No
Phase 2 – PA C-1 Entertainment	0.001	1.424	1.425	10	No
Phase 4 – PA B6A Mixed-Use	0.001	0.22	0.22	10	No
Phase 5 – PA D8 Mixed-Use	0.0004	0.0485	0.0489	10	No
Student Receptors					
Phase 2 – PA A-9 School	0.01	0.70	0.71	10	No
Phase 3 – PA A-3 School	0.003	2.93	2.93	10	No
Phase 5 – PA C-6 School	0.001	0.98	0.98	10	No
Phase 6 – PA E-3 School	N/A	0.70	0.70	10	No

1. The mitigated exposure scenario shows the risk with MM AQ-1 (Tier 4 Construction Equipment) and MM HRA-1 (require MERV 13 filters or greater). However, student receptor risk does not include MM HRA-1 in order to conservatively account for student activities occurring outdoors.
2. The maximum Phase 2 cancer risk is based on the site plan and assumes the houses built in PA A-6 nearest to I-10 would be a minimum of 120 feet (37 meters) from the Project boundary. Residential buildings constructed closer than 120 feet in Phase 2 would require an additional HRA. If the nearest buildings in PA A-6 to I-10 are more than 120 feet from the Project boundary the cancer risk would decrease.
3. The maximum Phase 3 cancer risk is based on the site plan and assumes the houses built in PA A-2 nearest to I-10 would be a minimum of 180 feet (55 meters) from the Project boundary. Residential buildings constructed closer than 180 feet in Phase 3 would require an additional HRA. If the nearest building in PA A-2 to I-10 is more than 180 feet from the Project boundary the cancer risk would decrease.

Source: Kimley-Horn and Associates, Inc. 2024. Health Risk Assessment. Page 26 – Table 4.

The incremental cancer risk of the Project would decrease if the nearest residential buildings are further than these distances from the Project boundary. Implementation of **MM AQ-1, MM AQ-7**, and **MM AQ-8**

would reduce incremental cancer risk from Project construction and operations below the SCAQMD's 10 in one million threshold; refer to **Table 4.2-19**. Impacts would be less than significant.

Non-Carcinogenic Hazard

The significance thresholds for TAC exposure also require an evaluation of non-cancer risk stated in terms of a hazard index. Non-cancer chronic impacts are calculated by dividing the annual average concentration by the reference exposure level (REL) for that substance. The REL is defined as the concentration at which no adverse non-cancer health effects are anticipated. RELs are designed to protect sensitive individuals within the population. The OEHHA RELs for DPM and Total Organic Gases (TOG) pollutants are used in this analysis and the target organ is the respiratory system.

Chronic non-carcinogenic impacts are shown in **Table 4.2-20: Chronic Hazard Assessment Results**. A chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the chronic exposure by the REL. The chronic hazard was calculated based on the highest annual average concentration at the maximally exposed individual receptor. The highest maximum chronic hazard associated with unmitigated DPM and TOG emissions would be 0.036. Therefore, even without mitigation, non-carcinogenic hazards are calculated to be within acceptable limits and a less than significant impact would occur. Impacts would be less than significant.

Table 4.2-20: Chronic Hazard Assessment Results

Emissions Sources	Unmitigated Chronic Hazard	Mitigated Chronic Hazard
Off-Site Receptors		
Nearest resident on Meritage Lane at Villas at Vineyards	0.0002	0.00003
On-Site Receptors		
Phase 1 – PA B-1 Mixed-Use	0.029	0.008
Phase 2 – PA A-6 Very Low Density Residential	0.036	0.015
Phase 3 – PA A-2 Very Low Density Residential	0.031	0.022
Phase 4 – PA B-8 High Density Residential	0.005	0.001
Phase 5 – PA C-2A Medium Density Residential	0.001	0.0003
Phase 6 – PA E-7 Low Density Residential	0.0015	0.0004
On-Site Worker Receptors		
Phase 1 – PA B-1 Mixed-Use	0.025	0.008
Phase 2 – PA C-1 Entertainment	0.036	0.015
Phase 4 – PA B6A Mixed-Use	0.005	0.001
Phase 5 – PA D8 Mixed-Use	0.001	0.0002
Student Receptors		
Phase 2 – PA A-9 School	0.001	0.001
Phase 3 – PA A-3 School	0.002	0.002
Phase 5 – PA C-6 School	0.0005	0.0005
Phase 6 – PA E-3 School	0.0005	0.0005
Threshold	1.0 / 1.0	1.0 / 1.0
Threshold Exceeded	No	No

1. Refer to Appendix A. According to OEHHA, the REL for DPM is 5 and the target organ is the respiratory system.
2. The mitigated exposure scenario shows the risk with MM AQ-1 (Tier 4 Construction Equipment) and MM HRA-1 (require MERV 13 filters or greater). However, student receptor risk does not include MM HRA-1 in order to conservatively account for student activities occurring outdoors.

Source: Kimley-Horn and Associates, Inc. 2024. Health Risk Assessment. Page 27 – Table 4.

Off-Site Improvements

Off-site improvements were modeled in CalEEMod and are assumed to begin construction during the first two years of Phase 1 to support future phases of the Project. Off-site improvements include improvements to Vista del Norte, developing a construction staging area, powerlines, a natural gas regulator station, well supply system, installing low-voltage cables (telephone lines and cable), and a sewer system; refer to **Exhibit 3-11: Off-Site Improvements**. The construction of the proposed off-site improvements alone would not exceed SCAQMD thresholds and would result in less than significant impacts. However, to ensure a conservative analysis, emissions from off-site construction were combined with on-site Phase 1 emissions.

Mitigation Measures

MM AQ-7 Prior to the issuance of occupancy permits, the Planning Department shall confirm that buildings include air filtration systems that use MERV 13 filters or greater.

MM AQ-8 Prior to the issuance of building permits, the Planning Department shall confirm that Phase 2 and Phase 3 residences meet the following setbacks:

- Phase 2 residences shall be located more than 120 feet from the Project boundary facing the I-10 freeway.
- Phase 3 residences shall be located more than 180 feet from the Project boundary facing the I-10 freeway.

A project specific Health Risk Assessment shall be required if Phase 2 residences are located within 120 feet of the Project boundary facing the freeway or if Phase 3 residences are located within 180 feet from the Project boundary facing the freeway. The Health Risk Assessment shall demonstrate that health risks from exposure to freeway exhaust do not exceed SCAQMD's thresholds at these locations. Residential dwelling units that exceed SCAQMD's 10 in one million cancer risk threshold shall implement mitigation measures to reduce impacts below the threshold.

Impact 4.2-4: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Level of Significance: Less Than Significant

CONSTRUCTION

The odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

During construction, emissions from construction equipment, such as diesel exhaust, and VOCs from architectural coatings and paving activities may generate odors. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly. Therefore, impacts related to odors associated with the Project's construction-related activities would be less than significant.

OPERATIONS

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the Project would not create objectionable odors.

Off-Site Improvements

Similar to the Project discussion above, odors generated by construction equipment would be temporary are not expected to affect a substantial number of people and would disperse rapidly. Additionally, the off-site improvements would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, impacts from the off-site improvements would be less than significant.

Mitigation Measures

No mitigation is necessary.

4.2.5 CUMULATIVE IMPACTS

Refer to analysis under Impact 4.2-2 above. The Project would result in short term and long-term air quality impacts because emissions would exceed the SCAQMD thresholds for ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$ during operations. These pollutants are precursors for O_3 for which SCAQMD is currently an extreme nonattainment area. Therefore, operational impacts would be cumulatively considerable.

4.2.6 SIGNIFICANT UNAVOIDABLE IMPACTS

With implementation of the Project, significant unavoidable impacts would occur in the following areas despite the implementation of the Mitigation Program:

- Project-Related Operational Emissions. Despite implementation of Mitigation Measures, the Project's operational emissions would remain above SCAQMD thresholds for ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$ resulting in a significant and unavoidable impact.
- AQMP Consistency. Although the Project's long-term influence would be consistent with the 2022 AQMP and SCAG's goals and policies, the Projects exceedance of operational ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$ thresholds would potentially result in both short-term and long-term impacts on the region's ability to meet state and federal air quality standards.
- Cumulative Emissions. As stated above, operational activities would create a significant and unavoidable impact due to exceedances of SCAQMD thresholds for ROG, NO_X, CO, PM_{10}, and

$PM_{2.5}$. Implementation of **MMs AQ-1** through **AQ-6** would reduce impacts; however, a significant and unavoidable impact would remain.

4.2.7 REFERENCES

City of Coachella. (2015). *City of Coachella General Plan Update – Safety Element.* *https://www.coachella.org/home/showpublisheddocument/10702/638906775794200000*.

City of Coachella. (2022). *Municipal Code.* https://library.municode.com/ca/coachella/codes/code_of_ordinances.

Kimley-Horn and Associates, Inc. (2024). *Air Quality Assessment*.

Kimley-Horn and Associates, Inc. (2024). *Health Risk Assessment*.

4.3 BIOLOGICAL RESOURCES

The purpose of this section is to describe the existing regulatory and environmental conditions related to biological resources, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts.

This environmental setting discussion is based largely on the following documentation:

- *KPC Coachella Biological Resources Assessment* (BRA) *and Coachella Valley Multiple Species Habitat Conservation Plan* (CVMSHCP) *Consistency Report* (Rocks Biological Consulting [RBC], 2020) (**Appendix C1)**;
- *KPC Coachella Project Jurisdictional Delineation Report* (RBC, 2019) (**Appendix C2**);
- *KPC Coachella Project Off-site Improvements – Biological and Aquatic Resources Assessment Memo* (RBC, 2023) (**Appendix C3**);
- *Coachella Valley Multiple Species Habitat Conservation Plan Like Exchange* (ELMT Consulting, 2024) (**Appendix C4**); and
- *Wildlife Agencies' Concurrence Regarding Proposed Like Exchange to Conservation Areas for the KPC Coachella Specific Plan.* (CDFW and USFWS, 2025) (**Appendix C5**).

These documents are included in their entirety in **Appendix C: Biological Resources Data**.

In April and May 2019, RBC biologists conducted vegetation mapping, habitat assessments, and general biological field surveys to evaluate potential impacts on biological resources within the Project site. Prior to commencing field surveys, RBC conducted a literature and database review to assist in determining the existence or potential occurrence of special-status biological resources on and within the vicinity of the Project site. The natural inventories included resources identified in the CVMSHCP database, California Natural Diversity Database (CNDDB), United States Fish and Wildlife Services (USFWS) database for special-status species, and USFWS database for endangered species and critical habitat within a five-mile radius of the Project site. RBC also queried the California Native Plant Society Inventory of Rare and Endangered Plants of California (CNPS). RBC also reviewed other available technical information on the biological resources of the area, including previous surveys and recent findings on adjacent sites. On January 14, 2023, RBC conducted a general reconnaissance of the Project site and confirmed nothing significant had changed such as a major disturbance from construction, off roading, and other potential disturbance activities since the biological surveys were prepared in April and May 2019.

RBC conducted a formal aquatic resources delineation between May 7 and May 10, 2019, and an additional jurisdictional delineation from October 29, 2019 and October 30, 2019 to identify areas that may be considered jurisdictional under the U.S. Army Corps of Engineers (USACE) pursuant to Section 404 of the Clean Water Act; the Regional Water Quality Control Board (RWQCB) pursuant to Section 401 of the Clean Water Act and the Porter-Cologne Act; and streambed and riparian habitats under California Department of Fish and Wildlife (CDFW) pursuant to California Fish and Game Code (Section 1602).

On January 14, 2023, RBC also conducted vegetation mapping, a general biological survey, habitat assessments for special-status species, and a constraints-level assessment for potentially jurisdictional aquatic resources for the Project's off-site improvement areas plus a 50-foot buffer (off-site improvement area[s]).

On October 2024, ELMT Consulting prepared a Like Exchange report that analyzed the compensation for the loss of habitats within the East Indio Hills Conservation Area (EIHCA) that would occur due to the proposed installation of the Vista Del Norte Crossing over the All-American Canal which is necessary to provide westerly access to the Project site. CDFW responded with a letter of concurrence regarding the proposed Like Exchange on January 14, 2025, indicating that the proposed Like Exchange would result in equal or greater benefits to Covered Species and conserved natural communities as compared to those benefits analyzed in the CVMSHCP.

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo its own independent CEQA analysis, including but not limited to an analysis of any impacts on biological resources. Each project-specific development analysis would provide more detail based on each project's specific location and other site-specific factors such as habitat suitability and presence of aquatic features.

4.3.1 ENVIRONMENTAL SETTING

PROJECT LOCATION

The Project site is located along the western foothills of the Little San Bernardino Mountains on the eastern flank of the Coachella Valley, north of the Salton Sea. The site is immediately north of Interstate 10 (I-10) and east of Coachella Canal Road in the City of Coachella (City), Riverside County, California. A portion of the Coachella Canal runs north to south through the westernmost portion of the Project site.

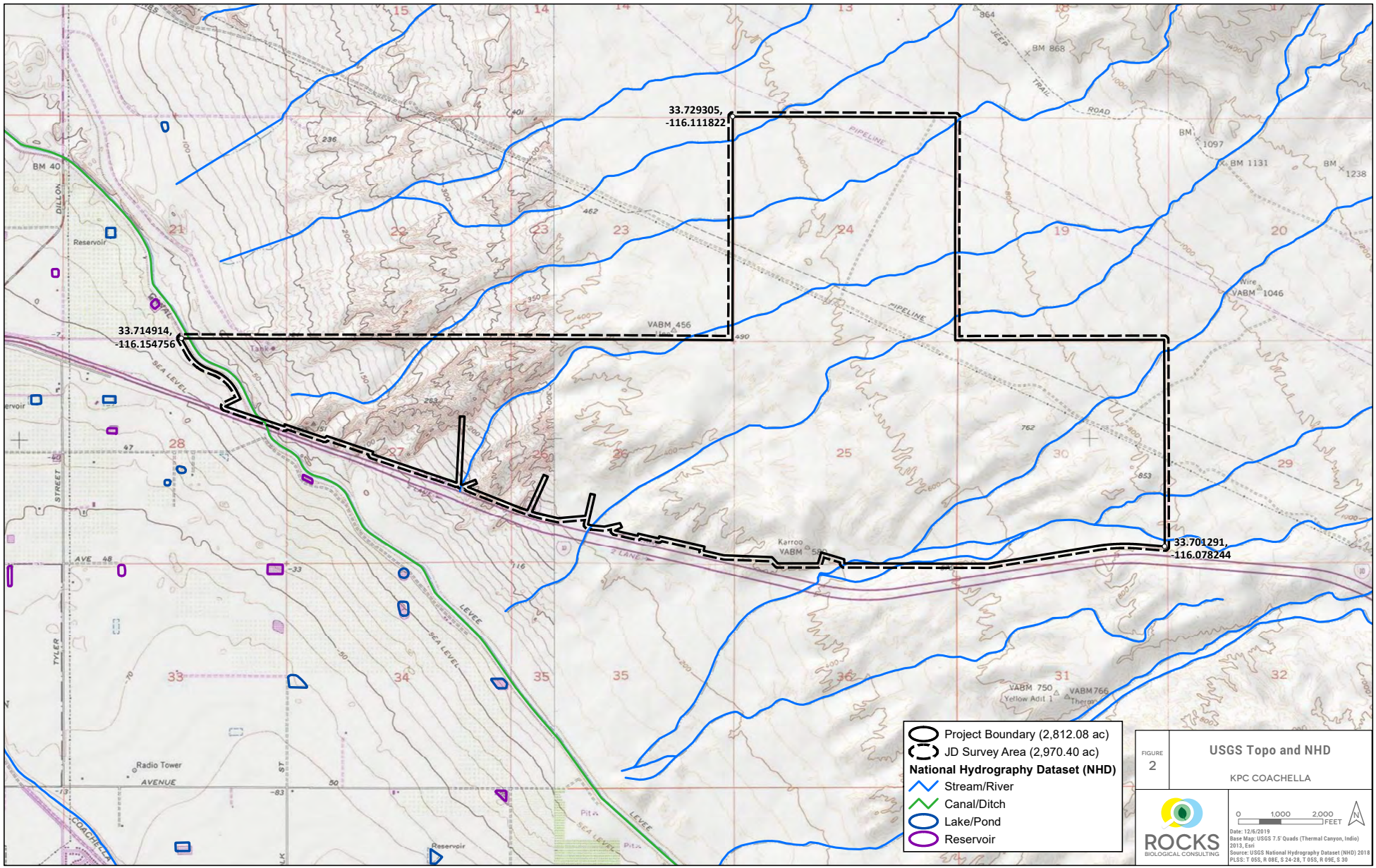
The Project site lies within the northeast portion of the U.S. Geological Survey (USGS) Indio 7.5-minute topographic quadrangle in Sections 24, 25, 26, 27, and 28; Township 5 South; Range 8 East; and within the northwestern portion of Thermal Canyon quadrangle in Section 30, Township 5 South, Range 9 East, San Bernardino Base Meridian; see **Exhibit 4.3-1: USGS Topo and NDH**. Elevations on the Project site range from approximately 35 to 758 feet above mean sea level (amsl). Surface drainage generally runs from the northeast to the southwest.

The Project site is located within the Coachella Valley within the Sonoran Desert region, a subdivision of the Colorado Desert. The site is undeveloped land, consisting of gently sloped terrain within the broad alluvial fan derived from the Little San Bernardino Mountains to the north, with the bedrock highlands of the Little San Bernardino and Orocopia Mountains to the northeast, east, and southeast. The Project site includes several southwest-trending ridges of relatively low relief with alluvial drainages that drain into a larger alluvial fan. The western extent of the Project site (adjacent to the Coachella Canal) has been subject

to historic human disturbance, including previous agricultural use. On-site disturbances include unpaved roads, power lines, illegal dumping, and Off Highway Vehicle (OHV) use.

Off-site improvements areas that would be affected as part of the Project occurs along Vista Del Norte, Dillon Road, Tyler Street, Avenue 48, Polk Street, and 50th Avenue located southwest of the Interstate 10 (I-10) Freeway and northeast of the State Route 86 (SR-86) Highway. Off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure. An additional area occurs south of the I-10 Freeway on the north side of the Coachella Canal; see **Exhibit 4.3-2: Off-Site Improvement Areas** and **Exhibit 3-11: Off-Site Improvements**.

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Source: Rocks Biological Consulting, December 2019.

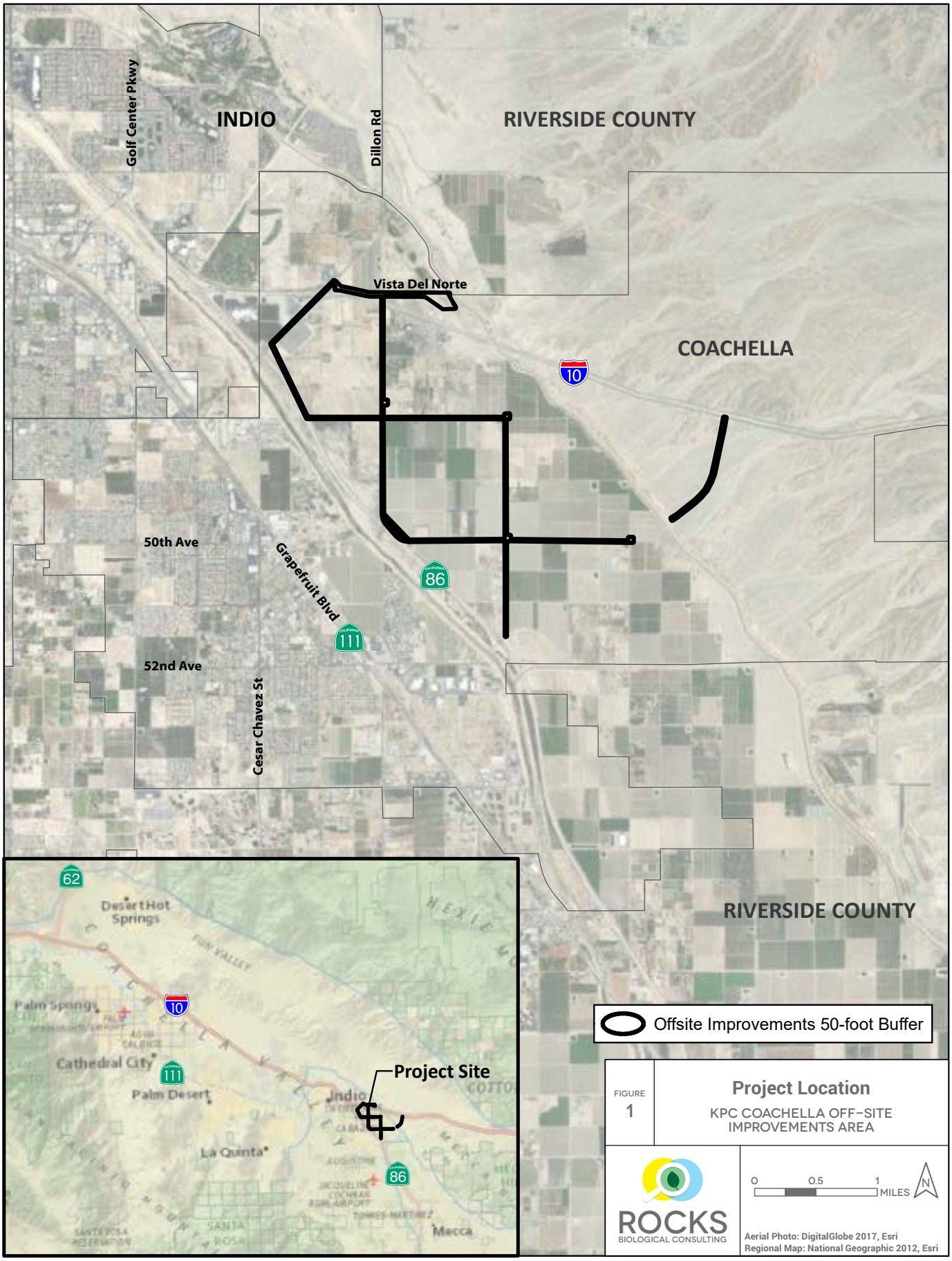
EXHIBIT 4.3-1: USGS Topo and N H

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Source: Rocks Biological Consulting, February 2023.

EXHIBIT 4.3-2: ff-Site Improvement reas
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VEGETATION COMMUNITIES AND LAND USES

There are six vegetation communities and/or land uses within the Project site. The site is primarily comprised of Sonoran creosote bush scrub. The numerous ephemeral washes on site generally contain a mix of desert wash scrub and Sonoran creosote bush scrub. A list of vegetation communities and land uses and their size within the Project site is provided in **Table 4.3-1: Vegetation Communities and Land Uses**. A map of the vegetation and land uses is presented in **Exhibit 4.3-3: Biological Resources**.

Table 4.3-1: Vegetation Communities and Land Uses

Vegetation Community	Acres
Sonoran Creosote Bush Scrub	1,855.2
Desert Wash Scrub/Sonoran Creosote Bush Scrub	916.0
Mesquite Hummocks	0.99
Agricultural Land	2.43
Disturbed Habitat	36.48
Tamarisk Scrub	0.99
Total	**2,812.09**

Source: RBC. (2020). *Biological Resources Assessment and CVMSHCP Consistency Report*. p. 7 - Table 2.

Sonoran Creosote Bush Scrub

Sonoran creosote bush scrub is the dominant habitat type within the Project site. This community occurs on upland slopes, hills, bajadas, and alluvial fans, and within the ephemeral washes onsite. Sonoran creosote bush scrub is dominated by widely spaced stands of creosote bush (*Larrea tridentata*) with open soil, annual plants, and other shrubs occurring between creosote bush shrubs. Other common shrubs within this community include white bursage (*Ambrosia dumosa*), brittlebush (*Encelia farinosa*), and desert-holly (*Atriplex hymenelytra*). Observations of short-lived annual plant species was limited due to the timing of the field survey.

Desert Wash Scrub/Sonoran Creosote Bush Scrub

An intermixing of two vegetation types; desert wash scrub and Sonoran creosote bush scrub occur across large areas of the Project site most often within, but not limited to, the numerous ephemeral washes on site. These washes contain a mix of species associated with both vegetation types including desert-lavender (*Condea emoryi*), smoke tree (*Psorothamnus spinosus*), sweet-bush (*Bebbia juncea var. aspera*), catclaw acacia (*Senegalia greggii*), and occasional blue palo verde (*Parkinsonia florida*), as well as creosote bush and white bursage.

Mesquite Hummocks

Mesquite hummocks occur only on the western portion of the Project site within the EIHCA. Mesquite hummocks consist solely of mesquite (*Prosopis glandulosa var. glandulosa*) on a raised hummock of blown sand. These habitats are important for wildlife and have a stabilizing effect on sand dunes.

Agricultural Land

Agricultural land within the Project site consists of grapevines under active cultivation located near Project's western boundary. Agricultural areas are both disturbed and irrigated and provide little habitat for native plant and wildlife species.

Disturbed Habitat

Disturbed habitat within the Project site consists primarily of bare soils and non-native species resulting from human disturbance. Disturbed lands have been graded, cleared, or used to the point where the land cannot support native vegetation. Disturbed areas occur mostly in the western portion of the Project site adjacent to agricultural land.

Tamarisk Scrub

Tamarisk scrub within the Project site consists primarily of dense tamarisk (*Tamarix ramosissima*) shrubs. Tamarisk scrub typically occurs on sandy or gravelly soils within, or in close proximity to washes or streams and often follows major anthropogenic disturbance. Tamarisk scrub occurs in the western portion of the site in areas disturbed by both agriculture and construction of a water tower.

Off-site Improvement Areas

The vegetation communities/land covers in the off-site improvement area consist primarily of developed land and disturbed habitat dominated by tumbleweed (*Salsola australis*) and arrow weed (*Pluchea sericea*), but also include agriculture, creosote bush (*Larrea tridentata*) scrub, creosote bush scrub – disturbed and fourwing saltbush (*Atriplex canescens*) scrub. The vegetation communities are not considered sensitive by the CDFW.

The off-site improvement area also supports a small, isolated patch of cattail marsh – disturbed on the south side of Vista Del Norte within the northern portion of the area. The cattail marsh – disturbed includes cattail (*Typha sp*.), whispering bells (*Emmenanthe penduliflora*), and arrow weed. However, the habitat is disturbed by the presence of several non-native species, including tamarisk (*Tamarix sp.*), Saharan mustard (*Brassica tournefortii*), and common sow thistle (*Sonchus oleraceus*) as well as trash and debris. The cattail marsh is not considered a sensitive natural community by the CDFW.



Source: Rocks Biological Consulting, December 2019.

EXHIBIT 4.3-3: Biologi al esour es

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City of Coachella

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SPECIAL-STATUS BIOLOGICAL RESOURCES

Special-status biological resources are those defined as follows: 1) Species that have been given special recognition by federal, state, or local conservation agencies and organizations due to limited, declining, or threatened/endangered population sizes; 2) Species and habitat types recognized by local and regional resource agencies as sensitive; 3) Habitat areas or vegetation communities that are unique, are of relatively limited distribution, or are of particular value to wildlife; 4) Wildlife corridors and habitat linkages; and/or 5) Biological resources that may or may not be considered sensitive, but are regulated under local, state, and/or federal laws.

For purposes of this analysis, species are considered to have special status if they meet one or more of the following criteria:

- Listed under the federal or state Endangered Species Act (ESA)
- USFWS Birds of Conservation Concern
- CDFW Species of Special Concern
- CDFW Fully Protected Species
- Covered as a state protected furbearing mammal (14 California Code of Regulations [14 CCR §460])
- Listed as having a California Rare Plant Rank (CRPR; exc. CRPR 4)
- Record reported in the California Natural Diversity Database (CNDDB) and/or USFWS database

The BRA concluded that the literature review revealed 43 special-status species (13 plants, 30 animals) with the potential to occur within or immediately adjacent to the Project site. The following addresses threatened/endangered species and other non-listed special-status species identified as potentially present on the Project site. A list of these species and a discussion of their potential to occur within the Project site is included in **Table 4.3-2: Special-Status Plants and Animals with Potential to Occur** below.

No state and/or federally listed threatened or endangered species were observed onsite during the general biological field survey. However, the search of the CNDDB and USFWS databases shows three listed species have been documented within a five-mile radius of the Project site as follows:

- Desert tortoise (*Gopherus agassizii*); federally listed threatened and state-listed threatened; Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) covered species
- Coachella Valley fringe-toed lizard (*Uma inornata*); federally listed threatened and state listed endangered; CVMSHCP covered species
- Coachella Valley milk-vetch (*Astragalus lentiginosus var. coachellae*); federally listed endangered; CVMSHCP covered species

Habitat on the Project site is moderately suitable for Coachella Valley milk vetch and desert tortoise. No suitable habitat for the Coachella Valley fringe-toed lizard is present on the Project site. Additionally, the Project site is not within any USFWS-designated Critical Habitat for the Coachella Valley milk-vetch, desert tortoise, or Coachella Valley fringe-toed lizard, although suitable habitat for the desert tortoise is present.

Also note that portions of the Project site are located adjacent or diagonal to the Desert Tortoise and Linkage Conservation Area.

Two non-listed special-status species; loggerhead shrike and black-tailed gnatcatcher were observed during the general biological surveys (**Exhibit 4.3-3**). Based on review of the CNDDB, USFWS database, and California Native Plant Society (CNPS) Inventory, 39 non-listed special-status species (12 plants and 27 animals) have been documented within a five-mile radius of the Project site or have the potential to occur on the Project site.

An analysis of the likelihood for occurrence of each special-status species documented within a five-mile radius of the Project site or potential to occur is provided in **Table 4.3-2: Special-Status Plants and Animals with Potential to Occur**. This analysis considered species range as well as documentation within the vicinity of the Project area and includes the habitat requirements for each species and the potential for their occurrence on the site, based on required habitat elements and range relative to the current site conditions.

Table 4.3-2: Special-Status Plants and Animals with Potential to Occur

Species	Status	Habitat Description	Potential to Occur
Plants			
California ayenia (*Ayenia compacta*)	ESA: -- CESA: -- CRPR: 2B.3 CVMSHCP: NC	Rocky soil in Sonoran and Mojavean desert scrub at 490 to 3,595 feet elevation. Perennial herb. Blooms between March and April.	Moderate. Suitable habitat present on site.
California ditaxis (*Ditaxis serrata var. californica*)	ESA: -- CESA: -- CRPR: 3.2 CVMSHCP: NC	Sonoran desert scrub at 95 to 3,280 feet elevation. Perennial herb. Blooms between March and December.	Moderate. Suitable habitat present on site.
chaparral sand verbena (*Abronia villosa var. aurita*)	ESA: -- CESA: -- CRPR: 1B.1 CVMSHCP: NC	Sandy chaparral, coastal scrub and desert dunes at 245 to 5,250 feet elevation. Annual herb. Blooms between March and September.	Low. Suitable sandy/dune habitat not present.
Coachella Valley milkvetch (*Astragalus lentiginosus var. coachellae*)	ESA: FE CESA: -- CRPR: 1B.2 CVMSHCP: C	Loose aeolian (i.e., windblown) or alluvial (i.e., water transported) sands that are located on dunes or flats, and along disturbed margins of sandy washes in the Coachella Valley at 130 to 2,150 feet. Annual/short-lived perennial. Blooms between February and May.	Low. The Project site does not support aeolian or alluvial sand dunes; however, sandy washes do occur on site.
Coves' cassia (*Senna covesii*)	ESA: -- CESA: -- CRPR: 2B.2 CVMSHCP: NC	Dry, sandy washes and slopes in Sonoran desert scrub at 735 to 4,250 feet elevation. Perennial herb. Blooms between March and June.	Moderate. Suitable habitat present on site.
glandular ditaxis (*Ditaxis claryana*)	ESA: -- CESA: -- CRPR: 2B.2 CVMSHCP: NC	Sandy soils in Sonoran and Mojavean desert scrub at 0 to 1,526 feet elevation. Perennial herb. Blooms between October and March.	Moderate. Suitable habitat present on site.
gravel milk-vetch (*Astragalus sabulonum*)	ESA: -- CESA: -- CRPR: 2B.2 CVMSHCP: NC	Sandy/gravelly areas in flats, washes, and roadsides in Sonoran and Mojavean desert scrub and desert dunes at 197 to 3,051 feet elevation. Annual/short-lived perennial. Blooms between February and June.	Moderate. Suitable Sonoran creosote bush scrub habitat (sandy and gravelly areas) present on site.
jackass clover (*Wislizenia refracta ssp. refracta*)	ESA: -- CESA: -- CRPR: 2B.2 CVMSHCP: NC	Desert dunes, playas, and desert scrub of the Sonoran and Mojave deserts at 1,968 to 2,624 feet elevation. Annual herb. Blooms between April and November.	Moderate. Suitable habitat present on site.

Table 4.3-2: Special-Status Plants and Animals with Potential to Occur

Species	Status	Habitat Description	Potential to Occur
little-leaf elephant tree (*Bursera microphylla*)	ESA: -- CESA: -- CRPR: 2B.3 CVMSHCP: NC	Rocky soils in Sonoran desert scrub at 655 to 2,295 feet elevation. Perennial deciduous tree. Blooms between June and July.	Low. Suitable habitat present on site; however, species likely would have been observed during general biological survey.
mecca aster (*Xylorhiza cognata*)	ESA: -- CESA: -- CRPR: 1B.2 CVMSHCP: C	Arid canyons in sandstone and clay in Sonoran desert scrub at 65 to 1,300 feet elevation. Known principally in the Indio and Mecca hills of Riverside County. Perennial herb. Blooms between January and June.	Moderate. Suitable habitat present on site.
narrow-leaf sandpaper-plant (*Petalonyx linearis*)	ESA: -- CESA: -- CRPR: 2B.3 CVMSHCP: NC	Sandy or rocky canyons in desert scrub of the Sonoran and Mojave deserts at 80 to 3,660 feet elevation. Perennial shrub. Blooms between March and May.	Moderate. Suitable habitat present on site.
Orocopia sage (*Salvia greatae*)	ESA: -- CESA: -- CRPR: 1B.3 CVMSHCP: C	Alluvial slopes in desert scrub of the Sonoran and Mojave deserts at -130 to 2,705 feet elevation. Restricted to the Orocopia and Chocolate Mountains. Perennial evergreen shrub. Blooms between March and April.	Low. Suitable habitat present on site, but current distribution is limited to mountains southeast of the site.
slender cottonheads (*Nemacaulis denudata var. gracilis*)	ESA: -- CESA: -- CRPR: 2B.2 CVMSHCP: NC	Coastal dunes, desert dunes and Sonoran desert scrub at 160 to 1,310 feet elevation. Annual herb. Blooms between April and May.	Moderate. Suitable Sonoran desert scrub habitat present on site.
Mammals			
American badger (*Taxidea taxus*)	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: NC	A variety of habitats including arid fields, grasslands, and desert scrub containing friable soil to excavate dens. Preys on fossorial mammals, reptiles, and insects.	Moderate. Suitable habitat, soils, and prey species present on site.
Coachella Valley [Palm Springs] round-tailed ground squirrel (*Xerospermophilus tereticaudus chlorus*)	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: C	Habitats include eolian dunes and desert scrub containing shrubs for cover and burrowing. Prefers mesquite thickets and coarse sand/gravel soils.	Moderate. Suitable habitat and soils present on site.
desert bighorn sheep (*Ovis canadensis nelsoni*)	ESA: -- CESA: -- USFWS: -- CDFW: FP CVMSHCP: C	A variety of habitats including palm oases, desert riparian, desert succulent scrub, desert scrub, and perennial grasslands. Grazes in open areas and require steep, rocky areas for bedding. Close proximity to water sources is critical for this species.	Low. Suitable foraging and bedding habitat not present on site.
Palm Springs pocket mouse (*Perognathus longimembris bangsi*)	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: C	A variety of habitats including creosote bush scrub, desert scrub, and grasslands containing uncompressed soils and sparse to moderate vegetation cover.	Moderate. Suitable desert scrub habitat and soils present on site.
western mastiff bat (*Eumops perotis californicus*)	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: NC	Chaparral, live oaks, and arid, rocky regions. Requires downward opening crevices to roost. Foraging habitats include desert washes, flood plains, chaparral, oak woodlands, grasslands, and agricultural fields.	Moderate. No suitable roosting habitat present on site; however, suitable desert wash foraging habitat present.
western yellow bat (*Lasiurus xanthinus*)	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: C	A range of habitats in arid and dry areas. Inhabits secluded woodlands, agricultural lands, and sometimes even residential areas. In California, this species prefers to roost and forage in palms (both native palm oases and ornamental palms).	Low. No suitable palm habitat present on site.

Table 4.3-2: Special-Status Plants and Animals with Potential to Occur

Species	Status	Habitat Description	Potential to Occur
Birds			
black-tailed gnatcatcher (*Polioptila melanura*)	ESA: -- CESA: -- USFWS: -- CDFW: WL CVMSHCP: NC	Semiarid and desert thorn scrub with creosote bush.	Present. This species was documented onsite and suitable desert scrub habitat is present throughout.
burrowing owl (*Athene cunicularia*) ‡	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: C	Found in grasslands and open scrub habitats from coasts to deserts. Strongly associated with ground squirrels (*Otospermophilus spp., Xerospermophilis spp*., etc.) and other fossorial mammal burrows.	High. Suitable open scrub habitat, soils, and fossorial mammals present on site. CNDDB records show historic occurrences onsite.
California horned lark (*Eremophila alpestris actia*)	ESA: -- CESA: -- USFWS: -- CDFW: WL CVMSHCP: NC	Sparsely vegetated prairies, deserts, and agricultural lands.	Moderate. Suitable desert habitat present on site.
Cooper's hawk (*Accipiter cooperii*) †	ESA: -- CESA: -- USFWS: BCC CDFW: -- CVMSHCP: NC	Habitats include deserts, desert washes, and hillsides within desert scrub, chaparral, coastal sage scrub, and various fringe habitats.	High. Suitable desert habitats present on site.
crissal thrasher (*Toxostoma crissale*)	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: C	In the Coachella Valley region, this species inhabits mesquite thickets containing catclaw acacia (*Acacia greggii*), desert ironwood (*Olneya tesota*), and arrowweed (*Pluchea sericea*).	Moderate. Suitable habitat (tamarisk thickets) present on site.
ferruginous hawk (*Buteo regalis*) ±	ESA: -- CESA: -- USFWS: BCC CDFW: WL CVMSHCP: NC	Open habitats from grasslands to deserts. During winter, tend to aggregate where prey species, especially ground squirrels and prairie dogs, are abundant.	High. Suitable wintering habitat present on site.
Lawrence's goldfinch (*Spinus lawrencei*) †	ESA: -- CESA: -- USFWS: BCC CDFW: -- CVMSHCP: NC	Arid and open woodlands bordered by chaparral/scrub, annual weed fields, or aquatic features.	Low. No suitable woodland habitat present on site.
Le Conte's thrasher (*Toxostoma lecontei*)	ESA: -- CESA: -- USFWS: BCC CDFW: SSC CVMSHCP: C	Saltbush scrub, creosote bush scrub, and other lightly vegetated desert scrub. Permanent resident within California range.	High. Suitable desert scrub habitat present on site.
least Bell's vireo (*Vireo bellii pusillus*)	ESA: FE CESA: SE USFWS: -- CDFW: SSC CVMSHCP: C	Breeding habitat: riparian communities including Sonoran cottonwood-willow riparian forest, southern arroyo willow riparian forest, and southern sycamore-alder riparian woodland. Migration habitat: mesquite hummocks, desert dry wash woodland, desert saltbush scrub, desert sink scrub, mesquite bosque, and arrowweed scrub.	Low (breeding habitat). High (migration habitat). There is no suitable riparian breeding habitat on site or within the East Indio Hills Conservation Area. The site contains suitable migration habitat in the form of mesquite hummocks and desert dry wash woodland on site.

Table 4.3-2: Special-Status Plants and Animals with Potential to Occur

Species	Status	Habitat Description	Potential to Occur
loggerhead shrike (*Lanius ludovicianus*) †	ESA: -- CESA: -- USFWS: BCC CDFW: SSC CVMSHCP: NC	Grassland, chaparral, desert, and desert edge scrub, particularly near dense vegetation used for nesting.	Present. This species was observed onsite and suitable foraging and breeding habitat (tamarisk thickets) are present on site.
Merlin (*Falco columbarius*) ±	ESA: -- CESA: -- USFWS: -- CDFW: WL CVMSHCP: NC	Riparian habitats and coastal marshes. Uncommon to rare in southern California.	Low. Suitable wintering habitat not present on site.
northern harrier (*Circus hudsonius*) †	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: NC	A variety of open habitats including deserts, plains, agricultural fields, and estuaries.	Low. Although suitable foraging habitat present on site, suitable breeding habitat not present on site.
Oregon vesper Sparrow (*Pooecetes gramineus affinis*) ±	ESA: -- CESA: -- USFWS: BCC CDFW: SSC CVMSHCP: NC	Winters on open, flat areas containing low grasslands or savannahs in southern California.	Low. Suitable habitat not present on site.
peregrine falcon (*Falco peregrinus*) †	ESA: FDL CESA: SDL USFWS: BCC CDFW: FP CVMSHCP: NC	A variety of habitats. Most peregrine falcon will nest on open cliff faces, however, are also known to occupy water body fringes and human-built buildings and towers.	Low. Suitable habitat not present on site.
prairie falcon (*Falco mexicanus*) †	ESA: -- CESA: -- USFWS: BCC CDFW: WL CVMSHCP: NC	Desert shrubland and grasslands. Primarily forages in grassland habitats.	Low. Suitable desert shrubland occurs on site, however foraging habitat is sparse.
summer tanager (*Piranga rubra cooperi*)	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: C	Breeding habitat: riparian natural communities including Sonoran cottonwood-willow riparian forest, southern arroyo willow riparian forest, and southern sycamore-alder riparian woodland. Migration habitat: mesquite hummocks, desert dry wash woodland, desert saltbush scrub, desert sink scrub, mesquite bosque coastal and valley freshwater marsh, and arrowweed scrub.	Low (breeding habitat). High (migration habitat). There is no suitable riparian breeding habitat on site or within the East Indio Hills Conservation Area. The site contains suitable migration habitat in the form of mesquite hummocks, and desert dry wash woodland on site.
vermilion flycatcher (*Pyrocephalus rubinus*) †	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: NC	Deserts, scrub, agricultural fields, parks, golf courses, and riparian woodlands, often near water.	Moderate. Suitable breeding habitat (tamarisk thickets) present on site.
white-tailed kite (*Elanus leucurus*) †	ESA: -- CESA: -- USFWS: -- CDFW: FP CVMSHCP: NC	Low elevation grasslands, agricultural fields, wetlands/marshes, oak woodlands, savannahs, and riparian habitats bordering open areas.	Low. No suitable habitat occurs on site.

Table 4.3-2: Special-Status Plants and Animals with Potential to Occur

Species	Status	Habitat Description	Potential to Occur
yellow-breasted chat (*Icteria virens*)	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: C	Breeding habitat: riparian communities including Sonoran cottonwood-willow riparian forest, southern arroyo willow riparian forest, southern sycamore-alder riparian woodland. Migration habitat: mesquite hummocks, desert dry wash woodland, desert saltbush scrub, desert sink scrub, mesquite bosque coastal and valley freshwater marsh, arrowweed scrub.	Low (breeding habitat). High (migration habitat). There is no suitable riparian breeding habitat on site or within the East Indio Hills Conservation Area. The site contains suitable migration habitat in the form of mesquite hummocks, and desert dry wash woodland on site.
yellow warbler (*Setophaga petechia*)†	ESA: -- CESA: -- USFWS: -- USFWS: BCC CDFW: SSC CVMSHCP: C	Variety of riparian habitats and occasionally disturbed habitats bordering riparian areas.	Low. No suitable riparian habitat occurs on site.
Reptiles/Amphibians			
Coachella Valley fringe-toed lizard (*Uma inornata*)	ESA: FT CESA: SE USFWS: -- CDFW: -- CVMSHCP: C	Fine, windblown sand and dune habitat with widely spaced desert shrubs; known only from the Coachella Valley.	Low. Although historically recorded in proximity of site, suitable aeolian transported sand and dune habitat not present on site.
desert tortoise (*Gopherus agassizii*)	ESA: FT CESA: ST USFWS: -- CDFW: -- CVMSHCP: C	Burrows in firm sandy or gravelly soils along creosote bush flats, riverbanks, washes, dunes, alluvial fans, hillsides, and canyons, often containing rocky areas.	Moderate. Suitable habitat and soils present on site.
flat-tailed horned lizard (*Phrynosoma mcallii*)	ESA: -- CESA: -- USFWS: -- CDFW: SSC CVMSHCP: C	Fine sand in desert washes and flats with vegetative cover and prey species (ants), generally below 600 feet elevation in Riverside, San Diego, and Imperial Counties.	Moderate. Suitable desert washes and flats are present on site and this species is known from the East Indio Hills Conservation Area.

Source: Ibid. Appendix C.

California Rare Plant Rank (CRPR) Definitions

California Rare Plant Rank (CRPR)	1A	presumed extirpated in California and rare or extinct elsewhere
	1B	rare, threatened, or endangered in California and elsewhere
	2A	presumed extirpated in California but more common elsewhere
	2B	rare, threatened, or endangered in California but more common elsewhere
	3	plants for which more information needed
	4	plants of limited distribution
CRPR Threat Ranks	0.1	Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
	0.2	Moderately threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)
	0.3	Not very threatened in California (<20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

Endangered Species Act (ESA)

FE: Endangered Species Act (ESA) Federally Endangered Species
FT: Endangered Species Act (ESA) Federally Threatened Species
FDL: Endangered Species Act (ESA) Federally Delisted Species

California Endangered Species Act (CESA)

SE: California Endangered Species Act (CESA) State Endangered Species

Table 4.3-2: Special-Status Plants and Animals with Potential to Occur

Species	Status	Habitat Description	Potential to Occur
ST: California Endangered Species Act (CESA) State Threatened Species SDL: California Endangered Species Act (CESA) State Delisted Species			
United States Fish and Wildlife Service (USFWS)			
BCC: United States Fish and Wildlife Service (USFWS) Birds of Conservation Concern			
California Department of Fish and Wildlife (CDFW)			
FP: California Department of Fish and Wildlife (CDFW) Fully Protected Species SSC: California Department of Fish and Wildlife (CDFW) Species of Special Concern WL: California Department of Fish and Wildlife (CDFW) Watch List Species			
Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP)			
C: Species Covered Under Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) NC: Species Not Covered Under Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP)			
Bird Nesting Status			
†: Nesting ±: Wintering ‡: Nesting and Wintering			

Burrowing Owl and Nesting Birds

Highly suitable habitat for burrowing owl and other special-status species such as Le Conte's thrasher, loggerhead shrike (observed), and black-tailed gnatcatcher (observed), as well as numerous more common bird species is present within the Project site and adjacent areas. These birds (common and special-status) are protected by the California Fish and Game Code, which makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed under 50 Code of Federal Regulations (CFR) 10.13, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). The Migratory Bird Treaty Act (MBTA) prohibits take of nearly all native birds.

Off-site Improvement Areas

The Biological and Aquatic Resources Assessment Memo concluded that no special status plant species, including federally or state-listed as threatened or endangered plant species, were observed within the survey area during the general field survey and none have a moderate or high potential to occur based on the disturbed nature of the site and the lack of suitable habitat. One special-status plant species, the Mecca aster, has been documented within one mile of the off-site improvement area, but has low potential to occur within the creosote bush scrub as the off-site improvement area is below the documented elevation range of this species.

No federally and state-listed wildlife species, including Coachella Valley fringe-toed lizard and desert tortoise were observed within the survey area. Desert tortoise has low potential to occur within the creosote bush scrub habitat on site. Coachella Valley fringe-toed lizard is not anticipated to occur due to the lack of suitable dune habitat within the off-site improvement areas.

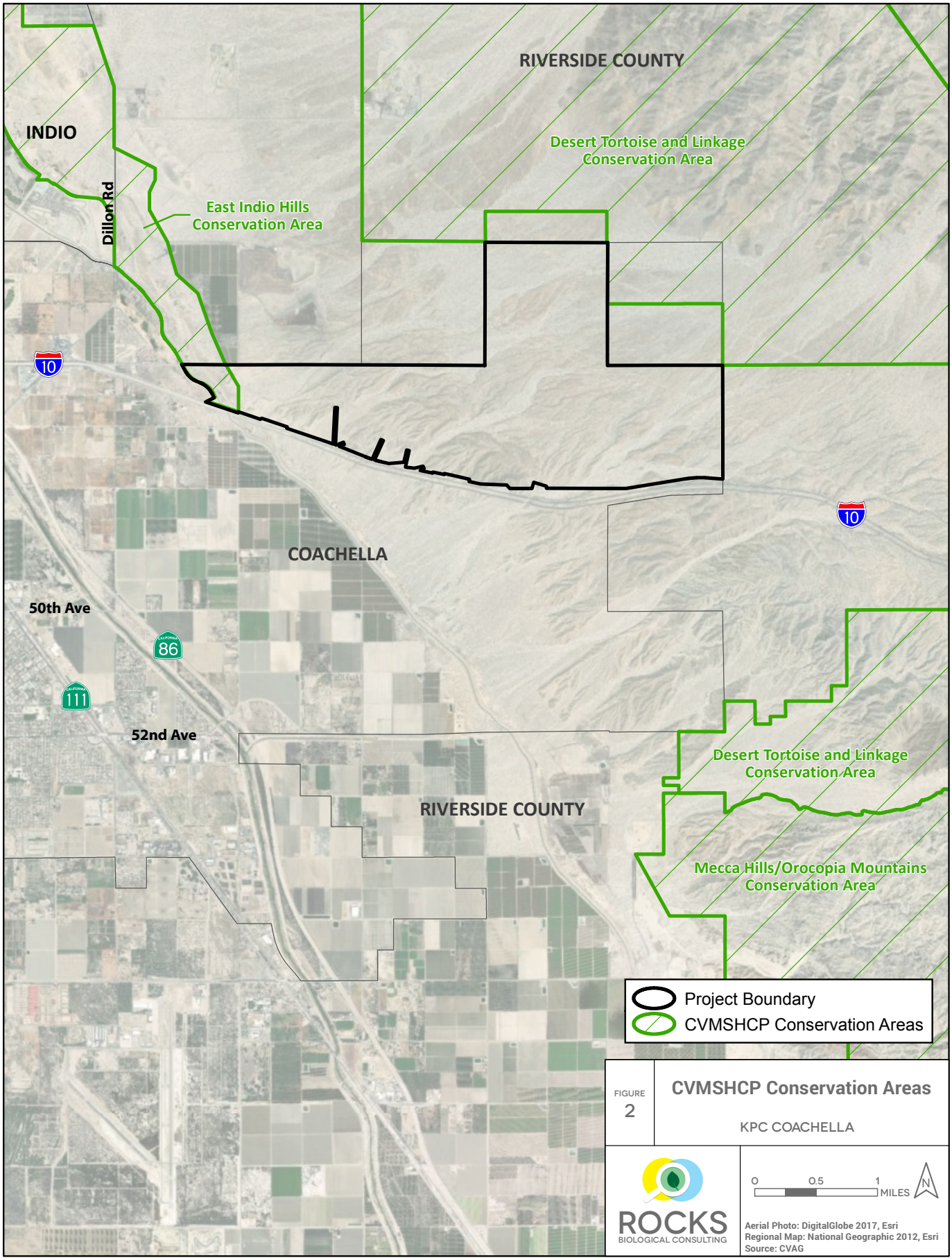
Several special-status wildlife species have been documented within one mile of the off-site improvement areas and have low to moderate potential to occur within the creosote bush scrub habitat on site including black-tailed gnatcatcher, burrowing owl, crissal thrasher, ferruginous hawk, Palm Springs pocket mouse, and the Palm Springs round-tailed ground squirrel. Two additional special-status species, western yellow bat and western mastiff bat have been documented within one mile of the off-site improvement areas

but are not anticipated to occur due to the lack of suitable habitat. Additionally, the off-site improvement areas do not occur within any USFWS Critical Habitat for federally listed wildlife species.

CVMSHCP

Project Conservation Areas

As shown in **Exhibit 4.3-4: CVMSHCP Conservation Areas**, the western portion of the Project site is within the EIHCA, and the Project site shares a common boundary along the north and northeastern frontage with the Desert Tortoise and Linkage Conservation Area. Approximately 61 acres of the Project site are within the EIHCA. This area within the EIHCA consists of Sonoran creosote bush scrub, mesquite hummocks, tamarisk scrub, disturbed habitat, and agricultural land. This portion of the Project site is mapped as Other Conserved Habitat for LeConte's thrasher, Coachella Valley round-tailed ground squirrel (*Spermophilus tereticaudus chlorus*), and flat-tailed horned lizard (*Phrynosoma mcallii*), which are all Covered Species under the CVMSHCP. The EIHCA is part of the watershed for mesquite hummocks and provides potential habitat connectivity with the Thousand Palms Conservation Area through the Indio Hills Palms Conservation Area to the west.



Source: Rocks Biological Consulting, December 2019.

EXHIBIT 4.3-4: CV SHP Conservation reas

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Off-site Improvement Areas

The off-site improvement area is located within the Coachella Valley MSHCP boundary but is not located within a MSHCP Conservation Area, which are mapped areas with conservation obligations, which require additional review by the Coachella Valley Conservation Commission's (CVCC).

Like Exchange Process

The entire Project site is located within the Plan Area for the CVMSHCP. Specifically, the land proposed for the Vista Del Norte Crossing occurs within the southern terminus of the EIHCA. Since the Vista Del Norte Crossing, as planned, is wider than the maximum road width to be considered a Covered Activity under the CVMSHP, a Like Exchange report was prepared by ELMT Consulting (**Appendix C-4**) that analyzed the compensation for the loss of habitats within the EIHCA. See **Impact 4.3-6** for further discussion and analysis.

JURISDICTIONAL DELINEATION

RBC conducted a formal aquatic resources delineation of the Project site from May 7, 2019 to May 10, 2019 in order to identify areas that may be considered jurisdictional under the USACE pursuant to Section 404 of the Clean Water Act (CWA); jurisdictional under the RWQCB pursuant to Section 401 of the CWA and the Porter-Cologne Act, and streambed and riparian habitats under the CDFW pursuant to Cal. Fish and Game Code (Section 1602). An additional jurisdictional delineation was conducted of the Project site from October 29, 2019, to October 30, 2019. Complete methods and results are presented in the Project's Jurisdictional Delineation located in **Appendix C2**.

The aquatic resources delineation determined that the Project site supports USACE-jurisdictional non-wetland waters of the U.S., RWQCB-jurisdictional non-wetland waters of the State, and CDFW-jurisdictional non-wetland streambed, associated riparian habitat, and/or watercourse. The total acreage and linear feet of each resource type is summarized in **Table 4.3-3: Jurisdictional Resources within Project Site** below.

Table 4.3-3: Jurisdictional Resources within Project Site

Agency	Resource Type	Total Acreage	Total Linear Feet
USACE	Non-wetland waters of the U.S.	2.72	2,957
RWQCB	Non-wetland waters of the U.S./State	637.37	282,372
CDFW	Streambed (Bank)	637.37	282,372
	Riparian Vegetation	0.20	Not applicable
Source: RBC 2020, Table 3.			

Estimated jurisdictional features observed within the Project survey area during the formal jurisdictional delineation field effort include Feature (F) 1 to F16 and the Coachella Canal (**Exhibit 4.3-5: Jurisdictional Delineation – Project Site**). Each named/numbered feature represents a separate watercourse, and as such, includes all functionally related and connected single-thread channels, compound channels, braided channels, and floodplains. Features that may connect outside of the Project survey boundary (Project area

plus 100-foot buffer) were not deemed to be functionally related or connected for purposes of naming each on-site feature.

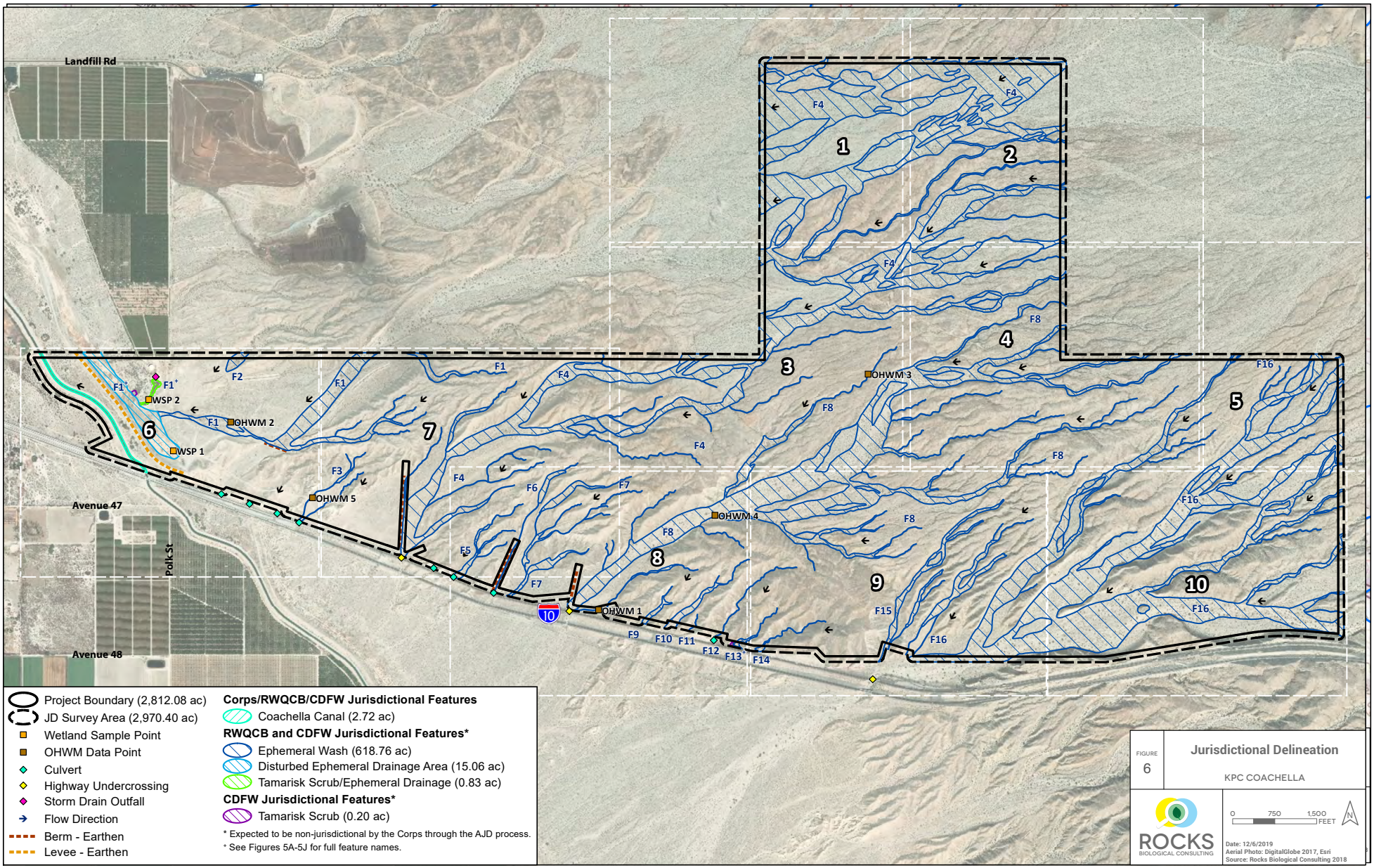
The Coachella Canal would be considered a USACE-jurisdictional non-wetland waters of the U.S. as a tributary (i.e., 33 Code of Federal Regulation [CFR] 328.3(a)(5)) to the Whitewater River and ultimately the Salton Sea. The Coachella Canal and F1 to F16 (excluding F1 – Tamarisk Scrub and F13 – Tamarisk Scrub) would be considered non-wetland waters of the State/surface waters per the RWQCB. It is also expected that the Coachella Canal and F1 to F16 would be considered CDFW streambed, associated riparian habitat, and/or watercourse as defined by the Mapping Episodic Stream Activity (MESA) Field Guide. Generally, areas deemed as jurisdictional by the RWQCB and CDFW consist of watercourses comprised of ephemeral desert wash.

Since there would be impacts on the Coachella Canal via the proposed crossing, a USACE permit would be required. Impacts on jurisdictional features per RWQCB and CDFW (if deemed jurisdictional) would require Waste Discharge Requirements (WDR) from RWQCB and Streambed Alteration Agreement (SAA) from CDFW. The RWQCB and/or CDFW may also require a functional assessment (e.g., California Rapid Assessment Method [CRAM]) to quantitatively estimate the stream condition for the evaluation of the Project. Additionally, compensatory mitigation would be required by the regulatory agencies to offset potential impacts to wetlands and/or waters of the State.

Off-site Improvement Areas

RBC conducted a constraints-level assessment of the survey area for the presence of potential USACE, RWQCB-, and CDFW-jurisdictional aquatic resources. Based on the constraints-level assessment, two potentially jurisdictional aquatic resources occur within the northern portion of the off-site improvement areas, consisting of an unvegetated linear feature and a disturbed area of cattail marsh. **Exhibit 4.3-6: Jurisdictional Delineation – Off-Site Improvement Areas**.

The unvegetated linear feature commences within the survey area, south of Vista del Norte before continuing off site and dissipating in disturbed uplands. The disturbed cattail marsh occurs on the south side of Vista Del Norte within the off-site improvement areas and is primarily composed of cattail and tamarisk, both of which are wetland indicator plant species per the USACE's Arid West 2020 Regional Wetland Plant List. The Biological and Aquatic Resources Assessment also concluded that according to the NRCS Online Soil Map, both features are located in Myoma fine sand, which is classified as a hydric soil per the NRCS Soil Data Access Hydric Soils List. The USFWS National Wetland Inventory and USGS National Hydrography Dataset do not map the linear feature or the disturbed cattail marsh, and standing water was not observed in either feature.



Source: Rocks Biological Consulting, December 2019.

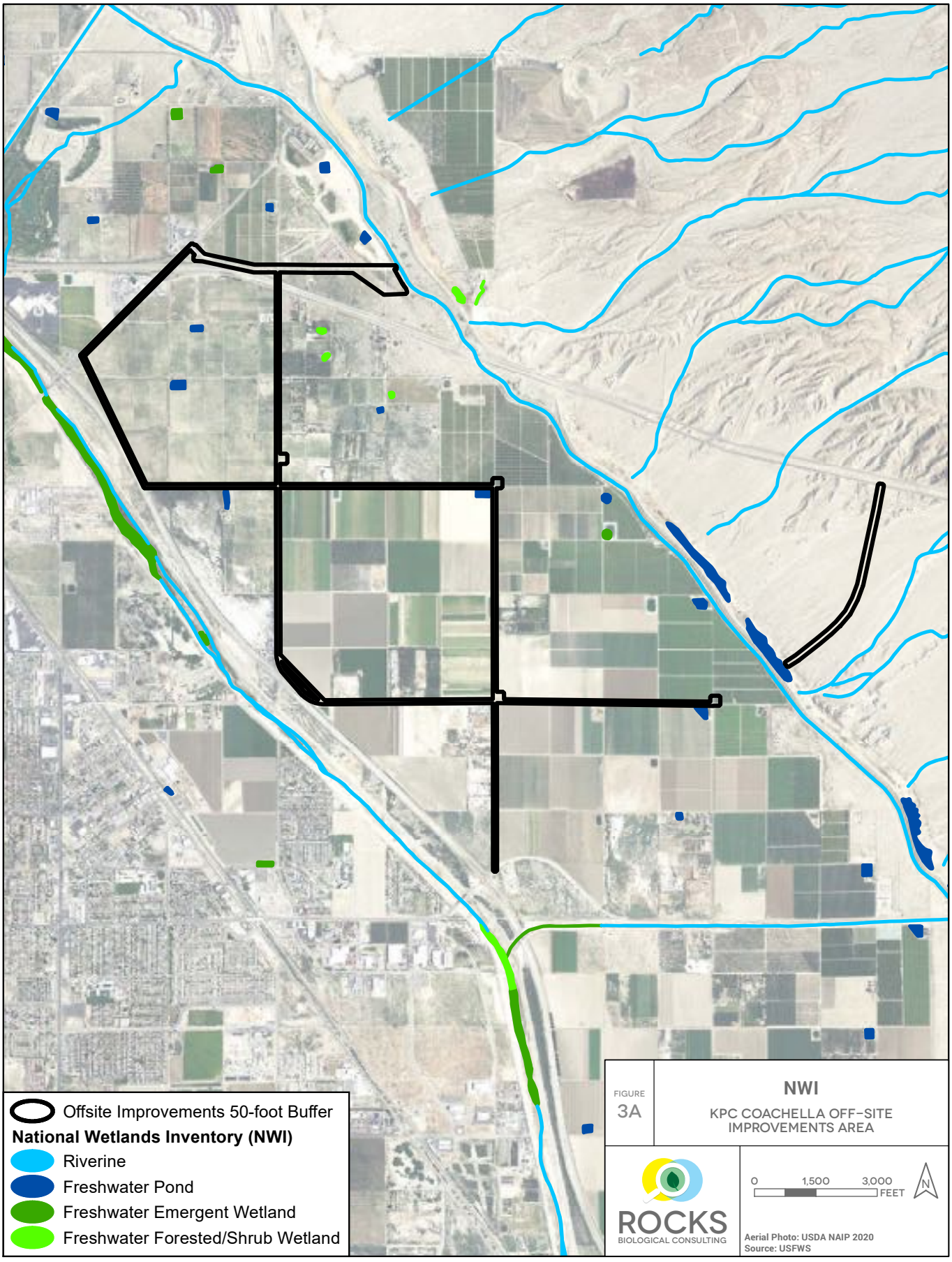
EXHIBIT 4.3-5: Jurisdi tional elineation - Pro e t site

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City of Coachella

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Source: Rocks Biological Consulting, December 2019.

EXHIBIT 4.3-6: Jurisdi tional elineation - ff-Site Improvement reas
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4.3.2 REGULATORY SETTING

FEDERAL

Federal Endangered Species Act

The federal Endangered Species Act of 1973 (ESA; 16 U.S.C. Section 1531 et seq.), as amended, provides for the listing of endangered and threatened species of plants and animals and the designation of critical habitat for listed species. The ESA regulates the "taking" of any endangered fish or wildlife species, per Section 9 of the ESA. As development is proposed, the responsible agency or individual landowner is required to consult with the USFWS to assess potential impacts to listed species (including plants) or its critical habitat, pursuant to Sections 7 and 10 of the ESA. USFWS is required to determine the extent of impact a project would have to a particular species. If it is determined that potential impacts to a species would likely occur, measures to avoid or reduce such impacts must be identified. USFWS may issue an incidental take statement, following consultation and the issuance of a Biological Opinion. This allows for take of the species that is incidental to another authorized activity, provided that the action will not adversely affect the existence of the species. Section 10 of the ESA provides for issuance of incidental take permits to non-federal parties with the development of an HCP. Section 7 of the ESA provides for permitting of projects where interagency cooperation is necessary to ensure that a federal action/decision does not jeopardize the existence of a listed species.

Migratory Bird Treaty Act

The MBTA (16 U.S.C. Section 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive and listed at 50 CFR 10.13. The USFWS enforces the MBTA, which prohibits "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird, or attempt such actions, except as permitted by regulation.

Clean Water Act

Pursuant to Section 404 of the CWA (33 U.S. Code Section 1344), the USACE is authorized to regulate any activity that would result in the discharge of dredged or fill material into waters of the U.S. (including wetlands), which include those waters listed in 33 CFR 328.3 (a) (as amended at 88 Federal Register 3142, January 18, 2023). The USACE, with oversight from the U.S. Environmental Protection Agency (U.S. EPA), has the principal authority to issue CWA Section 404 permits. The USACE would require a Standard Individual Permit (SIP) for more than minimal impacts to waters of the U.S. as determined by the USACE. Substantial impacts on waters of the U.S. may require an Individual Permit. Projects with minimal individual and cumulative adverse effects on the environment may meet the conditions of an existing Nationwide Permit (NWP).

A water quality certification or waiver pursuant to Section 401 of the CWA (33 U.S. Code Section 1341) is required for all Section 404 permitted actions. The RWQCB, a division of the State Water Resources Control Board (SWRCB), provides oversight of the 401-certification process in California. The RWQCB is required to provide Water Quality Certification for licenses or permits that authorize an activity that may

result in a discharge from a point source into a water of the U.S. Water Quality Certification authorization "is limited to assuring that a discharge from a Federally licensed or permitted activity will comply with water quality requirements" (40 CFR 121.3).

The National Pollutant Discharge Elimination System (NPDES) is the permitting program for discharge of pollutants into surface waters of the U.S. under Section 402 of the CWA (33 U.S. Code Section 1342).

Navigable Waters Protection Rule

The U.S EPA and USACE published the Navigable Waters Protection Rule (Final Rule) in order to define the scope of waters subject to federal regulation under the CWA. The final "Revised Definition of 'Waters of the United States" rule was published on January 18, 2023, and took effect on March 20, 2023.

The term "Waters of the U.S." means:

1) All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2) All interstate waters including interstate wetlands;
3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation, or destruction of which would or could affect interstate or foreign commerce including any such waters:
    1) Which are or could be used by interstate or foreign travelers for recreational or other purposes; or
    2) From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
    3) Which are used or could be used for industrial purposes by industries in interstate commerce;
4) All impoundments of waters otherwise defined as waters of the United States under this definition;
5) Tributaries of waters identified in paragraphs (a)(1) through (4) of this section;
6) The territorial seas; and
7) Wetlands adjacent to waters (other than waters that are themselves wetlands).

The USACE typically regulates as waters of the U.S. any body of water displaying an ordinary high-water mark (OHWM). USACE jurisdiction over non-tidal waters of the U.S. extends laterally to the OHWM or beyond the OHWM to the limit of any adjacent wetlands, if present. The OHWM is defined as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the

characteristics of the surrounding area." Jurisdiction typically extends upstream to the point where the OHWM is no longer perceptible.

Permits authorized by USACE under the Act typically contain mitigation to offset unavoidable impacts on wetlands and other waters of the U.S. in a manner that achieves no net loss of wetland acres or values.

Executive Order 11990, Protection of Wetlands

This Executive Order from May 1977 establishes a national policy to avoid adverse impacts on wetlands whenever there is a practicable alternative. On projects with federal actions or approvals, impacts on wetlands must be identified in the environmental document. Alternatives that avoid wetlands must be considered. If wetland impacts cannot be avoided, then all practicable measures to minimize harm to those wetlands must be included. This must be documented in a specific 'Wetlands Only Practicable Alternative Finding' in the final environmental document for the proposed project.

Rivers and Harbors Appropriation Act of 1899

The Rivers and Harbors Appropriation Act of 1899 (Rivers and Harbors Act; 33 USC Section 403) prohibits the discharge of any material into navigable waters, or tributaries thereof, of the United States without a permit. The Rivers and Harbors Act also makes it a misdemeanor to excavate, fill, or alter the course, condition, or capacity of any port, harbor, or channel; or to dam navigable streams without a permit.

Many activities originally covered by the Rivers and Harbors Act are now regulated under the Clean Water Act of 1972 (CWA; 33 USC Section 1251 et seq.), discussed above. However, the 1899 Act retains relevance and created the structure under which the USACE oversees CWA Section 404 permitting.

STATE

California Environmental Quality Act

The California Environmental Quality Act (CEQA) was established in 1970 as California's counterpart to the National Environmental Policy Act (NEPA; 42 USC §4321 et seq.). CEQA requires state and local agencies to identify significant environmental impacts of their actions and to avoid or mitigate those impacts, where feasible.

CEQA applies to certain activities of state and local public agencies. A public agency must comply with CEQA when it undertakes an activity defined by CEQA as a "project." A project is an activity undertaken by a public agency or a private activity, which must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency that may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

California Endangered Species Act and Natural Community Conservation Planning Act

The CESA, in combination with the Native Plant Protection Act of 1977 (NPPA; Cal. Fish and Game Code Section 1900 et seq.), regulates the listing and take of plant and animal species designated as endangered,

threatened, or rare within the state. California also lists species of special concern (SSC) based on limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. CDFW is responsible for assessing development projects for their potential to impact listed species and their habitats. State listed special-status species are addressed through the issuance of a 2081 permit (Memorandum of Understanding).

In 1991, the California Natural Community Conservation Planning Act (NCCP Act; Cal. Fish and Game Code [CFGC] Section 2800 et seq.) was approved and the NCCP Coastal Sage Scrub program was initiated in southern California. California law established the NCCP program "to provide for regional protection and perpetuation of natural wildlife diversity while allowing compatible land use and appropriate development and growth." The NCCP Act encourages preparation of plans that address habitat conservation and management on an ecosystem basis rather than one species or habitat at a time.

Native Plant Protection Act of 1977

The Native Plant Protection Act (NPPA) (e.g., CFGC Sections 1900-1913) directs CDFW to carry out the legislature's intent to "preserve, protect and enhance rare and endangered plants in this State." The NPPA gives the California Fish and Game Commission the power to designate native plants as endangered or rare, since CESA does not explicitly cover rare plants. Accordingly, the CDFW's Wildlife and Habitat Data Analysis Branch maintains a 'special plants' list of approximately 2,000 native plant species, subspecies or varieties that are tracked by the CNDDB. The NPPA prohibits the taking of listed plants from the wild and requires notification of the CDFW at least 10 days in advance of any change in land use which would adversely impact listed plants. This requirement allows CDFW to salvage plants that would otherwise be destroyed.

The CNPS publishes and maintains an Inventory of Rare and Endangered Vascular Plants of California. The inventory assigns a ranking status. Plants on the 1A, 1B and 2 lists of the CNPS Inventory consist of plants that may qualify for listing and CDFW requires that they be addressed under CEQA.

Unlawful Take or Destruction of Nests or Eggs (Fish and Game Code Sections 3505.5-3513)

Section 3503.5 of the CFGC specifically protects birds of prey, stating:

> *It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.*

Section 3513 of the CFGC duplicates the federal protection of migratory birds, stating:

> *It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act.*

California Wetlands Conservation Policy

California wetlands policy is more restrictive than Federal wetlands policy. The goal of California Wetlands Conservation Policy (1993) is to ensure no net loss of wetlands within the State. This policy, incorporated in an executive order by then Governor Pete Wilson, also encourages a long-term net gain in the State's quantity, quality, and permanence of wetlands acreage and values. Interpretation of this order indicates that any developer wishing to fill in wetlands for construction for new development must perform mitigation in the form of constructed wetlands elsewhere at ratios ranging from 2:1 to 10:1. In addition to the USACE, State regulatory agencies claiming jurisdiction over wetlands include the CDFW and the SWRCB.

Regional Water Quality Control Board

Under Section 401 of the CWA, the RWQCB must certify that actions receiving authorization under Section 404 of the CWA also meet State water quality standards. The RWQCB also regulates waters of the State under the Porter-Cologne Act Water Quality Control Act (Porter-Cologne Act) (see below). The RWQCB requires projects to avoid impacts to wetlands if feasible and requires that projects do not result in a net loss of wetland acreage or a net loss of wetland function and values. The RWQCB typically requires compensatory mitigation for impacts on wetlands and/or waters of the State. The RWQCB also has jurisdiction over waters deemed isolated or not subject to Section 404 jurisdiction under the *Solid Waste Agency of Northern Cook County v. Army Corps of Engineers* decision. Dredging, filling, or excavation of isolated waters constitutes a discharge of waste to waters of the State and prospective dischargers are required to obtain authorization through an Order of Waste Discharge or waiver thereof from the RWQCB and comply with other requirements of Porter-Cologne Act.

California Fish and Game Code Section 1600-1602

Pursuant to Division 2, Chapter 6, Section 1602 of the CFGC, CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel or bank of any river, stream or lake that supports fish or wildlife. A Notification of Lake or Streambed Alteration must be submitted to CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake" (CFGC Section 1602). CDFW has jurisdiction over riparian habitats associated with watercourses and wetland habitats supported by a river, lake, or stream. Jurisdictional waters are delineated by the outer edge of riparian vegetation (i.e., drip line) or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources (e.g., riparian or wetland areas not supported by a river, lake, or stream). CDFW reviews the proposed actions and, if necessary, submits (to the applicant) a proposal that includes measures to protect affected fish and wildlife resources. The final proposal that is mutually agreed upon by CDFW and the applicant is the Lake or Streambed Alteration Agreement.

California Fish and Game Code Sections 3503, 3511, 3513, 3800, 4700, 5050, and 5515

CDFW protects and manages fish, wildlife, and native plant resources within California. The California Fish and Game Commission and/or CDFW are responsible for issuing permits for the take or possession of protected species. The following sections of the CFGC address protected species: Section 3511 (birds),

Section 4700 (mammals), Section 5050 (reptiles and amphibians), and Section 5515 (fish). In addition, the protection of birds of prey is provided for in Sections 3503, 3513, and 3800 of the CFGC.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (California Water Code Section 13000 et seq.) provides for statewide coordination of water quality regulations. The SWRCB was established as the statewide authority and nine separate RWQCBs were developed to oversee water quality on a day-to-day basis.

The RWQCBs have primary responsibility for protecting water quality in California. As discussed above, the RWQCBs regulate discharges to surface waters under the CWA. In addition, the RWQCBs are responsible for administering the Porter-Cologne Water Quality Control Act.

Pursuant to the Porter-Cologne Water Quality Control Act, the state is given authority to regulate waters of the State, which are defined as any surface water or groundwater, including saline waters. As such, any person proposing to discharge waste into a water body that could affect its water quality must first file a Report of Waste Discharge if a Section 404 permit is not required for the activity. “Waste” is partially defined as any waste substance associated with human habitation, including fill material discharged into water bodies.

REGIONAL

Coachella Valley Multiple Species Habitat Conservation Plan

The CCVC oversees and administers the implementation of the CVMSHCP. The CVCC, a joint powers authority was formed by Local Permittees[1] pursuant to the requirements of the California Government Code and other appropriate legal authorities.

The purpose of the CVMSHCP is to enhance and maintain biological diversity and ecosystem processes while allowing future economic growth. The CVMSHCP sets Conservation Goals and Objectives to ensure conservation of the Covered Species and conserved natural communities in the CVMSHCP Reserve System. In addition to setting Conservation Goals and Objectives for the Covered Species and conserved natural communities, the CVMSHCP has designated Core Habitat, Other Conserved Habitat, Essential Ecological Processes, and Biological Corridors and Linkages. The CVMSHCP area is divided into Conservation Areas based on a combination of ecological and jurisdictional factors.

The CVMSHCP was approved in October 2008 and provides ongoing comprehensive framework for species and ecosystem conservation, and short- and long-term local land use decision making in the Coachella Valley. The CVMSHCP program was undertaken by the Coachella Valley Association of Governments (CVAG), a joint powers authority with eight participating cities (Cathedral City, Coachella, Indian Wells, Indio, La Quinta, Palm Desert, Palm Springs and Rancho Mirage) along with the County of Riverside, Coachella Valley Water District and Imperial Irrigation District. With the CVMSHCP’s approval in 2008,

[1] Local Permittees are the cities of Cathedral City, Coachella, Desert Hot Springs, Indian Wells, Indio, La Quinta, Palm Desert, Palm Springs, and Rancho Mirage; the County; County Flood Control; County Parks; County Waste; CVCC, CVAG, CVWD, Mission Springs Water District (MSWD), and Imperial Irrigation District (IID)

each of the participating local jurisdictions are now able to authorize development and other activities without proposing additional mitigation or conservation measures for covered species. The 30-year term of the MSHCP coincides with the timeline applicable to all assessments made in the plan. The CVMSHCP geographic scope or "inventory area," wherein evaluation of impacts and conservation planning are anticipated, roughly includes the entire Coachella Valley and adjacent mountainous areas. The City is located entirely within the CVMSHCP boundaries. The CVMSHCP covers 27 special status plant and wildlife that meet certain regulatory and ecological criteria. Of these, 10 covered species are known or have at least a low potential to occur within or near the City. There are three identified MSHCP conservation areas that occur within, adjacent to and/or nearby the City boundaries. These are the Mecca Hills/Orocopia Mountains Conservation area, situated southeast of the City; the Desert Tortoise and Linkage Conservation Area to the north and east of the City, and the Indio Hills Conservation Area to the north.[2]

Coachella Valley Conservation Commission – Like Exchange Process

According to the MSHCP "Like Exchanges are changes proposed by a Permittee to modify the boundary of one or more Conservation Areas in exchange for reducing or modifying the boundary of a Conservation Area. A Like Exchange must result in equal or greater benefits to Covered Species and conserved natural communities as compared to those benefits analyzed in the Plan.".[3]

LOCAL

City of Coachella General Plan

The Project site is located in the City of Coachella and would be required to comply with the regulations set forth in the City of Coachella General Plan (Coachella GP). Coachella GP elements, goals, and policies relevant to the Project are as follows:

Sustainability and Natural Environment Element

This Element establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces.[4]

Goal 7 **Waterways. Waterways and desert washes that serve a natural, environmental function and provide aesthetically pleasing open space for the community.**

Policy 7.6 Waterways as amenities. When considering development applications and infrastructure improvements, treat waterways as amenities, not hazards, and encourage designs that embrace the waterways.

Goal 9 **Plant and Wildlife Habitat Areas. Protected plant and wildlife habitat areas that are protected, productive, viable natural resources and exist harmoniously with adjacent development.**

[2] City of Coachella. 2015. City of Coachella General Plan Update Environmental Impact Report. Section 4.3, Biological Resources. Page 20.. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.3_-_biological_resources.pdf(accessed October 2025).

[3] CVCC. 2016. CVMSCHP. Chapter 6: Plan Implementation. Page 6-20. https://cvmshcp.org/Plan-Documents/13-CVAG-MSHCP-Plan-Section-6-0.pdf (accessed July 2023).

[4] City of Coachella. 2015. City of Coachella General Plan Update – Sustainability and Natural Environment Element. https://www.coachella.org/home/showpublisheddocument/8419/637819141150600000 (accessed October 2025).

Policy 9.1 Buffers from new development: Require new developments adjacent to identified plant and wildlife habitat areas to maintain a protective buffer.

Policy 9.5 Multiple species habitat conservation plan: Support and adhere to the Coachella Valley Multiple Species Habitat Conservation Plan.

Policy 9.7 Landscape design: Encourage new developments to incorporate native vegetation materials into landscape plans and prohibit the use of species known to be invasive according to the California Invasive Plant Inventory.

Goal 10 Passive Open Space. Preserved open space areas that represent significant aesthetic, cultural, environmental, economic and recreational resources for the community.

Policy 10.1 Open space network. Require new development to contribute land and/or funding to expand the community's open space network, in support of the MSHCP.

Policy 10.8 Preservation of natural land features: Preserve significant natural features and incorporate into all developments. Such features may include ridges, rock outcroppings, natural drainage courses, wetland and riparian areas, steep topography, important or landmark trees and views.

City of Coachella Municipal Code

The City of Coachella Municipal Code (MC) contains several provisions that are expressly designed to identify and limit biological resource impacts as projects are undergoing review by the City. Specifically, the following provisions of the Coachella MC regulate impacts related to biological resources throughout all areas of the City:

Chapter 4.48.020 – Coachella Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan Mitigation Fee: Findings. City council finds and determines as follows:

A. In order to realize the goals and objectives of the Coachella Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan ("MSHCP") and to mitigate the impacts caused by new development in the city, lands supporting species covered by the MSHCP must be acquired, monitored and managed in order to achieve habitat conservation in perpetuity.

B. The local development mitigation fee (the "fee") is necessary in order to supplement the financing of the acquisition of lands supporting species covered by the MSHCP and related public services, and to pay for new development's fair share of the cost of acquisition and perpetual conservation.

C. The appropriate source of funding for the costs associated with mitigating the impacts of new development to the natural ecosystems and covered species within the city, as identified in the MSHCP, is a fee paid for by residential, commercial and industrial development. The amount of the fee is determined by the nature and extent of the impacts from the development to the identified natural ecosystems and the relative cost of mitigating such impacts.

D. The fee does not reflect the entire cost of the lands which need to be acquired and perpetually conserved in order to implement the MSHCP and mitigate the impact caused by new development. Additional revenues will be required from other sources. The city finds that the benefit to each development project is greater than the amount of the fee to be paid by that project.

E. The use of the fee is apportioned relative to the type and extent of impacts caused by the development.

F. The costs of funding the proper mitigation for natural ecosystems and covered species identified in the MSHCP which are impacted by new development are apportioned relative to the type and extent of impacts caused by the development.

G. The facts and evidence provided to and considered by the city council establish that there is a reasonable relationship between the need for acquiring and conserving in perpetuity the natural ecosystems and covered species identified in the MSHCP, and the impacts to such natural ecosystems and species created by the types of development on which the fee will be imposed; and that there is a reasonable relationship between the fee's use and the types of development for which the fee is charged. This reasonable relationship is described in more detail in the mitigation fee nexus report.

H. The fees collected pursuant to this ordinance are reasonable and will not exceed the estimated total cost of the acquisition and perpetual conservation of the lands necessary to protect natural ecosystems and covered species, the plan and schedules for which are set forth in the MSHCP. Conservation of the land shall require monitoring and management beyond the life of the MSHCP permit.

I. The fee shall be used to finance the acquisition and perpetual conservation of lands and certain improvements necessary to implement the goals and objectives of the MSHCP.[5]

Chapter 12.24.040 – Street Trees: Duties of private owners. It shall be the duty of any person growing a tree within a public highway or responsible for trees growing on property abutting on public places supporting trees or plants:

A. Trim. To trim his or her trees so as not to cause a hazard to public places or interfere with the proper lighting of public highways by the streetlights, and so that minimum clearance of any overhanging portion shall be nine feet.

B. Treat or Remove. To treat or remove any tree or plant so diseased or insect ridden as to constitute a hazard to trees or plants in public places. [6]

Chapter 12.28.010 – Palm Trees: Trimming palm trees – Required. Every person owning real property in the city on which there are standing or growing palm trees shall, at least annually, remove or cause to be removed, by trimming or cutting, from the palm trees standing or growing on the property so owned by such person all dead leaves and/or fronds adhering to the trunks of such palm trees.[7]

[5] City of Coachella. 2022. *City of Coachella Municipal Code. Section 4.48.020.* https://library.municode.com/ca/coachella/codes/code_of_ordinances?nodeId=TIT4REFI_CH4.48COVAMUSPHACOPLNACOCOPLMIFE_4.48.020FI (accessed October 2025).

[6] City of Coachella. 2022 *City of Coachella Municipal Code. Section 12.24.040.* https://library.municode.com/ca/coachella/codes/code_of_ordinances?nodeId=TIT12STSIPUPL_CH12.24STTR_12.24.040DUPROW (accessed October 2025).

[7] City of Coachella. 2022. *City of Coachella Municipal Code. Section 12.28.010.* https://library.municode.com/ca/coachella/codes/code_of_ordinances?nodeId=TIT12STSIPUPL_CH12.28PATR_12.28.010TRPATREQ (accessed October 2025).

4.3.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning biological resources. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

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

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

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

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

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

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

METHODOLGY AND ASSUMPTIONS

The Project and associated Project Design Features (PDFs) are evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning biological resources. This analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

For detailed methods used for the biological resources assessment and jurisdictional delineation, see the respective studies in **Appendix C**.

APPROACH TO ANALYSIS

This analysis of impacts on biological resources examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects based on application of the significance criteria/thresholds outlined

above. Each criterion is discussed in the context of the Project site, the off-site improvement areas, and the surrounding characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The baseline conditions and impact analyses are based on the aforementioned biological resources studies; review of maps and drawings; analysis of aerial and ground-level photographs; and review of various data available in public records, including local planning documents. The determination that a Project component would or would not result in "substantial" adverse effects on biological resources considers how the potential for development and operation of the site would affect the resources.

PROJECT DESIGN FEATURES

- The Project has been designed to avoid or minimize impacts to the more biologically sensitive areas including the major drainage courses that traverse the site.
- The Project would include 379 acres of parks, greenways, and amenity centers which would include natural spaces.
- The Project would include 68 acres of agricultural production. This may include vineyards for the production of table grapes, date palm groves for resale, or other agricultural products that are suitable for the region.
- The Project would include 770 acres of drainage and other open space. Conservation areas (wildlife/natural habitats, habitat enhancement areas and sanctuaries) are a permitted use in the areas designated as Open Space.

4.3.4 PROJECT IMPACTS AND MITIGATION

Impact 4.3-1: ***Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

Level of Significance: Less Than Significant with Mitigation Incorporated

A substantial adverse effect to special-status species would occur if a project would: (1) reduce the population size or reduce the area of occupied habitat of a rare, threatened, or endangered species; or (2) reduce the population size or reduce the area of occupied habitat of a locally uncommon species. A substantial adverse effect on a special-status wildlife species would occur if a project would: (1) reduce the known distribution of a species; (2) reduce the local or regional population of a species; (3) increase predation of a species, leading to population reduction; (4) reduce habitat availability sufficiently to affect potential reproduction; or (5) reduce habitat availability sufficiently to constrain the distribution of a species and not allow for natural changes in distributional patterns over time.

CONSTRUCTION

Project construction would occur in six phases. The greatest disturbance would occur during excavation activities associated with the grading phase. This phase of construction has the potential to create the highest levels of disturbance due to its disruptive nature. Approximately 1,171 acres of open space, approximately 43 percent of the entire Project area, would be comprised of active and passive parks, sports fields, and natural drainage and other open space areas.

Threatened and Endangered Species

No state or federally threatened or endangered species were observed during the general biological field survey. There is moderate potential for the federally and state-threatened desert tortoise to occur within the Project site and low potential for the federally endangered Coachella Valley milk-vetch and the federally endangered and state-threatened Coachella Valley fringe-toed lizard to occur. In addition, suitable migration habitat for the federally and state-endangered least Bell's vireo is present onsite, but no breeding habitat is present, and this species is unlikely to nest within the Project site. All four of these species are covered by the CVMSHCP. Any potential impacts on these species would be covered through compliance with the CVMSHCP**.**

Please note that while impacts on desert tortoise and their habitat are covered through participation in the CVMSHCP (and pre-established mitigation measures), the USFWS Permit Conditions for the CVMSHCP require that the USFWS be notified 45 days prior to the issuance of a grading permit to allow for the potential salvage of adult tortoises within the notification time period and that preconstruction desert tortoise clearance surveys be conducted per USFWS protocol. These actions would be implemented pursuant to **MM BIO-1**.

Non-Listed Special Status Species

Two non-listed special-status species, loggerhead shrike and black-tailed gnatcatcher, were observed during the general biological field survey. Thirty-nine non-listed special-status species that have a low, moderate, or high potential to occur within the Project site were identified (**Table 4.3-2**). These species have no official state or federal protection status; however, they are required to be considered under CEQA. Of the non-listed special status species with potential to occur on the Project site, 13 are covered by the CVMSHCP while 26 species are not covered.

Through implementation of the CVMSHCP Reserve System and conservation objectives, the covered species are considered protected and adequately conserved through the CVMSHCP's pre-established Conservation Areas and avoidance, minimization, and mitigation measures. The non-listed special status species that are not covered by the CVMSHCP (i.e., loggerhead shrike and black-tailed gnatcatcher) occur within the same habitats as the covered species (e.g., creosote bush scrub, desert scrub, Grassland, and chaparral) and are still considered relatively common within the Reserve System and across the Coachella Valley (see **Table 4.3-2**). Additionally, the non-listed special status bird species not covered by the CVMSHCP would be protected under the MBTA. With regard to the American badger and the western mastiff bat, no CNDDB occurrences have been recorded within a mile of the Project site. Also, over 1,000

acres of potential suitable habitat would remain within the Project site in the form of greenways and natural open space. Therefore, the Project would not have significant impacts on any of the non-listed special species that could potentially occur onsite.

Special-Status Plant Communities/California Desert Native Plants Act

There would be no impacts on special-status plant species or communities as no such habitats occur on the Project site.

Burrowing Owl and Migratory Birds

The burrowing owl, a species protected under the MBTA and the CFGC and covered under the CVMSHCP has high potential to occur on the Project site. Impacts on burrowing owl would be considered less than significant through participation in the CVMSHCP; however, under the MBTA, Project-related impacts on burrowing owl would require mitigation to ensure compliance with the MBTA and CFGC. Activities that cause destruction of active nests, or that cause nest abandonment and subsequent death of eggs or young may constitute violations of one or both of these laws. In order to comply with these state and federal regulations, and pursuant to **MM BIO-2**, a pre-construction survey for the burrowing owl is required on the Project site 30 days prior to site disturbance. If burrowing owl is found to be present, avoidance measures would be required following accepted protocols. If burrowing owl is found to be present during the breeding season (February 1 to August 31), no ground disturbance can begin within the occupied area until after the breeding season (i.e., after August 31) and/or until the burrowing owl have completed their nesting activities. Any relocation efforts must be coordinated with CDFW and/or USFWS.

Additionally, the Project has the potential to impact active bird nests if vegetation is removed or ground disturbing activities are initiated during the nesting season (February 1 to August 31). The existing habitat onsite supports special-status species loggerhead shrike and black-tailed gnatcatcher and has potential to support nesting bird species such as Le Conte's thrasher and several raptor species. Impacts on nesting birds are prohibited by the MBTA and CFGC, as such, ground-disturbing activities, including vegetation clearing, should be conducted outside of the nesting season. If avoidance of the nesting season is not feasible then a qualified biologist should conduct a nesting bird survey, pursuant to **MM BIO-3**, within three days prior to any disturbance of the Project site, including disking, excavation, and grading. If active nests are identified, the qualified biologist shall establish suitable buffers around the nests depending on the level of activity within the buffer and sensitivity of the species observed. The buffer areas shall be avoided until the nests are no longer occupied and juvenile birds can survive independently from the nest.

Off-Site Construction Improvements

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The off-site improvement areas are highly developed, and the undeveloped areas are subject to frequent disturbance from human activity, resulting in low suitability for special-status plant species. Mitigation related to potential impacts on special-status plants is not anticipated.

The burrowing owl and desert tortoise have moderate and low potential to occur, respectively on the north side of the Coachella Channel. Pre-construction surveys for the desert tortoise burrowing owl and may be required prior to any ground disturbance activities, pursuant to **MMs BIO-1** and **BIO-2**, respectfully. If either species is documented in the off-site improvement areas, further coordination with USFWS and/or CDFW may be required. Additional special-status wildlife species have low potential to occur within the off-site improvement areas. The majority of the off-site improvement areas proximity to developed land makes it highly unlikely to support special-status wildlife species. Additionally, impacts on wildlife resulting from the construction activities aren't likely to increase substantially from the existing amount of development and human-caused disturbance to the off-site improvement areas.

The off-site improvement areas, however, have potential to support avian nests, which would be protected by the Migratory Bird Treaty Act (MBTA). Similarly, **MM BIO-3** would be implemented which requires that pre-construction presence/absence surveys are conducted for nesting birds. To avoid direct impacts on raptors and/or native/migratory birds, vegetation removal, ground-breaking activities, and other site disturbances should occur outside of the general avian breeding season (generally February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds in the proposed area of disturbance. Adequate avoidance buffers, as determined by a qualified biologist, shall be required around active nests, if observed during pre-construction surveys.

Note that off-site improvements areas are conceptual and would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including biological resources.

Therefore, with implementation of **MMs BIO-1** through **BIO-3**, the construction activities conducted at the off-site improvement areas would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Further, the off-site powerline improvements were included in the footprint of the biological resources surveys completed for the Project. Impacts resulting from the construction of these powerlines would be consistent with the impacts of other powerline construction and would not create unique circumstances such that the impacts would be any other than those expected. There are existing powerlines in the general vicinity and these uses would not be out of the ordinary.

OPERATIONS

Operations of the Project would not have an effect on sensitive animals or their habitat. Once construction activities for each project within the Project site are completed, no additional impacts would occur with Project operations as it relates to listed and non-listed species. Therefore, impacts would be less than significant, and mitigation would not be required.

Off-Site Operational Improvements

Refer to operations discussion above.

Mitigation Measures

MM BIO-1 **Desert Tortoise Salvage or Surveys.** Prior to the issuance of a grading permit, the Project applicant will retain a qualified biologist to conduct preconstruction surveys for the desert tortoise. If desert tortoise are found, the Project applicant shall notify the USFWS 45 days prior to the issuance of any grading permit to allow the USFWS to salvage adult tortoises. If the USFWS is not able to salvage desert tortoise, the Project applicant will salvage desert tortoise per current USFWS desert tortoise clearance survey protocol. Construction on the Project site would not occur until the tortoises are salvaged.

MM BIO-2 **Burrowing Owl.** In accordance with CDFW's Staff Report on Burrowing Owl Mitigation, two preconstruction take avoidance surveys should be conducted prior to any vegetation removal, ground disturbance, or similar activity as follows:

No less than thirty days prior to the onset of ground disturbance, a qualified biologist shall survey the construction limits of the Project and 500-foot buffer for the presence of burrowing owls and occupied nest burrows, in accordance with the Staff Report on Burrowing Owl Mitigation. A final survey shall be conducted within 24 hours prior to ground disturbance.

If nesting and/or activity is present at any burrow site, then the active burrow shall be protected until nesting activity has ended to ensure compliance with Section 3503.5 of the California Fish and Game Code. Nesting activity for burrowing owls normally occurs from February 1 to August 31. To protect any burrow site, the following restrictions on construction are required between February 1 to August 31:

1) *Clearing limits will be established a minimum of 300 feet in any direction from any occupied burrow; and*

2) *Access and surveying will not be allowed within 50 feet of any occupied burrow. Any occupied burrows found during the survey efforts shall be mapped on the construction plans and an ESA avoidance buffer shall be established. Construction during the non-nesting season can occur only at the sites if a qualified biologist has determined that the burrows are no longer active. If an active burrow is observed during the non-nesting period, the burrow site will be monitored by a qualified biologist, and when the owl is outside the burrow entrance, the biologist will flush any owl to open space areas. The biologist will then excavate the burrow site with tools or fill the burrow with soil so owls cannot return to the burrow site.*

Any relocation efforts would be coordinated with the CDFW and/or USFWS. If a burrowing owl is found to be present during the breeding season (February 1 to August 31), no ground disturbance would begin within the occupied area until after the breeding season (i.e., after August 31) and/or until the burrowing owl have completed their nesting activities. Generally, a 300- to 500-foot buffer around nesting owls during construction activities would be implemented.

MM BIO-3 **Nesting Birds.** To avoid direct impacts to raptors and/or native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance would occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, a qualified avian biologist would conduct a preconstruction survey to determine the presence or absence of nesting birds in the proposed area of disturbance. The pre-construction survey would be conducted three calendar days prior to the start of construction activities (including removal of vegetation). If nesting birds are observed, a letter report or mitigation plan in conformance with applicable state and federal law (i.e., appropriate follow-up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) would be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan would be submitted to CDFW and/or USFWS, as applicable, for review and approval and implemented to the satisfaction of the agency(ies). The Project biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not observed during the pre-construction survey, no further mitigation is required.

Impact 4.3-2: ***Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION

Per **Table 4.3-3** above, there are 637.37 acres of CDFW streambed and 0.20 acre of riparian vegetation within the Project survey area. Riparian habitat refers to vegetation and habitat associated with a stream. The CDFW jurisdictional habitat includes all riparian shrub or tree canopy that may extend beyond the banks of a stream. Riparian habitat areas are associated with F1 – Tamarisk Scrub and F13– Tamarisk Scrub. F13 is located outside the Project boundary, within the jurisdictional delineation survey area, and would not be impacted by Project construction. F1 is located in Planning Area DR-1 (Drainage and Other Open Space) and would not be impacted by Project construction activities since no improvements are planned for this Planning Area (DR-1). Lastly, there would be no impacts on special-status plant species or

communities as no such habitats occur on the Project site. Therefore, impacts would be less than significant.

Additionally, the Project applicant would need to obtain permits through the USACE, RWQCB, and CDFW for impacts on jurisdictional aquatic resources. Additionally, a formal, project-specific aquatic resources delineation and reporting per USACE standards and guidelines and further coordination would be required to receive an official determination from the USACE related to potential aquatic resources (Coachella Canal) on-site. Similarly, additional coordination with the RWQCB and CDFW would be required to receive concurrence regarding the jurisdictional status of on-site potential aquatic resources.

Should the on-site aquatic resources not meet the USACE definition of Waters of the U.S. based on the results of a formal aquatic resource delineation and associated jurisdictional analysis, **MM BIO-4** would be implemented in which an approved jurisdictional determination (AJD) would be requested from the USACE to confirm no waters of the U.S., based on the regulatory framework in place at the time of the request occur within the on-site improvement areas and therefore, no USACE permit would be required for the Project. In the event that the on-site jurisdictional aquatic resources meet the definition of Waters of the U.S./State, compensatory mitigation would be required by the regulatory agencies to offset the proposed Project impacts. Therefore, impacts would be reduced to less than significant levels with implementation of **MM BIO-4**.

Off-Site Construction Improvements

No vegetation communities considered sensitive by CDFW occur within the survey area. The off-site improvement areas support two potentially jurisdictional aquatic resources, in the form of a linear feature and disturbed cattail marsh within the northern portion of the off-site improvement area, as depicted in **Exhibit 4.3-6: Jurisdictional delineation – Off-Site Improvement Areas**. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**.

Although impacts on native vegetation communities such as cattail marsh – disturbed, creosote bush scrub, creosote bush scrub – disturbed, and fourwing saltbush scrub would occur during construction activities in the off-site improvement areas, the Project impacts would be offset through payment of CVMSHCP Local Development Mitigation Fees, that would be used to acquire and maintain high-quality habitat within the CVMSHCP Boundary. MSHCP Local Mitigation Development Fees would be in the amount of $5,911 per acre for industrial or commercial uses; $1,331 per dwelling unit for residential development of zero to eight units per acre, $554 per dwelling unit for residential development between 8.1 and 14 dwelling units per acre, and $247 per dwelling unit for development greater than 14 dwelling unit per acre. These fees must be paid at the time a certificate of occupancy is issued for the residential unit or development project or upon final inspection (whichever occurs first).

Additionally, permits through the USACE, RWQCB, and CDFW would be needed for impacts on jurisdictional aquatic resources (i.e., the potentially jurisdictional linear feature and area of disturbed cattail marsh). Additionally, formal aquatic resources delineation and reporting per USACE standards and guidelines and further coordination would be required to receive an official determination from the

USACE related to potential off-site aquatic resources. Similarly, additional coordination with the RWQCB and CDFW would be required to receive concurrence regarding the jurisdictional status of potential off-site aquatic resources. Should the off-site aquatic resources not meet the USACE definition of waters of the U.S. based on the results of a formal aquatic resource delineation and associated jurisdictional analysis, an approved jurisdictional determination (AJD) may be requested from the USACE to confirm no waters of the U.S. occur within the off-site improvement areas and therefore, no USACE permit would be required for the project. In the event that the off-site jurisdictional aquatic resources meet the definition of Waters of the U.S./State, compensatory mitigation would be required by the regulatory agencies to offset the proposed impacts. Therefore, impacts would be reduced to less than significant levels.

Note that off-site improvements areas are conceptual and would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including biological resources. Therefore, adverse effects on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS would be less than significant.

OPERATIONS

Operations of the Project would not have an effect on riparian habitat or other sensitive natural community. Feature (F) 13 is outside the Project footprint and F1 would be preserved in open space refer to **Exhibit 4.3-5**). Therefore, impacts would be less than significant, and mitigation would not be required.

Off-Site Operational Improvements

Off-site operations would not result in substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Mitigation Measures

MM BIO-4 The Project Applicant will submit a request for an AJD to the USACE to be analyzed based on the regulatory framework in place at the time of the request to determine if waters of the U.S. occur off-site. In the event that off-site jurisdictional aquatic resources meet the definition of Waters of the U.S./State, the Project Applicant would be required to submit a permit with the USACE and compensatory mitigation would be required by the regulatory agencies to offset the impacts.

Impact 4.3-3: ***Would the Project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

Level of Significance: Less than Significant

CONSTRUCTION AND OPERATIONS

A jurisdictional delineation field visit for the Project was conducted from May 7, 2019 to May 10, 2019. The Project survey area included the Project area with a 100-foot buffer for a total of approximately 2,970 acres. Two wetland sample points were investigated to determine the presence or absence of federally jurisdictional wetlands in areas displaying potential wetland landscape position (e.g., minimal slope and/or depressional) and hydrology (e.g., surface soil cracks).

Wetland Sample Point (WSP 1) was taken within the relatively flat F1 – Disturbed Ephemeral Drainage Area in an area primarily dominated by nettle-leaf goosefoot (*Chenopodium murale*; Facultative Upland [FACU]), blue palo verde (Not Listed [NL]/ Upland [UPL]), and London rocket (*Sisymbrium irio*; NL/UPL). WSP 1 met the wetland hydrology parameter based on the presence of surface soil cracks; the hydrophytic vegetation and hydric soils parameters, however, were not met. Note that there was also evidence of recent surface manipulation within this area due to the presence of large tire tracks; therefore, the vegetation and topsoil layer appeared disturbed.

WSP 2 was taken within F1 – Tamarisk Scrub/Ephemeral Drainage in an area that was primarily dominated by tamarisk/salt cedar (*Tamarix sp.*). The *Tamarix sp.* was likely *Tamarix ramosissima* (NL/UPL) but is understood to hybridize and function similarly to *Tamarix chinensis* (FAC). Assuming *Tamarix chinensis* as the dominant vegetation, WSP 2 met the hydrophytic vegetation parameter; the wetland hydrology and hydric soils parameters, however, were not met.

For detailed information on wetland delineation and the wetland delineation forms see the Jurisdictional Delineation Report in **Appendix C**.

As summarized above and further detailed in the Jurisdictional Delineation Report in **Appendix C**, no State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) are present on the Project site. Therefore, no impact would occur, and no mitigation is required.

Off-Site Construction and Operational Improvements

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. As discussed in Impact 4.3-2, the off-site improvement areas support two potentially jurisdictional aquatic resources, one of which is a disturbed cattail marsh within the northern portion of the off-site improvement area (on south side of Vista Del Norte) and is primarily composed of cattail and tamarisk. Both species are wetland indicator plant species per the USACE Arid West 2020 Regional Wetland Plant List. According to the NRCS Online Soil Map, the disturbed cattail marsh is located in Myoma fine sand, which is classified as a hydric soil per the NRCS Soil Data Access Hydric Soils List. USFWS National Wetland Inventory (NWI) and USGS

National Hydrography Dataset (NHD) do not map the disturbed cattail marsh, and standing water was not observed in the feature.

As discussed above, permits through the USACE, RWQCB, and CDFW would be needed for impacts on jurisdictional aquatic resources (i.e., the area of disturbed cattail marsh). Additionally, formal aquatic resources delineation and reporting per USACE standards and guidelines and further coordination would be required to receive an official determination from the USACE related to potential off-site aquatic resources. Similarly, additional coordination with the RWQCB and CDFW would be required to receive concurrence regarding the jurisdictional status of potential off-site aquatic resources. Should the off-site aquatic resources not meet the USACE definition of waters of the U.S. based on the results of a formal aquatic resource delineation and associated jurisdictional analysis, an AJD may be requested from the USACE to confirm no waters of the U.S. occur within the off-site improvement areas and therefore, no USACE permit would be required for the project. In the event that the off-site jurisdictional aquatic resources meet the definition of Waters of the U.S./State, compensatory mitigation would be required by the regulatory agencies to offset the proposed impacts. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation is necessary.

Impact 4.3-4: ***Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

Level of Significance: Less Than Significant

CONSTRUCTION AND OPERATIONS

The western-most area of the Project site lies within the EIHCA which serves as a biological corridor and linkage to the Indio Hills Conservation Area through the Thousand Palms Conservation Area, which ultimately links with Joshua Tree National Park. The adjacent Desert Tortoise Linkage and Conservation Area provides biological corridors and linkages to the Little San Bernardino Mountains and their associated canyon mouths and alluvial fans, which provide a linkage to the central part of the Coachella Valley MSCHP Area (refer to **Exhibit 4.3-4**)

A wildlife corridor can be defined as a physical feature that links wildlife habitat, often consisting of native vegetation that joins two or more larger areas of similar wildlife habitat. Corridors enable migration, colonization, and genetic diversity through interbreeding and are therefore critical for the movement of animals and the continuation of viable populations. Through the maintenance of numerous drainages throughout the Project site and installation of multi-cell arched concrete culverts at the proposed Vista Del Norte crossing over the Coachella Canal and adjacent dike to allow for wildlife movement through the EIHCA that occurs on site and compliance with the CVMSHCP, the Project would not have a significant impact on regional wildlife movement.

Off-Site Construction and Operational Improvements

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The off-site improvement areas are not within a wildlife corridor. The off-site improvement area occur along existing roads, are adjacent to existing development, and represent a wildlife travel route, crossing, or regional movement corridor between large open space habitats. Therefore, development and operations would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. No impact would occur.

Note that off-site improvements areas are conceptual and would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including biological resources.

Mitigation Measures

No mitigation is necessary.

Impact 4.3-5: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Level of Significance: Less Than Significant With Mitigation Incorporated

CONSTRUCTION

Individual development projects in the Project area would be constructed in compliance with the requirements of the Specific Plan and Coachella GP and MC. The Coachella GP provides goals and policies for the conservation of biological resources. Coachella GP Sustainability and Natural Environment Element Goal 9 protects plant and wildlife habitat areas and Goal 10 encourages the planning of passive open space. The City of Coachella does not have a Tree Preservation Policy or Ordinance. However, the below Coachella MC chapters are relevant to tree maintenance and preservation:

Chapter 12.24.040 – Street Trees: Duties of private owners. It shall be the duty of any person growing a tree within a public highway or responsible for trees growing on property abutting on public places supporting trees or plants:

A. Trim. To trim his or her trees so as not to cause a hazard to public places or interfere with the proper lighting of public highways by the streetlights, and so that minimum clearance of any overhanging portion shall be nine feet.

B. Treat or Remove. To treat or remove any tree or plant so diseased or insect ridden as to constitute a hazard to trees or plants in public places.

Chapter 12.28.010 – Palm Trees: Trimming palm trees – Required. Every person owning real property in the city on which there are standing or growing palm trees shall, at least annually, remove or cause to be

removed, by trimming or cutting, from the palm trees standing or growing on the property so owned by such person all dead leaves and/or fronds adhering to the trunks of such palm trees.

Additionally, the Project is adjacent to the Desert Tortoise and Linkage Conservation Area. The Project would adhere to the Coachella Valley Multiple Species Habitat Plan Section 4.5, Land Use Adjacency Guidelines, which ensures that during Project construction and long-term operation, the Project shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light during the hours of dawn and dusk when many wildlife species are most active (see **MM AES-1** in **Section 4.1: Aesthetics** of this Draft EIR). **MM AES-1** also ensures that all lighting for Project is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in lighting trespass including glare onto other properties—including any areas of the adjacent Desert Tortoise and Linkage Conservation Area—or upward into the night sky.

Through adherence to relevant Coachella GP and MC goals, policies, and chapters, and **MM AES-1**, Project construction would not conflict with any local policies or ordinances protecting biological resources. A less than significant impact would occur, and no additional mitigation is required.

Off-Site Construction Improvements

See construction discussion above.

OPERATIONS

Operation of the development projects within the Project area would not result in any impacts to any terrestrial environment, or any sensitive biological areas or species such that it conflicts with a local policy or ordinance protecting biological resources. Therefore, impacts would be less than significant, and no mitigation is required.

Off-Site Operational Improvements

See operations discussion above.

Mitigation Measures

See **MM AES-1** in **Section 4.1: Aesthetics** of this Draft EIR.

Impact 4.3-6: ***Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION

The Project would adhere to CVMSHCP guidelines and procedures. More specifically, the Project would be required to adhere to CVMSHCP Section 4.5 Land Use Adjacency Guidelines, which state:

The purpose of [Guidelines] is to avoid or minimize indirect effects from [d]evelopment adjacent to or within the Conservation Areas. Adjacent means sharing a common boundary with any parcel in a Conservation Area. Such indirect effects are commonly referred to as edge effects, and may include noise, lighting, drainage, intrusion of people, and the introduction of non-native plants and non-native predators, such as dogs and cats. Edge effects will also be addressed through reserve management activities such as fencing.

These Guidelines include:

***Drainage** – Proposed [d]evelopment adjacent to or within a Conservation Area shall incorporate plans to ensure that the quantity and quality of runoff discharged to the adjacent Conservation Area is not altered in an adverse way when compared to existing conditions. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the adjacent Conservation Area.*

***Toxics** – Land uses proposed adjacent to or within a Conservation Area that use chemicals or generate bio-products such as manure that are potentially toxic or may adversely affect wildlife and plant species, habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in any discharge to the adjacent Conservation Area.*

***Lighting** – For proposed [d]evelopment adjacent to or within a Conservation Area, lighting shall be shielded and directed toward the developed area. Landscape shielding or other appropriate methods shall be incorporated in project designs to minimize effects of lighting adjacent to or within the adjacent Conservation Area in accordance with the guidelines to be included in the Implementation Manual.*

***Noise** – Proposed [d]evelopment adjacent to or within a Conservation Area that generates noise in excess of 75 dBA Leq hourly shall incorporate setbacks, berms, or walls, as appropriate, to minimize the effects of noise on the adjacent Conservation Area in accordance with the guidelines included in the Implementation Manual.*

***Invasives** – Invasive, non-native plant species shall not be incorporated in the landscape for land uses adjacent to or within a Conservation Area. Landscape treatments within or adjacent to a Conservation Area shall incorporate native plant materials listed in Table 4-112 of the Coachella Valley MSHCP to the maximum extent [f]easible. The plants listed in Table 4-113 of the Coachella Valley MSHCP are considered invasive and shall not be used within or adjacent to a Conservation Area. This list may be amended from time to time through a Minor Amendment with Wildlife Agency Concurrence.*

Barriers *– Land uses adjacent to or within a Conservation Area shall incorporate barriers in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping in a Conservation Area. Such barriers may include native landscaping, rocks/boulders, fencing, walls and/or signage.*

Grading/Land Development *– Manufactured slopes associated with site [d]evelopment shall not extend into adjacent land in a Conservation Area.*

Additionally, the CVMSHP Section 4.5, Land Use Adjacency Guidelines Lighting standards ensures that during Project construction and long-term operation, the Project would eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light during the hours of dawn and dusk when many wildlife species are most active (see **MM AES-1**). **MM AES-1** also ensures that all lighting for Project is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in lighting trespass including glare onto other properties—including any areas of the adjacent Desert Tortoise and Linkage Conservation Area—or upward into the night sky.

In addition, per the CVMSHCP Section 5.2.1.1 Local Development Mitigation Fee, the Project would be conditioned by the lead agency to pay a mitigation fee for the costs of mitigating impacts of the Project.

Furthermore, the Project is within the EIHCA and adjacent to the Desert Tortoise Linkage and Conservation Area. The Project would comply with CVMSHCP Section 4.5 Land Use Adjacency Guidelines to avoid and minimize indirect effects to the adjacent Desert Tortoise Linkage and Conservation Area.

Like Exchange Process

As previously discussed in Section 4.3.1, Environmental Setting, the Project proposes the installation of the Vista Del Norte Crossing over the All American Canal which occurs within the southern terminus of the EIHCA. As shown in **Exhibit 4.3-7**, the physical development of the Vista Del Norte Crossing within the EIHCA would result in 3.42 acres of permanent impacts and 4.5 acres of temporary impacts, totaling 7.92 acres of impacts. Additionally, approximately 56.75 acres of indirect impacts would occur to the southern terminus of the EIHCA from the development of the crossing. In total, the proposed development of the Vista Del Norte Crossing would result in a total of approximately 64.67 acres of impact to the EIHCA. The installation of the crossing is subject to the CVCC Like Exchange process. Since the proposed Vista Del Norte Crossing, would be wider than the maximum road width to be considered a Covered Activity under the CVMSHP, a Like Exchange report was prepared by ELMT Consulting (**Appendix C4**) that analyzed the compensation for the loss of habitats within the EIHCA. Refer to **Exhibit 4.3-7: East Indio Hills Conservation Area – Vista Del Norte Crossing.**

Section 6.12, Modifications, Like Exchanges to Conservation Areas, and Amendments to the MSHCP of the MSCHP acknowledges that in some instances, it may be possible to achieve the CVMSHCP's conservation goals through a different configuration of one or more Conservation Areas. Through this process, the boundary of a conservation area may be modified as determined and/or approved by the CVCC, CDFW, and the USFWS if the resulting conservation is biologically superior to that approved under the Plan.

Accordingly, the Like Exchange, prepared in accordance with Section 6.12, analyzed the Like Exchange which includes the donation of 100 acres between three parcels (APNs 733-190-010, 733-190-012, and 733-190-01) of natural habitat to be incorporated into the Dos Palmas Conservation Area (DPCA) of the CVMSHCP to compensate for the direct and indirect impacts of approximately 64.67 acres of habitat within the EIHCA; refer to **Exhibit 4.3-8**, **Proposed Conservation Area**. This would result in a net increase of 35.33 acres of land being added to the DPCA, in addition to the 64.67 acres required to be offset for the City of Coachella's portion of the EIHCA being impacted by the Project.

The Like Exchange's equivalency analysis (discussed further below) determined that the Project's Like Exchange to CVMSHCP conservation within the EIHCA (reduction) and DPCA (addition) would result in biologically superior conservation acreage and value using the mandatory categories for equivalency analysis listed in MSHCP Section 6.12.2.

Covered Species Habitat and Level of Take[8]

Regarding covered species habitat and level of take, the Like Exchange indicated that the habitat within the DPCA and its surrounding area remains undeveloped within minimal anthropogenic disturbances. The undisturbed habitats within and around the 100-acre area proposed for inclusion in the DPCA are of higher quality than those in the impacted areas of the EIHCA, as they are not constrained by surrounding development and have not experienced significant anthropogenic disturbances. As a result, the 100-acre area to be included in the DPCA offers greater long-term conservation value than the habitats being impacted in the EIHCA. More specifically, core habitat for each of the Covered Species (i.e., Flat-tailed horned lizard, Le Conte's thrasher, Coachella Valley round-tailed ground squirrel, and Palm Springs pocket mouse) addressed in the EIHCA would be conserved at a higher acreage with potentially higher quality habitats throughout the CVMSHCP Conservation Areas because of the Like Exchange. The following **Table 4.3-4: Conservation and Take Authorization for EIHCA within the Project Site** shows the maximum acreages of disturbance on private lands within the Project's portion of the EIHCA and acres proposed for conservation due to the Like Exchange.

Table 4.3-4: Conservation and Take Authorization for EIHCA within the Project Site

Conservation Objective	Total Acres in Conservation Area	Existing Conservation Lands	Acres of Disturbance Authorized (threshold)	Remaining Acres to be Conserved	Acres of Impact from Vista Del Norte Crossing Bridge (direct) /total (indirect)	Acres Proposed for Conservation within the DPCA	Net Increase of Conservation Lands
Conserve Other Cons. Habitat for flat-tailed horned lizard	6 ac	0	1 ac	5 ac	1.32 / 6.43 ac	87.01 ac	79.26 ac
Conserve Other Cons. Habitat for Le Conte's thrasher	62 ac	0	6 ac	56 ac	7.19 / 54.99 ac	69.61 ac	7.43 ac
Conserve Other Cons. Habitat for CV round-	6 ac	0	1 ac	5 ac	1.43 / 6.51 ac	18.38 ac	10.44 ac

[8] ELMT Consulting. (2024). *Coachella Valley Multiple Species Habitat Conservation Plan Like Exchange*. pp. 24 through 26. Refer to **Appendix C4**.

Conservation Objective	Total Acres in Conservation Area	Existing Conservation Lands	Acres of Disturbance Authorized (threshold)	Remaining Acres to be Conserved	Acres of Impact from Vista Del Norte Crossing Bridge (direct) /total (indirect)	Acres Proposed for Conservation within the DPCA	Net Increase of Conservation Lands
tailed ground squirrel							
Conserve Other Cons. Habitat for Palm Springs pocket mouse	8 ac	0	1 ac	7 ac	1.43 / 8.3 ac	46.40 ac	36.67 ac
ELMT Consulting. (2024). Coachella Valley Multiple Species Habitat Conservation Plan Like Exchange. p. 25. See **Appendix C4**.							

Although the Project would impact core habitat for several species listed above, the donation site generally provides more core habitat for species, including species not included in the EIHCA. As the Project may result in some habitat loss, the donation site would compensate by providing a larger or more diverse area of core habitat. This includes support for additional species not covered by the EIHCA, helping to offset the Project's impacts. The following **Table 4.3-5: MSHCP Core Habitat Acreage in the EIHCA and DPCA** shows the comparison of the core habitats acreages for species and plant communities within the EIHCA and DPCA.

Table 4.3-5: MSHCP Core Habitat Acreage in the EIHCA and DPCA

MSHCP Species	Acres in EIHCA	Acres in DPCA
Crissal thrasher	0.25	4.01
CV round-tailed ground squirrel	6.34	17.64
Desert tortoise	55.20	0
flat-tailed horned lizard	6.21	89.41
Least Bell's vireo	0.25	4.01
Le Conte's thrasher	60.79	69.50
Palm Springs pocket mouse	7.75	45.95
Summar tanager	0.25	36.59
Southwestern willow flycatcher	0.25	0
Yellow breasted chat	0.25	36.60
Yellow warbler	0.25	36.60
Sonoran creosote bush scrub	60.54	65.49
Mesquite Hummocks	0.97	4.01
Desert Sinks	0	32.56
Ibid. pp. 32 and 33. See **Appendix C4**.		

As shown in **Tables 4.3-4** and **Table 4.3-5**, the conservation of suitable habitat and level of take of MSHCP covered species under the Project's Like Exchange would be biologically superior compared to what would occur under the MSHCP.

Natural Community[9]

In regard to natural communities, the Like Exchange would result in greater benefits to natural communities as compared to those benefits analyzed under the MSHCP. This includes an increase in acreage of conserved Sonoran creosote bush scrub and mesquite hummocks with improved overall

[9] Ibid. pp. 26 and 27.

habitat function and values. Furthermore, while no habitat-specific conservation goals are identified for the portion of the EIHCA within the Project boundaries, the conservation goals of the DPCA do include conservation of mesquite hummocks, which are present within the proposed conservation land additions. Therefore, conservation and increase of acreage for natural communities under the Project's Like Exchange would be biologically superior to compared to what would occur under the MSHCP.

Biological Corridors and Linkages[10]

The analysis of the Like Exchange also concluded that inclusion of the proposed 100-acre conservation area into the DPCA would provide additional local wildlife movement opportunities to the Dos Palmas Preserve to the north and Salt Creek to the southeast. The addition of the 100 acres to the DPCA would enhance local wildlife movement opportunities by adding additional undeveloped habitat to the DPCA that would act as an additional habitat buffer/refugia habitat to the Dos Palmas Preserve to the north and Salt Creek. Therefore, the Project would preserve a biologically superior corridor than that analyzed in the MSHCP because the habitats within the EIHCA are constrained by existing development and anthropogenic disturbances.

Essential Ecological Processes[11]

No areas indicated to support essential ecological processes would be impacted by Project activities (i.e., sand movement/transportation). The Project would result in the provision of essential ecological processes that are biologically equivalent to what would occur without the Like Exchange.

Per the CVMSHCP, the Essential Ecological Processes within the EIHCA (Section 4.3.15) include the Indio Hills which are part of the watershed for mesquite hummocks. As concluded in the Like Exchange, the extension of Vista Del Norte would result in direct impacts to 0.18 acre of mesquite hummocks, and 0.79 acre of indirect impacts to mesquite hummocks.[12] Direct impacts to mesquite hummocks would be mitigated by the conservation of approximately 4 acres of mesquite hummocks within the proposed 100-acre conservation area being added to the DPCA. Once construction of the crossing is complete, the proposed box culverts over the All-American Canal and six large culverts on the east side of the levee would continue to support the watershed that supports the 0.79 acre of mesquite hummocks.

The Essential Ecological Processes within the DPCA, as listed in CVMSHCP Section 4.3.19, have been impacted by the Coachella Canal, which has blocked some of the natural drainage patterns from the Orocopia Mountains. It should be noted that Salt Creek remains largely intact within the DPCA. The proposed 100 acres of conversation area that would be included in the DPCA are located approximately 0.25 mile southwest of a drainage feature that is tributary to Salt Creek (approximately 2 miles southwest). The proposed 100-acre conservation area would conserve additional upstream habitat that supports mesquite hummocks and undisturbed CVMSHCP modeled habitat.

[10] Ibid. p. 27.
[11] Ibid. p. 27.
[12] Ibid. pp. 35 and 36.

Conservation Area Configuration and Management[13]

The installation of the Vista Del Norte crossing would have both permanent and temporary impacts to the EIHCA. As previously discussed, the proposed box culverts over the All-American Canal and six large culverts on the east side of the levee (with soft "natural" bottoms) would maintain local wildlife movement opportunities within the southern terminus of the EIHCA after installation of the Vista Del Norte Crossing. Additionally, the acquisition of conservation lands that would be added to the DPCA, would result in additional lands being added to the DPCA that are biologically superior to the habitats being impacted within the EIHCA, which would result in a biologically superior configuration and management of CVMSHCP Conservation Areas. Lastly, the 100-acre conservation area to be added to the DPCA would decrease potential edge effects on Salt Creek, the major wildlife corridor in the DPCA, by adding additional buffer/refugia habitat to the overall DPCA that will be protected in perpetuity. Therefore, the Project would be biologically superior regarding Conservation Area Configuration and Management than that analyzed in the MSHCP.

Ecotones and Other Conditions Affecting Species Diversity[14]

Refer to subsection *Covered Species Habitat and Level of Take* above. As concluded in the Like Exchange analysis, the Like Exchange would offer greater long-term conservation value than the habitats being impacted in the EIHCA, and therefore, overall species diversity is not expected to be reduced.

Equivalent or Greater Acreage

The Project, with the contribution of three parcels of additional conservation land totaling 100 acres of Core Habitat, would result in greater conservation acreage (35.33 additional acres of like habitat) than would otherwise occur without the Like Exchange. Additionally, the three parcels that constitute the additional conservation land have been acquired by the Project Applicant and, therefore, would be under the direct ownership of the applicant before being deeded to CVCC.

Results

Based on this analysis provided above and further discussed in **Appendix C4**, the Like Exchange would result in biologically superior conservation value compared with implementation of the CVMSHCP without the Like Exchange for this Project. This was confirmed in CDFW's Concurrence Letter (**Appendix C5**) that stated that the USFWS and CDFW both concur that the proposed like exchange would result in equal or greater benefits to Covered Species and conserved natural communities as compared to those benefits analyzed in the CVMSHCP. Furthermore, the Like Exchange was approved by the City of Coachella City Council on February 12, 2025, and the County Board of Supervisors on March 11, 2025. Additionally, on September 11, 2025, the CVCC approved the like exchange to the CVMSHCP. Therefore, the Project's potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan would be less than significant.

[13] Ibid. p. 36.
[14] Ibid. pp. 36 and 37.

Off-Site Construction Improvements

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; Refer to **Exhibit 3-11: Off-site Improvements**. The off-site improvement area is located within the CVMSHCP but not located within a MSHCP Conservation Area. Therefore, the off-site improvement area is not subject to the Required Avoidance, Minimization and Mitigation Measures set forth in Section 4.4 of the MSHCP. Although the construction of the off-site improvement areas would result in impacts on habitat that could support MSHCP-covered species, impacts on habitat would be offset by the payment of the MSHCP Local Development Mitigation Fee. Furthermore, the Project represents a Covered Activity under the MSHCP. As described in Section 7.1 of the MSHCP, take authorization would be provided for Covered Activities outside of Conservation areas including "development permitted or approved by Local Permittees. This includes, but is not limited to, new projects approved pursuant to county and city general plans."

OPERATIONS

The overall goal of the CVMSHCP is to conserve Covered Species and their habitats, improve future economic development in the County by providing an efficient, streamlined regulatory process through which development can proceed, and provide for permanent open space, community edges, and recreational opportunities which contribute to and maintain the community character of central Riverside County.

The CVMSHCP has a local mitigation fee on all new development. Each project in the Project area would be evaluated through the entitlement process to determine the need to pay development impact fees established by the CVMSHCP. As such, once projects are constructed, the operations of projects within the Project area would not conflict with the CVMSHCP and no significant impacts would occur.

Off-Site Operational Improvements

Off-site operations would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Mitigation Measures

See **MM AES-1** in **Section 4.1: Aesthetics** of this Draft EIR.

4.3.5 CUMULATIVE IMPACTS

Cumulative impacts refer to incremental individual environmental effects of two or more projects when considered together. Such impacts taken individually may be minor but are collectively significant in light of regional impacts. The City's, including the Project site's cumulative biological resources impacts was analyzed as part of the Coachella GP Update.[15] Per the Coachella GP Final EIR, the identified sensitive habitat areas have been preserved through land use allocation as well as regional protection plans and agencies including the CVMSHCP. Furthermore, the Coachella GP contains a land use plan and policies

[15] City of Coachella. (2015). *Coachella General Plan 2035 Final EIR – Section 4.3 Biological Resources*. Available at: https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.3_-_biological_resources.pdf (accessed October 2025).

that protect such sensitive biological resources through the preservation of thousands of acres of open space. As concluded in the environmental impact analysis above, the Project would be compliant with all applicable Coachella GP Policies pertaining to the projection, preservation, and avoidance of sensitive biological resources. Additionally, the Project would be consistent with planned development envisioned for the existing site. The Project would also comply with the CVMHSCP as discussed above via approval of the Like Exchange which was prepared and adopted specifically to address and prevent cumulative environmental impacts to sensitive species and habitats in the EIHCA and DPCA areas. The CVMSHCP has analyzed cumulative effects within the region of the Project under CEQA, NEPA, CESA, and Federal ESA.[16] Since the Project would comply with the CVMSHCP any cumulative Project impacts would be less than significant.

4.3.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable biological resources impacts have been identified.

4.3.7 REFERENCES

City of Coachella. (2015). *General Plan Update*. https://www.coachella.org/home/showpublisheddocument/10698/638906775782700000.

City of Coachella. (2015). *Coachella General Plan 2035 Final EIR – Section 4.3 Biological Resources*. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.3_-_biological_resources.pdf.

City of Coachella. (2023). *Coachella Municipal Code*. https://library.municode.com/ca/coachella/codes/code_of_ordinances?nodeId=TIT12STSIPUPL_CH12.28PATR_12.28.010TRPATREQ.

CDFW and USFWS. (2025). *Wildlife Agencies' Concurrence Regarding Proposed Like Exchange to Conservation Areas for the KPC Coachella Specific Plan.* Palm Springs, CA; Ontario, CA. USFWS and CDFW.

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RBC. (2023). *KPC Coachella Project Off-site Improvements – Biological and Aquatic Resources Assessment Memo*. San Diego, CA; Rock Biological Consulting.

[16] CVCC. (2007). *Coachella Valley MSPHCP and Natural Community Conservation Plan*. https://cvmshcp.org/plan-documents/ (accessed October 2025).

4.4 CULTURAL RESOURCES

This section describes the environmental and regulatory settings for cultural resources. Cultural resources relate to buildings, sites, structures, and/or objects that may have architectural, historic, archaeological, cultural, and/or scientific value. The evaluation of the Project and potential impacts to cultural resources is largely based on the following sources:

- Cultural Resources Assessment (CRA), BCR Consulting LLC, January 2023 (Attached as **Appendix D**)
- Archaeological Testing Report (ATR), BCR Consulting LLC, August 2023 (Attached as **Appendix D**)
- City of Coachella General Plan Update Final EIR

Section 4.4.4, Project Impacts and Mitigation below, discusses the potential impacts that would occur to cultural resources. Additionally, this analysis is informed by consultations and comments received from the Agua Caliente Band of Cahuilla Indians, as described more detail in **Section 4.15: Tribal Cultural Resources**.

The cultural resources assessment and evaluations were conducted in compliance with California Public Resources Code (PRC) Section 5024.1 and Section 106 of the National Historic Preservation Act (NHPA) to identify cultural resources in the Project site area, evaluate the significance/eligibility of the resources for listing in the California Register of Historical Resources (CRHR) and/or National Register of Historic Places (NRHP), and identify potential impacts/adverse effects to significant/eligible resources that could result from implementation of the Project. Due to the confidential nature of the location of cultural resources, these reports do not include maps or location descriptions (California Government Code Section 6254.10, Section 304 of the National Historic Preservation Act, Section 9(a) of the Archaeological Resources Protection Act, Executive Order 13007).

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts to cultural resources. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors, such as presence of potentially historic structures or disturbance level of area soils.

4.4.1 ENVIRONMENTAL SETTING

The Project site occupies approximately 2,800 acres in portions of Sections 24, 25, 26, 27, and 28, Township 5 South, Range 8 East, and Section 30 of Township 5 South, Range 9 East, San Bernardino Baseline and Meridian, in the City of Coachella, Riverside County, California. It is depicted on the U.S. Geological Survey (USGS) Thermal Canyon (1972) and Indio (1972), California 7.5-minute topographic quadrangles. The Project site is located in the Coachella Valley, north of the Salton Sea in the City of

Coachella. It is bounded by vacant land to the north and east, Interstate 10 (I-10) to the south, and the Coachella Canal to the west. It contains vacant and undeveloped land, and a portion of the Coachella Canal at its west end that is approximately 2,700 feet in length with the Project site.

The elevation of the Project sites ranges from approximately 11 feet above mean sea level (AMSL) to approximately 915 feet AMSL. It is located in the Coachella Valley and the Mecca Hills of the Colorado Desert. The region is characterized by an arid climate with dry, hot summers and mild winters. Annual rainfall averages 2-5 inches, and usually occurs as winter rain and monsoonal summer showers. The Project site conveys water in a south-westerly direction. It partially occupies the former northeastern shoreline of prehistoric Lake Cahuilla and extends into the Mecca Hills to the east. Now partially occupied by the artificially (and accidentally) created Salton Sea, Lake Cahuilla was formed by periodic prehistoric natural diversions of the Colorado River. Local sediments retain a high water-holding capacity and contained the huge lake between circa A.D. 900 and 1500 during its most recent stand. The western portion of the Project site would have occupied a relatively high shoreline for the former lake. The oldest local rocks are Precambrian rocks derived from the San Gorgonio complex, and are intruded by Cactus Granite, quartz monzonite, breccia, diorite porphyry, and plutonic rocks. Many lakes (now dry) in the Colorado Desert are thought to have supported small human populations during the terminal Pleistocene (22,000-11,000 years before present) and early Holocene (11,000-8,000 years before present). Since the desiccation of California's deserts during the later Holocene, local lakes have dried, and significant sand dunes have formed. Common local flora includes cacti, desert agave, cheesebush, catclaw acacia, creosote, and seasonal grasses. Common animals include coyotes, foxes, rabbits, rodents, ravens, and raptors (BCR 2023).

PREHISTORIC, ETHNOGRAPHIC, AND HISTORIC CONTEXTS

Prehistoric Context

Two primary regional syntheses are commonly utilized in the archaeological literature for southern California. The first was advanced by Wallace in 1955, and defines four cultural horizons, each with characteristic local variations: Early Man Horizon, Milling Stone, Intermediate, and Late Prehistoric. Employing a more ecological approach, Warren (1984) defined five periods in southern California prehistory: Lake Mojave, Pinto, Gypsum, Saratoga Springs, and Protohistoric. Warren viewed cultural continuity and change in terms of various significant environmental shifts, defining the cultural ecological approach for archaeological research of the California deserts and coast. Many changes in settlement patterns and subsistence focus are viewed as cultural adaptations to a changing environment, beginning with the gradual environmental warming in the late Pleistocene, the desiccation of the desert lakes during the early Holocene, the short return to pluvial conditions during the middle Holocene, and the general warming and drying trend, with periodic reversals, that continue to this day (BCR 2023).

Paleoindian (12,000 to 10,000 BP) and Lake Mojave (10,000 to 7,000 BP) Periods. Climatic warming characterizes the transition from the Paleoindian Period to the Lake Mojave Period. This transition also marks the end of Pleistocene Epoch and ushers in the Holocene. The Paleoindian Period has been loosely defined by isolated fluted (such as Clovis) projectile points, dated by their association with similar artifacts

discovered in-situ in the Great Plains. Some fluted bifaces have been associated with fossil remains of Rancholabrean mammals approximately dated to ca. 13,300-10,800 BP near China Lake in the Mojave Desert. The Lake Mojave Period has been associated with cultural adaptations to moist conditions, and resource allocation pointing to more lacustrine environments than previously. Artifacts that characterize this period include stemmed points, flake and core scrapers, choppers, hammerstones, and crescentics. Projectile points associated with the period include the Silver Lake and Lake Mojave styles. Lake Mojave sites commonly occur on shorelines of Pleistocene lakes and streams, where geological surfaces of that epoch have been identified (BCR 2023).

Pinto Period (7,000 to 4,000 BP). The Pinto Period has been largely characterized by desiccation of southern California. As formerly rich lacustrine environments began to disappear, the artifact record reveals more sporadic occupation of the drier regions, indicating occupants' recession into the cooler fringes. Pinto Period sites are rare and are characterized by surface manifestations that usually lack significant in-situ remains. Artifacts from this era include Pinto projectile points and a flake industry similar to the Lake Mojave tool complex, though use of Pinto projectile points as an index artifact for the era has been disputed. Milling stones have also occasionally been associated with sites of this period (BCR 2023).

Gypsum Period (4,000 to 1,500 BP). A temporary return to moister conditions during the Gypsum Period is postulated to have encouraged technological diversification afforded by the relative abundance of available resources. Lacustrine environments reappear and begin to be exploited during this era. Concurrently a more diverse artifact assemblage reflects intensified reliance on plant resources. The new artifacts include milling stones, mortars, pestles, and a proliferation of Humboldt Concave Base, Gypsum Cave, Elko Eared, and Elko Corner-notched dart points. Other artifacts include leaf-shaped projectile points, rectangular-based knives, drills, large scraper planes, choppers, hammer stones, shaft straighteners, incised stone pendants, and drilled slate tubes. The bow and arrow appear around 2,000 BP, evidenced by the presence of a smaller type of projectile point, the Rose Spring point (BCR 2023).

Saratoga Springs Period (1,500 to 800 BP). During the Saratoga Springs Period regional cultural diversifications of Gypsum Period developments are evident. Influences from Patayan/Yuman assemblages are apparent in the southern inland areas and include buff and brown wares often associated with Cottonwood and Desert Side-notched projectile points. Obsidian becomes more commonly used throughout southern California and characteristic artifacts of the period include milling stones, mortars, pestles, ceramics, and ornamental and ritual objects. Large villages evidence more structured settlement patterns, and three types of identifiable archaeological sites (major habitation, temporary camps, and processing stations) emerge. Diversity of resource exploitation continues to expand, indicating a much more generalized, somewhat less mobile subsistence strategy (BCR 2023).

Shoshonean Period (800 BP to Contact). The Shoshonean period is the first to benefit from contact-era ethnography and is subject to its inherent biases. Interviews of living informants allowed anthropologists to match artifact assemblages and particular traditions with linguistic groups and plot them geographically. During the Shoshonean Period, continued diversification of site assemblages and reduced Anasazi and Yuman influence both coincide with the expansion of Numic (Uto-Aztecan language family)

speakers across the Great Basin, Takic (also Uto-Aztecan) speakers into southern California, and the Hopi across the Southwest. Hunting and gathering continued to diversify, and the diagnostic arrow points include desert side-notch and cottonwood triangular, which have been locally recorded. Ceramics continue to proliferate, though are more common in the desert during this period. Trade routes have become well established between coastal and inland groups during this period (BCR 2023).

Ethnography

Cahuilla. The Cahuilla belong to the Cupan group of the Takic subfamily of languages. Like other Native American groups in southern California, they practiced semi-nomadic hunter-gatherer subsistence strategies and commonly exploited seasonably available plant and animal resources. Spanish missionaries were the first outsiders to encounter these groups during the late 18th century. The Cahuilla are generally divided into three groups: Desert Cahuilla, Mountain Cahuilla, and Western (or Pass) Cahuilla. The term Western Cahuilla is preferred over Pass Cahuilla because this group is not confined to the San Gorgonio Pass area. The distinctions are believed to be primarily geographic, although linguistic and cultural differences may have existed to varying degrees. Cahuilla territory lies within the geographic center of southern California and the Cocopa-Maricopa Trail, a major prehistoric trade route, ran through it. The first written accounts of the Cahuilla are attributed to mission fathers; later documentation was by Strong (1929), Bright (1998), and others (BCR 2023).

History

The modern City of Coachella was established within the desert of the Coachella Valley. Prior to European settlement, the area was home to the Cahuilla Native Americans (Cahuilla). The Cahuilla migrated between the valley floor and the surrounding mountains as dictated by various stands of the Ancient Lake Cahuilla. After Lake Cahuilla dried up around 1500, many Cahuilla settled in the valley and were historically known as the Desert Cahuilla. The first European to pass through the area is thought to be a Spaniard named Father Francisco Garces. Having become familiar with the area, Garces acted as a guide to Juan Bautista de Anza, who had been commissioned to lead a group across the desert from a Spanish outpost in Arizona to set up quarters at the Mission San Gabriel in 1771 near what today is the City of Pasadena. Garces was followed by Alta California Governor Pedro Fages, who briefly explored the region in 1772. Later Spanish expeditions end, eventually, Spanish settlements (including Mission outposts) occurred in the 1820s. In the early years of non-Native settlement, the valley area was referred to as "Cuchuil" by the Spanish and Mexicans, derived from a rendering of a Cahuilla word with a spelling variant being "Coahuila." The Desert Cahuilla people remaining in the Coachella Valley, lived at Mission outposts and, following secularization of mission lands and Mexican independence from Spain, on rancherias where they learned technical agriculture. After the United States acquired Californian territories from Mexico in 1848, several reservations were established for the Cahuilla that remained in the valley. These included Agua Caliente, Cabazon, and Torres Martinez Reservations established in 1876, and the Augustine Reservation established in 1891 (BCR 2023).

In 1876, the Southern Pacific Railroad completed its line from Los Angeles to Indian Wells (the present-day City of Indio), under General Superintendent A.N. Towne. Jason L. Rector was the first American to take up permanent residence in the valley, in present-day Coachella. Born and raised in Iowa, Rector came

to San Diego in 1884. He was actively engaged in real estate and cattle businesses and bought livestock throughout southern California. He soon accepted a position with the Southern Pacific Railroad Company and arranged contracts with the A.N. Towne Estate to export wood from the Coachella Valley. At the time, the valley was covered in a heavy growth of mesquite and greasewood. Rector chose a site along the Southern Pacific rail siding to establish a mesquite wood terminal named Woodspur, from which lumber was hauled off to market in Los Angeles. Rector ultimately relinquished his lumber exporting venture in favor of surveying the valley to plan a townsite. He built an adobe home there. After digging a test well to check the groundwater source for irrigation potential, Jason Rector and his brother Lon excavated a well four miles east of Indio in 1900. The well tapped into pure water, at a depth of 550 feet below the desert surface. With a reliable fresh water supply secured, jobs in the railroad and lumber industries induced a settlement in Woodspur, and a small community was established. Rector dubbed the community Woodspur shortly after his well was completed. In 1901, the burgeoning town voted to change the name of Woodspur to “Conchilla,” a Spanish word denoting the small shells found throughout the valley floor. When the name was decided upon and sent to printers to create advertisements for the town, the printers published the name as “Coachella,” confusing the “n” and “i” for an “a” and “e,” respectively. Rector and other townsite planners decided to keep the new name rather than delay development any further. The surrounding valley adopted the name as well (BCR 2023).

New settlers flocked to the townsite and began establishing homesteads. The Southern Pacific Indio Station accommodated most passengers, and the Coachella siding remained a loading station where goods and resources were imported and exported. In its nascent years, Coachella featured a general store, a drugstore, a bank, and a pool hall among its growing number of homesteads. In 1902, Rector established the Coachella Valley Produce Association, a venture that would encourage farming settlements in the area and through which the town shipped crops from the valley by train. In 1904, Rector also built, owned, and operated the first pre-cooling plant under the title of the Coachella Valley Refrigerating Company. The A.N. Towne Estate, organized under the Coachella Land and Water Company, platted the town and sold its interests to Rector. By 1905, Rector had overseen the development of a water delivery system with over two miles of pipes and the planting of a plethora of ornamental trees, making settlement in Coachella an alluring venture. Despite seasonal flooding from the surrounding mountains, people continued to settle farms and ranches in Coachella and congregated in the town center for holidays and parades. By the time Jason Rector died in 1919, he had Coachella grow into a thriving community. Private artesian wells supplied local farmers and ranchers until 1918, when the Coachella Valley Water District was formed and developed a broader distribution system for irrigation and agriculture, managed groundwater supply, and provided drinking water. Abundant water meant that crops could be planted and harvested all year; such crops that would remain viable for decades included onions, corn, melons, grapes, citrus, and dates. Front Street served as the communal center for the town of Coachella, where the Southern Pacific station and an increasing number of businesses and stores were located. The local Hayward Lumber Company provided increasing numbers of settlers with the wood to build their residences and other structures. Growing popularity and affordability of automobiles in the 1920s accompanied a locally robust economy, and service stations and garages proliferated. Family-owned businesses remained the common enterprises of Coachella through the 1930s. Social organizations, such as the Coachella Ladies Aid Society, formed and facilitated charitable projects for the community. By this time the arid desert setting of

Coachella had been transformed into a mature agricultural landscape, due to year-round farming made possible by the climate and plentiful water. Construction of the Coachella Branch of the All-American Canal in the late 1940s diverted water from the Colorado River to Coachella Valley communities and bolstered the growing region's ability to cultivate year-round crops. Decades of study, planning, and negotiating between the Coachella Valley County Water District, the Bureau of Reclamation, and various local groups resulted in construction of the system. Prior to construction of the canal, farmers irrigated a total of 14,030 acres of crops. The newly completed Coachella Canal distribution system allowed cultivation of over 50,000 acres. The system remains intact and operates as originally intended. In December of 1946, Coachella's residents overwhelmingly voted to incorporate the 2.5-square-mile town as a city. A City Hall was dedicated in 1949, which housed a courthouse, post office, police department, and administrative offices (BCR 2023).

Recent decades have brought residential development which has modernized the Coachella Valley landscape. By the 1970s, the Southern Pacific siding at Coachella was no longer in use and demolished, leaving the farming and ranching enterprises without a nearby railroad connection to their markets. Persistence of agriculture and an influx of Hispanic laborers to work the fields resulted in Coachella becoming a locus of political activism for fieldworkers' rights and better working conditions through the 1960s and 1970s. Cesar Chavez was among the most prominent organizers of rallies and marches for the movement, even signing his first labor contract in Coachella. By the late 1980s and early 1990s, vineyards and other large swaths of agricultural properties began to be supplanted by commercial properties and residential subdivisions. In the 1990s, the region became internationally famous for the Coachella Valley Music and Arts Festival (colloquially known as "Coachella Fest," or simply "Coachella") which annually attracts crowds that exceed 100,000 persons. Today, the original 2.5-square-mile town has expanded into a 29-square-mile city with a diverse populace of 42,158 residents, as of January 2022. While agriculture persists, it is described as a largely young, rural, and family-oriented desert community (BCR 2023).

METHODOLOGY

Methods

This section is based on the Draft Cultural Resources Assessment (CRA) and Archaeological Testing Report (ATR) prepared by BCR Consulting LLC as was completed pursuant to CEQA and Section 106 of the NHPA. The CRA and ATR were intended to determine whether cultural resources are located within the Project boundaries, whether any cultural resources are significant/eligible pursuant to the regulations and standards referenced in **Section 4.4.2** below, and to develop specific mitigation measures and treatment that will address potential impacts or effects to existing or potential historical resources/historic properties. The CRA and ATR included the following tasks:

- Cultural resources records search to review any studies conducted and the resulting cultural resources recorded within a one-mile radius of the Project boundaries;
- Systematic pedestrian survey of the entire Project site;
- Evaluation of California Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP) eligibility, including archaeological testing for select sites; and

- Completion of California Department of Parks and Recreation (DPR) 523 forms for cultural resources identified.

Research

Records Search

An archaeological records search was conducted at the Eastern Information Center (EIC) on April 15, 2019 prior to fieldwork. This included a review of all recorded cultural resources and survey/excavation reports generated from projects located within one mile of the Project site. In addition, a review was conducted of the CRHR, NRHP, and documents and inventories from the California Office of Historic Preservation (OHP), including the lists of California Historical Landmarks, California Points of Historical Interest, and the Inventory of Historic Structures.

Additional Research

BCR Consulting performed additional research using records provided by the Bureau of Reclamation, records of the General Land Office maintained by the Bureau of Land Management (BLM) and using various internet resources.

Field Survey

Intensive-level cultural resources field surveys of the Project site were conducted by BCR Consulting archaeologists from April 17, 2019, to May 31, 2019, January 9, 2020, to January 16, 2020, and July 28, 2022. The surveys were conducted by walking transects that followed the contours of the landforms present, such as the ridgetops and washes, excluding excessively steep slopes. Fifteen-meter transect intervals were maintained where possible. Additional fieldwork was conducted on April 19, 2023, to conduct subsurface archaeological testing. Digital photographs were taken at various points within the Project site. These included overviews as well as detail photographs of all cultural resources.

Results

Previously Recorded Cultural Resources

Data from the EIC revealed that 40 cultural resource studies have taken place and 34 cultural resources have been recorded within a one-mile radius of the Project site. Of the 40 previous studies, five overlap with portions of the Project site, resulting in the identification of six cultural resource within its boundaries. The records search is summarized in **Table 4.4-1: Cultural Resources Located Within One Mile of the Project Site** below.

Field Survey

During the field survey, BCR Consulting personnel identified 48 total cultural resources, including five historic-period archaeological sites, one historic-period transmission alignment, one historic-period canal, 21 prehistoric archaeological sites, and 20 isolated artifacts (13 historic-period and seven prehistoric). This total number includes the six cultural resources previously recorded and identified within the records search. A complete description of each resource is provided under ***Field Survey*** in the CRA in **Appendix D**.

Each of the resources were documented in greater detail on DPR 523 forms and are summarized in **Table 4.4-1** below.

Table 4.4-1: Cultural Resources Located Within One Mile of the Project Site

USGS 7.5 Minute Quadrangle	Cultural Resources Within One Mile of the Project Site	Studies Within One Miles of the Project Site
Thermal Canyon (1972) and Indio (1972), California	P-33-5705: Historic-period Coachella Canal (within Project) P-33-8389: Isolated Prehistoric Ceramic Sherds (within Project) P-33-8907: Prehistoric trail (within Project) P-33-11008: Prehistoric Ceramic Sherd Scatter (3/4 Mile outside) P-33-12452: Historic Refuse Scatter (1 Mile outside) P-33-12670: Prehistoric Ceramic Sherd (1 Mile outside) P-33-12818: Prehistoric Ceramic Sherds (1/8 Mile outside) P-33-13402: Prehistoric Metate (3/4 Mile outside) P-33-14403: Prehistoric Ceramic Scatter (1/4 mile outside) P-33-14404: Prehistoric Ceramic Scatter (1/4 mile outside) P-33-14405: Prehistoric Ceramic Scatter (1/4 mile outside) P-33-14408: Prehistoric Ceramic Scatter (3/4 Mile outside) P-33-14409: Prehistoric Ceramic Scatter (3/4 Mile outside) P-33-14984: Historic-Period Highway (1/8 mile outside) P-33-15035: Historic-Period Transmission Line (within Project) P-33-15086: Prehistoric Ceramic Scatter (adjacent) P-33-15151: Prehistoric Artifact Scatter (within Project Site) P-33-15302: Ceramic Sherd (1/4 mile outside) P-33-18150: Prehistoric Trail (1 mile outside) P-33-23009: Historic Trash Scatter (1/2 mile outside) P-33-23969: Historic-Period House Debris (1/4 mile outside) P-33-23970: Historic Irrigation Feature (1/4 mile outside) P-33-26490: Rock Cairn (1 mile outside) P-33-26491: Isolated Historic Glass Bottle (1 Mile outside) P-33-26562: Isolated Ceramic Sherd (adjacent) P-33-26567: Ceramic Sherd (within Project Site) P-33-26568: 1911 Survey Monument (adjacent) P-33-26569: Two Rock Cairns (1/4 Mile outside) P-33-26598: Pot Sherd Scatter (1/4 Mile outside) P-33-26599: Ceramic Scatter (1/4 Mile outside) P-33-26600: Prehistoric Mano Fragment (1/8 mile outside) P-33-26709: Historic Can (1/4 mile outside) P-33-28170: Historic Street Segment (1 mile outside) P-33-28497: Transmission Alignment (3/4 mile outside)	RI-0161, 0258, 0259, 0284*, 0590, 1778, 1919, 1920, 1922, 2210, 2975*, 3245, 3672, 4465, 4916, 4919, 5125, 6061*, 6305, 6346, 6453, 6501, 6530, 6538*, 6651, 8375, 8410, 8491, 8981, 9018, 9045, 9047*, 9134, 9451, 9491, 9837, 10157, 10349, 10350, 10461
Source: BCR (2023). * = Previously assessed a portion of the Project site for cultural resources.		

Table 4.4-2: Bibliographic Information for Cultural Resources Reports Within Project Site

Report Number	Author (Date)	Title	Percentage of Project Assessed
RI-284	Richard A. Weaver (1977)	Cultural Resources Identification-Sundesert Nuclear Project	Less than 5
RI-2975	Gale Broeker and Anne Duffield (1990)	I-10/Coachella Canal Land Exchange – NE ¼ of Section 28, T5S, R8E	Less than 5

Report Number	Author (Date)	Title	Percentage of Project Assessed
RI-6061	Jerry Schaefer (2003)	A History and Evaluation of the Coachella Canal, Riverside and Imperial Counties, California	Less than 5
RI-6538	Bai "Tom" Tang and Michael Hogan (2006)	Historical/Archaeological Resources Survey Report City of Coachella Riverside County, California	75
RI-9047	Patrick McGinnis, Rachel Droessler, Stacie Wilson (2013)	Cultural Resources Investigations Class III Report for the Path 42 Transmission Line Project, Riverside County, California	Less than 5
Source: BCR (2023).			

Evaluations

Of the 48 cultural resources identified within the Project site, only 27 required evaluations of eligibility for listing in the CRHR/NRHP. Isolated finds are not considered "historical resources" under CEQA or "historic properties" under the NHPA and, as such, none of the 20 isolated artifacts are listed in **Table 4.4-3** below. However, a detailed list can be found in Table C: Isolated Artifacts of the CRA in **Appendix D**. Additionally, one historic resource, a contributing segment of the Coachella Canal (P-36-5705), was previously evaluated and determined to be eligible by qualified personnel, with concurrence by the State Historic Preservation Officer (SHPO), for listing in the CRHR and NRHP under Criteria 1/A and 3/C due to its association with important events in history and unique workmanship and engineering. For the remaining 27 cultural resources, BCR Consulting personnel recommended 25 cultural resources ineligible for listing, as they are not associated with important people or events in history, do not embody any distinctive architectural characteristics nor represent the work of a master, and do not have the potential yield important prehistoric or historic information. However, BCR noted that two prehistoric archaeological sites, P-33-15151 and KIM1905-PS-9, required additional archaeological testing to thoroughly analyze potential eligibility of each resource. For a complete description and preliminary eligibility evaluation of each resource listed in **Table 4.4-3**, see the CRA in **Appendix D**.

Table 4.4-3: CRHR and NRHP Preliminary Eligibility Summary

Site Number	Site Type	CRHR and NRHP Recommendation	Recommendation
P-33-5705	Historic Coachella Canal	Eligible	No Additional Work
P-33-8907	Prehistoric Trail Segment	Not Eligible	No Additional Work
P-33-15035	Historic-Period Transmission Line	Not Eligible	No Additional Work
P-33-15151	Prehistoric Artifact Scatter	Potentially Eligible	Archaeological Evaluation/ Test Excavation
KIM1905-HS-1	Historic-Period Can Scatter	Not Eligible	No Additional Work
KIM1905-HS-3	Historic-Period Shell Casings	Not Eligible	No Additional Work
KIM1905-HS-5	Historic-Period Steel Refuse	Not Eligible	No Additional Work
KIM1905-HS-14	Historic-Period Refuse	Not Eligible	No Additional Work
KIM1905-HS-17	Historic-Period Refuse	Not Eligible	No Additional Work
KIM1905-PS-1	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-2	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-3	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-4	Prehistoric Lithic Scatter	Not Eligible	No Additional Work

Site Number	Site Type	CRHR and NRHP Recommendation	Recommendation
KIM1905-PS-5	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-6	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-8	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-9	Prehistoric Ceramic Sherd Scatter	Potentially Eligible	Archaeological Evaluation/ Test Excavation
KIM1905-PS-10	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-11	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-13	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-14	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-15	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-17	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-18	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-19	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-23	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-24	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
KIM1905-PS-25	Prehistoric Lithic Scatter	Not Eligible	No Additional Work
Source: BCR (2023).			

Archaeological testing for P-33-15151 and KIM1905-PS-9 was conducted by BCR Consulting personnel on April 19, 2023. KIM1905-PS-9 exhibited no intact or significant buried archaeological component and therefore is not recommended eligible for CRHR/NRHP listing. Significant buried archaeological materials were identified during test excavations at P-33-15151, though excavation and analysis exhausted the site's data potential and, therefore, the site is not recommended eligible for CRHR/NRHP listing. Further, neither site is the oldest or best example of its perspective site type and have not been connected with a scientifically recognized important prehistoric or historic event or person. Based on these results, neither site is considered a "historical resource" or "unique archaeological resource" under CEQA nor a "historic property" under Section 106 of the NHPA. Additional information regarding the testing program and analysis can be found in the ART in **Appendix D**.

Summary

Of the 48 cultural resources identified within the Project site, only one resource, a contributing segment of the Coachella Canal (P-33-5705), has been determined eligible for listing in the CRHR/NRHP under Criteria 1/A and 3/C due to its association with significant events in history and unique workmanship and engineering. This resource is also considered a "historical resource" under CEQA and a "historic property" under Section 106 of the NHPA. No other cultural resources within the Project area are recommended eligible or considered a "historical resource" under CEQA or "historic property" under Section 106 of the NHPA, and no resources are considered a "unique archaeological resource" under CEQA.

4.4.2 REGULATORY SETTING

FEDERAL

Archaeological Resources Protection Act

The intent of the Archaeological Resources Protection Act of 1979 (ARPA) is to ensure preservation and protection of archaeological resources on public and Native American lands. ARPA places primary emphasis on a Federal permitting process in order to control the disturbance and investigation of archaeological sites on these lands. In addition, ARPA's protective provisions are enforced by civil penalties for violation of the Act.

Under this regulation, the term "archaeological resources" includes but is not limited to:

> *…pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. Nonfossilized and fossilized paleontological specimens, or any portion or piece thereof, shall not be considered archaeological resources, under the regulations under this paragraph, unless found in an archaeological context. No item shall be treated as an archaeological resource under regulations under this paragraph unless such item is at least 100 years of age.*

ARPA mandates consultation procedures before initiation of archaeological research on Native American lands or involving Native American archaeological resources. Section 4(c) requires Native American tribes be notified of possible harm to, or destruction of, sites having religious or cultural significance to that group. The Federal land manager must notify affected tribes before issuing the permit for archaeological work. Section (g)(2) specifies that permits to excavate or remove archaeological resources from Indian lands require consent of the Native American or Native American tribe owning or having jurisdiction over such lands. The permit, it is also stipulated, must include such terms and conditions as may be requested by the affected Native Americans.

Concerning the custody of archaeological resources, ARPA stipulates that any exchange or ultimate disposition of archaeological resources excavated or removed from Native American lands must be subject to the consent of the Native American or Native American tribe that owns or has jurisdiction over such lands.

National Historic Preservation Act Section 106

Archaeological resources are protected through the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [USC] 300101 et seq.), and its implementing regulations, Protection of Historic Properties (36 CFR Part 800); the Archaeological and Historic Preservation Act of 1974; and the Archaeological Resources Protection Act of 1979. The NHPA authorized the expansion and maintenance of the NRHP, established the position of SHPO, provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes in preserving their cultural heritage, and created the Advisory Council on Historic

Preservation (ACHP). Prior to implementing an "undertaking" (e.g., issuing a federal permit), Section 106 of the NHPA requires federal agencies to consider the effects of the undertaking on historic properties and to afford the ACHP and the SHPO a reasonable opportunity to comment on any undertaking that would adversely affect properties eligible for listing in the NRHP. As indicated in Section 101(d)(6)(A) of the NHPA, properties of traditional religious and cultural importance to a tribe are eligible for inclusion in the NRHP. Under the NHPA, a resource is considered significant if it meets the NRHP listing criteria at 36 CFR 60.4.

National Register of Historic Places

The NRHP was established by the NHPA as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (36 CFR 60.2). The NRHP recognizes both historic-period and prehistoric archaeological properties that are significant at the national, state, and local levels.

To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. A property (districts, sites, buildings, structures, and objects of potential significance) is eligible for the NRHP if it is significant under one or more of the following four established criteria:

- **Criterion A:** It is associated with events that have made a significant contribution to the broad patterns of our history.
- **Criterion B:** It is associated with the lives of persons who are significant in our past.
- **Criterion C:** It embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.
- **Criterion D:** It has yielded, or may be likely to yield, information important in prehistory or history.

Unless the property possesses exceptional significance, it must be at least 50 years old to be eligible for listing in the NRHP (U.S. Dept. of the Interior, 1995). In addition to meeting the criteria of significance, a property must have integrity. Integrity is defined as "the ability of a property to convey its significance" (U.S. Dept. of the Interior, 1995). The NRHP recognizes seven qualities that, in various combinations, define integrity: location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains, associated funerary objects, and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally

funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

STATE

California Environmental Quality Act

The California Environmental Quality Act (CEQA) applies to all discretionary projects undertaken or subject to approval by the state's public agencies (California Code of Regulations [CCR] 14(3), Section 15002(i)). Under CEQA, "A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (CCR tit. 14(3), Section 15064.5(b)). State CEQA Guidelines Section 15064.5(a) defines a "historical resource" as a resource that meets one or more of the following criteria:

- Listed in, or eligible for listing in, the California Register of Historical Resources (CRHR)
- Listed in a local register of historical resources (as defined at Cal. Public Res. Code [PRC] Section 5020.1(k))
- Identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Cal. PRC
- Determined to be a historical resource by a project's lead agency (CCR tit. 14(3), Section 15064.5(a))

A historical resource consists of "Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California…Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources" (CCR tit. 14(3), Section 15064.5(a)(3)).

The significance of a historical resource is impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for the CRHR. If an impact on a historical or archaeological resource is significant, CEQA requires feasible measures to minimize the impact (State CEQA Guidelines Section 15126.4 (a)(1)). Mitigation of significant impacts must lessen or eliminate the physical impact that the project will have on the resource.

Section 5024.1 of the Cal. PRC established the CRHR. Generally, a resource is considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (CCR tit. 14(3), Section 15064.5(a)(3)). The eligibility criteria for the CRHR are similar to those of the NRHP, and a resource that meets one or more of the eligibility criteria of the NRHP will be eligible for the CRHR.

The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance, identifies historical resources for state and local planning

purposes, determines eligibility for state historic preservation grant funding and affords certain protections under CEQA. Criteria for Designation:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). Fifty years is normally considered sufficient time for a potential historical resource, and in order that the evaluation remain valid for a minimum of five years after the date of this report, all resources older than 45 years (i.e., resources from the "historic-period") will be evaluated for CRHR listing eligibility, or CEQA significance. The CRHR also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

Finally, CEQA requires that significant effects on unique archaeological resources be considered and addressed. CEQA defines a unique archaeological resource as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA Guidelines Section 15064.5 Appendix G includes significance criteria relative to archaeological and historical resources. These have been utilized as thresholds of significance here, and a project would have a significant environmental impact if it would:

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 10564.5;

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 10564.5;

c) Disturb any human remains, including those interred outside of formal cemeteries.

Assembly Bill (AB) 52

On July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (PRC Section 21084.2). It further states that the lead agency shall avoid damaging effects to a tribal cultural resource, when feasible. (PRC Section 21084.3). PRC Section 21074 (a)(1) and (2) defines tribal cultural resources as "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and meets either of the following criteria:

a) Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or

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

AB 52 also established a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project" if requested. (PRC Section 21080.3.1(b)). Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency. The Notice of Preparation for this Project was issued on November 14, 2022; therefore, AB 52 applies to this Project. Tribal Cultural Resources are discussed in Chapter 4.15.

California Register of Historical Resources

State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15064.5(a) of the CEQA Guidelines. These criteria are nearly identical to those for the NRHP.

The SHPO maintains the CRHR. Properties listed, or formally designated eligible for listing, on the NRHP are nominated to the CRHR and then selected to be listed on the CRHR, as are State Landmarks and Points of Interest.

California Historical Resource Status Codes

A resource must meet at least one of the above-listed criteria and retain enough integrity to support its period of significant and association within a historical context. A resource is assigned a California Historical Resource (CHR) status code following evaluation, which identifies its significant level. The status codes and descriptions are listed below:

1. Properties listed in the NRHP or the CRHR.
2. Properties determined eligible for listing in the NRHP or CRHR.
3. Appears eligible for NRHP or CRHR through survey evaluation.
4. Appears eligible for NRHP or CRHR through other evaluation.
5. Properties recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated for NRHP or CRHR or needs re-evaluation.

Typically, resources designated as CHR Status Code 6 are determined ineligible for designation under any criteria and are not considered historical resources under CEQA. However, there are several subcategories that exist within each of the status codes that allow for various exemptions, such as whether a resource contributes to a Historic District.

California Historical Building Code

The California Historical Building Code (CHBC) provides guidelines for the preservation, restoration, rehabilitation, relocation, and reconstruction of buildings or structures designated as qualified historical buildings or properties by a local, State, or Federal jurisdiction. The CHBC provides guidelines for long-term preservation efforts of qualified historical buildings or properties in order to allow owners to make improvements for access for persons with disabilities; to provide a cost-effective approach to preservation; and, to ensure overall safety of affected occupants or users.

As defined by the CHBC, a "qualified historical building" is "any building, site, structure, object, district, or collection of structures, and their associated sites, deemed of importance to the history, architecture, or culture of an area by an appropriate local, State, or Federal governmental jurisdiction. This includes designated buildings or properties on, or determined eligible for, official national, State, or local historical registers or official inventories, such as the NRHP, CRHR, State Historical Landmark, State Points of Historical Interest, and officially adopted city or county registers, inventories, or surveys of historical or architecturally significant sites, places, or landmarks."[1]

Senate Bill 18

Senate Bill (SB) 18 (California Government Code Section 65352.3) requires local governments to consult with Native American tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to the adoption and amendment of general plans and specific plans. The consultation process requires (1) that local governments send the Native American Heritage Commission (NAHC) information on a proposed project and request contact information for local Native American tribes; (2) that local governments then send information on the project to the tribes that the NAHC has identified and notify them of the opportunity to consult; (3) that the tribes have 90 days to respond on whether they want to consult or

[1] California Historic Building Code (Section 18955 of Division 13, Part 2.7 of California Health and Safety Code).

not, and (4) that consultation begins, if requested, by a tribe and there is no statutory limit on the duration of the consultation. If issues arise and consensus on mitigation cannot be reached, SB 18 allows a finding to be made that the suggested mitigation is infeasible.

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the Coroner must notify the NAHC within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

Public Resources Code Section 5097.5

PRC Section 5097.5 provides for the protection of cultural and paleontological resources and prohibits the removal, destruction, injury, or defacement of archaeological and paleontological features on any lands under the jurisdiction of State or local authorities.

California Penal Code Section 622.5

California Penal Code Section 622.5 provides misdemeanor penalties for injuring or destroying objects of historic or archaeological interest located on public or private lands but specifically excludes the landowner.

LOCAL

City of Coachella General Plan

The Project site is located in the City of Coachella and would be required to comply with the regulations set forth in the CGP. CGP elements, goals, and policies relevant to the Project are as follows:

Sustainability and Natural Environment Element

This Element[2] establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces.

Goal 10 **Passive Open Space. Preserved open space areas that represent significant aesthetic, cultural, environmental, economic and recreational resources for the community.**

Policy 10.3 Archaeological resource preservation: Preserve important archaeological and paleontological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.

[2] City of Coachella. 2015. City of Coachella General Plan 2035 – Sustainability and Natural Environment Element. https://www.coachella.org/home/showpublisheddocument/8419/637819141150600000. (accessed July 2022).

Policy 10.4 Mitigation and preservation of cultural resources: Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources.

Policy 10.5 Grading: Require that proposed projects that involve a significant amount of grading shall have an archaeological and paleontological survey conducted before construction.

Goal 12 Cultural Resources and Sites. Preserved and protected cultural resources that provide the community with significant cultural, scientific, or educational value.

Policy 12.1 Disturbance of human remains. In areas where there is a high chance that human remains may be present (areas along the Whitewater Rivers/Coachella Valley Storm Channel, on Tribal lands, on areas with previously undisturbed soil, in the washes and canyons found in the eastern areas of the Planning Area, and areas of historic settlement), require proposed projects to conduct survey to establish occurrence of human remains, if any. If human remains are discovered on proposed project sites, the project must implement mitigation measures to prevent impacts to human remains in order to receive permit approval.

Policy 12.2 Tribal coordination: Require notification of California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.

Policy 12.3 Protected sites: Require sites with significant cultural resources to be protected.

Policy 12.4 Preservation of historic resources: Where practical, encourage the preservation of historic resources.

Policy 12.5 Document historic resources: When it is not practical to preserve a historic resource, require the architectural details and design elements of historic structures to be preserved during renovations and remodels.

Policy 12.6 Discovery of human remains: Require that any human remains discovered during implementation of public and private projects within the City be treated with respect and dignity and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.

Policy 12.8 Disturbance of human remains. In areas where there is a high chance that human remains may be present (areas along the Whitewater Rivers/Coachella Valley Storm Channel, on Tribal lands, on areas with previously undisturbed soil, in the washes and canyons found in the eastern areas of the Planning Area, and areas of historic settlement), require proposed projects to conduct survey to establish occurrence of human remains, if any. If human remains are discovered on proposed project sites, the project must implement mitigation measures to prevent impacts to human remains in order to receive permit approval.

City of Coachella Municipal Code

The City of Coachella Municipal Code contains several provisions that are expressly designed to identify and limit cultural resource impacts as projects are undergoing review by the City. Specifically, the

following provisions of the Municipal Code regulate impacts related to cultural resources throughout all areas of the City:

Chapter 15.48.010 – Historic Districts and Sites: Purpose - Authority. This chapter is adopted pursuant to the authority of Government Code Section 37361 for the purpose of preserving areas and specific buildings of the city which reflect elements of its cultural, social, economic, political, architectural and archaeological history. This chapter is intended to stabilize and improve buildings, structures or areas which are considered to be of historical, architectural, archaeological or ecological value, to foster civic beauty, to strengthen the local economy and to promote the use of specific buildings for the education and welfare of the citizens.[3]

4.4.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning cultural resources. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- Disturb any human remains, including those interred outside of dedicated cemeteries.

METHODOLOGY AND ASSUMPTIONS

The Project and associated Project Design Features (PDFs) are evaluated against the aforementioned significance criteria/thresholds as the basis for determining the impact's level of significance concerning cultural resources. This analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

Approach to Analysis

This analysis of impacts on cultural resources examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects based on application of the significance criteria/thresholds outlined above. For each criterion, the analyses are generally divided into two main categories: (1) temporary impacts and (2) permanent impacts. Each criterion is discussed in the context of Project components that share similar characteristics/geography. The impact conclusions consider the potential for changes in

[3] City of Coachella. 2022. *City of Coachella Municipal Code. Section 15.48.010.*

environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The baseline conditions and impact analyses are based on field observations made by BCR personnel April 17, 2019 to May 31, 2019, January 9, 2020 to January 16, 2020, July 28, 2022, and April 19, 2023; review of project maps and drawings; analysis of aerial and ground-level photographs; and review of various data available in confidential repositories (such as archaeological information) and public records (such as local planning documents). The determination that the Project would or would not result in "substantial" adverse effects on historical and archaeological resources and human remains considers the existing site's historical resource value and the severity of the Project implementation on resources that may be considered significant.

PROJECT DESIGN FEATURES

- The KPC Coachella Specific Plan has been designed to preserve portions of the Specific Plan site as permanent open space, thereby reducing the potential for disturbance of previously unidentified paleontological and archaeological resources in those areas.

4.4.4 PROJECT IMPACTS AND MITIGATION

Impact 4.4-1: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION

As previously discussed, the records search and field survey conducted by BCR personnel identified 48 cultural resources. These included five historic-period archaeological sites, one historic-period transmission alignment, one historic-period canal, 21 prehistoric archaeological sites, and 20 isolated artifacts (13 historic-period and seven prehistoric). Isolated finds are not considered "historical resources" under CEQA and are not considered "historic properties" under Section 106 of the NHPA and, as such, none of the isolated artifacts merit further consideration. Of the remaining 28 cultural resources identified within the Project site, the CRA and ART found one site, a contributing segment of the Coachella Canal (P-33-5705), was previously determined eligible for listing in the CRHR and NRHP with concurrence from the SHPO under Criteria 1/A and 3/C due to its associated with important events in history and unique workmanship and engineering. As such, this resource is considered a "historical resource" under CEQA and a "historic property" under Section 106 of the NHPA.

Per the Specific Plan, a crossing associated with the extension of Vista Del Norte would be added that intersects with a specific location of the Coachella Canal (P-33-5705) that would use one or more reinforced concrete box culverts. This would result in physical modification to roughly 0.08 percent of the contributing segment. Given that the physical impact would be very small and would not alter the overall integrity or destroy the canal's ability to convey its significance under Criteria 1/A or 3/C, the impact to the Coachella Canal (P-33-5705) would be less than significant as a result of the crossing. Additionally,

monitoring is recommended during all earthmoving activities within the vicinity of the Coachella Canal to ensure additional physical impacts beyond the identified 0.08 percent of the resource would not occur and that the Project would not result in adverse effects/significant impacts to this resource during construction. Should any unauthorized physical impacts occur, corrective action may be warranted to ensure the data associated with the resource can be salvaged and that the resource remains properly mitigated against future damage. Construction monitoring for this historic built resource and the process to identify corrective action as a result of unauthorized impacts would be conducted pursuant to **MM CUL-1.** No other cultural resources within the Project area are recommended eligible or considered a "historical resource" under CEQA or a "historic property" under Section 106 of the NHPA. However, although no significant or adverse impacts to cultural resources are anticipated, **MM CUL-2, MM CUL-3,** and **MM TCR-1** are proposed to address the discovery of potential unknown cultural resources during ground-disturbing activities. Impacts to historical resources during construction would be less than significant with mitigation incorporated. **MM CUL-3** is located within the Impact 4.4-2 section below and **MM TCR-1,** which outlines Tribal Monitoring, is located within **Section 4.15: Tribal Cultural Resources**.

OPERATIONS

Following Project construction and completion, the Project would provide housing, commercial, and educational opportunities within the City of Coachella. These land use operations would not impact historical resources. Therefore, Project operations would not cause a substantial adverse change in the significance of a historical resource. Impacts would be less than significant.

Off-Site Impacts

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site circulation and utility improvements would involve grading and construction equipment. Note that off-site improvements areas are conceptual and would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including cultural resources. In the event that unanticipated cultural resources are encountered during construction, **MM CUL-1** through **MM CUL-3** and **MM TCR-1** would be implemented to address inadvertent finds. **MM CUL-3** is located within the Impact 4.4-2 section below and **MM TCR-1**, which outlines Tribal Monitoring, is located within **Section 4.15: Tribal Cultural Resources**.

Further, the off-site powerline improvements were included in the footprint of the cultural resources surveys completed for the Project. Impacts resulting from the construction of these powerlines would be consistent with the impacts of other powerline construction and would not create unique circumstances such that the impacts would be any other than those expected. There are existing powerlines in the general vicinity and these uses would not be out of the ordinary.

Mitigation Measures

MM CUL-1 **Construction Monitoring – Built Historical Resources.** A qualified cultural resources monitor would be present during all earthmoving activities within 100 feet of the

Historic Coachella Canal (P-33-5705). The monitor would work under the direct supervision of a cultural resources professional who meets the Secretary of the Interior's Professional Qualification Standards for Architectural History and/or Archaeology (Project Archaeologist). Should any previously unidentified features or artifacts associated with the canal be inadvertently discovered during earthmoving activities, the monitor would be empowered to temporarily halt or redirect construction work within 100 feet of any find until the find can be assessed and evaluated by the Project Archaeologist, as required in **MM CUL-2**. Should any unanticipated physical impacts occur to the known and recorded portion of the canal, ground-disturbing activities will halt within 100 feet of the canal. The Project Archaeologist will immediately notify the City Planner and identify the extent and nature of the impact, as well as to discuss any needed corrective action.

MM CUL-2 **Inadvertent Discoveries.** Prior to the commencement of Project implementation, the Project Archaeologist will conduct a Worker Environmental Awareness Program (WEAP) training for all on-site personnel related to cultural resources for the Project. The training will provide an overview of how to identify cultural resources within the Project area and the process to follow in the case of inadvertent discovery. All personnel that access the site must undergo this training, to include any personnel that engage with the Project after the initial WEAP training is provided.

In the event that cultural resources are discovered during Project implementation, all earthwork and ground-disturbing activities will halt within 100 feet of the discovery. The City Planner and Project Archaeologist will immediately be notified, and the Project Archaeologist will identify whether the resource is potentially significant and, therefore, requires further evaluation. If the cultural resources are Native American in origin (i.e., prehistoric), the Agua Caliente Band of Cahuilla Indians (Consulting Tribe) must be immediately contacted and consulted regarding potential significance and treatment of the resource. For any potential significant cultural resources, the Project Archaeologist will make recommendations to the City Planner on the measures that will be implemented to avoid or mitigate impacts the newly discovered resource. Recommendations from the Project Archaeologist and/or additional measures required by the City may include the addition of archaeological monitoring for all remaining ground-disturbing activities.

Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Subsequent disposition of significant prehistoric archaeological material, such as reburial or curation by a qualified repository within the County, will be agreed upon by the City and Consulting Tribe. Any significant historic archaeological material shall be curated at a public, non-profit institution with a research interest in the materials within the County, if such an

institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

All identified cultural resources will be recorded on appropriate CA DPR 523 series forms and evaluated for CEQA significance in accordance with the applicable code sections. All findings will be included within a Monitoring Report drafted by the Project Archaeologist and submitted to the City and Consulting Tribe for review. Final copies of the Monitoring Report will be submitted to the City, Consulting Tribe, and Eastern Information Center (EIC).

Impact 4.4-2: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Level of Significance: Less Than Significant with Mitigation Incorporated

A significant impact would occur if grading and construction activities would result in a substantial adverse change in the significance of an archaeological resource determined to be "historic" or "unique." As defined in PRC Section 21083.2, a "unique" archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to CEQA, if a resource is neither unique nor historical, the effects of a project on that resource will not be considered significant effects on the environment (CEQA Guidelines Section 15064(C)(4)).

Under a worst-case scenario, it is assumed that any archaeological resources located within the development areas of the Project would be eliminated through grading and construction activities. However, the significance of the impact would be based upon the criteria presented in the thresholds of significance (i.e., is archaeological resource determined to be "historic" or "unique"). If a site is not in a development area, there would be no direct impact.

CONSTRUCTION

Of the 48 total cultural resources identified within the Project site, only 26 are archaeological sites (5 historic and 21 prehistoric). BCR Consulting personnel recommended 24 archaeological sites ineligible for listing in the CRHR and NRHP, as they are not associated with important people or events in history, do not embody any distinctive architectural characteristics nor represent the work of a master, and do

not have the potential yield important prehistoric or historic information. However, BCR noted that two prehistoric archaeological sites, P-33-15151 and KIM1905-PS-9, required additional archaeological testing to thoroughly analyze potential eligibility of each resource. Archaeological testing for P-33-15151 and KIM1905-PS-9 was conducted by BCR Consulting personnel on April 19, 2023. KIM1905-PS-9 exhibited no intact or significant buried archaeological component and therefore is not recommended eligible for CRHR/NRHP listing. Significant buried archaeological materials were identified during test excavations at P-33-15151, though excavation and analysis exhausted the site's data potential and, therefore, the site is not recommended eligible for CRHR/NRHP listing. Further, neither site is the oldest or best example of its perspective site type and have not been connected with a scientifically recognized important prehistoric or historic event or person. Based on these results, neither site is considered a "unique archaeological resource" under CEQA.

No unique archaeological resources were identified within the Project site through archaeological investigations, and ethnographic data obtained through research and Tribal consultation did not reveal an increased likelihood that significant prehistoric archaeological sites are located within the Project area. However, archaeological monitoring is recommended during all earthmoving activities within the vicinity of P-33-15151 and KIM1905-PS-9 to ensure adverse effects/significant impacts will not occur to unknown buried resources associated with these sites. Construction monitoring for these sites would be conducted pursuant to **MM CUL-3** and **MM TCR-1**, and the process to address the discovery of potential unknown cultural resources during ground-disturbing activities would be followed per **MM CUL-2**. Impacts to unique archaeological resources during construction would be less than significant with mitigation incorporated. **MM CUL-2** is located in the Impact 4.4-1 section above and **MM TCR-1,** which outlines Tribal Monitoring, is located within **Section 4.15: Tribal Cultural Resources**.

OPERATIONS

Project operations would not involve any activities that would impact archaeological resources. Therefore, Project operations would not cause a substantial adverse change in the significance of an archaeological resource.

Off-Site Impacts

See Impact 4.4-1 above. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Note that off-site improvements areas are conceptual and would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including cultural resources. In the event that unanticipated archaeological resources are encountered during construction, **MM CUL-2, MM CUL-3,** and **MM TCR-1** would be implemented to address inadvertent finds. **MM CUL-2** is located within the Impact 4.4-1 section above and **MM TCR-1,** which outlines Tribal Monitoring**,** is located within **Section 4.15: Tribal Cultural Resources.**

Mitigation Measures

MM CUL-3 **Archaeological Monitoring.** A qualified archaeological monitor would be present during all earthmoving activities within 100 feet of P-33-15151 and KIM1905-P-9. The monitor would work under the direct supervision of a cultural resources professional who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology (Project Archaeologist). The monitor would be empowered to temporarily halt or redirect construction work within 100 feet of any find until the find can be assessed and evaluated by the Project Archaeologist in consultation with the Consulting Tribe, as required in MM CUL-2.

Impact 4.4-3: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION

The archaeological records search and field survey did not reveal any resources known to contain human remains within or near the Project site. However, the entirety of the Project area is considered sensitive for archaeological resources due to the presence of archaeological sites, and ground disturbing activities have the potential to reveal unknown human remains. Therefore, construction of the Project could disturb human remains should any be discovered during ground disturbing activities. If human remains are found, those remains would require proper treatment in accordance with applicable laws, including Health and Safety Code (HSC) Section 7050.5-7055 and PRC Section 5097.98 and Section 5097.99. HSC Section 7050.5-7055 describe the general provisions for treatment of human remains. Specifically, HSC Section 7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. HSC Section 7050.5 also requires that all activities cease immediately, and the County Coroner be contacted immediately. As required by state law, the procedures set forth in PRC Section 5087.98 would be implemented, including evaluation by the County Coroner and notification of the remains to the NAHC. The NAHC would then designate the MLD of the unearthed human remains and contact the applicable MLD. If human remains are found during excavation, excavation would be halted in the vicinity of the find and any area that is reasonably suspected to overlay adjacent remains shall remain undisturbed until the County Coroner has investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Compliance with the established regulatory framework (i.e., HSC Section 7050.5-7055 and PRC Section 5097.98 and Section 5097.99) would ensure potential Project impacts concerning human remains are reduced to less than significant. Compliance with **MM CUL-4** would further minimize potential impacts to human remains.

OPERATIONS

Operation of the Project would not involve any activities that could impact human remains.

Off-Site Impacts

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project proposes off-site circulation and utility improvements. Note that off-site improvements areas are conceptual and would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including cultural resources. In the event that human remains are encountered during construction, the process outlined in **MM CUL-4** would be followed.

Mitigation Measures

MM CUL-4 **Human Remains.** For discoveries of Native American human remains, PRC Section 5097.98 and HSC Section 7050.5 will be followed. If human remains are encountered, all ground-disturbing activities will halt within 100 feet of the find. The human remains, along with any associated grave goods and associated burial and sacred items, will remain in place until the procedures as outlined in PRC Section 5097.98 and HSC Section 7050.5 are completed.

4.4.5 CUMULATIVE IMPACTS

For purposes of the cultural resource impact analysis, cumulative impacts are considered for cumulative development within Coachella and Indio.

As concluded above, the Project would not cause an adverse change in the significance of a "historical resource" pursuant to State CEQA Guidelines Section 15064.5 or a "historic property" pursuant to Section 106 of the NHPA. Only one historical resource, a contributing segment of the Coachella Canal (P-33-5705), was identified within the Project area. While only 0.08% of this resource would potentially be physically altered as a result of the Project, it is recommended that construction monitoring occur during all earthmoving activities in the vicinity of the resource and all inadvertently discovered cultural resources be subject to appropriate consideration and treatment to ensure adverse effects/significant impacts will not occur, pursuant to **MM CUL-1** and **MM CUL-2.** With this mitigation in place, the Project would not result in a significant impact or adverse effect on this historical resource/historic property. Therefore, no cumulative impact concerning historical resources/historic properties would occur.

As discussed above, though no unique archaeological resources were identified within the Project site, the potential exists for known and unknown archaeological resources to be adversely impacted during Project construction. With implementation of **MM CUL-2**, **MM CUL-3,** and **MM TCR-1**, the Project would not cause a substantial adverse change in the significance of archaeological resources. Cumulative projects could involve actions that damage known or as-yet undiscovered archaeological specific to those development sites. However, as with the Project, all cumulative development would undergo environmental and design review on a project-by-project basis pursuant to CEQA to evaluate potential impacts to cultural resources. This would include cultural resources assessments to identify cultural resources that are present or could be present within a development site. Additionally, cumulative

development would be subject to compliance with the established federal, state, and local regulatory framework concerning the protection of cultural resources on a project-by-project basis. Where significant or potentially significant impacts are identified, implementation of all feasible site-specific mitigation would be required to avoid or reduce impacts. The Project's cumulative impacts to archaeological resources would be less than significant given compliance with the established regulatory framework and site-specific mitigation would be required.

As concluded above, previously undiscovered human remains could be encountered during Project construction activities; however, a less than significant impact would occur in this regard following compliance with the established state regulatory framework, as outlined in **CUL MM-4**. Cumulative development could impact previously undiscovered human remains during construction. However, all cumulative development would undergo environmental review on a project-by-project basis to evaluate the site-specific archaeological sensitivity. Additionally, cumulative development would be subject to compliance with the established state regulatory framework concerning the discovery of human remains on a project-by-project basis. The Project's cumulative impacts concerning the potential to disturb human remains would be less than significant given compliance with the established regulatory framework would be required.

4.4.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable cultural resources impacts have been identified.

4.4.7 REFERENCES

BCR Consulting LLC. 2023. *Cultural Resources Assessment*.

BCR Consulting LLC. 2023. *Archaeological Testing Report.*

City of Coachella. 2015. *General Plan Update*. https://www.coachella.org/Home/ShowDocument?id=3221.

City of Coachella. 2020. *Coachella Municipal Code*. https://library.municode.com/ca/coachella/codes/code_of_ordinances.

4.5 ENERGY

This section describes the existing setting of the Project as it relates to energy conservation, identifies associated regulatory conditions and requirements, presents the criteria used to evaluate potential impacts related to use of fuel and energy upon implementation of the Project, and identifies mitigation measures to reduce or avoid each significant impact. The significance of each impact after the incorporation of identified mitigation measures is included at the end of this section.

Additionally, the Project is analyzed at a programmatic level. As such, specific projects proposed under the KPC Coachella Specific Plan would be required to undergo its own independent CEQA analysis, including but not limited to an analysis of any potential impacts on energy. The project-specific analysis would provide more detail based on each project's specific location and other site-specific factors.

4.5.1 ENVIRONMENTAL SETTING

Pursuant to Section 15126.2(b), Section 15126.4 (a)(1)(C), and Appendix F of the State CEQA Guidelines, the environmental setting may include "existing energy supplies and energy use patterns in the region and locality." Energy use is analyzed in this document due to the potential direct and indirect environmental impacts associated with the Project. Such impacts include the depletion of nonrenewable resources (e.g., oil, natural gas, coal, etc.) and emissions of pollutants during both Project construction and operations. Refer to **Section 4.2: Air Quality** and **Section 4.7: Greenhouse Gas Emissions** for additional regulatory background and environmental setting regarding the Project's energy use.

EXISTING ELECTRICITY AND NATURAL GAS SUPPLIES

Electricity

Electricity as a utility is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into electricity. The delivery of electricity involves a number of system components including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million watts, while energy use is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion watt-hours.

Electrical services are provided to the area by Imperial Irrigation District (IID). A public agency, IID is the sixth largest public power utility in the state of California, providing generation, transmission, and

distribution services to more than 145,000 residential, commercial, and industrial customers.[1] It is also the largest irrigation district in the U.S., with more than 3,000 miles of canals and drains delivering water to active farmland and providing wholesale water to local municipalities primarily in the Southern California desert corridors of Imperial Valley and Coachella Valley.

IID produces and purchases their energy from a mix of conventional and renewable generating sources. **Table 4.5-1: Energy Resources Used to Generate Electricity for Imperial Irrigation District (2022)** shows the Imperial Irrigation District electric power mix in 2022 compared to the statewide 2022 power mix.

Table 4.5-1: Energy Resources Used to Generate Electricity for Imperial Irrigation District (2022)

Energy Resources	2022 Imperial Irrigation District Power Mix	2022 CA Power Mix
Eligible Renewable:	37.7%:	35.8%
Biomass and Biowaste	7.8%	2.1%
Geothermal	11.3%	4.7%
Eligible Hydroelectric	6.6%	1.1%
Solar	12.0%	17.0%
Wind	0.0%	10.8%
Coal	0.0%	2.1%
Large Hydroelectric	4.6%	9.2%
Natural Gas	35.3%	36.4%
Nuclear	3.4%	9.2%
Other	0.0%	0.1%
Unspecified Sources of Power1	19.0%	7.1%
Total	100%	100%

1. Electricity from transactions that are not traceable to specific generation sources.
Source: Imperial Irrigation District. 2022. *Power Content Label*, https://www.energy.ca.gov/filebrowser/download/6033. Accessed October 2025.

Natural Gas

The Southern California Gas Company (SoCalGas), the service provider for Project area, services approximately 21 million people in a 20,000-square mile service territory. SoCalGas has four storage fields; Aliso Canyon, Honor Rancho, La Goleta, and Playa del Rey, as well as a combined storage capacity of approximately 134 billion cubic feet. According to the California Energy Commission (CEC), natural gas demand in the SoCalGas service area 11,104 million therms in 2024.[2]

SoCalGas projects that total demand for natural gas will decline at an annual rate of 0.7 percent from 2024 to 2040.[3] The decline in demand is due to modest economic growth, California Public Utilities Commission mandated energy efficiency standards and programs, tighter standards created by revised

[1] A Century of Service: Imperial Irrigation District. Retrieved from: https://www.iid.com/home/showpublisheddocument/4900/635648001335730000 . Accessed October 2025.
[2] California Energy Commission (CEC) (2024). *Gas Consumption by Southern California Gas*. Retrieved from CEC Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1. Accessed October 2025.
[3] Southern California Gas Company (2024). *2024 California Gas Report.* Website: https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf (socalgas.com). Accessed October 2025.

Title 24 Codes and Standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure.

ENERGY USE

Energy use is typically quantified using the British Thermal Unit (BTU). Total energy use in California was 6,817 trillion BTU in 2023[4] (the most recent year for which this specific data is available), which equates to an average of approximately 174 million BTU per capita. Of California's total energy use, transportation accounts for nearly two-fifths of the total energy consumption, the industrial sector uses about one-fourth of the total energy consumption, residential uses one-fifth of the total energy, and the commercial sector uses slightly less than one-fifth. Electricity and natural gas in California are generally used by stationary sources such as residences, commercial sites, and industrial facilities, whereas petroleum use is generally accounted for by transportation-related energy use. In 2023, taxable gasoline sales (including aviation gasoline) in California accounted for 13,564,578,025 gallons of gasoline.[5]

4.5.2 REGULATORY SETTING

FEDERAL

Energy Independence and Security Act of 2007

The Energy Independence and Security Act (EISA; Public Law 110-140) was signed into law by President George W. Bush on December 19, 2007. The Act's goal is to achieve energy security in the United States by increasing renewable fuel production, improving energy efficiency and performance, protecting consumers, improving vehicle fuel economy, and promoting research on greenhouse gas (GHG) capture and storage. Under the EISA, the Renewable Fuel Standard program (RFS2) was expanded in several key ways:

- Expanded the RFS program to include diesel, in addition to gasoline;
- Increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022;
- Established new categories of renewable fuel and set separate volume requirements for each; and
- Required the U.S. Environmental Protection Agency (U.S. EPA) to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

RFS2 lays the foundation for achieving significant reductions of GHG emissions from the use of renewable fuels, for reducing imported petroleum, and encouraging the development and expansion of our nation's renewable fuels sector.

[4] US Energy Information Administration. 2023. *California Energy Consumption Estimates.* Retrieved from EIA Website: https://www.eia.gov/state/print.php?sid=CA. (accessed October 2025).

[5] California Department of Tax and Fee Administration (CDTFA). 2023. *Net Taxable Gasoline Gallons.* Retrieved from CDTFA Website: https://www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm. (accessed October 2025).

The EISA also includes a variety of standards for lighting and for residential and commercial appliance equipment. The equipment includes residential refrigerators, freezers, refrigerator-freezers, metal halide lamps, and commercial walk-in coolers and freezers.

STATE

Assembly Bill 32 and Senate Bill 32

California's major initiative for reducing GHG emissions is outlined in AB 32, the "California Global Warming Solutions Act of 2006." AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 (essentially a 15 percent reduction below 2005 emission levels; the same requirement as under S-3-05) and requires the California Air Resources Board (CARB) to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Reductions in overall energy consumption have been implemented to reduce emissions. See **Section 4.7: Greenhouse Gas Emissions** for a further discussion of AB 32.

In September 2016, Governor Jerry Brown signed into legislation SB 32, which builds on AB 32 and requires the state to cut GHG emissions to 40 percent below 1990 levels by 2030. With SB 32, the Legislature also passed AB 197, which provides additional direction for updating the Scoping Plan to meet the 2030 GHG reduction target codified in SB 32. CARB has published a draft update to the Scoping Plan and has received public comments on this draft but has not released the final version.

Additional energy efficiency measures beyond the current regulations are needed to meet these goals as well as the AB 32 GHG reduction goal of reducing statewide GHG emissions to 1990 levels by 2020 and the SB 32 goal of 40 percent below 1990 levels by 2030 (see **Section 4.7: Greenhouse Gas Emissions**, for a discussion of AB 32 and SB 32). Part of the effort in meeting California's long-term reduction goals include reducing petroleum use in cars and trucks by 50 percent, increasing from one-third to more than one-half of California's electricity derived from renewable sources, doubling the efficiency savings achieved at existing buildings and making heating fuels cleaner; reducing the release of methane, black carbon, and other short-lived climate pollutants, and managing farm and rangelands, forests, and wetlands so they can store carbon.

State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

California Building Energy Efficiency Standards: Title 24, Part 6 (California Energy Code)

The Code California Energy Code (Title 24, Part 6) was created as part of the California Building Standards Code (Title 24 of the California Code of Regulations) by the California Building Standards Commission in 1978 to establish statewide building energy efficiency standards to reduce California's energy use. In general, Title 24 energy code is designed to reduce wasteful and unnecessary energy consumption in newly constructed and existing buildings. The CEC updates the Title 24 Energy Efficiency Standards every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The Title 24 Energy Efficiency Standards conserve nonrenewable resources, such as natural gas, and ensure renewable resources are extended as far as possible to reduce the need for constructing new power plants.

On August 11, 2021, the CEC adopted the 2022 Energy Code. In December, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

The Title 24 Energy Efficiency Standards include provisions applicable to all buildings, residential and non-residential, which describe requirements for documentation and certificates that the building meets the standards. These provisions include mandatory requirements for efficiency and design of the following types of systems, equipment, and appliances:

- Air Conditioning Systems
- Heat Pumps
- Water Chillers
- Gas- and Oil-Fired Boilers
- Cooling Equipment
- Water Heaters and Equipment
- Pool and Spa Heaters and Equipment
- Gas-Fired Equipment Including Furnaces and Stoves/Ovens
- Windows and Exterior Doors
- Joints and Other Building Structure Openings (Envelope)
- Insulation and Cool Roofs
- Lighting Control Devices
- Solar Photovoltaic Systems

The standards include additional mandatory requirements for space conditioning (cooling and heating), water heating, indoor and outdoor lighting systems, as well as equipment in non-residential, high-rise residential, and hotel or motel buildings. Mandatory requirements for low-rise residential buildings cover indoor and outdoor lighting, fireplaces, space cooling and heating equipment (including ducts and fans), and insulation of the structure, foundation, and water piping. The standards require solar photovoltaic systems for new homes. In addition to the mandatory requirements, the standards call for further energy efficiency that can be provided through a choice between performance and prescriptive compliance approaches. Separate sections apply to low-rise residential and to non-residential, high-rise

residential, and hotel or motel buildings. In buildings designed for mixed use (e.g., commercial and residential), each section must meet the standards applicable to that type of occupancy.

The performance approach set forth under these standards provides for the calculation of an energy budget for each building and allows flexibility in building systems and features to meet the budget. The energy budget addresses space-conditioning (cooling and heating), lighting, and water heating. Compliance with the budget is determined using a CEC-approved computer software energy model. The alternative prescriptive standards require demonstrating compliance with specific minimum efficiency for components of the building such as building envelope insulation R-values, fenestration (areas, U-factor and solar heat gain coefficients of windows and doors) and heating and cooling, water heating and lighting system design requirements. These requirements vary depending on the building's location in the state's 16 climate zones.

California Green Building Standards

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The CEC approved the 2022 California Green Building Standards Code and went into effect January 1, 2023.

2008 California Energy Action Plan Update

The 2008 Energy Action Plan Update provides a status update to the 2005 Energy Action Plan II, which is the State of California's principal energy planning and policy document (CPUC and CEC, 2008). The plan continues the goals of the original Energy Action Plan, describes a coordinated implementation plan for State energy policies, and identifies specific action areas to ensure that California's energy is adequate, affordable, technologically advanced, and environmentally sound. First-priority actions to address California's increasing energy demands are energy efficiency, demand response (i.e., reduction of customer energy usage during peak periods in order to address system reliability and support the best use of energy infrastructure), and the use of renewable sources of power. If these actions are unable to satisfy the increasing energy and capacity needs, the plan supports clean and efficient fossil-fired generation.

California Appliance Efficiency Regulations, Title 20

The California Energy Commission adopted Appliance Efficiency Regulations (Title 20, California Code of Regulations Sections 1601 through 1608) on October 11, 2006, and is updated regularly to allow consideration of new energy efficiency technologies and methods. The regulations include energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines,

dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California.

Renewable Portfolio Standard Senate Bill 1078 and 107; Executive Order S-14-08, S-21-09, and SB 2X

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008, then-Governor Schwarzenegger signed Executive Order S-14-08, which expands the State's Renewable Portfolio Standard to 33 percent renewable power by 2020.

In September 2009, then-Governor Schwarzenegger continued California's commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs the CARB under its AB 32 authority to enact regulations to help the state meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020. In addition, CARB is to design emissions reduction measures, adopt regulations requiring the reporting and verification of greenhouse gas emissions, including accounting for greenhouse gas emissions from all electricity consumed in the state, and develop emissions reduction measures, including limits on emissions of greenhouse gases applied to electricity and natural gas providers serving customers in California.

On April 2011, Governor Brown signed SB 2X, which legislated the prior Executive Order S-14-08 renewable standard, which required California energy providers to buy 33 percent of their energy from clean, renewable energy sources by 2020. In 2022, 54.23 percent of California's total power mix is from renewable sources.[6]

Executive Order B-30-15, Senate Bill 350, and Senate Bill 100

In April 2015, the Governor issued Executive Order B-30-15, which established a GHG reduction target of 40 percent below 1990 levels by 2030. SB 350 (Chapter 547, Statutes of 2015) advanced these goals through two measures. First, the law increases the renewable power goal from 33 percent renewables by 2020 to 50 percent by 2030. Second, the law requires the CEC to establish annual targets to double energy efficiency in buildings by 2030. The law also requires the California Public Utilities Commission (CPUC) to direct electric utilities to establish annual efficiency targets and implement demand-reduction measures to achieve this goal. In 2018, SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

[6] California Energy Commission. 2023. *2021 Total System Electric Generation*. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation. (accessed October 2025).

Appendix F to CEQA Guidelines

Public Resources Code Section 21100(b)(3) and *CEQA Guidelines* Section 15126.4 require EIRs to describe, where relevant, the wasteful, inefficient, and unnecessary use of energy caused by a project. In 1975, largely in response to the oil crisis of the 1970s, the California State Legislature adopted AB 1575, which created the CEC. The CEC's statutory mission is to forecast future energy needs, license thermal power plants of 50 megawatts or larger, develop energy technologies and renewable energy resources, plan for and direct State responses to energy emergencies, and promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code Section 21100(b)(3) to require EIRs to consider the wasteful, inefficient, and unnecessary use of energy caused by a project. In addition, *CEQA Guidelines* Section 15126.4 was adopted in 1998 which requires that an EIR describe feasible mitigation measures which would minimize the inefficient and unnecessary use of energy. Thereafter, the State Resources Agency created *CEQA Guidelines,* Appendix F.

Pursuant to Appendix F, an EIR must include a "discussion of the potential energy impacts of proposed projects… ." However, because lead agencies have not consistently included such analysis in their EIRs, California's Natural Resources Agency amended Appendix F to the *CEQA Guidelines* in 2009 "to ensure that lead agencies comply with the substantive directive in Section 21100(b)(3)." *CEQA Guidelines,* Appendix F lists environmental impacts and mitigation measures that an EIR may include. What is required is a "discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." Potential impacts that may be discussed include:

- The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance, or removal. If appropriate, the energy intensiveness of materials may be discussed.
- The effects of the Project on local and regional energy supplies and on requirements for additional capacity.
- The effects of the Project on peak and base period demands for electricity and other forms of energy.
- The degree to which the Project complies with existing energy standards.
- The effects of the Project on energy resources.
- The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

State CEQA Guidelines, Appendix F assists EIR preparers in determining whether a Project will result in the inefficient, wasteful, and unnecessary use of energy. The discussion below analyzes the Project's effect on energy resources.

LOCAL

City of Coachella General Plan

The Project site is located in the City of Coachella and would be required to comply with the regulations set forth in the CGP. CGP elements, goals, and policies relevant to the Project are as follows:

Land Use and Community Character Element

The Land Use and Community Character Element of the CGP is intended to provide a long-term vision, goals and policies for land use and development in Coachella over the next 20 to 30 years.

Goal 5 **Neighborhoods. Neighborhoods that provide a variety of housing types, densities, designs and mix of uses and services that reflect the diversity and identity of Coachella, provide for diverse needs of residents of all ages, ethnicities, socio-economic groups and abilities, and support healthy and active lifestyles.**

Policy 5.22 Green neighborhoods. Encourage new developments to build to a green neighborhood rating standard and apply for certification from a program such as LEED for Neighborhood Development or LEED for Homes.

Sustainability and Natural Environment Element

This Element establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces. [7]

Goal 2 **Energy. An energy efficient community that relies primarily on renewable and non-polluting energy sources.**

Policy 2.1 Community development–subdivisions. When reviewing applications for new subdivisions, require all residences be oriented along an east-west access, minimizing western sun exposure, to maximize energy efficiency.

Policy 2.2 Passive solar design. Require new buildings to incorporate energy efficient building and site design strategies for the desert environment that include appropriate solar orientation, thermal mass, use of natural daylight and ventilation, and shading.

Policy 2.3 Alternative energy. Promote the incorporation of alternative energy generation (e.g., solar, wind, biomass) in public and private development.

Policy 2.5 Construction standards. Consider and evaluate new construction practices and standards that increase building energy efficiency.

Policy 2.6 Energy performance targets – new construction. Require new construction to exceed Title 24 energy efficiency standards by 15 percent and incorporate solar photovoltaics.

[7] City of Coachella. 2015. City of Coachella General Plan – Sustainability and Natural Environment Section. https://www.coachella.org/home/showpublisheddocument/8419/637819141150600000 (accessed October 2025).

Policy 2.9 Energy-efficient street lighting. Implement a program to install the latest energy-efficient technologies for street and parking lot lights to meet City and state standards.

Policy 2.12 Solar access. Prohibit new development and renovations that impair adjacent buildings' solar access, unless it can be demonstrated that the shading benefits substantially offset the impacts of solar energy generation potential.

Goal 4 Green Building. Community building stock (both new construction and renovations) that demonstrates high environmental performance through green design.

Policy 4.5 Heat island reductions. Require heat island reduction strategies in new developments such as light-colored cool roofs, light-colored paving, permeable paving, right-sized parking requirements, water efficient vegetative cover and planting, substantial tree canopy coverage, south and west side water-efficient tree planting, and shaded asphalt paving.

Policy 4.6 Public realm shading. Strive to improve shading in public spaces such as bus stops, sidewalks and public parks and plazas through the use of trees, shelters, awnings, gazebos, fabric shading and other creative cooling strategies.

Housing Element

The Housing Element[8] addresses existing and future housing needs for persons of all economic groups in the city. The Housing Element is a tool for use by citizens and public officials in understanding and meeting the housing needs in Coachella.

Goal 3 Reduced Energy Usage. Reduced residential energy usage within the city, resulting in reduced housing costs.

Policy 3.1 Conservation Techniques. Encourage the use of energy-conserving techniques in the siting and design of new housing.

4.5.3 STANDARDS OF SIGNIFICANCE

CEQA THRESHOLDS

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning energy. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation; or
- Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency.

[8] City of Coachella. 2022. City of Coachella General Plan – Housing Element. https://www.coachella.org/home/showpublisheddocument/8427/637819141838130000. (accessed October 2025).

METHODOLOGY

This section analyzes energy use on three sources of energy that are relevant to the Project, including electricity, natural gas, and transportation fuel for vehicle trips associated with new development, as well as the fuel necessary for Project construction. The analysis of the Project's electricity and natural gas use is based on the California Emissions Estimator Model version 2022.1 (CalEEMod), which quantifies energy use for occupancy. The results of CalEEMod are included in **Appendix B (Air Quality Assessment)** and **Appendix G (Greenhouse Gas Assessment)** of this EIR. Modeling related to Project energy use was based primarily on the default settings in CalEEMod. The amount of operational fuel use was estimated using CalEEMod outputs for the Project and CARB Emissions Factor (EMFAC) 2021 computer program for typical daily fuel use in Riverside County. Construction fuel was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry.

Energy impacts are analyzed below according to topic. Mitigation measures directly correspond with an identified impact.

4.5.4 PROJECT IMPACTS AND MITIGATION

Impact 4.5-1: ***Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?***

Level of Significance: Less than Significant with Mitigation Incorporated

CONSTRUCTION

The Project is anticipated to be constructed in six phases. Construction is anticipated to occur over a duration of approximately 20 years. For modeling purposes, construction was assumed to begin in early 2025. Since the time the energy calculations (provided in **Appendix E**) were prepared, the Project's construction phasing has been changed, and construction is anticipated to commence in late 2026; refer to **Section 3.0: Project Description**. As Project development is speculative, a conservative worst-case construction timeline has been modeled for analysis purposes. This involves modeling emissions at the earliest feasible date. Emissions in future years (i.e., due to a later construction start date or operational opening year) would be lower due to phased-in emissions standards, inspection and maintenance requirements, and fleet turnover). Project construction that occurs at a later date than what was modeled impacts would result in lower emissions than those analyzed due to the use of more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to state regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment. As a result, Project-related construction emissions would be lower than the impacts disclosed herein. For emissions modeling purposes, conservatively analyzing the emissions using an earlier construction start date provides for a worst-case analysis and full disclosure of potential impacts, as required by CEQA. Therefore, although the actual energy modeling data is based on a construction start date of early 2025, the energy impacts reported in this document are anticipated to remain the same for a construction year of late 2026.

The energy associated with Project construction includes electricity use associated with water utilized for dust control, diesel fuel from on-road hauling trips, vendor trips, and off-road construction diesel equipment, as well as gasoline fuel from on-road worker commute trips. Because construction activities typically do not require natural gas, it is not included in the following discussion. The methodology for each category is discussed below. This analysis relies on the construction equipment list and operational characteristics, as stated in **Section 4.2: Air Quality** and **Section 4.7: Greenhouse Gas Emissions**. Quantifications of construction energy are provided for the Project below; see **Table 4.5-2: Energy Use During Construction** and **Table 4.5-3: Petroleum Fuel Use During Construction**.

Electricity

Water for Construction Dust Control

Electricity use associated with water use for construction dust control is calculated based on total water use and the energy intensity for supply, distribution, and treatment of water. The total number of gallons of water used is calculated based on acreage disturbed during grading and site preparation, as well as the daily watering rate per acre disturbed:

- The total acres disturbed are calculated using the methodology described in Chapter 4.2 of Appendix C of the CalEEMod User's Guide.
- The water application rate of 3,020 gallons per acre per day is from the Air and Waste Management Association's Air Pollution Engineering Manual (2000).

The energy intensity value is based on the CalEEMod default energy intensity per gallon of water for the South Coast Hydrologic Region. As summarized in **Table 4.5-2**, the total electricity demand associated with water use for Project construction dust control would be approximately 160.6 MWh over the duration of construction. For comparison, in 2022 Riverside County used 17,781 GWh.[9] Therefore, Project construction would increase annual electricity consumption by 0.0009 percent.

Table 4.5-2: Energy Use During Construction

Project Source	Total Construction Energy
Electricity Use	**MWh**
Total Construction Electricity Usage[1]	160.6
Average (Per Year)	8.03

Notes:
Electricity associated with construction water use is based on acres disturbed per day and estimated water use per acre.
Source: Refer to energy calculations in Appendix E.

The electricity used for construction activities would be temporary and minimal; therefore, impacts would be less than significant. IID total energy sales are projected to be 4,052 GWh of electricity in 2025 (the first year of Project construction).[10] The Project's construction-related net annual electricity consumption of 8.03 MWh would represent approximately 0.20 percent of IID projected sales.

[9] California Energy Commission. 2022. http://www.ecdms.energy.ca.gov/gasbycounty.aspx. (accessed July 1, 2024).
[10] California Energy Commission, CED 2022 *LSE and BA planning Forecast Tables*, https://efiling.energy.ca.gov/GetDocument.aspx?tn=249500. (accessed October 2025).

Therefore, it is anticipated that IID's existing and planned electricity capacity and electricity supplies would be sufficient to serve the Project's temporary construction electricity demand. During construction the use of electricity would not be wasteful, inefficient, or unnecessary, therefore this impact would be less than significant.

Petroleum Fuel

Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, current crude oil production would be sufficient to meet demand until 2050.[11] As such, it is expected that existing and planned transportation fuel supplies would be sufficient to serve the Project's temporary construction demand.

Furthermore, there are no unusual characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or state. In addition, some energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These engines use highly efficient combustion engines to minimize unnecessary fuel use.

Construction fuel demands are calculated based on GHG emissions. All construction equipment and trucks hauling equipment to the site are conservatively assumed to use diesel fuel while all construction workers are conservatively assumed to travel to the site using gasoline-powered vehicles. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary use of energy during construction. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive and that there is a significant cost-savings potential in green building practices.

Substantial reduction in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The Project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest in minimizing the costs of business.

On-Road Diesel Construction Trips and Off-Road Diesel Construction Equipment

The diesel fuel associated with on-road construction mobile trips is calculated based on vehicle miles traveled (VMT) from vehicle trips (i.e., worker, vendor, and hauling), the CalEEMod default diesel fleet

[11] US Energy Information Administration. 2022. *California Energy Consumption Estimates*. Retrieved from EIA Website: https://www.eia.gov/state/print.php?sid=CA (accessed July 1, 2024).

percentage, and vehicle fuel efficiency in miles per gallon (MPG). VMT for the entire construction period is calculated based on the number of trips multiplied by the trip lengths for each phase shown in CalEEMod. Construction fuel was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry (refer to energy calculations in Appendix E for on-road diesel fuel consumption per phase).

Similarly, the construction diesel fuel associated with the off-road construction equipment is calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry (refer to energy calculations in **Appendix E** for off-road diesel fuel consumption per phase).

The combined diesel usage from both on-road and off-road construction is 3,496,921 gallons over the 20-year construction period (see **Table 4.5-3**). During construction, diesel fuel consumption would average 174,846 gallons per year. For comparison, in 2025, the year construction is anticipated to begin, Riverside County is anticipated to consume 259,549,258 gallons of diesel fuel.[12] Therefore, throughout the duration of construction, the Project would increase annual diesel fuel consumption by 0.07 percent. Because the consumption of diesel fuel during construction would be less than one percent, it can be assumed that this impact would be less than significant.

On-Road Gasoline Construction Trips

The gasoline fuel associated with on-road construction mobile trips is calculated based on VMT from vehicle trips (i.e., worker, vendor, and hauling), the CalEEMod default gasoline fleet percentage, and vehicle fuel efficiency in MPG using the same methodology as the construction on-road trip diesel fuel calculation discussed above. The total gasoline fuel consumption associated with Project on-road construction trips would be approximately 2,643,674 gallons (see **Table 4.5-3**). During construction, gasoline consumption would average 132,184 gallons per year.

Table 4.5-3: Petroleum Fuel Use During Construction

Construction Phase and Years	Diesel Fuel Usage	Gasoline Usage
	Gallons	
Phase 1 (2025, 2026, 2027, and 2028)	623,328	341,476
Phase 2 (2028, 2029, 2030, and 2031)	562,600	379,581
Phase 3 (2031, 2032, 2033, and 2034)	482,551	192,340
Phase 4 (2035, 2036, 2037, and 2038)	647,846	646,008
Phase 5 (2038, 2039, 2040, and 2041)	652,580	857,106
Phase 6 (2041, 2042, 2043, and 2044)	501,016	254,1663
Total	3,496,921	2,643,674
Total (Per Year)	174,846	132,184

Notes:
1. On-road mobile source fuel use based on vehicle miles traveled (VMT) from CalEEMod and fleet-average fuel consumption in gallons per mile from EMFAC2021 in Riverside County for 2025.
2 Construction fuel use was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry.
Source: Refer to energy calculations in Appendix E.

[12] California Air Resources Board (CARB), EMFAC. 2022. *Emissions Inventory*. https://arb.ca.gov/emfac/emissions-inventory/74381190e596013b5bfe95769c296a397865215f (accessed October 2025).

For comparison, in 2025, the year construction is anticipated to begin, Riverside County is anticipated to consume 698,621,144 gallons of gasoline.[13] Therefore, throughout the duration of construction, the Project would increase annual gasoline consumption by 0.02 percent. Because the consumption of gasoline during construction would be less than one percent and would use construction fleets consistent with the existing market, as may be controlled by state regulations designed to reduce energy demand from construction, it can be assumed that this impact would be less than significant. The project does not propose any unique construction features that would cause wasteful use of energy.

OPERATIONS

The energy consumption associated with Project operations would occur from building energy (electricity and natural gas) use, water use, and transportation-related fuel use. Annual energy use during Project operations is shown in **Table 4.5-4: Project Annual Energy Use During Operations**. It is noted that the Project's unmitigated energy consumption estimates are provided in **Table 4.5-4** to provide a conservative impact analysis. As indicated in **Section 4.7: Greenhouse Gas Emissions**, the Project is required to provide on-site solar photovoltaic (PV) panels to offset its electricity consumption.

Table 4.5-4: Project Annual Energy Use During Operations

Energy	Annual Unmitigated Operational Energy[1]	Annual Mitigated Operational Energy[1]
Electricity Use	**GWh**	
Phase 1	31.7	17.4
Phase 2	18.5	10.1
Phase 3	9.1	6.2
Phase 4	37.0	18.7
Phase 5	34.9	19.8
Phase 6	11.3	6.7
Total	142.5	78.9
Natural Gas Use	**Therms**	
Phase 1	302,678	230,726
Phase 2	402,832	73,097
Phase 3	206,021	1,691
Phase 4	340,022	72,968
Phase 5	791,220	24,568
Phase 6	289,204	10,445
Total	2,331,977	413,495

Notes:
1. The electricity and natural gas usage are based on Project-specific estimates and CalEEMod defaults.
Source: Refer to energy calculations in Appendix E.

Electricity

The operational phase of the Project would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. The electricity use during Project operations is based on CalEEMod defaults. Once completed, the Project

[13] California Air Resources Board (CARB), EMFAC. 2021. *Emissions Inventory*. https://arb.ca.gov/emfac/emissions-inventory/74381190e596013b5bfe95769c296a397865215f(accessed October 2025).

would use approximately 78.9 GWh of electricity per year (see **Table 4.5-4**) with mitigation measures included in **Section 4.7: Greenhouse Gas Emissions.** These measures would reduce energy consumption and increase efficiency. **MM GHG-1** requires the Project to install solar PV panels to cover the maximum roof space available for solar (i.e., solar-ready zone) to reduce electricity demands. **MM GHG-2** requires the Project to meet or exceed 2022 CALGreen Tier 2 standards and prohibits the installation of natural gas for residential uses. **MM GHG-5** requires all major appliances be Energy Star certified or of equivalent energy efficiency where applicable. Future development within the Project would be designed and constructed in accordance with the City's latest adopted energy efficiency standards and California Title 24 energy efficiency standards.

Additionally, plans submitted for building permits in the Project area would be required to include verification demonstrating compliance with the Building and Energy Efficiency Standards in effect at the time building permits are issued. The proposed project would also be required to adhere to the provisions of CALGreen, which established planning and design standards for sustainable site development, energy efficiency, water conservation, and material conservation. Even though the proposed Project would increase the consumption of electricity, the proposed Project would not increase demand such that IID would need to plan for new regional electricity or natural gas facilities, the construction of which could cause significant environmental effects.

Based on the above analysis, the proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. As discussed above, the proposed project would meet or exceed federal energy standards and would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities.

Due to the inherent increase in efficiency of building code regulations, and a net decrease in electricity use from mitigation measures, the Project would not result in a wasteful use of energy. Impacts related to operational electricity use would be less than significant.

Natural Gas

The methodology used to calculate the natural gas use associated with the Project is based on CalEEMod default rates. Natural gas consumption during operation would be required for various purposes, including building heating and cooking. For building consumption, default natural gas generation rates in were used. As shown in **Table 4.5-4**, once completed, the Project would consume approximately 413,495 therms per year with mitigation measures included in **Section 4.7: Greenhouse Gas Emissions.** These measures would reduce energy consumption and increase efficiency. **MM GHG-2** requires the Project to meet or exceed 2022 CALGreen Tier 2 standards and prohibits natural gas in residential uses. **MM GHG-5** requires all major appliances be Energy Star certified or of equivalent energy efficiency where applicable. Future development within the Project would be designed and constructed in accordance with the City's latest adopted energy efficiency standards and California Title 24 energy efficiency standards.

Additionally, plans submitted for building permits in the Project area would be required to include verification demonstrating compliance with the Building and Energy Efficiency Standards in effect at the

time building permits are issued. The proposed project would also be required to adhere to the provisions of CALGreen, which established planning and design standards for sustainable site development, energy efficiency, water conservation, material conservation, and internal air contaminants. Even though the proposed Project would increase the consumption of natural gas, the proposed Project would not increase demand such that Southern California Natural Gas Company would need to plan for new regional natural gas facilities, the construction of which could cause significant environmental effects.

Due to the inherent increase in efficiency of building code regulations, and a net decrease in natural gas use from mitigation measures, the Project would not result in a wasteful use of energy. Impacts related to operational electricity use would be less than significant.

Petroleum Fuel

The gasoline and diesel fuel associated with on-road vehicular trips is calculated based on total VMT calculated for the analyses within **Section 4.2: Air Quality**, and **Section 4.7: Greenhouse Gas Emissions**, and average fuel efficiency from the EMFAC model. The EMFAC fuel efficiency data incorporates the Pavley Clean Car Standards and the Advanced Clean Cars Program.[14] As summarized in **Table 4.5-5: Petroleum Fuel Use During Operations**, the total gasoline and diesel fuel associated with on-road trips is conservatively estimated to be approximately 20,251,865 gallons per year and 2,616,711 gallons per year, respectively.

For comparison, in 2045, the anticipated year of project buildout, Riverside County is anticipated to consume 617,999,237 gallons of gasoline and 292,027,876 gallons of diesel fuel.[15] Therefore, during operations, the Project is anticipated to increase annual gasoline consumption by 3.28 percent and diesel fuel by 0.90 percent. However, CARB regulations will prohibit the sale of new gas-powered vehicles after 2035 and new diesel-powered vehicles after 2036, and by 2045 nearly all internal combustion engine vehicles will be off California roads.[16] As ZEV are phased in, the consumption of gasoline and diesel will decrease significantly, resulting in a less than significant impact.

Table 4.5-5: Petroleum Fuel Use During Operations

	Gasoline Usage	Diesel Fuel Usage
Project Phases[1]	**Gallons**	
Phase 1	3,812,184	446,204
Phase 2	2,048,411	246,748
Phase 3	1,260,745	158,360
Phase 4	5,472,775	711,302

[14] The CARB EMFAC 2017 Technical Documentation from March 2018 notes that emissions are estimated with all current controls active, except Low Carbon Fuel Standards (LCFS). The reason for excluding LCFS is that most of the emissions benefits due to the LCFS come from the production cycle (upstream emissions) of the fuel rather than the combustion cycle (tailpipe). As a result, LCFS is assumed to not have a significant impact on CO2 emissions from EMFAC's tailpipe emission estimates.

[15] California Air Resources Board (CARB), EMFAC. 2021. *Emissions Inventory*. https://arb.ca.gov/emfac/emissions-inventory/74381190e596013b5bfe95769c296a397865215f (accessed October 2025).

[16] Center for Biological Diversity. 2020. All-Electric Drive: How California's Climate Success Depends on Zero-Emission Vehicles. https://www.biologicaldiversity.org/programs/climate_law_institute/pdfs/All-Electric-Drive-California-zero-emissions-vehicles-report.pdf (accessed October 2025).

	Gasoline Usage	Diesel Fuel Usage
Phase 5	5,960,765	808,039
Phase 6	1,696,985	246,058
Total	20,251,865	2,616,711

Notes:
1. Calculated based on the mobile source fuel use based on vehicle miles traveled (VMT) and fleet-average fuel consumption.
Source: Refer to energy calculations in Appendix E.

Compliance With Energy Efficiency Measures

As discussed above, California's Energy Efficiency Standards for Residential and Non-Residential Buildings create uniform building codes to reduce California's energy use and provide energy efficiency standards for residential and non-residential buildings. These standards are incorporated within the California Building Code and are expected to substantially reduce the growth in electricity and natural gas use. The 2022 Title 24 standards for new residential and nonresidential buildings encourage electric heat pump technology and use, promote electric-ready buildings to get owners to use cleaner electric heating, cooking, and vehicle charging, expanding solar photovoltaic systems and battery storage systems to reduce reliance on fossil fuel power plants.

Regarding water energy conservation, the Project would incorporate drought-tolerant landscaping throughout portions of the site. Water-efficient irrigation controls would also be used in landscape areas. Comprehensive water conservation strategies would be developed to each respective land use as part of the Project plan development. Buildings would incorporate water-efficient fixtures and appliances, to comply with Title 24.

It should also be noted that IID is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase total procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030. SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat.

As discussed above, California's Energy Efficiency Standards create uniform building codes to reduce California's energy use and provide energy efficiency standards for residential and non-residential buildings. These standards are incorporated within the California Building Code and are expected to substantially reduce the growth in electricity and natural gas use.

None of the Project energy uses exceed one percent of the corresponding uses within the County. Project operations would not substantially affect existing energy or fuel supplies or resources. All Project buildings will comply with energy and fuel efficiency laws and regulations; thus, the Project would not be wasteful or inefficient. Therefore, the Project would result in a less than significant impact in this regard.

OFF-SITE IMPROVEMENTS

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site construction or improvements are conceptual in nature. As mentioned above, all construction activities would be subject to compliance with California Building Code, applicable California's Energy Efficiency Standards, Coachella MC regulations, and Project-specific mitigation presented within this EIR. The grading and other construction-related activity would be temporary and would not result in wasteful, inefficient, or unnecessary consumption of energy resources, such that significant and adverse physical effects to the environment would occur.

Mitigation Measures

Refer to **MM GHG-1**, **MM GHG-2**, and **MM GHG-5** in **Section 4.7: Greenhouse Gas Emissions** of this EIR. No additional mitigation measures are required.

Impact 4.5-2: Would the Project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?

Level of Significance: Less than Significant with Mitigation Incorporated

As discussed in Impact 4.5-1 above, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards and the 2022 CALGreen Building Code. The Project would be required to exceed existing energy efficiency standards as required by **MM GHG-2** and would ensure that the Project meets all applicable energy conservation policies and regulations. As such, the Project would not conflict with applicable plans for renewable energy or energy efficiency. SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) (RTP/SCS), adopted in April 2024, integrates transportation, land use, and housing to meet GHG reduction targets set by CARB. The document establishes GHG emissions goals for automobiles and light-duty trucks, as well as an overall GHG target for the region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of SB 375. The Project would not conflict with the stated goals of the RTP/SCS. Potential impacts are considered not significant.

OFF-SITE IMPROVEMENTS

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site construction or improvements are conceptual in nature. As mentioned above, all construction activities would be subject to compliance with California Building Code, applicable California's Energy Efficiency Standards, Coachella MC regulations, and Project-specific mitigation presented within this EIR.

Mitigation Measures

Refer to **MM GHG-2** in **Section 4.7: Greenhouse Gas Emissions** of this EIR. No additional mitigation measures are required.

4.5.5 CUMULATIVE IMPACTS

Potential cumulative impacts to energy would result if the Project, in combination with past, present, and future projects, would result in the wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features, would not achieve building energy efficiency standards, or would result in the unnecessary use of energy during construction and/or operation.

The cumulative projects within the areas serviced by the energy service providers would be applicable to this analysis. Projects that include development of large buildings or other structures that would have the potential to consume energy in an inefficient manner would have the potential to contribute to a cumulative impact.

Construction and operations associated with implementation of the Project would result in the use of energy, but not in an inefficient or wasteful manner. The primary source of energy will be from the required solar PV panels and would therefore not cause any extra demand on the energy grid. The use of energy would not be substantial in comparison to statewide electricity, natural gas, gasoline, and diesel demand. The electricity used for construction would be less than that required during operation of the Project, would be temporary and would have a minimal contribution to the Project's overall energy consumption. Construction of the Project would not typically involve the consumption of natural gas. The Project's construction electricity consumption would be negligible relative to IID's generated electricity and electricity supplies would be sufficient to serve the Project's temporary construction electricity demand.

IID will review the Project's estimated electricity consumption in order to ensure that the estimated power requirement would be part of the total load growth forecast for their service area and accounted for in the planned growth of the power system if the electricity demand was to increase past what the PV panels can provide. It should be noted that the planning projections of IID and SoCalGas consider planned development for their service areas and are in and of themselves providing for cumulative growth. Therefore, it is likely that the cumulative growth associated with the related projects is already accounted for in the planning of future supplies to cover projected demand.

IID and SoCalGas have policies, programs, and projects in place to provide continued, adequate energy to their users, including the Project. Substantial reductions to the cumulative demand for energy can result from an increased reliance on renewable energy systems (as required by the State's Renewable Portfolio Standards) and the construction of energy-efficient buildings. Cumulative projects would be subject to applicable Title 24 and CALGreen requirements similar to the Project, which includes energy efficiency standards to minimize the wasteful and inefficient use of energy.

Furthermore, transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, current crude oil production would be sufficient to meet worldwide consumption demand until 2050. As such, it is expected that existing and planned transportation fuel supplies would be sufficient to serve the Project's construction and operational demand. New capacity or supplies of energy resources would not

be required. Additionally, the Project would be subject to compliance with all federal, state, and local requirements for energy efficiency. State regulations, including the Low Carbon Fuel Standard, Pavley Clean Car Standards, and Low Emission Vehicle Program, would serve to reduce the transportation fuel demand of cumulative projects.

In consideration of cumulative energy use, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Additionally, as discussed above, the Project would increase overall electricity and natural gas demand but would not require additional facilities other than local connections to, or undergrounding of, existing facilities in the Project vicinity. Therefore, the proposed Project's incremental demand for electricity and natural gas facilities would not be cumulatively considerable. Thus, the Project would not contribute to a cumulative impact to the wasteful or inefficient use of energy. A less than significant cumulative impact would occur.

The Project and new development projects located within the cumulative study area would also be required to comply with all the same applicable federal, state, and local measures aimed at reducing fossil fuel consumption and the conservation of energy. The anticipated Project impacts, in conjunction with cumulative development in the vicinity, would increase urbanization and result in increased energy use. Potential land use impacts are site-specific and require evaluation on a case-by-case basis. As noted above, the Project would not result in significant impacts to state or local plans for renewable energy or energy efficiency. Therefore, the Project and identified cumulative projects are not anticipated to result in a significant cumulative impact. Therefore, potential impacts are considered less than significant.

4.5.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable energy impacts have been identified.

4.5.7 REFERENCES

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4.6 GEOLOGY AND SOILS

The purpose of this section is to describe the existing regulatory and environmental conditions related to the geologic, soil, and seismic characteristics within the Project area. This section identifies potential impacts that could result from implementation of the Project, and as necessary, recommends mitigation measures to reduce the significance of impacts. The issues addressed in this section are risks associated with faults, strong seismic ground shaking, seismic-related ground failure such as liquefaction, landslides, substantial erosion or the loss of topsoil, and unstable geological units and/or soils.

The environmental setting and baseline conditions is based largely on review of the Feasibility-Level Geotechnical Evaluation by Petra Geosciences, dated on March 23, 2023 (see **Appendix F1**), Fault Investigation Report, ~2850-acre KPC Coachella Project, City of Coachella, Riverside, California", by Kenney GeoScience, dated September 20, 2021 (revised January 2022) see **Appendix F2**), "Geotechnical Feasibility of 85-Foot-Tall Building, PC Coachella Project, 2,850 Acres± of Vacant Land, North of Interstate 10 and East of the All-American Canal, City of Coachella, Riverside County, California" by Petra Geosciences 2025 (see **Appendix F3**), review of aerial photographs and maps of the proposed Project and its surroundings. The Project site is vacant and undeveloped and site conditions have been consistent comparing site analysis conducted in January 2022, November 2022, and March 2023. Other information in this section, such as regulatory setting, is derived from the various planning documents including the KPC Coachella Specific Plan, Federal Occupational Safety and Health Administration Regulations, Seismic Hazards Mapping Act (SHMA) of 1990), and pertinent State of California Building Codes.

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts on geologic and soil resources. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors, such as fault proximity and soil types.

4.6.1 ENVIRONMENTAL SETTING

NATURAL SETTING

The 2,808-acre Project site is located immediately north of Interstate 10 (I-10), east of Vista Del Norte, and east of the Coachella Canal in the City of Coachella (City). The Project site is on the eastern flank of Coachella Valley north of the Salton Sea. Topographically, the Project site lies between the relatively flat-lying alluvial floor of the Coachella Valley to the west and bedrock highlands of the Little San Bernardino and Orocopia Mountains to the northeast, east, and southeast. Several southwest trending ridges of relatively low relief with intervening alluvial drainages exist within the Project site. Elevations across the Project site range from approximately 500 feet to approximately 1,250 feet above mean sea level (amsl). Surface drainage is generally by sheet flow and directed toward the southwest. Vegetation typically

consists of scattered small shrubs, creosote, ocotillo, and small dispersed trees. The Project site is currently vacant and undeveloped. Man-made features within the Project site include, earthen flood control embankments, and electrical and gas transmission lines along the northern portion of the Project site.

REGIONAL GEOLOGIC SETTING

The Project site lies within the Salton Trough region that comprises a portion of the Colorado Desert Geomorphic Province. The Salton Trough region is well known for its exposures of the San Andreas and related faults that form the margin between the Pacific and North American Plates. In southern California, these plates move right-laterally past each other along a somewhat diffuse array of faults comprising the San Andreas Fault System. The Salton Trough, however, formed as a major half-graben basin when regional crustal extension affected much of western North America in Miocene time prior to the development of the San Andreas Fault System.

The modern Salton Trough is the northern part of the Gulf of California rift basin formed by oblique strike-slip motion between the North American and Pacific plates. The basin itself continues to form, engendered mainly by activity of the San Andreas Fault System. Sediments deposited within the lowland area cause partial filling of the Salton Trough. The major contributors of sediments to the Salton Trough include erosion of the San Jacinto Mountains along the western margins, the San Bernardino and Little San Bernardino Mountains to the north and northeast, respectively, and the Orocopia Mountains to the east. Additionally, Colorado River delta sediments were deposited in the Salton Trough and eventually separated the Salton Trough from the ocean, which produced a region of interior drainage (a basin), which is now evident as the Salton Sea.

Three- to five-million-year-old sediments within the Salton Trough basin are typically associated with shallow seas (marine: Imperial Formation) and lakes (lacustrine: Palm Spring Formation). These deposits are typically comprised of salt beds, fine-grained muds (silts and clays) and relatively minor sand and channel gravels. Pleistocene age sediments within the basin generally consist of relatively fine-grained terrestrial sediments associated with lakes, slow moving streams, and sand dunes. Basin sediments typically pinch out and interfinger with coarser-grained sediments of similar age along the trough margins which include the Canebrake Formation, Ocotillo Conglomerate, and relatively young alluvial fan deposits.

Throughout the Pleistocene epoch (past two million years), this region has received relatively fine-grained sediments similar to those deposited within the basin, that interfinger with relatively coarser-grained sediments derived from erosion of the hills and mountains toward the north and east. Locally, these deposits include fine-grained deposits of the Palm Spring Formation and coarse-grained sediments of the Ocotillo Conglomerate, and unnamed relatively younger alluvial fan deposits.

Lake Cahuilla extended over much of the current Salton Trough from 300 A.D. to about 1600 A.D. with an estimated high-stand of 53 feet above mean sea level. Old shorelines can be seen around the margins of the Salton Trough and are clearly visible in the 1932 aerial photographs near the southeastern portion of the Project site west of the current location of the All-American Canal. There have been approximately five to six high-stands of Lake Cahuilla in the City area during the past 12,000 years.

LOCAL GEOLOGIC SETTING

The Project site is underlain by mid- to late-Quaternary sediments consisting of the lower (late Pliocene to early Pleistocene) and upper (mid-Pleistocene) members of the Palm Spring Formation (oldest), fluvial fan deposits represented by the Ocotillo Conglomerate (mid- to late-Pleistocene), and relatively younger fluvial deposits (latest-Pleistocene to Holocene) laid down within the current drainage system. Additionally, slopewash deposits are present along the slopes of the incised channels of the older uplifted geologic units. Minor areas in the Project site contain surficial artificial fill and fill associated with storm water control. The following geologic units on the Project site are described from relatively youngest to oldest: [1]

Quaternary Artificial Fill (Afu)

Minor amounts of disturbed cut and artificial fill areas exist in the western portion of the Project site. The artificial fill is associated with the abandoned agricultural development. The artificial fill typically consists of locally derived reworked soils. Storm water control fill berms were noted in the natural canyon drainages in the western portion of the Project site. Riprap exists on the up-gradient side of the northernmost berm.

Quaternary Slopewash (Qsw)

Late Quaternary age slopewash (Qsw) is generally dry, loose, medium brown, and is typically composed of fine to coarse sand and gravels. According to **Appendix F1**, the thickness of the slopewash is usually less than two feet. However, thicker deposits were observed at the bottom of slopes within the Project site, where the slopewash was approximately seven feet thick.

Many of the natural slopes throughout the Project site contain residual gravel. This coarse material occurs where the finer grained portion of the native formation has been eroded away, leaving a thin (usually less than one foot) layer of cobbles and occasional small boulders. Many of the minor drainages within the northern portion of Project site contain variable concentrations of cobbles and small boulders, as a result of down slope movement of this residual material.

Quaternary Fluvial Fan Deposits (Qfy)

Holocene fan deposits are the one of the most common geologic units on the Project site. These deposits are generally comprised of light gray, dry to slightly moist, fine- to coarse-grain sand with gravel and cobble of granitic and metamorphic origin. At depth locally, this material consisted of sandy gravel and sandy cobble composition.

Quaternary Fluvial Fan Deposits (Qfo)

Latest Pleistocene fan deposits are the one of the least common geologic units on the Project site. Where encountered within the Project site, this unit consisted mostly of light gray to olive gray, dry, loose to

[1] Petra Geosciences, Inc. 2022. Feasibility-level Geotechnical Evaluation KPC Coachella Project (Formerly Desert Lakes Project) 2,864-acres± of Vacant Land North of Interstate 10 and East of the All-American Canal City of Coachella, Riverside County, California. page 8.

medium dense, fine- to coarse-grain sand with minor subangular gravel. Although most common in the northern portion of the Project site, small remnants were noted throughout the Project site, in direct contact with younger fan deposits (Qfy), suggesting recent erosion of the older fan deposits (Qfo).

Quaternary Ocotillo Conglomerate (Qo)

The mid- to late-Pleistocene Ocotillo Conglomerate consists of coarse-grained fluvial fan deposits which covers a majority of the Project site. The Ocotillo Conglomerate is divided into two members: a relatively younger member (QoU) and a lower member (QoL); however, the older member is not encountered within the Project site and may be the Canbrake formation. The Upper Member of the Ocotillo Conglomerate contains massive to fairly well-bedded sand and gravels, and some boulders. Where encountered in the borings and test pits, this unit was found to be moderately well to well indurated and weathered.

Quaternary Upper Palm Spring Formation (Qpu)

The upper member of the Palm Spring Formation (Qpu) is mid-Pleistocene in age, which generally is exposed on low ridges and isolated outcrops in the western part of the Project site and canyon walls on the eastern part of the Project site.

Small slumps and landslides are mapped in this unit in the southwestern portion of the Project site, in proximity to Holocene Fluvial Fan Deposits (Qfy) near the southern boundary. In addition, there is evidence of liquefaction occurring in units composed of very well sorted clean fine sands, especially when bounded by relatively impermeable sandy silt layers. These liquefiable layers were also observed to accommodate basal shearing associated with lateral spreading. In addition, unit Qpu also exhibits numerous shear surfaces along weathered volcanic ash deposits.

Cut slopes identified within the southwestern portion of the Project site can cause instability and may require replacement. As discussed further below, cut slope shall be identified upon Project development.

Quaternary Lower Member of the Palm Spring Formation (Qpl)

The Pliocene to early Pleistocene lower member occurs stratigraphically below the Palm Spring upper member and crops out at two locations near the southern edge of the Project site.

These units are best exposed immediately north of Interstate 10 and immediately south of the Project site boundary in the southernmost portion of the Coachella Hills in the Project site.

Groundwater

According to the geotechnical evaluation (**Appendix F1**), groundwater was not encountered at a maximum depth of 71 feet.

The Project site is situated over the Desert Hot Springs subbasin of the Coachella Groundwater Basin. The San Andreas fault, located generally along the southwest edge of the Project site, forms a groundwater barrier between the Whitewater/Indio subbasin to the southwest, which contains accessible groundwater

compared with the areas northeast of the fault, where wells are rare. No groundwater wells are known to exist on the Project site. The nearest public well to the Project site is the Coachella Water Authority Well 18, approximately 0.75 mile south of the site.[2]

Groundwater depths in wells located in the vicinity of the Project site were reviewed on the California Department of Water Resources (DWR) website. One inactive irrigation well at the Terra Lago Golf Course South Course is mapped approximately three miles northwest of the Project site. Between April 2012 and July 2022 groundwater depths were reported to vary from approximately 122 to 156 feet below the ground surface (bgs). An irrigation well mapped at Citrus Ranch 5 on Dillion Road, approximately 3.5 miles north-northwest of the Project site, is not identified by a state well number. Between October 2011 and July 2022 groundwater depths were reported to vary from approximately 156 to 169 feet bgs. A second well, a short distance northeast of the previous well on Dillion Road, is mapped at Citrus Ranch 3. Between October 2011, and July 2022, groundwater depths were reported to vary from approximately 112 to 136 feet bgs.

TECTONIC SETTING

Local Faulting

The Coachella segment of the San Andreas fault is located roughly along the trend of the All-American Canal, just to the southwest of the Project site. According to the Geotechnical Investigation, faulting is identified throughout the Project site, associated with the following four fault zones: the San Andreas fault zone, the Berdoo Canyon fault zone, the Painted Canyon "Central" fault zone, and the Coachella Fan fault zone (see **Exhibit 4.6-1: Faults and Fault Zones**). Fault trenches excavated within the Project site indicated that the only faults observed during the field investigation to displace Holocene-age sediments (i.e., Holocene-active fault) was within the Berdoo Canyon fault zone. The Berdoo Canyon and Painted Canyon "Central" fault zones are considered secondary fault systems to the San Andreas Fault zone located immediately west of the westernmost Project site boundary and likely derive from a northeasterly dip of the San Andreas Fault at depth.

An additional dominantly strike-slip fault zone was identified in within the Geotechnical Investigation in that is herein called the Painted Canyon "central" fault zone.

The second mode of faulting in the Project site is associated with the Coachella Fan Fault zone, which occurs across the entire Project site and also is a secondary form of deformation as these faults may have only exhibited motion during strong ground motion (co-seismic) in combination with being more saturated.

Historical Seismicity

The Project site has experienced strong earthquake-induced ground shaking and fault surface rupture. Ground surface rupture can be expected as indicated by the continuing, periodic movement along known

[2] GeoTracker. 2023. *Sites, Other Records/ Field Points/Wells, Public Water Wells*. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=3801+university+avenue%2C+riverside. (accessed October 2025).

Holocene-active faults or age-undermined faults. The Holocene-active San Andreas fault (Coachella-Indio segment) extends across the western edge of the Project site, in proximity to easements associated with the All-American Canal and flood control berms constructed many years ago. Additionally, several other previously unnamed Holocene-active and pre-Holocene faults are located east of the San Andreas fault. These faults consist of the Berdoo Canyon fault zone, the Painted Canyon Fault zone, and the Coachella Fan Fault zone. Coseismic triggered surface displacements and creep caused by historical regional earthquakes have occurred on the Coachella segment of the San Andreas fault following the April 23, 1992, Joshua Tree and June 28, 1992, Landers earthquakes, and the July 8, 1986, North Palm Spring earthquake.

The most recent surface-rupturing earthquake on the Coachella segment of the San Andreas fault likely occurred in the late 1600's. Prior to that, apparently five paleo-earthquakes occurred on the Coachella segment in about A.D. 825, 982, 1231, 1502, and 1680, based on a trenching study at Thousand Palms Oasis. These data indicate that the average repeat time for surface-rupturing earthquakes on the Coachella-Indio segment of the San Andreas fault is approximately 215 +/- 25 years, and that the last surface-rupturing event occurred approximately 325 years ago.

Geologic and Seismic Hazards

Holocene – Active Fault Zones – Surface Rupture Hazard

According to State of California fault definitions, a Holocene-active fault has had displacement within the Holocene epoch or last 11,700 years. A pre-Holocene fault is a fault that does not have evidence of movement within the last 11,700 years, but has moved within Quaternary period, the last 2.6 million years. Pre-Holocene faults are not placed within Alquist-Priolo Earthquake Fault Zones, but are considered when placing such critical structures as dams and nuclear power plants, etc.

Age-undetermined faults are "where the recency of fault movement has not been determined." Faults can be 'age-undetermined' if the fault in question has not been studied to determine its recency of movement. Faults can also be age-undetermined due to limitations in the ability to ascertain the recency of faulting. Examples of such faults are where evidence of recency of movement has been eradicated due to disturbance, either by natural or anthropogenic processes, of Holocene-age deposits. Within the framework of the Alquist-Priolo Earthquake Fault Zoning Act, age-undetermined faults within regulatory Earthquake Fault Zones are "considered Holocene-active until proved otherwise." Age-undetermined faults are located in the western portion of the Project site, where surficial soils have been disturbed by previous agricultural activities.

The Coachella segment of the San Andreas fault is located to the southwest of the Project site, and the Berdoo Canyon fault zone extends northwest-southeast across the central portion of the Project site. These faults are Holocene-active faults, as discussed above, and has accordingly been placed within a State of California Alquist-Priolo Earthquake Fault Zone.

Two modes of faulting were identified in the Kenney Geosciences report within the Project site, which include strike-slip faults associated with the Berdoo Canyon and Painted Canyon "central" Fault zones,

and coseismic "sliding" faults associated with the Coachella Fan Fault. The first mode of faulting includes the right-lateral strike-slip Berdoo Canyon Fault zone, which is Holocene-active, and has been extended further southeast than previous mapped. It trends northwest through the center of the Project site. The data contained in the Kenney Geoscience report provides the best evidence of the age and style of faulting of the Berdoo Canyon Fault zone to date. The extent of the fault zone in the Project site was evaluated with fault trenching and mapping low relief and degraded fault scarps on Ocotillo Conglomerate fan surfaces. This fault zone last surface rupturing event occurred in the early Holocene. The only faults observed during the field investigation to displace Holocene-age sediments (i.e., Holocene-active fault) was within the Berdoo Canyon Fault zone.

Subsidiary faults associated with the Coachella Fan Fault zone are located within the Project site. Most of the faults are pre-Holocene faults, small-scale faults located within the formational units of the Ocotillo and Palm Spring formations. Evidence from the trench exploration, however, does indicate that there are some subsidiary faults on the Project site that are pre-Holocene faults.

However, it should be noted that according to the U.S. Geological Survey Unified Hazard Tool website and/or 2010 California Geological Survey Fault Activity Map of California, the Coachella Segment of the San Andreas Fault zone, located along the southwest portion of the Project site, would probably generate the most severe Project site ground motions. The approximate middle portion of the Project site is located at a distance of less than 6.25 miles (10 km) from the surface projection of this fault system, which is capable of producing a magnitude 7 or larger events with a slip rate along the fault greater than 0.04 inch per year.

Strong Ground Motion (Shaking)

The Project site is expected to experience strong ground shaking due to its proximity primarily to the San Andreas fault, but also other known Holocene-active faults in the region. Primary geotechnical hazards associated with strong ground shaking at the Project site include near surface fracturing, lateral spreading, liquefaction, and landslides. Based on probabilistic analysis from the California Geological Survey website, the peak ground acceleration (g) at the Coachella Segment site is estimated to be approximately 1.218 g, based on a probability of 2 percent in 50 years.

Secondary Seismic Effects

Secondary effects of seismic activity that are typically considered as possible hazards to a particular site include several types of ground failure as well as induced flooding. The general types of ground failure that can occur as a consequence of severe ground shaking include ground lurching/surface fracturing, landsliding, liquefaction, and lateral spreading. The probability of occurrence of each type of ground failure depends on the severity of the earthquake, distance from the causative fault, topography, subsoils and groundwater conditions, in addition to other factors. These factors are discussed in more detail below.

Seismically Induced Ground Lurching/Surface Fracturing

Near surface fracturing of unconsolidated granular soils were observed in fault exploration trenches. Trenching data indicated that within zones of fracturing, new fractures were typically produced, and older fractures abandoned.

The fractures were not placed within fault zones because they are technically not faults and they are ubiquitous to the Project site.

Seismically Induced Landsliding

Localized evidence of landsliding was observed in the southwestern portion of the Project site during field evaluation which was conducted in January and February 2021 (**Appendix F1**). Slumps and small landslides would be entirely removed as part of construction of the Project site during site grading, either as a part of normal operations or remedial earthwork.

The majority of the normal dip-slip faults of the Coachella Fan fault zone primarily resulted from lateral spreading and translational sliding induced by strong ground shaking and wetter conditions during the Pleistocene; see **Appendix F2** for further details.

Seismically Induced Flooding

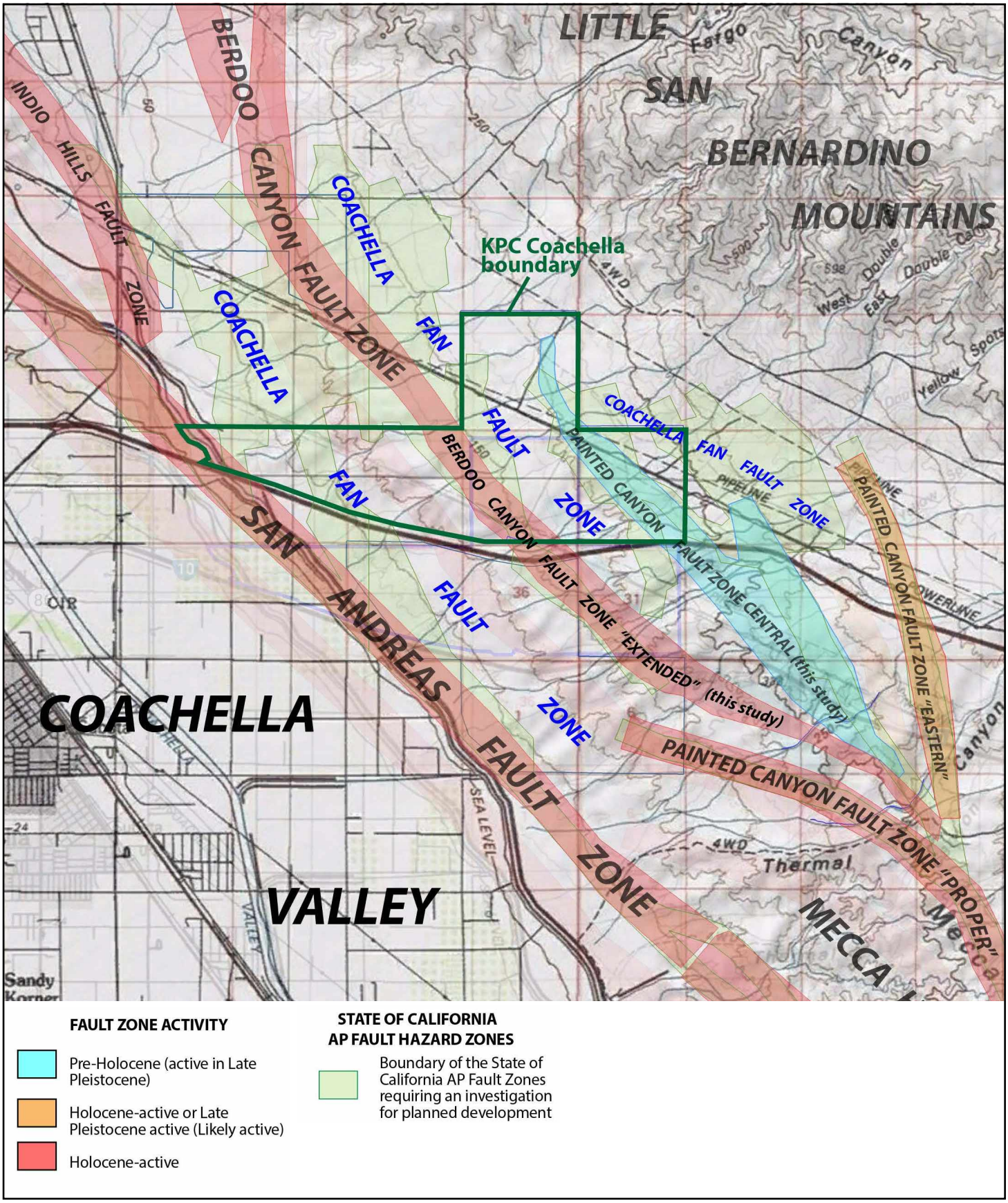
Seismically induced flooding includes flooding due to tsunami or seiche (i.e., a wave-like oscillation of the surface of water in an enclosed basin that may be initiated by a strong earthquake) or failure of a major reservoir or retention structure upstream of the Project site. No major reservoir is located near, or upstream of the Project site so the potential for seiche or inundation is considered low. Because of the inland location of the Coachella Segment site, flooding due to a tsunami is also considered low.

Liquefaction Potential

Owing to the absence of shallow groundwater and the presence of dense soils at the Project site, the potential for liquefaction is considered to be low.

Lateral Spreading

According to the geotechnical evaluation (**Appendix F1**), current Project site geologic conditions consist of semi consolidated and dense materials. In addition, groundwater is much deeper in the Project site area due to the dryer Holocene climate and relative uplift of the Coachella Valley margins. The potential for lateral spreading at the Project site is, therefore, considered to be low.



Source: Kenney GeoScience Vista, Inc., 2022.

EXHIBIT 4.6-1: a or Faults and l uist-Priolo Fault Zones
KPC Coachella Specific Plan Project
City of Coachella

Not to scale

Kimley»Horn

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PALEONTOLOGICAL SETTING[3]

Paleontological resources are the fossilized remains or traces of multi-cellular invertebrate and vertebrate animals and multi-cellular plants, including their imprints from a previous geologic period. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

The City is located on the following rock types, described by their paleontological sensitivity:

- Ocotillo Conglomerate – Low Sensitivity: The Ocotillo Conglomerate (or Ocotillo Formation) is present to the north of the Mecca Hills. No fossil site is recorded within the City and vicinity where it is underlain by the Ocotillo Conglomerate and the formation as it exists in the Project site is probably too coarse-grained to contain any fossil remains.
- Palm Springs Formation – High Sensitivity: Sandstones and siltstones of the Palm Springs Formation, present primarily in the Mecca Hills, have a high potential for containing significant non-renewable paleontological resources.
- Lake Cahuilla Sediments – High and Undetermined Sensitivity: Silts and sands of Pleistocene and early Holocene Lake Cahuilla contain fossil birds, pond turtles, large and small fish, and bivalves and snails. These sediments underlie a majority of the City, on the floor of the Coachella Valley. High potential is assigned to the area expressed at or below the high-stand of the Lake Cahuilla shoreline. Underdetermined potential is assigned to areas which are underlain by Lake Cahuilla sediments, but which are overlain by recent sediments from the Whitewater Delta and have been disturbed by agriculture.
- Recent (Holocene) Alluvium – Low Sensitivity: Recent alluvium has low potential to contain significant non-renewable paleontological resources. The recent alluvium and dune sand does not contain fossils in a meaningful context. Recent alluvium can be found as alluvial fans deposited at the base of the hills on the eastern side of the Project site.

Sensitivity for Paleontological Resources

Most of the western and southern portion of the City is located within a high sensitivity area for paleontological resources, while the underdeveloped portion of the City (eastern half) has a low or undetermined sensitivity for paleontological resources.[4] The Project site is located within a high sensitivity area for paleontological resources.

Paleontological Records Search

A Vertebrate Paleontological Records Search was conducted in April 2019, by BCR Consulting LLC, for evidence of paleontological resources on the Project site; see Attachment E of **Appendix D: Cultural Resources**.

[3] City of Coachella. Coachella General Plan Update Draft EIR, Section 4.4, Cultural Resources, page 4.4-8,9. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.4_-_cultural_resources.pdf. (accessed October 2025).

[4] City of Coachella. Coachella General Plan Update Draft EIR, Section 4.4, Cultural Resources, Figure 4.4-3: Paleontological Resource Sensitivity. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.4_-_cultural_resources.pdf. (accessed October 2025).

A check was conducted in April 2019, of the paleontology collection records for the locality and specimen data for the Project. No vertebrate fossil localities that lie directly within the Project area boundaries were identified. However, localities have been identified south and southwest of the Project site from sedimentary deposits similar to those that occur in the Project site, either at the surface or at depth.

In the far western portion of the Project area there are surficial late Pleistocene or Holocene age lacustrine and fluvial (lake and stream channel) deposits, beneath soil, with the lacustrine deposits derived from the ancient, enlarged Lake Cahuilla. The closest vertebrate fossil localities in these Lake Cahuilla deposits are situated southwest of the Project area near the present Lake Cahuilla on both sides of Madison Street north of 58th Avenue, which produced a significant fauna of terrestrial and freshwater vertebrates as well as diatoms, land plants, clams, snails and crustaceans. A single jaw of the bighorn sheep (*Ovis canadensis*) was recovered at another locality to the east of Madison Street, north of 58th Avenue. Shallow excavations in the younger Quaternary Alluvium and even in the coarse deposits of the Ocotillo Formation exposed in the eastern portion of the Project area are unlikely to uncover significant vertebrate fossils. Deeper excavations there that extend down into older and perhaps finer-grained deposits, or any excavations in the Lake Cahuilla Beds exposed in the far western portion of the Project area, may encounter significant vertebrate fossil remains.

Shallow excavations in the younger Quaternary Alluvium and even in the coarse deposits of the Ocotillo Formation exposed in the eastern portion of the Project area are unlikely to uncover significant vertebrate fossils. Deeper excavations there that extend down into older and perhaps finer-grained deposits, or any excavations in the Lake Cahuilla Beds exposed in the far western portion of the Project area, may well encounter vertebrate fossil remains.

4.6.2 REGULATORY SETTING

FEDERAL

Occupational Safety and Health Administration Regulations

Excavation and trenching are among the most hazardous construction activities. The Occupational Safety and Health Administration's (OSHA's) Excavation and Trenching standard, Title 29 of the Code of Federal Regulations, Part 1926.650, covers requirements for excavation and trenching operations. OSHA requires that all excavations in which employees could potentially be exposed to cave-ins be protected by sloping or benching the sides of the excavation, supporting the sides of the excavation, or placing a shield between the side of the excavation and the work area.

Soil and Water Resources Conservation Act

The purpose of the Soil and Water Resources Conservation Act of 1977 is to protect or restore soil functions on a permanent sustainable basis. Protection and restoration activities include prevention of harmful soil changes, rehabilitation of the soil of contaminated sites and of water contaminated by such sites, and precautions against negative soil impacts. Disruptions of natural soil functions and functions as an archive of natural and cultural history should be avoided, as far as practicable. In addition, the Federal Water Pollution Control Act (also referred to as the Clean Water Act [CWA]) requirements, through the

National Pollution Discharge Elimination System (NPDES) permitting process, provide guidance for protection of geologic and soil resources.

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act of 1977 (Public Law 95-124) established the National Earthquake Hazards Reduction Program which is coordinated through the Federal Emergency Management Agency (FEMA), the U.S. Geological Survey (USGS), the National Science Foundation, and the National Institute of Standards and Technology. The purpose of the Program is to establish measures for earthquake hazards reduction and promote the adoption of earthquake hazards reduction measures by federal, state, and local governments; national standards and model code organizations; architects and engineers; building owners; and others with a role in planning and constructing buildings, structures, and lifelines through (1) grants, contracts, cooperative agreements, and technical assistance; (2) development of standards, guidelines, and voluntary consensus codes for earthquake hazards reduction for buildings, structures, and lifelines; and (3) development and maintenance of a repository of information, including technical data, on seismic risk and hazards reduction. The Program is intended to improve the understanding of earthquakes and their effects on communities, buildings, structures, and lifelines through interdisciplinary research that involves engineering, natural sciences, and social, economic, and decision sciences.

U.S. Geological Survey Landslide Hazard Program

The USGS Landslide Hazard Program provides information on landslide hazards including information on current landslides, landslide reporting, real-time monitoring of landslide areas, mapping of landslides through the National Landslide Hazards Map, local landslide information, landslide education, and research.

STATE

Public Resources Code Section 5097.5

Requirements for paleontological resource management are included in the Public Resources Code (PRC) Division 5, Chapter 1.7, Section 5097.5, and Division 20, Chapter 3, Section 30244, which states:

> *No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.*

These statutes prohibit the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 also establishes the removal of paleontological

resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, and district) lands.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code [PRC] 2621-2624, Division 2 Chapter 7.5) was passed in 1972 following the destructive February 9, 1971, moment magnitude (Mw) 6.6 San Fernando earthquake to mitigate the hazard of surface faulting to structures intended for human occupancy. The Act's main purpose is to prohibit siting buildings used for human occupancy across traces of Holocene-active faults that constitute a potential hazard to structures from surface faulting or fault creep. The Act requires the State Geologist to establish regulatory zones, known as "Earthquake Fault Zones," delineating appropriately wide earthquake fault zones to encompass potentially active and recently active traces of faults. Local agencies must regulate most development projects within these zones. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed human occupancy structures would not be constructed across Holocene-active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically at least 50-foot setbacks are required).

Effective June 1, 1998, the Natural Hazards Disclosure Act requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more State-mapped hazard areas, including Earthquake Fault Zones.

Seismic Hazards Mapping Act of 1990

The Seismic Hazards Mapping Act (SHMA) of 1990 (California PRC, Section 2690 et seq.) directs the California Department of Conservation's California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards.

The SHMA provides a statewide seismic hazard mapping and technical advisory program to assist cities and counties in fulfilling their responsibilities for protecting the public health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and other seismic hazards caused by earthquakes. Mapping and other information generated pursuant to the SHMA is to be made available to local governments for planning and development purposes. The state requires (1) local governments to incorporate site-specific geotechnical hazard investigations and associated hazard mitigation as part of the local construction permit approval process, and (2) the agent for a property seller, or the seller if acting without an agent, to disclose to any prospective buyer if the property is located within a seismic hazard zone. The State Geologist is responsible for compiling seismic hazard zone maps. The SHMA specifies that the lead agency for a project may withhold development permits until geologic or soils investigations are conducted for specific sites and mitigation measures are incorporated into plans to reduce hazards associated with seismicity and unstable soils.

California Building Code

California building standards are published in the CCR, Title 24, also known as the California Building Code (CBC), which was updated in 2022 with an effective date of January 1, 2023. The CBC, which applies to all applications for building permits, consists of 12 parts that contain administrative regulations for the California Building Standards Commission and for all state agencies that implement or enforce building standards. Local agencies must ensure development complies with the CBC guidelines. Cities and counties can adopt additional building standards beyond the CBC. CBC Part 2, named the California Building Code (CBC), is based upon the 2021 International Building Code. Project construction will comply with the 2022 CBC.

Given the state's susceptibility to seismic events, the CBC's seismic standards are among the strictest in the world. The CBC applies to all development in the state, except where stricter standards have been adopted by local agencies. CBC Chapter 16 addresses structural design requirements governing seismically resistant construction (CBC Section 1604), including (but not limited to) factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design (CBC Section 1613.5 through Section 1613.7). CBC Chapter 18 includes (but is not limited to) the requirements for foundation and soil investigations (CBC Section 1803); excavation, grading, and fill (CBC Section 1804); allowable load-bearing values of soils (CBC Section 1806); and the design of footings, foundations, and slope clearances (CBC Sections 1808 and 1809), retaining walls (CBC Section 1807), and pier, pile, driven, and cat-in-place foundation support systems (CBC Section 1810). CBC Chapter 33 includes, but is not limited to, requirements for safeguards at worksites to ensure stable excavations and cut or fill slopes (CBC Section 3304).

Construction activities are subject to occupational safety standards for excavation and trenching as specified in the California OHSA regulations (Title 8 of the CCR) and in Chapter 33 of the CBC. These regulations specify the measures to be used for excavation and trench work where workers could be exposed to unstable soil conditions. All aspects of construction of the warehouse would be required to employ these safety measures during excavation and trenching.

California Education Code

California Education Code sections 17212 and 17212.5 requires that the governing board of a school district, prior to acquiring any site on which it proposes to construct any school building as defined in Section 17283 shall have the site, or sites, under consideration investigated by competent personnel to ensure that the final site selection is determined by an evaluation of all factors affecting the public interest and is not limited to selection on the basis of raw land cost only. If the prospective school site is located within the boundaries of any special studies zone (an area which is identified as a special studies zone on any map, or maps, compiled by the State Geologist pursuant to Chapter 7.5 [commencing with Section 2621) of Division 2 of the PRC], or within an area designated as geologically hazardous in the safety element of the local general plan as provided in subdivision (g) of Section 65302 of the Government Code, the investigation shall include any geological and soil engineering studies by competent personnel needed to provide an assessment of the nature of the site and potential for earthquake or other geologic hazard damage.

According to Section 17212.5, geological and soil engineering studies as described in Section 17212 shall be made, within the boundaries of any special studies zone, for the construction of any school building as defined in Section 17283, or if the estimated cost exceeds twenty-five thousand dollars ($25,000), for the reconstruction or alteration of or addition to any school building for work which alters structural elements. The Department of General Services may require similar geological and soil engineering studies for the construction or alteration of any school building on a site located outside of the boundaries of any special studies zone. No studies need be made if the site under consideration has been the subject of adequate prior studies. No school building shall be constructed, reconstructed, or relocated on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building.

California Health and Safety Code

Sections 17922 and 17951–17958.7 of the California Health and Safety Code require cities and counties to adopt and enforce the current edition of the CBC, including a grading section. The City enforces these provisions (refer to Title 15 of the City's Municipal Code). Sections of Volume 2 of the CBC specifically apply to select geologic hazards. Chapter 16 of the CBC addresses requirements for seismic safety. Chapter 18 regulates excavation, foundations, and retaining walls. Chapter 33 contains specific requirements pertaining to site demolition, excavation, and construction.

State Earthquake Protection Law

The State Earthquake Protection Law (California Health and Safety Code 19100 et seq.) requires that structures be designed to resist stresses produced by lateral forces caused by wind and earthquakes. Specific minimum seismic safety and structural design requirements are set forth in Chapter 16 of the CBC. The CBC requires a site-specific geotechnical study to address seismic issues and identifies seismic factors that must be considered in structural design. Because the Specific Plan area is located within an Alquist–Priolo Earthquake Fault Zone, special provisions would be required for project development related to fault rupture.

LOCAL

City of Coachella General Plan

The Project site is located in the City of Coachella and would be required to comply with the regulations set forth in the CGP. CGP elements, goals, and policies relevant to the Project are as follows:

Sustainability and Natural Environment Element

This Element[5] establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces.

Goal 7 **Waterways. Waterways and desert washes that serve a natural, environmental function and provide aesthetically pleasing open space for the community.**

[5] City of Coachella. 2015. City of Coachella General Plan – Sustainability and Natural Environment Element. https://www.coachella.org/home/showpublisheddocument/8419/637819141150600000. (accessed October 2025).

Policy 7.3 Soil erosion: Require the prevention of water-born soil erosion from sites, especially those undergoing grading and mining activities.

Goal 10 Passive Open Space. Preserved open space areas that represent significant aesthetic, cultural, environmental, economic and recreational resources for the community.

Policy 10.3 Archaeological resource preservation. Preserve important archaeological and paleontological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.

Policy 10.4 Mitigation and preservation of cultural resources. Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources.

Policy 10.5 Grading. Require that proposed projects that involve a significant amount of grading shall have an archaeological and paleontological survey conducted before construction.

Policy 10.6 Grading and vegetation removal: Limit grading and vegetation removal of new development activities to the minimum extent necessary to reduce erosion and sedimentation.

Goal 12 Cultural Resources and Sites. Preserved and protected cultural resources that provide the community with significant cultural, scientific, or educational value.

Policy 12.7 Paleontological resources. Require any paleontological artifacts found within the City or Sphere of Influence be reported to the City and temporarily loaned to local museums like the Western Science Center for Archaeology and Paleontology, in Hemet, CA.

Safety Element

This Element[6] establishes the City's long-term goals and policies for providing long-term measures that reflect the City's desire to deal effectively with natural hazards and provide a safe living environment for the community. The primary objective of the Safety Element, as the policies and actions are implemented over the next 20 years, is to make Coachella increasingly resistant to disasters and become more self-reliant, sustainable and prosperous.

Goal 1 Earthquake Hazards. A community that is minimally affected by seismic shaking and other earthquake-induced hazards.

Policy 1.1 Development plan review. Review all plans for new development to be certain new structures are designed in accordance with the most recent California Building Code adopted by City Council, including the provisions regarding seismic loads, lateral forces and grading.

[6] City of Coachella. 2015. City of Coachella General Plan – Safety Element. https://www.coachella.org/home/showpublisheddocument/10702/638906775794200000. (accessed October 2025).

Policy 1.2 Earthquake-resistant new buildings. Require all new habitable buildings and structures to be designed and built to be seismically resistant and not built across the trace of an active fault.

Policy 1.6 Liquefaction assessment studies: Require liquefaction assessment studies be conducted for all projects proposed in areas identified as potentially susceptible to liquefaction (Plate 1-3, Technical Background Report). These studies need to be conducted in accordance with the provisions in the Seismic Hazards Mapping Act and the most recent version of the California Geological Survey's Special Publication 117: Guidelines for Evaluating and Mitigating Seismic Hazards in California.

Goal 2 Geologic Hazards. A community that has used engineering solutions to reduce or eliminate the potential for injury, loss of life, property damage and economic and social disruption caused by geologic hazards such as slope instability; compressible, collapsible, expansive or corrosive soils; and subsidence due to groundwater withdrawal.

Policy 2.1 Geotechnical investigations. Require all development proposals in the City to conduct, as a condition of approval, geotechnical and engineering geological investigations, prepared by state-certified professionals (geotechnical engineers and engineering geologists, as appropriate) following the most recent guidelines of the California Geological Survey and similar organizations, that address, as a minimum, the site-specific geologic hazards identified in the Technical Background Report. This includes the hazard of slope failure in, and adjacent to, hillside areas.

Policy 2.2 Mitigated geologic hazards. Require all new developments to mitigate the geologic hazards that have the potential to have an impact on habitable structures and other improvements.

Policy 2.3 Slope failure mitigation. Minimize grading and modifications to the natural topography to prevent potential for man-induced slope failures. Where deemed necessary, erect protective devices such as barriers, rock fences, retaining structures or catchment areas.

Policy 2.4 Field inspections. Conduct routine field inspections during grading and construction to ensure safety practices are being followed and the site is being graded; and new structures are being built in accordance with the most recent California Building Code adopted by the City, in agreement with the approved plans and specifications.

City of Coachella Municipal Code

Coachella Municipal Code Title 15

The City of Coachella adopted the Building and Construction Codes in Title 15, Chapter 15.08. These codes regulate the erection, construction, enlargement, alteration, repair, moving, removal, demolition, conversion, occupancy, equipment, use, height, area and maintenance of all buildings and/or structures

in the city. Building permits are required and may be issued, as stated above, for projects that conform to the CBC.[7]

Coachella Municipal Code Title 16

The City of Coachella adopted the Improvements and Grading Codes in Title 16, Chapter 16.28. These codes set forth rules and regulations intended to further implement the goals and objectives of the City General Plan, to control grading and earthwork construction. It also establishes the administrative procedures for plan approval, issuance of permits, and inspections.

4.6.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning geology and soils. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

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

- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42;
- Strong seismic ground shaking;
- Seismic-related ground failure, including liquefaction; or
- Landslides.

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

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

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

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

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

[7] City of Coachella. 2022. *City of Coachella Municipal Code – Section. Chapter 15.08.*

PROJECT DESIGN FEATURES

The Project Design Features related to geology and soils are:

- The Specific Plan has incorporated areas with identified earthquake fault traces into the open space and park components of the plan.
- School sites have been located on the Specific Plan Land Use Plan to ensure adequate separation from existing fault zones.

4.6.4 PROJECT IMPACTS AND MITIGATION

Impact 4.6-1: ***Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.***

Level of Significance: Significant and Unavoidable

CONSTRUCTION AND OPERATION

A Geotechnical Evaluation (**Appendix F1**), supplemented by a Geotechnical Fault Investigation (**Appendix F2**), was conducted to identify the location, age, and style of fault-related deformation across the Project site. According to the Fault Investigation Report, Alquist-Priolo Earthquake Fault Zones cover approximately 42 percent of the Project site; including the portion of San Andres Fault located at the western Project site boundary at the All-American Canal; see **Exhibit 4.6-1: Major Faults and Alquist-Priolo Fault Zones**.[8] Also shown in **Exhibit 4.6-1** are the Holocene-active faults, pre-Holocene faults, and age-undermined faults associated with the Berdoo Canyon, Painted Canyon "central", and Coachella Fan fault zones were identified within the Project site; refer to Tectonic Setting discussion in Section 4.6.1 above.

As concluded in the Fault Investigation Report, faulting associated within the Painted Canyon "central" fault zone was determined to be very low due to the fault being identified as pre-Holocene (i.e., no longer active) but was likely active in the early part of the Late Pleistocene.[9] Additionally, faulting associated with the Coachella Fan fault zone may have only exhibited motion during strong groundmotion in combination with being more saturated. Thus, significant adverse impacts from direct rupture of a Coachella Fan fault was determined to be unlikely.[10] However, the Fault Investigation Report concluded that the Berdoo Canyon Fault Zone fault is considered to be Holocene-active and faults determined to be Age-undetermined, anticipate movement during a future surface rupturing and would exhibit right-lateral motion across numerous small scale fault strands of varying trends and type of displacement across a wide zone. This would result in potentially significant adverse effects during construction and operations of future development within the Project site.

[8] Kenny GeoScience. (2022). *Fault Investigation Report.* **Appendix F2.** Pg. ES-1.
[9] Ibid**.** Pg. 22.
[10] Ibid. Pg. 22.

Due to the presence of active faulting and secondary fault rupture by seismic events, adjacent and throughout the Project site, all future development would be subject to **MM GEO-1** which requires all project applicants to submit site-specific geologic and/or geotechnical reports, prepared by a qualified professional geologist and/or geotechnical engineer, address on-site geotechnical issues. Each geotechnical study would include recommendations for design-level measures that must be in compliance with the geotechnical recommendations included in **Appendix F1** and **Appendix F2**; see below for more information. Implementation of **MM GEO-1** would ensure that all proposed development of habitable, essential, and critical structures on-site are designed and built-in accordance with the seismic regulations as recommended in the current CBC, thereby substantially reducing the risks associated with fault rupture.

Additionally, in order to further mitigate impacts of fault rupture for future development, if identified within or near identified Holocene-active faults and faults determined to be age-undetermined, additional fault setbacks would be implemented pursuant to **MM GEO-1**. On a project-by-project basis, **MM GEO-1** would require all structures to be setback a minimum of 50 feet to a maximum of 150 feet from a Holocene-active faults or faults determined to be age-undetermined. Setback distances shall be enforced by the City of Coachella Planning and Engineering staff. This minimum setback distance would be compliant with the minimum 50-foot distance set forth in Coachella Municipal Code Chapter 17.44 - Supplemental Classification Geological Hazard Zone, ensuring impacts from potential geological hazards are reduced and construction is designed in accordance with the latest California Building Code; and the Coachella General Plan Safety Element Update's Technical Background Report. Lastly, all future development would be designed in compliance with all applicable development standards, and all applicable grading ordinances listed under the City Municipal Code Chapter 16.28, Improvements and Grading, and above in **Section 4.6.2: Regulatory Setting** above.

Future development of utility infrastructure (water, sewer, natural gas, and electricity) facilitated by the Project, would be subject to impacts from fault rupture. Future development of underground utilities would be subject to fault setbacks pursuant to **MM GEO-1**, as the Fault Investigation Report concluded that underground utility lines could experience relatively small magnitude vertical and horizontal displacement. More specifically a "primary" right-lateral strike-slip fault within this zone may exhibit a total of 2 to 5 feet of offset. Until the I-10/Avenue 50 interchange and Vista Del Norte Roadway Extension are constructed, there would be no way to access the Project site. The disruption or severing of one or both of these roadways could prevent emergency services from reaching the Project site and people from evacuating the Project site. Although the roadways would be constructed per the requirements of a geotechnical and structural engineer, there is no guarantee there would be no fault rupture on the San Andreas fault (Coachella-Indio segment) along the western where the Vista Del Norte extension would occur.

Therefore, significant and unavoidable direct or indirect adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Zoning Map, would remain despite implementation of **MM GEO-1** and compliance with all applicable federal, state, and local regulations and development standards.

Offsite Improvements

Refer to analysis above. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure. The off-site facility locations, as depicted in **Exhibit 3-11A: Off-Site Improvements** and **Exhibit 3.11B: Off-Site Improvements – Vista Del Norte,** are within proximity of the San Andres Fault, known Holocene-active faults, and Age-undetermined faults. Utility and roadway infrastructure improvements facilitated by the Project is expected to experience strong ground shaking during the life span of the proposed development. These off-site improvements would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources and avoid geological hazards. Development of these off-site improvements would implement **MM GEO-1** as well as comply with all applicable local, state, and federal design standards. However, as discussed above, it is not feasible to ensure that faulting in the off-site improvement areas could be reduced to less than significant levels. Despite implementation of **MM GEO-1** and compliance with all applicable local, state, and federal design standards, impacts involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, would remain significant and unavoidable.

Mitigation Measures

MM GEO-1 **Specific Plan-wide Geologic and Geotechnical Reports and Geotechnical Evaluation Recommendations.** Prior to approval of any implementing project, a final geotechnical study for shall be completed by the project applicant. These studies shall be prepared by qualified geologist and submitted for review and approval to the City of Coachella (City) Engineer in accordance with Coachella Municipal Code Section 17.44.030. The location and scope of each final geotechnical report shall be tiered off of the two geotechnical reports prepared for the overall site, *Feasibility-Level Geotechnical Evaluation* (Petra Geosciences, Inc., March 23, 2023) and the *Fault Investigation Report* (Kenney GeoScience, January 2022.

The final geotechnical report for each future development project shall delineate the precise locations of all active faults and shall determine the appropriate building setbacks and restricted use zones within the planning area. Prior to issuance of grading permits, the City Engineer shall confirm that all grading and construction plans incorporate and comply with the recommendations included in the final specific geotechnical report. Design, grading, and construction would adhere to all of the seismic requirements incorporated into the latest California Residential Code and California Building Code and the requirements and standards contained in the applicable chapters of the City of Coachella Municipal Code, as well as appropriate local grading regulations, and the specifications of the project geotechnical consultant, including but not limited to those related to seismic safety, as determined in the final area-specific geotechnical studies prepared in association with all future development project conditions, subject to review by the Director of the City of Coachella Development Services Department, or designee, prior to the issuance of any grading permits.

An outline of the applicable recommendations is listed below, and a detailed explanation of each item is provided in the Conclusions and Recommendations section of **Appendix F1**.

- Recommendations for grading plan review;
- Recommendations for building restriction zones;
- Recommendations for excavation and soil material and suitability for use as fill and backfill, including options for fill slope, building pad, street, and utility trench backfill;
- Recommendations for low-density surface soils and compressibility;
- Recommendations to evaluate the potential for earthquake-induced dry sand settlement;
- Recommendations for expansion potential;
- Recommendations for Earthwork including adjustments; site clearing and grubbing; pre-watering, ground preparation; recompacting of fault investigation trench backfill (if applicable); observation of ground preparation to be observed, tested, and approved by the project geotechnical consultant and/or engineering geologist prior to fill placement; settlement monitoring; benching; mixing; disposal of oversize rock; and for cut/fill area processing and transitions; and shrinkage/bulking
- Recommendations for haul roads;
- Recommendations for slope construction;
- Recommendations for Post-Grading Considerations which include utility trenches, pad drainage, water quality management plans, and slope landscaping and maintenance;
- Recommendations for preliminary foundation designs;
- Recommendations for Retaining Wall Design, Exterior Concrete Flatwork, and preliminary pavement design; and
- Recommendations for Corrosivity Screening.

An outline of the applicable recommendations is listed below, and a detailed explanation of each item is provided in the Conclusions and Recommendations section of **Appendix F2.**

- Recommendations for Fault Setbacks from Holocene-active and Age-Undetermined Faults.
- Proposed Project Development Mitigation - Utility Lines, and construction of habitable, essential and critical structures.

Impact 4.6-2: ***Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATION

As discussed above, due to the fact that the Project site contains several Holocene-active faults, the potential for strong seismic ground shaking is considered a potentially significant impact that may affect people and structures affiliated with the Project. As a result of the complex fault conditions on-site, a Geotechnical Fault Investigation Report was conducted to identify the location, age, and style of fault-related deformation across the Project site. The Fault Investigation resulted in the recommendation of Fault Setback Zones which identify constraints for future development on the Project site.

MM GEO-1 requires a final geotechnical report to evaluate Holocene-age fault and age-undermined fault setbacks as well as ground shaking, ground fracturing, and slope stability and delineate the precise locations of all Holocene-active faults within each planning area and determine and refine any restricted use zones (as defined above) prior to approval of any future project by the City. **MM GEO-1** also requires compliance with the recommendations in the Geotechnical Investigation, including recommendations for appropriate development setbacks and building engineering measures to address seismic-related impacts. Further, all development associated with the Project would be designed to adhere to all of the seismic requirements found within the City of Coachella General Plan Update, Safety Element and Coachella Municipal Code, Chapter 17.44 - Supplemental Classification Geological Hazard Zone, which ensures impacts from potential geological hazards are reduced and construction is designed in accordance with the latest California Building Code. Compliance with **MM GEO-1** would ensure that appropriate geotechnical evaluation is conducted prior to development because no future project would be approved by the City prior to such an investigation, and that recommended geotechnical measures are incorporated into final design plans, thereby reducing the risks associated with strong seismic shaking to less than significant.

Offsite Improvements

Refer to analysis above under Impact 4.6-2.

Mitigation Measures

MM GEO-1 is applicable.

Impact 4.6-3: ***Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATIONS

Liquefaction is the loss of the strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. The Geotechnical Investigation determined that based on underlying dense soil conditions, and the absence of shallow groundwater, the potential for liquefaction at the Project site is low. Therefore, as noted in Geotechnical Investigation, overall impacts associated with seismic-related ground failure, including liquefaction would be less than significant.

To further reduce impacts due to liquefaction, compliance with **MM GEO-1** would be required. After implementation of **MM GEO-1**, total post construction dynamic settlement (dry sand settlement) due to the ground shaking would be reduced to a low level. Therefore, impacts related to liquefaction would be less than significant.

Offsite Improvements

Refer to analysis above. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. According to the City of Coachella Liquefaction Risk map, the off-site improvements area is within a moderate zone of liquefaction susceptibility.[11] These offsite utilities would be constructed in accordance with standard design and construction measures to minimize impacts from liquefaction during and following construction. The offsite improvements would also be subject to **MM GEO-1** as identified above. Any potential future development would be subject to the City's standard discretionary review process, including the City of Coachella Municipal Code and CEQA compliance. Therefore, a less than significant impact would occur with mitigation incorporated.

Mitigation Measures

MM GEO-1 is applicable.

Impact 4.6-4: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATION

Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes. The susceptibility of a geologic unit to landslides is dependent upon various factors, primarily: 1) the presence and orientation of weak structures, such as fractures, faults, and joints; 2) the height and steepness of the pertinent natural or cut slope; 3) the presence and quantity of groundwater; and 4) the occurrence of strong seismic shaking. According to the City's Landslide Risk map, most of the

[11] City of Coachella. 2012. Section 4.5 Geology and Soils, Figure 4.5-5: Liquefaction Risk. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.5_-_geology.pdf. (accessed April 2023).

site is within risk of experiencing landsliding, with portions of the site lying within the low to moderate and moderate to high zones.[12] During the Geotechnical Investigation, localized evidence of landsliding was observed on the Project site. Local failures along steepened wash banks were observed in the southwestern portion of the Project site. Where mapped, failures are associated with the Upper Member of the Palm Springs Formation (Qpu). Slumps and small landslides would be entirely removed during Project site grading, either as a part of normal operations or remedial earthwork. Stability analyses were performed of selected proposed cut and fill slopes that exposed a variety of geologic units. Pseudo-static slope stability analyses were performed in accordance with guidelines for preparation of geotechnical reports. The results of these calculations meet or exceed minimum requirements for both static and pseudo-static conditions. It is proposed that the majority of the normal dip-slip faults of the Coachella Fan fault zone primarily resulted from lateral spreading and translational sliding induced by strong ground shaking and wetter conditions during the Pleistocene. Hence, that sliding occurred when the sediments were wetter and heavier, and during strong ground motions (co-seismic). Therefore, compliance with **MM GEO-1** would be required, which includes remedial measures as described in the Geotechnical Report. Impacts would be less than significant with mitigation.

Due to the active seismicity of the region, the residential and commercial developments would conform to the CBC standards as well as any applicable City building code regulations. Overall, Project developments could expose persons and structures to potential substantive adverse effects involving strong seismic ground shaking, seismic-related ground failure (liquefaction/lateral spreading), and seismically-induced landslides. Therefore, implementation of **MM GEO-1** would further reduce impacts related to landslides. Impacts are less than significant with mitigation.

Offsite Improvements

Refer to analysis above. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. According to the City of Coachella Landslide Risk map, the off-site improvements area is within a moderate to high zone of landslide potential.[13] These offsite improvements would be constructed in accordance with standard design and construction measures to minimize impacts from landslide potential during and following construction, and the offsites would be subject to **MM GEO-1** as identified above. Any potential future development would be subject to the City's standard discretionary review process, including the City of Coachella Municipal Code and CEQA compliance. Therefore, a less than significant impact would occur with mitigation incorporated.

Mitigation Measures

MM GEO-1 is applicable.

[12] City of Coachella. 2012. General Plan Update Final EIR Section 4.5 Geology and Soils, Figure 4.5-6: Landslide Risk. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.5_-_geology.pdf. (accessed October 2025).

[13] Petra Geosciences Inc., Feasibility-Level Geotechnical Evaluation, KPC Coachella Project (formerly Desert Lakes Project), 2,850 Acres± of Vacant Land, North of Interstate 10 and East of the All-American Canal, City of Coachella, Riverside County, California. October 11, 2022.

Impact 4.6-5: Would the Project result in substantial soil erosion or the loss of topsoil?

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION

Construction activities such as excavation and grading may have the potential to cause soil erosion or the loss of topsoil. The onsite soils are geotechnically suitable for use as engineered fills in the construction of building pads, roadways, and fill slopes. Construction activities related to the Project would be required to comply with the NPDES General Construction Permit, refer to **Section 4.9: Hydrology and Water Quality** for discussion of the Project's anticipated NPDES permitting process. The construction would be required to comply with the erosion control measures stipulated through the CBC and the Coachella MC Title 13 Chapter 13.16 Water Quality Control, which requires compliance with NPDES permits and implementation measures. Further, all grading and building activities would be in compliance with Coachella MC Title 16 Chapter 16.28 Improvements and Grading; the Grading Manual; other applicable ordinances; federal, state, and local permits; and other applicable requirements. Implementation of **MM GEO-1**, which requires the geotechnical report to specify measures to reduce the erosion potential of engineered slopes, would further reduce impacts through protective measures to mitigate excessive Project site erosion and runoff during construction. Implementation of mitigation measures and these permitting requirements would ensure that impacts related to soil erosion are less than significant.

OPERATIONS

Project implementation would not involve operations which would result in substantial soil erosion that would cause significant property damage or result in the loss of topsoil/sedimentation into local drainage facilities and water bodies; refer to **Section 4.9: Hydrology and Water Quality**. A network of storm drains and gutters would be maintained and upgraded, as necessary, and provided throughout the developed Project site, along with landscaped and park areas and groundcovers to prevent soil erosion or loss of topsoil. Therefore, impacts would be less than significant.

Offsite Improvements

Refer to analysis above. These offsite improvements would be constructed in accordance with standard design and construction measures to minimize soil erosion during and following construction, and that the offsites would be subject to **MM GEO-1** as identified above. Any potential future development would be subject to the City's standard discretionary review process, including the City of Coachella Municipal Code and CEQA compliance. Therefore, a less than significant impact would occur with mitigation incorporated.

Mitigation Measures

MM GEO-1 is applicable.

Impact 4.6-6: ***Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATION

The Geotechnical Investigation concluded that the Project site is considered suitable for the proposed development from a soils engineering and geologic engineering point of view. The report further concluded that the building site would be free from landslide, liquefaction, settlement and slippage provided the recommendations in that report were incorporated in the design criteria and project specifications, as required by **MM GEO-1**. The recommendations include improvements such as removing unconsolidated soils and recompacting them to proper levels of compaction, stabilizing naturally weak or steep slopes through excavation and regrading at acceptable slope angles and benching, installing subdrainage systems to prevent water buildup or erosion of compacted soils, and over excavation and deep fill with reinforced foundation designs to prevent lateral spreading or subsidence impacts.

Based on the secondary effects of seismicity discussed in the Geotechnical Investigation, it was recommended that additional geotechnical consultation be conducted as part of project specific studies to prepare site-specific grading and foundation construction specifications. These are required by **MM GEO-1** to be completed prior to any project development plan approval by the City.

Slope Stability

As stated previously, localized evidence of landsliding is observed on the Project site. Local failures along steepened wash banks were observed in the southwestern portion of the Project site. However, slumps and small landslides would be entirely removed during Project site grading, either as a part of normal operations or remedial earthwork. Stability analyses were performed of selected proposed cut and fill slopes that exposed a variety of geologic units. Pseudo-static slope stability analyses were performed in accordance with guidelines for preparation of geotechnical reports. The results of these calculations meet or exceed minimum requirements for both static and pseudo-static conditions. It is proposed that the majority of the normal dip-slip faults of the Coachella Fan fault zone primarily resulted from lateral spreading and translational sliding induced by strong ground shaking and wetter conditions during the Pleistocene. Hence, that sliding occurred when the sediments were wetter and heavier, and during strong ground motions (co-seismic). However, future site-specific geotechnical studies would be completed pursuant to **MM GEO-1** to identify the potential for landslides and unstable slope conditions within each planning area as future projects are submitted for development. Implementation of **MM GEO-1**, which requires incorporation of recommended geotechnical measures into final design plans, would reduce impacts associated with landslides and slope stability to a less than significant level by eliminating the natural conditions that contribute to landslides or slope instability and replacing them with manufactured slopes that have been compacted and engineered to safely support project structures.

Lateral Spreading

During the Geotechnical Investigation, evidence indicating large scale lateral spreading occurred in the bedrock units, primarily the Palm Springs Formation. The lateral spreading represents a form of landsliding produced during saturated conditions in the Palm Spring Formation in combination with strong local ground shaking. Mid- to late-Pleistocene lateral spreading of the Palm Spring Formation also deformed the overlying Ocotillo Conglomerate. Current geologic conditions are much different, as the Palm Spring Formation materials are semi consolidated and dense. In addition, groundwater is much deeper in the Project site area due to the dryer Holocene climate and relative uplift of the Coachella Valley margins. The potential for lateral spreading at the Project site is, therefore, is considered to be low. However, implementation of **MM GEO-1**, which requires incorporation of recommended geotechnical measures into final design plans, would reduce impacts associated with lateral spreading to a less than significant level. These measures would eliminate the natural conditions that contribute to lateral spreading, similar to liquefaction, by removing unconsolidated soils and recompacting them to proper levels of compaction, installing subdrainage systems to prevent water buildup or erosion of compacted soils, and over-excavation of deep fill with reinforced foundation designs to prevent lateral spreading impacts. These measures would become conditions of approval as part of the City's development review process.

Subsidence

Saturation of low-density, granular soils can result in subsidence and settlement under relatively low loads. A rise in the groundwater table or an increase in infiltration can initiate settlement and cause the foundations and walls of buildings or structures to crack. Compressible and collapsible materials are expected to be found in the near-surface portions of the slopewash, landslide deposits, and alluvial deposits. Removal of these upper materials would be required prior to placement of fill, as outlined in the Geotechnical Investigation. Complete removal of all slopewash and shallow landslide deposits is anticipated, whereas removal of only the upper few feet of loose soils within alluvial units across the Project site is anticipated.

As stated in the Geotechnical Investigation, Section 1808.6.2 of the 2022 CBC specifies that slab-on-ground foundations (floor slabs) resting on expansive soils would be designed in accordance with the Wire Reinforcement Institute (WRI) publication "Design of Slab-on Ground Foundation," which was last updated in 1996. The design procedures in the WRI publication are based on the expansion potential and the weighted plasticity index of the different soil layers existing within the upper 15 feet of each building site. Therefore, since the individual lots would be underlain by soil and bedrock materials with variable expansion potentials, final foundation design would contain recommendations provided by the project geotechnical consultant on a lot-by-lot basis and would be based on the actual expansion potentials and weighted plasticity indices of the soil and bedrock materials underlying each individual lot.

Therefore, the potential for collapsible soils at the Project site would need to be evaluated during subsequent geotechnical investigations as required in **MM GEO-1** prior to Project approval by the City and incorporated into the conditions of approval for each site plan. Implementation of **MM GEO-1** and adherence to the recommendations of the geotechnical investigations would reduce potential subsidence impacts to a less than significant level. These measures would remove native soils subject to subsidence

and replace them and/or regrade areas of native soil to withstand expected levels of seismic shaking to the degree that habitable structures would not be destroyed by the shaking and would use reinforced foundation designs to prevent the collapse or subsidence of soils during seismic events.

Liquefaction or Collapse

See Impact 4.6-3. Implementation of **MM GEO-1**, which requires compliance with the recommendations in the final geotechnical studies, would reduce impacts related to liquefaction to a less than significant level.

Offsite Improvements

Refer to analysis above. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The offsite facilities improvements could potentially result in off-site landslide, lateral spreading, subsidence, liquefaction or collapse. However, these offsite improvements would be constructed in accordance with standard design and construction measures to minimize impacts from landslide, lateral spreading, subsidence, liquefaction or collapse during and following construction, and that the offsites would be subject to **MM GEO-1** as identified above. Any potential future development would be subject to the City's standard discretionary review process, including the City of Coachella Municipal Code and CEQA compliance. Therefore, a less than significant impact would occur with mitigation incorporated.

Mitigation Measures:

MM GEO-1 is applicable.

Impact 4.6-7: ***Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATION

Results of the laboratory expansion index tests performed in accordance with ASTM D 4829 indicate a majority of the on-site soil and bedrock materials exhibit a Very Low expansion potential. However, a sample of clayey silt material from the Palm Spring Formation was found to exhibit a Medium expansion potential. Therefore, based on the distribution of the various geologic units within the Project site and the anticipated grading, it is expected that upon the completion of rough grading that the majority of the soils underlying the building sites will exhibit a Very Low expansion; however, materials in building sites that are excavated to grade within the Palm Spring Formation (southwestern portion of the site), or building sites constructed with fill derived from this formation, will likely exhibit a Medium expansion potential. It is also anticipated that the foundations materials in building sites that are excavated to grade within the Palm Spring Formation, or building sites constructed with fill derived from this formation, will likely exhibit a Medium expansion potential. Typically, consequences of development on expansive soils include

cracked walls, foundations, decks, sidewalks, garage floors, and driveways. **MM GEO-2** requires that each project applicant submit a soil testing report that provides results of potential expansive soils, and if applicable, soil mitigation measures to be incorporated into the final foundation design recommendations. Implementation of **MM GEO-1** and **MM GEO-2** would reduce impacts associated with expansive soils to less than significant levels. These measures would require further investigation by the geotechnical consultant and design recommendations on a lot-by-lot basis and would require excavation of expansive soils and replacement with nonexpansive compacted fill, additional remedial grading, utilization of steel reinforcing in foundations, nonexpansive building pads, presoaking, and drainage control devices to maintain a constant state of moisture as ways to effectively eliminate potential impacts from expansive soils. Through compliance of **MM GEO-1** and **MM GEO-2**, Impacts would be less than significant.

Offsite Improvements

Refer to analysis above. The offsite facilities improvements could potentially be located on expansive soils. However, these offsite utilities would be constructed in accordance with standard design and construction measures to minimize impacts from expansive soils during and following construction, and the offsites would be subject to **MM GEO-1** and **MM GEO-2** as identified above for the Project. Any potential future development would be subject to the City's standard discretionary review process, including the City of Coachella Municipal Code and CEQA compliance. Therefore, a less than significant impact would occur with mitigation incorporated.

Mitigation Measures:

MM GEO-1 is applicable.

MM GEO-2 **Expansive Soils.** Prior to issuance of grading permits, laboratory testing for expansive soils shall be completed by a qualified geotechnical engineer and submitted as a report the City of Coachella for review and approval by the City Engineer, in addition to the final geotechnical report. If expansive soils are found within the area of proposed foundations, soil mitigation measures such as excavation of expansive soils and replacement with nonexpansive compacted fill; additional remedial grading; utilization of steel reinforcing in foundations; nonexpansive building pads; presoaking; and drainage control devices to maintain a constant state of moisture shall be included in the final foundation design recommendations during construction.

Final foundation design recommendations shall be provided by the project geotechnical consultant on a lot-by-lot basis and shall be based on the actual expansion potentials; and weighted plasticity indices of the soil and bedrock materials underlying each individual lot.

Via the covenants, conditions, and restrictions (CC&Rs), the Project Applicant/Owners shall advise homeowners and property occupants about maintaining drainage

conditions to direct the flow of water away from structures so that foundation soils do not become saturated.

During construction, the project engineer shall verify that expansive soil mitigation measures recommended in the final foundation design recommendations are implemented, and the City Building Official shall conduct site inspections prior to occupancy of any structure to ensure compliance with the approved measures.

Impact 4.6-8: ***Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?***

Level of Significance: No Impact

CONSTRUCTION AND OPERATION

No septic tanks or other alternative wastewater disposal systems are proposed. The Project would connect to the existing City sewer system and is not anticipated to use septic or alternative waste systems. Therefore, because the Project would connect to the City's existing sewer system, the Project would result in no impacts related to septic tanks or alternative wastewater disposal systems, and no mitigation is required.

Offsite Improvements

The offsite improvements would not utilize septic tanks. These improvements are infrastructure land use improvements would connect to the existing City sewer system and is not anticipated to use septic or alternative waste systems. No impact would occur in this regard.

Mitigation Measures

No mitigation is necessary.

Impact 4.6-9: ***Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

Level of Significance: Less than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATION

A Cultural Resources Assessment which included paleontological overview has been completed for the Project to review the susceptibility of subsurface geologic units to provide paleontological resources as well as review records for fossil localities near the Project site; see Attachment E of **Appendix D: Cultural Resources**.

In the far western portion of the Project area there are surficial late Pleistocene or Holocene age lacustrine and fluvial (lake and stream channel) deposits, beneath soil, with the lacustrine deposits derived from the ancient, enlarged Lake Cahuilla. The closest vertebrate fossil localities in these Lake Cahuilla deposits are

situated southwest of the Project area near the present Lake Cahuilla on both sides of Madison Street north of 58th Avenue, which produced a significant fauna of terrestrial and freshwater vertebrates as well as diatoms, land plants, clams, snails and crustaceans. A single jaw of the bighorn sheep Ovis canadensis was recovered, another locality to the east of Madison Street, north of 58th Avenue. Shallow excavations in the younger Quaternary Alluvium and even in the coarse deposits of the Ocotillo Formation exposed in the eastern portion of the Project area are unlikely to uncover significant vertebrate fossils. Deeper excavations there that extend down into older and perhaps finer-grained deposits, or any excavations in the Lake Cahuilla Beds exposed in the far western portion of the Project area, may encounter significant vertebrate fossil remains. Therefore, impacts to directly or indirectly destroy a unique paleontological resource could be potentially significant. However, with incorporation of **MM GEO-3,** which requires a Paleontological Construction Monitoring and Compliance Program, construction of the Project components would not destroy a unique paleontological resource or site or unique geologic feature, thereby reducing impacts to a less than significant level.

Offsite Improvements

Refer to the analysis above. The offsite facilities improvements could result in impacts to paleontological resources. However, the impacts would be similar to those evaluated as part of the City of Coachella's General Plan EIR. Development would be subject to the City's standard discretionary review process, including the City of Coachella Municipal Code and CEQA compliance. In consideration of the above, and with implementation of similar mitigation, a less than significant impact is anticipated. The provisions described in **MM GEO-3** would further reduce the impact of the offsite facilities improvements on paleontological resources or unique geologic features to less than significant impact levels with mitigation incorporated.

Mitigation Measures

MM GEO-3: Paleontological Construction Monitoring and Compliance Program. The following measures will be implemented to reduce potential impacts to paleontological resources to less than significant:

- Retain a Qualified Paleontologist. Prior to initial ground disturbance, the Applicant shall retain a project paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology standards for Qualified Professional Paleontologist, to direct all mitigation measures related to paleontological resources.
- Paleontological Mitigation and Monitoring Program. After project design has been finalized to determine the precise extent and location of planned ground disturbances, and prior to construction activity, a qualified paleontologist will prepare a Paleontological Mitigation and Monitoring Program to be implemented during ground disturbance activity for future proposed projects. This program will outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and

paleontological staff qualifications. The program will be prepared in accordance with the standards set forth by current Society of Vertebrate Paleontology guidelines.

- Paleontological Worker Environmental Awareness Program (WEAP). Prior to the start of construction, the project paleontologist or his or her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be presented at a preconstruction meeting that a qualified paleontologist shall attend. In the event of a fossil discovery by construction personnel, all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. If it is determined that the fossil(s) is (are) scientifically significant, the qualified paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources.
- Paleontological Monitoring. Ground disturbing construction activities (including grading, trenching, foundation work, and other excavations) in areas mapped as high paleontological sensitivity should be monitored on a full-time basis by a qualified paleontological monitor during initial ground disturbance. Areas mapped as low to high paleontological sensitivity shall be monitored by project-specific qualified paleontological monitor when ground-disturbing activities exceed five feet in depth, because underlying sensitive sediments could be impacted. Areas considered to have an undetermined paleontological sensitivity shall be inspected and further assessed if construction activities bring potentially sensitive geologic deposits to the surface. The Paleontological Mitigation and Monitoring Program shall be supervised by the project paleontologist. Monitoring should be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources. The duration and timing of the monitoring would be determined by the project paleontologist. If the project paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new or unforeseen deeper ground disturbances are required, and reduction or suspension will need to be reconsidered by the Supervising Paleontologist. Ground disturbing activity that does not exceed five feet in depth would not require paleontological monitoring.
- Salvage of Fossils. If fossils are discovered, the project paleontologist or paleontological monitor shall recover them. Fossils shall be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the paleontologist will have the authority to temporarily direct, divert, or halt

construction activity to ensure that the fossil(s) will be removed in a safe and timely manner.

- Preparation and Curation of Recovered Fossils. Once salvaged, the project paleontologist will ensure that significant fossils would be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the Western Science Center), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist. Field collection and preparation of fossil specimens would be performed by the project paleontologist with further preparation as needed by an accredited museum repository institution at the time of curation.
- Final Paleontological Mitigation Report. Upon completion of ground disturbing activity (and curation of fossils, if necessary) the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration, and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.

4.6.5 CUMULATIVE IMPACTS

As discussed above, the Project site is located within an Alquist-Priolo Earthquake Fault Hazard Zone and contains several potentially active faults. As such, the Project would be required to implement **MM GEO-1** through **MM GEO-3** and comply with applicable State and local requirements, including but not limited to the City of Coachella Building Code and the CBC. Seismic impacts are a regional issue, and all projects must adhere to applicable seismic codes and design standards. The Project's individual impacts related to geotechnical constraints are considered significant even after mitigation from fault rupture. Therefore, the Project's contribution to regional cumulative impacts regarding fault rupture is considered potentially significant. However, implementation of the recommended Project-level mitigation, plus standard mitigation imposed by the City and County on future development in the surrounding area, would result in less than significant cumulative impacts related to geotechnical and soil constraints.

Additionally, the seismic, geotechnical, and soil characteristics of each cumulative development site would be evaluated on a project-by-project basis, and appropriate mitigation measures would be required, as necessary. Cumulative development would be subject to numerous existing federal, State, regional, and local laws, ordinances, regulations, and standards in place to minimize and/or avoid the effects of past, current, and probable development. All development would be required to comply with the established regulatory framework, including the CBC and Municipal Code of each respective jurisdiction, and site-specific mitigation measures, which would include the recommendations of the site-specific geotechnical and soils investigations, as required. Future development would also be required to uphold the General Plan policies of each respective jurisdiction. The City of Coachella General Plan EIR addresses cumulative

impacts of City buildout. The Riverside County General Plan EIR addresses cumulative impacts of County buildout.

Therefore, the Project's incremental effects involving geology and soils, combined with those of the cumulative projects, are not considered cumulatively considerable.

4.6.6 SIGNIFICANT UNAVOIDABLE IMPACTS

With implementation of the Project, significant unavoidable impacts would occur in the following areas despite the implementation of the Mitigation Program:

- Project-related construction and operational impacts. Despite the implementation of **MM GEO-1**, the Project would potentially be impacted by substantial adverse effects due to fault rupture of unknown earthquake faults.

4.6.7 REFERENCES

City of Coachella. 2015. City of Coachella General Plan – Safety Element. https://www.coachella.org/home/showpublisheddocument/8421/637819141302800000.

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City of Coachella. 2014. General Plan Update EIR Section 4.5 Geology and Soils, Figure 4.5-6: Landslide Risk. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.5_-_geology.pdf.

Kenney GeoScience Inc., ~2850-acre KPC Coachella Project, City of Coachella, Riverside, California September 20, 2021 (revised January 2022).

Petra Geosciences, Inc., Geotechnical Feasibility of 85-Foot-Tall Building, KPC Coachella Project, 2,850 Acres± of Vacant Land, North of Interstate 10 and East of the All-American Canal, City of Coachella, Riverside County, California.

Petra Geosciences Inc., Feasibility-Level Geotechnical Evaluation, KPC Coachella Project (formerly Desert Lakes Project), 2,850 Acres± of Vacant Land, North of Interstate 10 and East of the All-American Canal, City of Coachella, Riverside County, California. October 11, 2022.

4.7 GREENHOUSE GAS EMISSIONS

The purpose of this section is to describe the potential for implementation of the KPC Coachella Specific Plan Project (Project) to cumulatively contribute to greenhouse gas (GHG) emissions impacts within the Coachella Valley. Because no single project is large enough to result in a measurable increase in global concentrations of GHG, climate change impacts of a project are considered on a cumulative basis.

This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (SCAQMD). Modeling of GHG emissions was conducted using the California Emissions Estimator Model (CalEEMod), Version 2020.4.0 and the California Air Resources Board's (CARB) EMFAC2021. Model outputs are in **Appendix G: Greenhouse Gas Emissions Assessment**, of this Draft EIR.

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts from GHG emissions. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors, such as the proximity or presence of GHG emitting land uses.

4.7.1 ENVIRONMENTAL SETTING

GREENHOUSE GASES AND CLIMATE CHANGE

Certain gases in the earth's atmosphere classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse

effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere. **Table 4.7-1: Description of Greenhouse Gases** describes the primary GHGs attributed to global climate change, including their physical properties.

Table 4.7-1: Description of Greenhouse Gases

Greenhouse Gas	Description
Carbon Dioxide (CO_2)	CO_2 is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO_2 is variable because it is readily exchanged in the atmosphere. CO_2 is the most widely emitted GHG and is the reference gas (Global Warming Potential of 1) for determining Global Warming Potentials for other GHGs.
Nitrous Oxide (N_2O)	N_2O is largely attributable to agricultural practices and soil management. Primary human-related sources of N_2O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N_2O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years. The Global Warming Potential of N_2O is 298.
Methane (CH_4)	CH_4, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, about 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH_4 include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH_4 is about 12 years and the Global Warming Potential is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year Global Warming Potential of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Global Warming Potentials range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs were synthesized in

Greenhouse Gas	Description
	1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. Global Warming Potentials for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF_6)	SF_6 is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The Global Warming Potential of SF_6 is 23,900.
Hydrochlorofluoro-carbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year Global Warming Potentials of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF_3)	NF_3 was added to Health and Safety Code section 38505(g)(7) as a GHG of concern. This gas is used in electronics manufacturing for semiconductors and liquid crystal displays. It has a high global warming potential of 17,200.
Source: Kimley-Horn. 2023. Greenhouse Gas Emissions Assessment. Table 2.	

4.7.2 REGULATORY SETTING

FEDERAL

To date, no national standards have been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

U.S. Environmental Protection Agency Endangerment Finding

The U.S. Environmental Protection Agency (EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in Massachusetts v. EPA (2007). The Supreme Court ruled that GHGs meet

the definition of air pollutants under the existing Federal Clean Air Act (FCAA) and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing FCAA and the EPA's assessment of the scientific evidence that form the basis for the EPA's regulatory actions.

Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon (mpg) if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021. On January 12, 2017, the U.S. EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks.

In 2021, the U.S. EPA reversed its previous decision and issued a final rule to strengthen the GHG emissions standards for cars and light trucks for model years 2023-2026. The proposed fuel efficiency standards would be the most stringent standards established by the U.S. EPA at 55 mpg in model year 2026. On March 20, 2024, the U.S. EPA established a final rule for cars and light trucks for model years 2027-2032 to reduce the projected fleet average emissions target levels by 50 percent relative to the projected model year 2026 standard.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final

standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.

In 2018, the President and the U.S. EPA stated their intent to halt various federal regulatory activities to reduce GHG emissions, including the phase two program. California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives. On September 27, 2019, the U.S. EPA and the NHTSA published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program." (84 Fed. Reg. 51,310 (Sept. 27, 2019.) The SAFE Rule (Part One) revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two, sets CO_2 emissions standards and corporate average fuel economy (CAFE) standards for passenger vehicles and light duty trucks, covering model years 2021-2026. The U.S. EPA and NHSTA repealed SAFE Rule Part One, effective January 28, 2022, allowing states to set stricter GHG emissions standards.

In December 2021, the U.S. EPA finalized federal GHG emissions standards for passenger cars and light trucks for Model Years 2023 through 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and are based on sound science and grounded in a rigorous assessment of current and future technologies. The updated standards will result in avoiding more than three billion tons of GHG emissions through 2050.

On June 7, 2024, the NHSTA announced the final rule for passenger cars and light trucks for model years 2027-2031, which strengthened previous emission standards and proposed an industry-wide fleet average of approximately 50.4 mpg in model year 2031. The new CAFE standards for model years 2027-2031 would reduce fuel use by 70 billion gallons through 2050.

In response to President Trump's "Unleashing American Energy" EO, published on January 20, 2025, the U.S. EPA announced its intention to reconsider regulations and actions that rely on the Endangerment Finding on March 12, 2025. This includes the CAFE standards. On June 6, 2025, the NHTSA published an interpretive rule that establishes the NHTSA's authority to revise the CAFE standards without consideration of electric vehicles.

STATE

California Air Resources Board

The California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of CO_2 equivalents (CO_2e) in the world and produced 371 million gross metric tons of CO_2e in 2022. In the State, the transportation sector is the largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark Assembly Bill (AB) 32, *California Global Warming Solutions Act of 2006*, was specifically enacted to address GHG emissions. Other legislation, such as California Code of Regulations (CCR) Title 24 Building Standards Code (CBSC) Part 6 (California Energy Code), CCR Title 24 Part 11 (California Green Building Standards Code), and CCR Title 20 (Appliance Energy regulations), were originally adopted for other purposes such as energy and water conservation but also provide GHG reductions. This section describes the legislation's major provisions.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

AB 32 instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. AB 32 also directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The Scoping Plan was first approved by CARB in 2008 and must be updated every five years. Since 2008, there have been updates in 2013, 2017, and 2022, each with policies to guide the state to achieve its GHG targets. According to the latest Scoping Plan (2022 Scoping Plan), California met the target established by AB 32 ahead of schedule.

California Air Resources Board Scoping Plan

Adopted December 15, 2022, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions to 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve AB 1279's GHG emissions reduction target, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen.

The 2022 CARB Scoping Plan's key elements focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector, which CARB adopted and enforce on vehicle manufacturers, and are outside local governments' jurisdiction and control. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with recommendations to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan is not regulatory, is not exhaustive, and does not include everything local governments can implement to support the State's climate goals. It focuses primarily on climate action plans (CAPs) and local authority

over new residential development. It includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. CARB specifically states that Section 3 of Appendix D, which discusses land use plans and development projects, does not address land uses other than residential and mixed-use residential. However, CARB plans to explore new approaches for other land use types in the future.

Advanced Clean Cars I and II (Waiver Revoked)

Advanced Clean Cars combined several regulations into one package including the Low-Emission Vehicle (LEV) criteria and greenhouse gas regulations and the zero-emission vehicle (ZEV) regulation. Advanced Clean Cars I was adopted in 2012 and contained regulations for vehicle up to model year 2025. Advanced Clean Cars II, adopted in 2022, replaced Advanced Clean Cars I and required a phased transition to 100 percent zero-emission vehicle sales by 2035 and included more aggressive tailpipe emission standards. On June 17, 2025, President Trump signed resolutions to revoke the U.S. EPA granted waivers for three California emission rules, including the Advanced Clean Cars II waiver. Although these actions are being challenged in court, Advanced Clean Cars II cannot be enforced until these legal challenges are resolved.

Advanced Clean Truck Regulation (Waiver Revoked)

CARB adopted the Advanced Clean Truck Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California would be required to be zero-emission. This rule directly addressed the disproportionate health risk and pollution burdens of California and put California on the path for all zero-emission short-haul drayage fleet in ports and railyards by 2035, and zero-emission "last-mile" delivery trucks and vans by 2040. However, on June 17, 2025, President Trump signed resolutions to revoke the U.S. EPA granted waivers for three California emission rules, including the Advanced Clean Truck Regulation waiver. Although these actions are being challenged in court, the Advanced Clean Truck Regulation cannot be enforced until these legal challenges are resolved.

Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit)

Signed into law in September 2016, SB 32 codifies the 2030 GHG emissions reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017, CARB adopted a second update to the Scoping Plan. The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by Executive Order B-30-15 and codified by SB 32. Other objectives listed in the 2017 Scoping Plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and support the Clean Power Plan and other Federal actions. In 2022, CARB published the 2022 Scoping Plan, which is discussed above.

SB 375 (The Sustainable Communities and Climate Protection Act of 2008)

Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction goals established by AB 32. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies.

AB 1493 (Pavley Regulations and Fuel Efficiency Standards)

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. AB 1493's implementation was delayed by lawsuits filed by automakers and by the U.S. EPA's denial of an implementation waiver. The U.S. EPA subsequently granted the requested waiver in 2009, which the U.S. District Court for the District of Columbia upheld in 2011. The regulations establish one set of emission standards for model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new automobiles will emit 34 percent fewer CO2e emissions and 75 percent fewer smog-forming emissions. In 2018, the U.S. EPA proposed the SAFE Vehicles Rule, which would roll back fuel economy standards and revoke California's waiver. However, in December 2021, the NHTSA repealed the SAFE Vehicle Rule Part One.

SB 1368 (Emission Performance Standards)

SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined-cycle natural gas power plant. The new law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO_2 per megawatt-hour.

SB 350 (Clean Energy and Pollution Reduction Act of 2015)

Signed into law on October 7, 2015, SB 350 implements the goals of Executive Order B-30-15. The objectives of SB 350 are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 25 percent by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

AB 398 (Market-Based Compliance Mechanisms)

Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 required CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the State. It also designated CARB as the statewide regulatory body responsible for ensuring that California meets its statewide carbon pollution reduction targets, while retaining local air districts' responsibility and authority to curb TACs and criteria pollutants from local sources that severely impact public health. AB 398 also decreased free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

SB 150 (Regional Transportation Plans)

Signed on October 10, 2017, SB 150 aligns local and regional GHG reduction targets with State targets (i.e., 40 percent below their 1990 levels by 2030). SB 150 creates a process to include communities in discussions on how to monitor their regions' progress on meeting these goals. The bill also requires the CARB to regularly report on that progress, as well as on the successes and the challenges regions experience associated with achieving their targets. SB 150 provides for accounting of climate change efforts and GHG reductions and identify effective reduction strategies.

AB 1346 (Air Pollution: Small Off-Road Engines)

Signed into Law in October 2021, AB 1346 requires CARB, to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines, consistent with federal law, by July 1, 2022. The bill requires CARB to identify and, to the extent feasible, make available funding for commercial rebates or similar incentive funding as part of any updates to existing applicable funding program guidelines to local air pollution control districts and air quality management districts to implement to support the transition to zero-emission small off-road equipment operations.

AB 1279 (The California Climate Crisis Act)

AB 1279 establishes the State's policy to to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are at least reduced to 85 percent below 1990 levels. AB 1279 requires CARB to ensure that the Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies.

SB 905 (Carbon Sequestration Program)

Signed on September 16, 2022, SB 905 establishes regulatory framework and policies that involve carbon removal, carbon capture, utilization, and sequestration. It also prohibits the injecting of concentrated CO_2 fluid into a Class II injection well for the purpose of enhanced oil recovery.

AB 1757 (Nature-Based Solutions)

Signed on September 16, 2022, AB 1757 requires State agencies to develop a range of targets for natural carbon sequestration and nature-based climate solutions that reduce GHG emissions to meet the 2030, 2038, and 2045 goals which would be integrated into a scoping plan addressing natural and working lands.

Renewable Electricity Standards

Established in 2002, California's Renewables Portfolio Standard (RPS) requires electricity providers (i.e., utilities, cooperatives, and community choice aggregators) to ensure that renewable energy constitutes a specified minimum portion of their electric load. Since then, the state Legislature has modified, increased, and accelerated the RPS several times. Relevant RPS laws are summarized below.

SB 1078. SB 1078 (2002) requires California to generate 20 percent of its electricity from renewable energy by 2017.

SB 107. SB 107 (2006) accelerated the 20 percent RPS requirement from 2017 to 2010.

SB 2 (1X). SB 2 (1X) (2010) increased the RPS to 33 percent renewables by 2020 with compliance period targets of 20 percent by 2013 and 25 percent by 2016.

SB 350. SB 350 (2015) extended the RPS to 50 percent by 2030, with interim targets of 40 percent by 2024 and 45 percent by 2027. The bill also requires that 65 percent of RPS procurement must be derived from long-term contracts (10 years or more) starting in 2021.

SB 100. SB 100 (2018) increased California's renewable electricity portfolio to 60 percent by 2030, with interim targets of 44 percent by 2024 and 52 percent by 2027. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

SB 1020. SB 1020 (2022) provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

Executive Orders Related to GHG Emissions

California's Executive Branch has taken several actions to reduce GHGs using executive orders. Although not regulatory, they set the State's tone and guide the actions of state agencies.

Executive Order S-3-05

Executive Order S-3-05, which was issued on June 1, 2005, established the following GHG emissions reduction targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Executive Order S-01-07

Issued on January 18, 2007, Executive Order S 01-07 mandates that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The executive order established a Low Carbon Fuel Standard (LCFS) and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission (CEC), CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. CARB adopted the LCFS on April 23, 2009.

Executive Order S-13-08

Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency development of the 2009 California Climate Adaptation Strategy. Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order S-14-08

Issued on November 17, 2008, Executive Order S-14-08 expands the State's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directed CARB to adopt regulations requiring 33 percent of electricity sold in the State come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

Executive Order S-21-09

Issued on July 17, 2009, Executive Order S-21-09 directs CARB to adopt regulations to increase California's RPS to 33 percent by 2020. This builds upon SB 1078 (2002), which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006), which advanced the 20 percent deadline to 2010, a goal which was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

Executive Order B-30-15

Issued on April 29, 2015, Executive Order B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of CO_2e ($MMTCO_2e$). The 2030 target acts as an interim goal on the way to achieving GHG emissions reductions to 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. The executive order also requires the State's climate adaptation plan to be updated every three years and for the State to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions to 40 percent below 1990 levels by 2030.

Executive Order B-55-18

Issued on September 10, 2018, Executive Order B-55-18 establishes a goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing GHG emissions. The executive order requires CARB to work with relevant state agencies to develop a framework for implementing this goal. It also requires CARB to update the Scoping Plan to identify and recommend measures to achieve carbon neutrality. The executive order also requires state agencies to develop sequestration targets in the Natural and Working Lands Climate Change Implementation Plan.

Executive Order N-79-20

Signed in September 2020, Executive Order N-79-20 establishes as a goal that where feasible, all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, be zero-emission by 2035. The executive order sets a similar goal requiring that all medium and heavy-duty vehicles be zero-emission by 2045 where feasible. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new zero emission vehicles (ZEVs) "towards the target of 100 percent." The executive order directs the California Environmental Protection Agency, the California Geologic Energy Management Division, and the California Natural Resources Agency to transition and repurpose oil production facilities with the goal of meeting carbon neutrality by 2045, which CARB adopted in July 2020.

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 Appliance Efficiency Regulations

The Appliance Efficiency Regulations (CCR Title 20, Sections 1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) were first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. In August 11, 2021, the California Energy Commission (CEC) adopted the 2022 Energy Code on August 11, 2021, which the California Building Standards Commission subsequently approved for inclusion into the California Building Standards Code. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings result in less electric energy consumption, which decreases fossil fuel consumption thereby decreasing GHG emissions across California. For example, the 2022 Title 24 standards require efficient electric heat pumps,

establish electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthen ventilation standards.

Title 24 California Green Building Standards Code

The California Green Building Standards Code (CCR Title 24, Part 11) commonly referred to as the CALGreen Code, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures concerning planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code went into effect January 1, 2023 (2022 CALGreen). The 2022 CALGreen standards continue to improve upon the existing standards for new construction of, and additions and alterations to, residential and nonresidential buildings.

REGIONAL

South Coast Air Quality Management District Thresholds

The South Coast Air Quality Management District (SCAQMD) formed a GHG California Environmental Quality Act (CEQA) Significance Threshold Working Group on December 5, 2008, to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the South Coast Air Basin (SCAB), various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. The Working Group has proposed a tiered approach to evaluating GHG emissions for development projects where SCAQMD is not the lead agency, wherein projects are evaluated sequentially through a series of "tiers" to determine whether the project is likely to result in a potentially significant impact due to GHG emissions.

With the tiered approach, a project is compared against the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The SCAQMD has adopted a threshold of 10,000 $MTCO_2e$ per year for industrial projects and a 3,000 $MTCO_2e$ threshold was proposed for non-industrial projects but has not been adopted. The SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, SCAQMD initially outlined that a project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business-as-usual emissions. However, the Working Group did not provide a

recommendation for this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 $MTCO_2e$ per service population per year. Tier 5 would exclude projects that implement offsite mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

Tier 3 Screening Thresholds

When the tiered approach is applied to a proposed project, and the project is found not to comply with Tier 1 or Tier 2, the project's emissions are compared against a screening threshold, as described above, for Tier 3. The screening threshold formally adopted by SCAQMD is an "interim" screening threshold for stationary source industrial projects where the SCAQMD is the lead agency under CEQA. The threshold was termed "interim" because, at the time, SCAQMD anticipated that CARB would be adopting a statewide significance threshold that would inform and provide guidance to SCAQMD in its adoption of a final threshold. However, no statewide threshold was ever adopted, and the interim threshold remains in effect since December 2008.

For projects for which SCAQMD is not a lead agency, no screening thresholds have been formally adopted. However, the SCAQMD Working Group has recommended a threshold of 10,000 $MTCO_2e$/year for industrial projects and 3,000 $MTCO_2e$/year for residential and commercial projects. SCAQMD determined that these thresholds would "capture" 90 percent of GHG emissions from these sectors, "capture" meaning that 90 percent of total emissions from all new projects would be subject to some type of CEQA analysis (i.e., found potentially significant).

Southern California Association of Governments (SCAG)

On April 4, 2024, SCAG's Regional Council adopted Connect SoCal (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy [2024 RTP/SCS]). The RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Orange, Los Angeles, Imperial, Riverside, San Bernardino, and Ventura. The RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals. The SCAG region strives toward sustainability through integrated land use and transportation planning. The SCAG region must achieve specific federal air quality standards and is required by State law to lower regional GHG emissions.

LOCAL

City of Coachella General Plan

Sustainability and Natural Environment Element

This Element[1] establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces.

Goal 1 **Climate Change. A resilient community that is prepared for the health and safety impacts of and minimizes the risks of climate change.**

Policy 1.1 Municipal operations. Conduct city operations and institutionalize practices that reduce municipal greenhouse gas (GHG) emissions and lead the community in reducing GHG emissions.

Policy 1.2 GHG reductions: Promote land use and development patterns that reduce the community's dependence on and length of automobile trips.

Policy 1.6 Climate-appropriate building types: Seek out and promote alternative building types that are more sensitive to the arid environment found in the Coachella Valley. Courtyard housing and commercial buildings can be designed to provide micro-climates that are usable year-round, reducing the need for mechanically cooled spaces and reducing energy consumption.

Policy 1.11 Urban forest: Protect the City's healthy trees and plant new ones to provide shade, increase carbon sequestration and purify the air.

Policy 1.13 Designing for warming temperatures: When reviewing development proposals, encourage applicants and designers to consider warming temperatures in the design of cooling systems.

Goal 2 **Energy. An energy efficient community that relies primarily on renewable and non-polluting energy sources.**

Policy 2.1 Community development–subdivisions. When reviewing applications for new subdivisions, require all residences be oriented along an east-west access, minimizing western sun exposure, to maximize energy efficiency.

Policy 2.2 Passive solar design. Require new buildings to incorporate energy efficient building and site design strategies for the desert environment that include appropriate solar orientation, thermal mass, use of natural daylight and ventilation, and shading.

Policy 2.3 Alternative energy. Promote the incorporation of alternative energy generation (e.g., solar, wind, biomass) in public and private development.

Policy 2.5 Construction standards. Consider and evaluate new construction practices and standards that increase building energy efficiency.

[1] City of Coachella. 2015. City of Coachella General Plan – Sustainability and Natural Environment. https://www.coachella.org/home/showpublisheddocument/8419/637819141150600000. (accessed July 2022).

Policy 2.6 Energy performance targets – new construction. Require new construction to exceed Title 24 energy efficiency standards by 15 percent and incorporate solar photovoltaics.

Policy 2.8 Renewable energy–open space areas. Allow the installation of renewable energy systems in areas zoned for open space.

Policy 2.9 Energy-efficient street lighting. Implement a program to install the latest energy-efficient technologies for street and parking lot lights to meet City and state standards.

Policy 2.10 New industries. Actively promote the City as a place for renewable energy generation, and a place for energy conservation businesses to locate.

Policy 2.11 Publicly funded buildings. Require energy conservation as the primary strategy to reduce energy demand in new and renovation projects using public funds.

Policy 2.12 Solar access. Prohibit new development and renovations that impair adjacent buildings' solar access, unless it can be demonstrated that the shading benefits substantially offset the impacts of solar energy generation potential.

Policy 2.13 Use of passive open space. Allow renewable energy projects in areas zoned for open space, where consistent with other uses and values.

Policy 2.14 Public buildings. Require that any new building constructed in whole or in part with City funds incorporate passive solar design features, such as daylighting and passive solar heating, where feasible.

Goal 4 Green Building. Community building stock (both new construction and renovations) that demonstrates high environmental performance through green design.

Policy 4.1 Public buildings. Require all new and substantially renovated or reconstructed City owned and operated buildings in excess of 5,000 square feet achieve a LEED Silver Certification standard, as determined by the U.S. Green Building Council, or a substantially similar green building standard.

Policy 4.2 Affordable housing – green design. Require affordable housing developments to prioritize green building design features that reduce monthly utility costs, enhance occupant health and lower the overall cost of housing.

Policy 4.3 Education. Provide technical support and information to educate the development community about green building.

Policy 4.4 Reducing GHG emissions. In consulting with applicants and designing new facilities, prioritize the selection of green building design features that enhance the reduction of greenhouse gas emissions.

Policy 4.5 Heat island reductions. Require heat island reduction strategies in new developments such as light-colored cool roofs, light-colored paving, permeable paving, right-sized parking requirements, vegetative cover and planting, substantial tree canopy coverage, and south and west side tree planting.

Policy 4.6 Public realm shading. Strive to improve shading in public spaces such as bus stops, sidewalks and public parks and plazas through the use of trees, shelters, awnings, gazebos, fabric shading and other creative cooling strategies.

City of Coachella Climate Action Plan

The goal of the City of Coachella Climate Action Plan (CAP) is to provide a more livable, equitable, economically vibrant community through the incorporation of energy efficiency features and reduction of GHG emissions. The City of Coachella proposed to set an efficiency-based GHG reduction target of 15 percent below 2010 per service population emissions by 2020 and proposes an aggressive emissions reduction target of 49 percent below 2010 per service population emissions by 2035. The 2020 target was tied to the recommendation of the CARB and the Climate Change Scoping Plan, which had suggested that local governments work to reduce emissions by 15 percent. Coachella's 2020 target aligned with this state recommendation and placed the City on a course towards California's long-term emissions reduction target, which is an ambitious goal to reduce greenhouse emissions by 80 percent below 1990 levels in 2050. The 2050 goal is the State's policy interpretation of the percent reduction necessary to stabilize global CO_2 levels, while still providing for economic growth. The City recognizes the need to continue reducing emissions beyond 2020, but also knows that additional state and federal actions will be needed to achieve an 80 percent target by 2050.

In order for Coachella to achieve a long-term goal to reduce emissions, the City needs to continue evaluating new strategies and implementation actions that take purposeful steps beyond the actions outlined in the General Plan. The suite of options available to Coachella will continue to evolve over time as more jurisdictions identify cost-effective, community-level solutions to reduce emissions, as businesses deploy less carbon intensive technologies, and as individuals change their behavior. Below is a selection of policies and measures that would help Coachella to meet the 2035 GHG emissions target:

- Energy Efficiency

  Residential and non-residential buildings produce approximately 39 percent of Coachella's emissions and are a primary target for the CAP. This strategy quantifies energy efficiency policies in the General Plan for homes, businesses, and private street lighting. This includes energy performance targets to construct buildings 15 percent more energy efficient than Title 24, increase passive solar design features, and planting new shade trees.

- Energy Generation

  This strategy includes General Plan policies that will help homes and businesses in Coachella increase renewable energy production. It includes requirements for solar photovoltaic infrastructure on new homes and businesses and pursuing clean energy through community choice aggregation.

- Land Use and Transportation

  Coachella's General Plan provides clear guidance for how Coachella will become a city of walkable neighborhoods tied together by multi-modal transportation corridors and interspersed with vibrant districts for shopping, working, entertaining, and commerce. The walkable neighborhoods

will have a diverse mix of housing types and will be in close proximity to shopping and neighborhood services so that the majority of one's daily needs are a short walk away. This strategy evaluates the land use and transportation policies in the General Plan that aim to reduce vehicle miles traveled and improve mobility. Specific implementation measures involve changing land uses, adopting a new perspective on community design, promoting alternative modes of travel, and revising antiquated parking standards.

- Solid Waste

  Solid waste generation produces only a small percentage of Coachella's emissions (three percent), but with population and employment growth, the specific actions outlined in the General Plan to increase waste diversion can result in significant emissions reductions. This strategy includes General Plan policies related to increase residential and commercial recycling and construction recycling.

- Vegetation and Open Space

  Not only do trees and open space enhance the appearance of a community, they reduce ambient air temperature, lower energy use, reduce air and water pollution, and absorb GHGs. Coachella's General Plan includes policies for increasing access to parks and open spaces and planting new trees. This compilation of General Plan policies focuses on the carbon sequestration benefits of new vegetation and trees.

- Water Use

  Water use represents one of the fastest-growing emissions sectors in the Coachella CAP with potable water use growing 45 percent between 2005 and 2010. The General Plan includes policies to address indoor and outdoor water use and future water supply. This strategy analyzes the effectiveness of these measures at reducing GHG emissions.

- Additional CAP Measures:

  <u>Community Choice Aggregation</u>

  The General Plan calls for the City to develop a community choice aggregation system in order to secure alternative energy supply contracts for the community. For enhanced performance, the City should strive to achieve a participatory rate of 100 percent of the homes and businesses will participate in the program that purchases a portfolio of cleaner energy sources.

  <u>Solid Waste Reduction</u>

  The City proposes striving for zero waste to landfills by 2040 through reusing, reducing and recycling solid waste. Under an enhanced approach, the City should strive for 90 percent of the community's commercial and residential waste to be diverted from the landfill. Along with commercial and residential waste, 90 percent of the construction and demolition debris should also be recycled.

Water Use and Supply

The City's General Plan proposes a series of policies to conserve water. Under the enhanced policy approach, the City should strive for reducing outdoor water use in new construction by 15 percent, which would lower GHG emissions from water use. Along with the water performance standard, the General Plan encourages the reduction of water use through plant selection and irrigation technology. It is estimated that the enhanced policy approach will reduce outdoor water use by an additional 12.5 percent and lower GHG emissions.

Energy Performance

The General Plan policies require new construction to incorporate solar and encourages solar in existing building retrofits. For the enhanced measure, the quantification of GHG emission reductions for these policies uses the following assumptions:

- By 2035, 2.5 percent electricity for new residential structures and 25 percent of the electricity for existing commercial buildings will be generated by on-site renewable sources of energy.
- By 2035, 25 percent of the electricity for new residential structures and 50 percent of the electricity for new commercial construction will be generated by on-site renewable sources of energy.

Commercial Energy Conservation Ordinance

To further reduce emissions, the City could explore enacting a commercial and industrial energy conservation ordinance that requires certain businesses to reduce energy use by 20 percent when a property is sold. This package of actions includes exploration of point-of-sale energy use disclosures, energy audits, and energy efficiency upgrades.

Residential Energy Conservation Ordinance

Along with a commercial energy conservation ordinance, the City could adopt an ordinance that requires cost-effective energy efficiency upgrades in existing buildings be implemented at point of sale or during major renovation of residential units. A maximum cost ceiling would be established to protect owners from excessive fees.

Travel Demand Management

Travel demand management (TDM) refers to strategies which reduce the need for people to travel in automobiles, particularly for work trips. Example TDM applications could include:

- Alternative work schedules
- Vanpooling
- Carpooling
- Telecommuting

The potential level of reduction associated with this measure could be as high as 25 percent of all work trips.

Intelligent Transportation System / Traffic Flow Improvements

One method available to the City to further reduce GHG emissions is the deployment of Intelligent Transportation Systems (ITS), which provide for more efficient traffic flow. These strategies are often implemented through signal coordination and retiming efforts. The City has received a grant and will be preparing an ITS Master Plan to implement ITS strategies along its major corridors. The level of reduction on a City-wide basis is likely to be approximately five percent, which assumes that a majority of the roadways within the City receive ITS improvements.

4.7.3 STANDARDS OF SIGNIFICANCE

CEQA THRESHOLDS

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning GHG emissions. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The Appendix G thresholds for GHG emissions do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA.

Addressing GHG emissions generation impacts requires an agency to determine what constitutes a significant impact. The Amendments to the State CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions will have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions.

CEQA Guidelines Section 15064.4(a) notes that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or other performance-based standards." A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision-makers to intelligently take into account the project's incremental contribution to climate change." (CEQA Guidelines Section 15064.4[c]). CEQA Guidelines Section 15064.4(b) provides that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment:

1. The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In addition, CEQA Guidelines Section 15064.7(c) specifies that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

The California Governor's Office of Planning and Research (OPR) Technical Advisory, CEQA and Climate Change: Addressing Climate Change through CEQA Review (2008) states that "public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact". Furthermore, the Technical Advisory indicates that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice."

The City of Coachella has not adopted project-specific significance thresholds, instead the proposed Project's GHG emissions are evaluated consistent with CEQA Guidelines Sections 15183.5, 15064.4(a)(2), and 15064.4(b) by considering whether the Project complies with the CARB Scoping Plan and the City's CAP. The CARB Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other State agencies to adopt regulations and other initiatives to reduce GHGs.

METHODOLOGY

Global climate change is, by definition, a cumulative impact of GHG emissions. Therefore, there is no project-level analysis. The baseline against which to compare potential impacts of the Project includes the natural and anthropogenic drivers of global climate change, including worldwide GHG emissions from human activities which almost doubled between 1970 and 2010 from approximately 27 gigatonnes (Gt) of CO_2/year to nearly 49 $GtCO_2$/year. As such, the geographic extent of climate change and GHG emissions cumulative impact discussion is worldwide.

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model (CalEEMod). Details of the modeling assumptions and emission factors are provided in Appendix A: Greenhouse Gas Emissions Data of Draft EIR **Appendix G**.

Construction

CalEEMod calculates construction emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. Construction GHG emissions were forecasted based on the proposed construction schedule and applying the emissions factors derived from CalEEMod. The Project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles.

For the purposes of analyzing GHG emissions, the construction activities for the five villages were modeled in separate phases (Phase 1, Phase 2, Phase 3, Phase 4, Phase 5, and Phase 6). Construction was modeled generally according to the following timeline:[2]

- Phase 1: Commence in 2025 with a 40-month duration.
- Phase 2: Commence in 2028 with a 40-month duration.
- Phase 3: Commence in 2031 with a 40-month duration.
- Phase 4: Commence in 2034 with a 40-month duration.
- Phase 5: Commence in 2038 with a 40-month duration.
- Phase 6: Commence in 2042 with a 40-month duration.

Operations

The Project's operational GHG emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance, consumer products), energy consumption (electricity and natural gas), water supply and wastewater treatment, and solid waste. These emissions categories are discussed below.

- **Area Sources.** Area source emissions occur from architectural coatings, landscaping equipment, and consumer products. The Project involves residential, hotel, and commercial uses. Landscaping and consumer products (i.e., personal care products, home, lawn, and garden products, disinfectants, sanitizers, polishes, cosmetics, and floor finishes) would be part of the emissions from area sources. Additionally, the primary emissions from architectural coatings are volatile organic compounds, which are relatively insignificant as direct GHG emissions.
- **Energy Consumption.** Energy consumption consists of emissions from project consumption of electricity and natural gas. Primary uses of electricity and natural gas by the Project would be for miscellaneous residential and hotel appliances, space heating and cooling, water heating, ventilation, lighting, and electronics. Energy emissions are calculated based on consumption rates and emissions factors in CalEEMod. No changes were made to the default energy usage consumption rates or emissions factors.
- **Solid Waste.** Solid waste releases GHG emissions in the form of methane when these materials decompose. Solid waste emissions are calculated based on generation rates and emissions factors in CalEEMod.

[2] Project construction is anticipated for late 2026. As the Project development is speculative, a conservative worst-case construction timeline, beginning in 2025, has been modeled for analysis purposes.

- **Water and Wastewater.** Project GHG emissions would be generated from energy consumption associated with water and wastewater conveyance and treatment. Water and wastewater emissions are calculated based on consumption rates and emissions factors in CalEEMod. No changes were made to the default water/wastewater usage consumption rates or emissions factors.
- **Refrigerants.** Project refrigerants include fugitive GHG emissions associated with building air conditioning and refrigeration equipment. Different types of refrigeration equipment are used by different types of land uses. For example, an office may use various types of air conditioning equipment, while a supermarket may use both air conditioning equipment and refrigeration equipment. CalEEMod automatically generates a default air conditioning and refrigeration equipment inventory for each project land use subtype based on industry data from the U.S. EPA.
- **Mobile Sources.** Mobile sources are emissions from motor vehicles. The Project's generated traffic was obtained from the Project's Traffic Impact Analysis (TIA) Scope of Work for KPC Coachella Specific Plan – Coachella, California prepared by Linscott, Law & Greenspan, Engineers (2023) and modeled using the latest version of CARB's Emission Factor model (EMFAC). Emission rates were calculated using emissions factors for 2028, 2031, 2034, 2038, 2042, and 2045, consistent with the opening year of each phase. The Project land use assumptions and trip generation from the Traffic Study are summarized in **Table 4.7-2: CalEEMod Land Use and Trip Generation**. Project trip generation from the Traffic Impact Analysis is based on the Riverside County Model (RIVCOM), a traffic forecasting model provided by Western Riverside Council of Governments (WRCOG). Other operational emissions from area, energy, and stationary sources were quantified in CalEEMod based on land use activity data.

  The Project would generate a total of 98,485 daily trips. When accounting for internal capture and diverted trips, the Project would generate 58,091 total external daily trips.

Table 4.7-2: CalEEMod Land Use and Trip Generation

Land Use Type	Building Area Modeled [1]	Modeled Acreage[2]	Daily Trips[3]
Phase 1			
Multifamily Housing (Mid-Rise)	349,000	4.50	--
Shopping Center	577,428	13.26	--
General Office Building	292,477	6.71	--
Hotel	644,500	6.00	--
Public Park	--	89.90	--
Drainage	--	117.00	--
Street / ROW	--	23.00	--
Parking Lot	--	107.00	--
Phase 1 Total	**1,863,405**	**367.37**	**20,108**
Phase 2			
Single Family Detached Housing	984,600	177.60	--
Multifamily Housing (Low-Rise)[4]	472,200	14.75	--
Multifamily Housing (Mid-Rise)[)5]	419,000	5.51	--
School	22,990	0.53	--
Theater	217,800	5.00	--
Public Park	--	8.90	--
Drainage	--	95.30	--

Land Use Type	Building Area Modeled [1]	Modeled Acreage[2]	Daily Trips[3]
Street / ROW	--	23.30	--
Parking Lot	--	19.11	--
Phase 2 Total	**2,116,590**	**350.00**	**10,168**
Phase 3			
Single Family Detached Housing	595,800	107.47	--
Multifamily Housing (Low-Rise)	510,000	25.50	--
School	11,788	0.27	--
Public Park	--	87.40	--
Drainage	--	99.50	--
Street / ROW	--	25.06	--
Parking Lot	--	59.00	--
Phase 3 Total	**1,117,588**	**404.20**	**6,012**
Phase 4			
Multifamily Housing (Mid-Rise)	2,032,000	53.47	--
Shopping Center	758,777	17.42	--
General Office Building	252,928	5.81	--
Public Park	--	38.30	--
Drainage	--	110.77	--
Street / ROW	--	23.27	--
Parking Lot	--	122.00	--
Phase 4 Total	**3,043,705**	**371.04**	**24,071**
Phase 5			
Single Family Detached Housing	1,170,000	211.04	--
Single Family Attached Housing (Condo)	1,456,000	91.00	--
Multifamily Housing (Low-Rise)	1,331,000	43.19	--
Multifamily Housing (Mid-Rise)	38,000	1.00	--
School	129,083	2.96	--
Shopping Center	62,930	1.44	--
General Office Building	20,977	0.48	--
Public Park	--	102.00	--
Drainage	--	153.4	--
Street / ROW	--	48.33	--
Parking Lot	--	121.50	--
Phase 5 Total	**4,207,990**	**776.34**	**29,514**
Phase 6			
Single Family Detached Housing	795,600	134.00	--
Multifamily Housing (Low-Rise)	714,000	20.63	--
School	72,818	1.67	--
Public Park	--	85.40	--
Drainage	--	244.00	--
Street / ROW	--	34.00	--
Parking Lot	--	24.00	--
Phase 6 Total	**1,582,418**	**543.70**	**8,612**
Total (All Phases)	***13,931,696***	***2,813***	***98,485***

1. Building area is estimated using CalEEMod and is based on land use units (dwelling units for residential properties, number of rooms for the hotel, number of students for schools, and the number of seats for the theater).
2. Acreage for buildings estimated using CalEEMod based on land use.
3. Daily trips based on RIVCOM data in the Traffic Impact Analysis.
4. Buildings that are 1-4 stories should classify all their units as low-rise
5. Buildings that are 5-9 stories should classify all their units as mid-rise

Source: Kimley-Horn. 2023. Greenhouse Gas Emissions Assessment. Table 3.

Consistency with GHG Reduction Plans

The Project was evaluated for consistency with the following GHG reduction plans:

- **City of Coachella General Plan**. Project consistency with the goals and policies of the City of Coachella General Plan.
- **City of Coachella CAP.** Project consistency with the goals and policies of City of Coachella CAP and contribution to the CAP's GHG reduction trend.
- **SB 375.** Project consistency with major goals of SCAG's Connect SoCal (2024-2050 RTP/SCS).
- **AB 32, SB 32, and AB 1279.** Project consistency with the State's GHG reduction targets and associated policies and regulations to meet the ultimate goal of net zero GHG no later than 2045, and achieve and maintain net negative GHG emissions thereafter, to ensure that anthropogenic GHG emissions are reduced to at least 85 percent below 1990 levels by 2045.

4.7.4 PROJECT IMPACTS AND MITIGATION

Impact 4.7-1: ***Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

Impact 4.7-2: ***Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

Level of Significance: Significant and Unavoidable

CONSTRUCTION GREENHOUSE GAS EMISSIONS

The Project would result in direct emissions of CO_2, N_2O, and CH_4 from construction equipment and the transport of materials and construction workers to and from the Project site. The GHG emissions only occur during temporary construction activities and would cease once construction is complete. The total GHG emissions (in CO_2e) generated during construction are shown in **Table 4.7-3: Construction-Related Greenhouse Gas Emissions**.

Table 4.7-3: Construction-Related Greenhouse Gas Emissions

Category	$MTCO_2e$
Phase 1 Construction[1]	
Construction Year 1 (2025)	1,944
Construction Year 2 (2026)	3,553
Construction Year 3 (2027)	3,693
Construction Year 4 (2028)	153
Total Phase 1 Construction Emissions	9,343
Phase 1: 30-Year Amortized Construction Emissions	311.43
Phase 2 Construction[1]	
Construction Year 1 (2028)	1,013

Category	$MTCO_2e$
Construction Year 2 (2029)	3,091
Construction Year 3 (2030)	3,904
Construction Year 4 (2031)	1,047
Total Phase 2 Construction Emissions	9,055
Phase 2: 30-Year Amortized Construction Emissions	301.83
Phase 3 Construction[1]	
Construction Year 1 (2031)	421
Construction Year 2 (2032)	1,934
Construction Year 3 (2033)	2,539
Construction Year 4 (2034)	1,698
Total Phase 3 Construction Emissions	6,592
Phase 3: 30-Year Amortized Construction Emissions	219.73
Phase 4 Construction[1]	
Construction Year 1 (2035)	2,185
Construction Year 2 (2036)	4,878
Construction Year 3 (2037)	4,979
Construction Year 4 (2038)	225
Total Phase 4 Construction Emissions	12,267
Phase 4: 30-Year Amortized Construction Emissions	408.90
Phase 5 Construction[1]	
Construction Year 1 (2038)	992
Construction Year 2 (2039)	5,024
Construction Year 3 (2040)	6,555
Construction Year 4 (2041)	1,604
Total Phase 5 Construction Emissions	14,175
Phase 5: 30-Year Amortized Construction Emissions	472.50
Phase 6 Construction[1]	
Construction Year 1 (2041)	440
Construction Year 1 (2042)	2,033
Construction Year 2 (2043)	2,931
Construction Year 3 (2044)	1,920
Total Phase 6 Construction Emissions	7,324
Phase 6: 30-Year Amortized Construction Emissions	**244.13**
Project Buildout Total Construction Emissions	**58,756**

Category	$MTCO_2e$
Project Buildout Total Amortized Emissions	**1,958.52**
1. As Project development is speculative, a conservative worst-case construction timeline has been modeled for analysis purposes. This involves modeling emissions at the earliest feasible date. Emissions in future years (i.e., due to a later construction start date or operational opening year) would be lower due to phased-in emissions standards, inspection and maintenance requirements, and fleet turnover). Project construction that occurs at a later date than what was modeled impacts would result in lower emissions than those analyzed due to the use of more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to state regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment. As a result, Project-related construction emissions would be lower than the impacts disclosed herein. For emissions modeling purposes, conservatively analyzing the emissions using an earlier construction start date provides for a worst-case analysis and full disclosure of potential air quality impacts, as required by CEQA.	
Source: Kimley-Horn and Associates, Inc. 2024. Greenhouse Gas Emissions Assessment. Page 34 – Table 4.	

As shown in **Table 4.7-3**, Phase 1 of the Project would result in the generation of approximately 9,343 $MTCO_2e$ over the course of construction; Phase 2 would generate approximately 9,055 $MTCO_2e$ over the course of construction; Phase 3 would generate approximately 6,592 $MTCO_2e$ over the course of construction; Phase 4 would generate approximately 12,267 $MTCO_2e$ over the course of construction; Phase 5 would generate approximately 14,175 $MTCO_2e$ over the course of construction; and Phase 6 would generate approximately 7,324 $MTCO_2e$ over the course of construction. Construction GHG emissions are typically summed and amortized over a 30-year period and then added to the operational emissions. The amortized Project Phase 1, Phase 2, Phase 3, Phase 4, Phase 5, and Phase 6 construction emissions would be 311.43 $MTCO_2e$, 301.83 $MTCO_2e$, 219.73 $MTCO_2e$, 408.90 $MTCO_2e$, 472.50 $MTCO_2e$, and 244.13 $MTCO_2e$ per year respectively. Total construction emissions and total amortized emissions for Project Buildout would be 58,756 $MTCO_2e$ and 1,958.52 $MTCO_2e$ per year respectively. Once construction is complete, the generation of these GHG emissions would cease.

OPERATIONAL GREENHOUSE GAS EMISSIONS

Operational emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, and the emissions associated with solid waste generated from the Project.

Existing regulations applicable to the Project would help to reduce GHG emissions. Prior to the issuance of building permits, the City of Coachella would review and verify that the Project plans demonstrate compliance with the current version of the Building and Energy Efficiency Standards. The Project would also be required to adhere to the provisions of CALGreen, which establishes planning and design standards for sustainable site development, and energy efficiency.

GHG emissions associated with Phase 1, Phase 2, Phase 3, Phase 4, Phase 5, Phase 6, and Project Buildout (combination of all phases) are summarized in **Table 4.7-4: Operational Greenhouse Gas Emissions**. As shown in **Table 4.7-4**, the Project's total unmitigated emissions per year would be approximately 34,471.51 MTCO2e for Phase 1, 21,320.32 MTCO2e for Phase 2, 12,142.42 MTCO2e for Phase 3, 47,453.19 MTCO2e for Phase 4, 53,121.59 MTCO2e for Phase 5, 15,804.63 MTCO2e for Phase 6, and 187,313.66 MTCO2e for Project Buildout.

Table 4.7-4: Operational Greenhouse Gas Emissions

Emissions Source	$MTCO_2e$ per Year	
	Unmitigated	Mitigated
Phase 1		
Construction Amortized Over 30 Years	311.43	311.43
Area Source[1]	96.00	70.90
Energy (Natural Gas)[2]	1,610.00	1,409.00
Energy (Electricity)[2,3]	3,978.00	2,185.00
Mobile	31,222.34	31,222.34
Waste[4]	421.00	105
Water and Wastewater	298.00	298.0
Refrigerants	142.00	142.00
TOTAL	**38,078.77**	**35,743.67**
Phase 2		
Construction Amortized Over 30 Years	301.83	301.83
Area Source[1]	313.55	292.15
Energy (Natural Gas)[2]	2,143.35	388.93
Energy (Electricity)[2,3]	2,084.09	1,139.22
Mobile	15,911.19	15,911.19
Waste[4]	380.24	95.06
Water and Wastewater	183.50	183.50
Refrigerants	2.57	2.57
TOTAL	**21,320.32**	**18,314.45**
Phase 3		
Construction Amortized Over 30 Years	219.73	219.73
Area Source[1]	181.49	170.86
Energy (Natural Gas)[2]	1,096.18	9.00
Energy (Electricity)[2,3]	1,020.84	700.82
Mobile	9,277.01	9,277.01
Waste[4]	222.69	55.67
Water and Wastewater	123.07	123.07
Refrigerants	1.41	1.41
TOTAL	12,142.42	10,557.57
Phase 4		
Construction Amortized Over 30 Years	408.90	408.90
Area Source[1]	452.81	412.83
Energy (Natural Gas)[2]	1,809.16	388.24
Energy (Electricity)[2,3]	4,170.12	2,109.50
Mobile	39,443.41	39,443.41
Waste[4]	792.23	198.06
Water and Wastewater	373.54	373.54
Refrigerants	3.02	3.02

Emissions Source	$MTCO_2e$ per Year	
	Unmitigated	Mitigated
TOTAL	**47,453.19**	**43,337.50**
Phase 5		
Construction Amortized Over 30 Years	472.50	472.50
Area Source[1]	752.30	705.99
Energy (Natural Gas)[2]	4,209.86	130.72
Energy (Electricity)[2,3]	3,929.31	2,237.83
Mobile	42,438.98	42,438.98
Waste[4]	955.41	238.85
Water and Wastewater	358.04	358.04
Refrigerants	5.19	5.19
TOTAL	**53,121.59**	**46,588.10**
Phase 6		
Construction Amortized Over 30 Years	244.13	244.13
Area Source[1]	250.29	234.86
Energy (Natural Gas)[2]	1,538.77	55.58
Energy (Electricity)[2,3]	1,273.67	757.05
Mobile	12,003.33	12,003.33
Waste[4]	343.09	85.77
Water and Wastewater	149.38	149.38
Refrigerants	1.97	1.97
TOTAL	**15,804.63**	**13,532.07**
Project Buildout		
Construction Amortized Over 30 Years	1,958.52	1,958.52
Area Source[1]	2,046.44	1,887.59
Energy (Natural Gas)[2]	12,407.32	2,381.47
Energy (Electricity)[2,3]	16,456.03	9,129.42
Mobile	150,296.26	150,296.26
Waste[4]	3,114.66	778.41
Water and Wastewater	1,485.53	1,485.53
Refrigerants	156.16	156.16
BUILDOUT TOTAL	**187,920.92**	**168,073.36**

1. Mitigation Measures AQ-5 requires 100 percent electric landscaping equipment and AQ-6 requires implementation of EPA Safer Choice cleaning products. Both measures would reduce area source emissions.
2. Mitigation Measure GHG-2 requires buildings to meet or exceed 2022 CALGreen Tier 2 standards.
3. Mitigation Measure GHG-1 requires single-family residential developments to provide 25 percent of projected electricity demand via solar and multifamily and nonresidential developments to provide 50 percent of projected electricity demands via solar.
4. Mitigation Measure GHG-3 requires a minimum of 75 percent solid waste diversion.

Source: Kimley-Horn and Associates, Inc. 2024. Greenhouse Gas Emissions Assessment. Page 36 – Table 5.

The majority of the GHG emissions (80 percent at Project Buildout) are associated with non-construction related mobile sources. Emissions of motor vehicles are controlled by State and federal standards, and the Project has no control over these standards.

The Project includes numerous mitigation measures that would reduce emissions. **MMs AQ-3**, **AQ-4**, **AQ-5**, and **AQ-6** have been identified in **Section 4.2: Air Quality** to reduce operational emissions and would also reduce GHG emissions. **MM AQ-3** requires the implementation of a Transportation Demand Management (TDM) program to reduce single occupant vehicle trips and encourage transit; **MM AQ-4** prohibits the use of any kind of fireplaces; **MM AQ-5** requires that all landscaping equipment used onsite shall be 100 percent electrically powered; and **MM AQ-6** requires the implementation of U.S. EPA Safer Choice certified cleaning products used in public areas.

Additionally, the Project would further reduce GHG emissions through the implementation of **MM GHG-1** through **GHG-4**. **MM GHG-1** requires the installation of photovoltaic solar panels to offset energy emissions; **MM GHG-2** requires the Project incorporate measures that meet or exceed 2022 CALGreen Tier 2 standards to further improve energy efficiency; **MM GHG-3** requires the Project to divert 75 percent of waste from landfills; and **MM GHG-4** requires the residential projects to use energy efficient appliances. The Project would also be required to comply with various plans, programs, and policies (PPPs) which would be required by local, State, or federal regulations or laws.

Table 4.7-4 shows that implementation of these mitigation measures and PPPs would reduce GHG emissions to 35,743.67 $MTCO_2e$ for Phase 1; to 18,314.45 $MTCO_2e$ for Phase 2; to 10,557.57 $MTCO_2e$ for Phase 3; to 43,337.50 $MTCO_2e$ for Phase 4; to 46,588.10 $MTCO_2e$ for Phase 5; to 13,532.07 $MTCO_2e$ for Phase 6; and to 167,366.65 $MTCO_2e$ for Project Buildout. The majority of the Project's GHG emissions are generated by mobile emissions.

Additional mitigation to reduce the Project's mobile emissions is not feasible due to the limited ability of the City to address emissions resulting from mobile sources and/or emissions generated by cars and trucks outside of the City's limits. As with all land use projects, the Project's mobile and transportation related GHG emissions are a function of two parameters: emissions control technology and vehicle miles traveled (VMT).

CARB is directly responsible for regulating mobile and transportation source emissions in the State. Regarding the first parameter, California addresses emissions control technology through a variety of legislation and regulatory schemes, including the State's Low Carbon Fuel Standard (Executive Order S-01-07) (LCFS), a regulatory program designed to encourage the use of cleaner low-carbon transportation fuels in California, encourage the production of those fuels, and therefore, reduce GHG emissions and decrease petroleum dependence in the transportation sector. The regulatory standards are expressed in terms of the "carbon intensity" of gasoline and diesel fuel and their substitutes. Different types of fuels are evaluated to determine their "life-cycle emissions" which include the emissions associated with producing, transporting, and using the fuels. Each fuel is then given a carbon intensity score and compared against a declining carbon intensity benchmark for each year. Providers of transportation fuels must demonstrate that the mix of fuels they supply for use in California meets these declining benchmarks for each annual compliance period.

In 2018, CARB approved amendments to the LCFS, which strengthened the carbon intensity benchmarks through 2030 to ensure they are in line with California's 2030 GHG emission reduction target enacted

through SB 32. CARB is also implementing additional transportation sector regulations such as Advanced Clean Cars II, Advanced Clean Trucks, and Advanced Clean Fleets. This ensures that the transportation sector is meeting its obligations to achieve California's GHG reduction targets. The Project would be required to comply with these regulations through vehicle manufacturer compliance. The State is also implementing legislation and regulations to address the second parameter affecting transportation related GHG emissions by controlling for VMT. Examples of this include SB 375, which links land use and transportation funding and provides one incentive for regions to achieve reductions in VMT, and SB 743, which discourages VMT increases for passenger car trips above a region-specific benchmark.

Additional mitigation to further reduce the Project's non-mobile emissions would be speculative as all feasible technologies have been applied to the Project through mitigation measures and PPPs. These mitigation measures and PPPs address non-mobile emissions by designing buildings to provide environmental design features that incorporate energy and water conservation measures, and provide electrical, heating, ventilation, lighting, and power systems that meet CALGreen Standards. The State is addressing the remaining energy-related GHG emissions through SB 100 and SB 1020, which requires 100 percent clean electricity retail sales by 2045. Additionally, SB 905 requires the State to use carbon removal, carbon capture, utilization, and sequestration technologies and AB 1757 requires nature-based sequestration in natural working lands.

CITY OF COACHELLA GENERAL PLAN CONSISTENCY

The City of Coachella approved the General Plan 2035 on April 22, 2015. The Sustainability and Natural Environment Element of the General Plan establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces. In addition, the City will explore opportunities to limit impacts on global climate change through energy conservation and emphasizing renewable energy.

Table 4.7-5: City of Coachella General Plan Consistency

Sustainability and Natural Environment Element		Compliance	
Goal 1:	Climate Change. A Resilient community that is prepared for the health and safety impacts of and minimizes the risks of climate change.	Consistent:	The Project is consistent with the City's CAP, SCAG's TEP/SCS, and CARB's Scoping Plan. Thus, the Project would not conflict with SNE Goal 1.
Policy 1.1:	Municipal Operations. Conduct city operations and institutionalize practices that reduce municipal greenhouse gas (GHG) emissions and lead the community in reducing GHG emissions.	Consistent:	This policy will be enforced during the design review and plan check process.
Policy 1.6:	Climate-appropriate building types: Seek out and promote alternative building types that are more sensitive to the arid environment found in the Coachella Valley. Courtyard housing and commercial buildings can be designed to provide micro-climates that are usable year-round, reducing the need for mechanically cooled spaces and reducing energy consumption.	Consistent:	These policies are required by the General Plan and will be enforced during the design review and plan check process.

Sustainability and Natural Environment Element		Compliance	
Policy 1.11:	Urban forest: Protect the City's healthy trees and plant new ones to provide shade, increase carbon sequestration and purify the air.	Consistent:	Trees have been incorporated into the Project landscape design. The Specific Plan includes a Landscape Master Plan in Section 4.6 Landscape Guidelines. The Specific Plan requires trees along streets, in public areas, and to shade trails within the Project.
Policy 1.13:	Designing for warming temperatures: When reviewing development proposals, encourage applicants and designers to consider warming temperatures in the design of cooling systems.	Consistent:	This policy will be enforced during the design review and plan check process.
Goal 2:	Energy. An energy efficient community that relies primarily on renewable and non-polluting energy sources.	Consistent:	**MM GHG-1** requires installation of photovoltaic solar panels. **MM GHG-2** requires the Project to meet or exceed 2022 CALGreen Tier 2 standards. Additionally, the Specific Plan Design Guidelines require energy efficient windows and allow for rooftop solar (Section 4.4.4).
Policy 2.1:	Community development-subdivisions. When reviewing applications for new subdivisions, require all residences be oriented along an east-west access, minimizing western sun exposure, to maximize energy efficiency.	Consistent:	This policy will be enforced during the design review and plan check process.
Policy 2.2:	Passive solar design. Require new buildings to incorporate energy efficient building and site design strategies for the desert environment that include appropriate solar orientation, thermal mass, use of natural daylight and ventilation, and shading.	Consistent:	**MM GHG-1** requires installation of photovoltaic solar panels.
Policy 2.3:	Alternative energy. Promote the incorporation of alternative energy generation (e.g., solar, wind, biomass) in public and private development.	Consistent:	**MM GHG-1** requires installation of photovoltaic solar panels.
Policy 2.5:	Construction standards. Consider and evaluate new construction practices and standards that increase building energy efficiency.	Consistent:	This policy will be enforced during the design review and plan check process. In addition, **MM GHG-2** requires the Project to exceed Title 24 energy efficiency standards.
Policy 2.6:	Energy performance targets – new construction. Require new construction to exceed Title 24 energy efficiency standards by 15 percent and incorporate solar photovoltaics.	Consistent:	**MM GHG-2** requires the Project to meet or exceed 2022 CALGreen Tier 2 standards.
Policy 2.8:	Renewable energy–open space areas. Allow the installation of renewable energy systems in areas zoned for open space.	Consistent:	**MM GHG-1** requires installation of photovoltaic solar panels. The Project will not conflict with Policy 2.8.
Policy 2.9:	Energy-efficient street lighting. Implement a program to install the latest energy-efficient technologies for street and parking lot lights to meet City and state standards.	Consistent:	Project construction would meet all City and state standards. Additionally, Specific Plan Section 4.9 requires energy efficient lighting.

Sustainability and Natural Environment Element		Compliance	
Policy 2.10:	New industries. Actively promote the City as a place for renewable energy generation, and a place for energy conservation businesses to locate.	N/A:	This is not a project-level policy; the Project will not actively promote the City as place of renewable energy or energy conservation. However, **MM GHG-1** requires installation of photovoltaic solar panels, and **MM GHG-2** requires that the Project be designed consistent with 2022 CALGreen Tier 2 standards or incorporate measures that would result in an equivalent reduction.
Policy 2.11:	Publicly funded buildings. Require energy conservation as the primary strategy to reduce energy demand in new and renovation projects using public funds.	Consistent:	All buildings would be required to implement **MM GHG-1** and **MM GHG-2. MM GHG-1** requires installation of photovoltaic solar panels. **MM GHG-2** requires the Project to exceed Title 24 energy efficiency standards.
Policy 2.12:	Solar access. Prohibit new development and renovations that impair adjacent buildings' solar access, unless it can be demonstrated that the shading benefits substantially offset the impacts of solar energy generation potential.	Consistent:	This policy will be enforced during the design review and plan check process.
Policy 2.13:	Use of passive open space. Allow renewable energy projects in areas zoned for open space, where consistent with other uses and values.	Consistent:	**MM GHG-1** requires installation of photovoltaic solar panels. The Project will not conflict with Policy 2.13.
Policy 2.14:	Public buildings. Require that any new building constructed in whole or in part with City funds incorporate passive solar design features, such as daylighting and passive solar heating, where feasible.	Consistent:	All buildings, public and private, would be required to implement **MM GHG-1** and **MM GHG-2. MM GHG-1** requires installation of photovoltaic solar panels. **MM GHG-2** requires the Project to exceed Title 24 energy efficiency standards.
Goal 4:	Green Building. Community building stock (both new construction and renovations) that demonstrates high environmental performance through green design.	Consistent:	This policy will be enforced during the design review and plan check process.
Policy 4.1:	Public buildings. Require all new and substantially renovated or reconstructed City owned and operated buildings in excess of 5,000 square feet achieve a LEED Silver Certification standard, as determined by the U.S. Green Building Council, or a substantially similar green building standard.	Consistent:	This policy will be enforced during the design review and plan check process. **MM GHG-2** requires that the Project be designed consistent with 2022 CALGreen Tier 2 standards or incorporate measures that would result in an equivalent reduction.
Policy 4.2:	Affordable housing – green design. Require affordable housing developments to prioritize green building design features that reduce monthly utility costs, enhance occupant health and lower the overall cost of housing.	Consistent:	This policy will be enforced during the design review and plan check process. **MM GHG-2** requires that the Project be designed consistent with 2022 CALGreen Tier 2 standards or incorporate measures that would result in an equivalent reduction.
Policy 4.3:	Education. Provide technical support and information to educate the development community about green building.	Consistent:	This policy will be enforced during the design review and plan check process. **MM GHG-2** requires that the Project be designed consistent with 2022 CALGreen Tier 2 standards or incorporate measures that would result in an equivalent reduction.

Sustainability and Natural Environment Element		Compliance	
Policy 4.4:	Reducing GHG emissions. In consulting with applicants and designing new facilities, prioritize the selection of green building design features that enhance the reduction of greenhouse gas emissions.	Consistent:	This policy will be enforced during the design review and plan check process. **MM GHG-2** requires that the Project be designed consistent with 2022 CALGreen Tier 2 standards or incorporate measures that would result in an equivalent reduction.
Policy 4.5:	Heat island reductions. Require heat island reduction strategies in new developments such as light-colored cool roofs, light-colored paving, permeable paving, right-sized parking requirements, vegetative cover and planting, substantial tree canopy coverage, and south and west side tree planting.	Consistent:	Trees and shade structures have been incorporated into the Project landscape design. The Specific Plan includes a Landscape Master Plan in Section 4.6 Landscape Guidelines. The Specific Plan requires trees along streets, in public areas, and to shade trails within the Project.

CITY OF COACHELLA CLIMATE ACTION PLAN CONSISTENCY

The City of Coachella adopted a CAP in April 2015. The Coachella GHG Emissions Inventory provides a snapshot of emissions for the baseline year of 2010, building on the earlier efforts of the City to quantify the main sources of emissions from the community as a whole in 2005. In 2010, total GHG emissions in Coachella were approximately 382,787 $MTCO_2e$, a 22 percent increase over 2005 emissions of 312,628 $MTCO_2e$. This aggregate number accounts for direct emissions from the on-site combustion of fuels and the combustion of fuel in vehicles. This figure also includes all indirect emissions associated with community electricity consumption, and emissions from solid waste generated, crop management, and water consumed by Coachella.

According to the CAP, the transportation sector emitted the largest quantity of GHG emissions, 206,909 $MTCO_2e$ or 54 percent of the community total. The combined commercial, industrial, and public authority sector was the second largest producer of GHG, contributing 72,294 $MTCO_2e$ of emissions, while the residential sector produced 65,357 $MTCO_2e$. The remainder of the emissions came from agriculture (8,844 $MTCO_2e$), lighting infrastructure (730 $MTCO_2e$), solid waste (10,960 $MTCO_2e$), and water (17,693 $MTCO_2e$) sectors.

Without policy intervention, these trends, coupled with high residential and commercial growth rates, are expected to continue into the future, increasing Coachella's GHG emissions significantly. Therefore, the CAP builds upon the goals and policies set forth in the City's General Plan and was specifically designed to achieve the City's goals of reducing community-wide GHG emissions.

The Project is an urban mixed-use project that would include local retail, housing, school, hotel, and performing arts center near SunLine transit routes, major freeways, and roadways. The Project location, mix of uses, and proximity to transit would reduce dependency on cars, reduce time spent in traffic, closely links residents to jobs and services, and reduce VMT. The Coachella General Plan includes specific policies that are incorporated into the CAP. These policies guide the City's approach to reducing GHG emissions and developing strategies to minimize the potential impacts of climate change and variability. For the CAP, policies were compiled from the Land Use (LU), Mobility (M), Sustainability and Natural Environment (SNE), Safety (S), and Infrastructure and Public Services (IPS) elements. The policies outlined

in the City of Coachella CAP are listed in **Table 4.7-6: City of Coachella Climate Action Plan Consistency**. The Project is evaluated for consistency with these goals.

Table 4.7-6: City of Coachella Climate Action Plan Consistency

CAP Measures	Compliance	
Energy Performance Policies (SNE 2.6 and 2.7) Require new buildings and old buildings undergoing major retrofits to exceed Title 24 energy efficiency standards by 15 percent and incorporate solar photovoltaics.	Consistent:	**MM GHG-1** requires installation of photovoltaic solar panels. Additionally, **MM GHG-2** requires the Project to meet or exceed 2022 CALGreen Tier 2 standards. Additionally, the Specific Plan Design Guidelines require energy-efficient windows and allow for rooftop solar (Section 4.4.4). Specific Plan Section 4.8 allows for small scale wind turbines and requires equipment to be located to maximize energy efficiency. Section 4.8 also mandates that Energy Star equipment is utilized.
Passive Solar Designs (SNE 2.1 and 2.2) All residences shall be oriented along an east-west access, minimizing western sun exposure and maximizing energy efficiency.	Consistent:	These policies are required by the General Plan and will be enforced during the design review and plan check process.
Heat Island Measures (SNE 1.11 and 4.6) Improve shading in public spaces using trees, shelters, and other cooling strategies.	Consistent:	Trees and shade structures have been incorporated into the Project landscape design. The Specific Plan includes a Landscape Master Plan in Section 4.6 Landscape Guidelines. The Specific Plan requires trees along streets, in public areas, and to shade trails within the Project.
Energy Efficient Street Lighting (SNE 2.9) Incorporate the latest energy efficient technologies for streets and parking lots to meet City and state standards.	Consistent:	Project construction would meet all City and state standards. Additionally, Specific Plan Section 4.9 requires energy efficient lighting.
Community Choice Aggregation (SNE 2.4) Work with local and regional agencies to secure alternative energy supply contracts for the community.	N/A:	This is not a project-level policy; therefore, this goal is not applicable. However, **MM GHG-1** requires installation of photovoltaic solar panels, while Specific Plan Section 4.4.4 allows for rooftop solar and Specific Plan Section 4.8 allows for small scale wind turbines.
Alternative Energy (SNE 2.3 and 2.13) Promote the incorporation of alternative energy generation in public and private development.	Consistent:	**MM GHG-1** requires installation of photovoltaic solar panels.
Renewable Energy – Open Space Areas (SNE 2.8) Allow the installation of renewable energy systems in areas zoned for open space.	Consistent:	The Project does not prevent the option for future installation of renewable energy systems in areas zoned for open space. Additionally, the Specific Plan Design Guidelines allow for rooftop solar (Section 4.4.4) and Specific Plan Section 4.8 allows for small scale wind turbines.
Solar Access (SNE 2.12) Prohibit new development and renovations that impair adjacent buildings solar access.	Consistent:	These policies are required by the General Plan and will be enforced during the design review and plan check process.

CAP Measures	Compliance	
Land Use Densification, Mix of Use, and Integrated Community Design (LU 3.2, 3.3, 5.1, 5.2, 5.4, and 5.7) Regulate new development to encourage walkability and connectivity. Developments will be complete with a mix of uses and promote a range of housing and price levels within each neighborhood.	Consistent:	These requirements will be enforced during the entitlement process as required in the General Plan. The Specific Plan includes a mix of uses that would be linked with sidewalks along internal roads and trails. Increased connectivity will be accomplished by linking community amenities like the commercial centers, school, open space, and parks, through a network of promenades, paseos, trails, bike/neighborhood electric vehicle (NEV) lanes, sidewalks, and transit routes.
Neighborhood and Site Enhancements (M 1.1, 1.2, 1.5, 2.1, 2.2, 3.1, 3.2, and 3.3) Require complete streets for new and existing roadways to create safe environments for pedestrians, bicyclists, and motorists.	Consistent:	All roadway improvements will be approved by Public Works Department ensuring all requirements are met. Specific Plan Section 4.6.3 notes that the overall streetscape design goal for the KPC Coachella community is to create a healthy, efficient, and walkable community that promotes strong pedestrian, bicycle and NEV connections. The Specific Plan would create a network of accessible connections via streets, sidewalks, bike paths, promenades, paseos, and natural systems to provide greater opportunities for convenient non-vehicular circulation.
Parks and Open Space (SNE 13.3, 13.4, 13.5, 13.9, and 13.15) Ensure existing and new neighborhoods have sufficient access to park facilities.	Consistent:	The Project includes 18 parks located throughout the Project area. These include neighborhood parks, passive recreation corridors, and a trail system totaling 395 acres. These parks are strategically located to provide access to residents. The Project will also conserve 754 acres of natural open space. The Specific Plan includes a system of neighborhood parks interconnected by NEV and multi-purpose trails which will provide a continuous open space network through the Project.
Source: Kimley-Horn. 2023. Greenhouse Gas Emissions Assessment. Table 6.		

REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY CONSISTENCY

On April 4, 2024, SCAG's Regional Council adopted Connect SoCal (2024 - 2050 Regional Transportation Plan/Sustainable Communities Strategy [2024 RTP/SCS]), however, it is still pending approval by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). Therefore, this analysis also discusses the projects consistency with the previously adopted Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy [2020 RTP/SCS]) which was adopted on September 3, 2020. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals.

The RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Under SB 375, SCAG's 2024 RTP/SCS establishes GHG emissions goals to reduce GHG emissions in the region by eight percent from 2005 levels by 2020 and by 2035. SCAG's 2024-2050 RTP/SCS has built upon SCAG's 2020 RTP/SCS which establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

Since Connect SoCal was adopted in 2024, SCAG gained responsibility for the selection of transportation projects to be funded with federal revenue. The RTP/SCS invests $751.7 billion in our transportation system, primarily in operations and maintenance, to ensure the continued performance of our current network. Implementation of the 2024 RTP/SCS would add 181,200 new miles of transit revenue service, 4,000 new miles of bike lanes and 869 new miles to the Regional Express Lane Network. Strategic investments in infrastructure and transportation would improve access to employment centers and stimulate regional economic growth and opportunity in historically underserved areas. Connect SoCal is an important planning document for the region, allowing public agencies to implement transportation projects in a coordinated manner while qualifying for federal and state funding. Connect SoCal also supports local jurisdictions in making informed land use planning and housing development decisions.

The 2024 and 2020 RTP/SCS plans account for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. The 2024 and 2020 RTP/SCS are also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and Federal Clean Air Act (FCAA) requirements, increased housing production, improved equity and resilience, the preservation of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources. GHG emissions resulting from development-related mobile sources are the most potent source of emissions, and therefore project comparison to the RTP/SCS is an appropriate indicator of whether the project would inhibit the post-2020 GHG reduction goals promulgated by the state. The Project's consistency with the RTP/SCS goals is analyzed in detail in **Table 4.7-7: Regional Transportation Plan/Sustainable Communities Strategy Consistency**.

Table 4.7-7: Regional Transportation Plan/Sustainable Communities Strategy Consistency

SCAG Goals	Compliance
2024 Regional Transportation Plan/Sustainable Communities Strategy Consistency[1]	
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	N/A. This is not a project-specific policy and is therefore not applicable.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to	N/A. This is not a project-specific policy and is therefore not applicable

SCAG Goals	Compliance
enhance equity in the offerings in high-need communities.	
Support planning for people of all ages, abilities, and backgrounds.	N/A. This is not a project-specific policy and is therefore not applicable.
Communities: Develop, connect, and sustain communities that are livable and thriving.	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.	Consistent. The Project will develop a new master planned community which will contain commercial, residential, education, employment, and recreational land uses which will reduce the distance residents will need to drive. Additionally, the Project is located adjacent to Interstate 10 (I-10).
Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households.	Consistent. The Project will develop a mix of residential dwelling units ranging from single family units to high density multi-family units.
Environment: Create a healthy region for the people of today and tomorrow.	
Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.	Consistent. As discussed in the Project's Air Quality Assessment, after implementing mitigation the Project would not exceed SCAQMD's regional or localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the SCAQMD's localized significance thresholds (LSTs) would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts. Additionally, the Project's Health Risk Assessment determined potential health risks associated with Toxic Air Contaminants resulting from implementation of the proposed Project would be less than significant. Although the Project would result in a significant GHG emissions, the Project is consistent with all applicable plans, policies, and regulations and will implement all feasible mitigation to reduce GHG emissions.
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	Consistent. While the Project is not a transportation improvement Project, the Project will develop a new master planned community which will contain a variety of uses which will reduce the trip lengths of residents. In addition, the Project will promote environmentally sustainable development through green design techniques for buildings and other energy-reducing techniques, through mitigation measures such as requiring solar panels, meet or exceed 2022 CALGreen Tier 2 standards, and requiring energy efficient appliances.
Conserve the region's resources.	Consistent. The proposed Project is located on vacant land that is not designated for agricultural uses, natural resources, or conservation. Therefore, Project development would not result in a loss of the region's resources.
Economy: Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region.	
Improve access to jobs and educational resources.	Consistent. The Project is a master planned community and will develop commercial and retail uses near residential uses. Therefore, the Project would improve access to jobs opportunities.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	Consistent. The Project is not a transportation improvement project, however, as summarized above, the Project would reduce trip lengths and result in less than significant air quality and health risk impacts.

SCAG Goals		Compliance	
2020 Regional Transportation Plan/Sustainable Communities Strategy Consistency 2.			
GOAL 1:	Encourage regional economic prosperity and global competitiveness.	N/A:	This is not a project-specific policy and is therefore not applicable. However, the Project would help to more urbanize the area and development of the site would contribute to regional economic prosperity.
GOAL 2:	Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent:	Although this Project is not a transportation improvement project, the Project is located near existing transit routes adjacent to the Project site and major transportation corridors on I-10, SR-86, and SR-111.
GOAL 3:	Enhance the preservation, security, and resilience of the regional transportation system.	N/A:	This is not a transportation improvement project and is therefore not applicable.
GOAL 4:	Increase person and goods movement and travel choices within the transportation system.	N/A:	This is not a transportation improvement project and is therefore not applicable.
GOAL 5:	Reduce greenhouse gas emissions and improve air quality.	Consistent:	The Project master planned community in proximity to existing transit routes and freeways. Location of the Project would reduce trip lengths, which would reduce GHG and air quality emissions.
GOAL 6:	Support healthy and equitable communities.	Consistent:	The Project is a specific plan which includes a mix of uses including residential, commercial, educational facilities and open space. Development of the Project would include housing and neighborhood-serving retail proximate to employment, reducing vehicle miles traveled (VMT), promoting walkability, and contributing to a jobs/housing balance.
GOAL 7:	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	N/A:	This is not a project-specific policy and is therefore not applicable.
GOAL 8:	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	N/A:	This is not a project-specific policy and is therefore not applicable.
GOAL 9:	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Consistent:	The Project is a master planned community and involves development of commercial, residential, educational, hotel, and park that would provide diverse housing options that would be served by several bus routes such as Routes 1, 6, and 8 operated by SunLine Transit Agency.
GOAL 10:	Promote conservation of natural and agricultural lands and restoration of habitats.	Consistent:	The Project will conserve 754 acres of natural open space.
Source: Kimley-Horn and Associates, Inc. 2024. Greenhouse Gas Emissions Assessment. Page 43 - Table 7.			

Compliance with applicable State standards would ensure consistency with State and regional GHG reduction planning efforts. The goals stated in the 2024 and 2020 RTP/SCS were used to determine consistency with the planning efforts previously stated. As shown in **Table 4.7-7**, the Project would be

consistent with the stated goals of the 2024 and 2020 RTP/SCS. Therefore, the Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's GHG emission reduction target of 19 percent by the year 2035 or the post-2020 mobile source GHG reduction targets.

CALIFORNIA AIR RESOURCE BOARD SCOPING PLAN CONSISTENCY

Adopted December 15, 2022, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines section 15183.5.

The California State Legislature adopted AB 32 in 2006. AB 32 focuses on reducing GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, CARB adopted the Climate Change Scoping Plan (Scoping Plan) in 2008, which outlines actions recommended to obtain that goal. The Scoping Plan provides a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as the cap-and-trade program, and an AB 32 implementation fee to fund the program.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission (ZE) transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place. Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include:

- Implementing SB 100 (achieve 100 percent clean electricity by 2045);
- Achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and
- Implementing the Advanced Clean Fleets regulation to deploy zero-emission vehicle (ZEV) buses and trucks.

Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The

2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

As shown in **Table 4.7-4**, approximately 96 percent of the Project's mitigated GHG emissions are from energy and mobile sources which would be further reduced by the 2022 Scoping Plan measures described above. It should be noted that the City has no control over vehicle emissions (approximately 80 percent of the Project's total emissions). However, these emissions would decline in the future due to Statewide measures discussed above, as well as cleaner technology and fleet turnover.

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan.

Scoping Plan Appendix D, Local Actions

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions without a CEQA-qualified CAP with the tools needed to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects. CARB specifically states that Appendix D does not address other land uses (e.g., industrial). However, CARB plans to explore new approaches for other land use types in the future.

CARB Scoping Plan Appendix D lists potential actions that support the State's climate goals. However, the Scoping Plan notes that the applicability and performance of the actions may vary across the regions. The document is organized into two categories (A) examples of plan-level GHG reduction actions that could be implemented by local governments and (B) examples of on-site project design features and mitigation measures, that could be required of individual projects under CEQA, if feasible, when the local jurisdiction is the lead agency.

Appendix D notes that project consistency with the Scoping Plan can be determined through consistency with a qualified CAP, and absent consistency with a qualified CAP the State recommends that residential and mixed-use projects meet the following three priority areas will reduce GHG emissions and should accommodate growth in a manner consistent with State GHG reduction and equity prioritization goals. These project attributes are intended to help local jurisdictions qualitatively identify projects that are clearly consistent with the Scoping Plan. Appendix D also notes that lead agencies may determine, with adequate additional supporting evidence, that projects that incorporate some, but not all, of the key project attributes are consistent with the State's climate goals.

- **Transportation Electrification.** Table 3 in the 2022 Scoping Plan, Appendix D, notes that to be clearly consistent with the State's goals, projects should provide EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the CALGreen code. The Project is consistent with this attribute as **MM GHG-2** requires Project EV charging to meet 2022 CALGreen Tier 2 standards.
- **VMT Reduction.** The Scoping Plan notes that to be consistent with the VMT reduction attribute, projects should be located on infill sites that are surrounded by existing urban uses or redevelop previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer); does not result in the loss or conversion of natural and working lands; and either consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), is within a half mile of existing transit stops, or satisfies more detailed criteria in the regions Sustainable Communities Strategy.

  In this case, the Project is not located in an infill site surrounded by existing urban uses and is not served by existing utilities and public services. However, the Project will conserve 754 acres of natural open space and designate 68 acres for agricultural production. As shown in **Table 4.7-7**, the Project is also consistent with SCAG's Sustainable Communities Strategy. Although the scale of the Project limits infill as a viable option, the Project is designed as a multi- and mixed-use specific plan that incorporates varied uses as a means to reduce VMT as compared to a singular project.

  Although the Project does not achieve all the key attributes under VMT reduction, the Project also includes **MM AQ-3** which implements a Commute Trip Reduction (CTR) /TDM program to reduce VMT and GHG emissions. The CRT/TDM program will discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. The Project Applicant will consult with local transit providers to provide infrastructure to connect the Project with transit services.
- **Building Decarbonization.** Building decarbonization involves maximizing energy efficiency and reducing the use of fossil fuel energy. **MM GHG-1** requires the Project to include renewable solar energy, **MM GHG-2** requires the Project to meet 2022 CALGreen Tier 2 energy efficiency standards and use all electric appliances in residential uses, **MM GHG-4** requires electric Energy Star-rated appliances, and **MM AQ-5** requires the use of electric landscape equipment.

However, as discussed previously, the City Coachella has adopted a CEQA-qualified CAP and as shown in **Table 4.7-6**, the Project is consistent with the Coachella CAP. The Coachella CAP includes a local plan to reduce GHG emissions and VMT reduction targets by 2035. As noted in Scoping Plan Appendix D, consistency with a qualified CAP ensures consistency with the Scoping Plan, therefore the Project is consistent with 2022 Scoping Plan.

CONCLUSION

Significant and unavoidable. The Project is consistent with City of Coachella CAP, Regional Transportation Plan/Sustainable Communities Strategy, and CARB Scoping Plan and does not conflict with the applicable

plans and policies that are discussed above. However, the Project is a mixed-use Specific Plan and due to the nature and size of the Project, it produces a tremendous number of vehicular trips. As explained above, the Project incorporates all feasible mitigation measures that could be implemented and there are no additional measures available that would further reduce emissions because the vast majority of the Project's GHG emissions are from mobile and energy sources which are regulated by the State and the Project has no control over them. However, as noted in **Table 4.7-4**, the Project would generate 167,366.65 MTCO2e during the first year of Project Buildout and as a result, the Project is assumed to result in a significant and unavoidable impact even with mitigation incorporated.

As shown in **Table 4.7-4**, approximately 96 percent of the Project's GHG emissions are from energy and mobile sources which would be further reduced by the 2022 Scoping Plan measures described above. The City has no control over vehicle emissions (approximately 83 percent of the Project's total emissions). However, these emissions would decline in the future due to statewide measures discussed above (including the reduction in fuels' carbon content, CARB's Advanced Clean Car Program, CARB's Mobile Source Strategy, fuel efficiency standards, etc.), as well as cleaner technology and fleet turnover. SCAG's 2024 RTP/SCS is also expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 19 percent by 2035. The Project includes a mix of residential, hotel, commercial, educational, and park land uses that would potentially reduce the need to travel long distances for some residents and reducing associated GHG emissions.

As identified in **Section 4.2: Air Quality**, **MM AQ-3** would reduce mobile source emissions through the implementation of a TDM program. PPPs GHG-1 through GHG-4, as required by the California Building Code, would provide designated parking to promote the use of alternative fuels and clean fleets, water-efficient irrigation systems and devices, recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, facilitate future installation of electric vehicle supply equipment, and limit idling times. Further, **MM GHG-1** requires the Project to install solar photovoltaic systems and **MM GHG-2** requires the Project to meet or exceed 2022 CALGreen Tier 2 standards to further improve energy efficiency. **MM GHG-3** requires the Project to divert 75 percent of waste from landfills. **MM GHG-4** requires the residential projects to use energy efficient appliances. In conclusion, the Project does not conflict with the applicable plans that are discussed above. However, as noted in **Table 4.7-4**, the Project would generate 167,366.65 $MTCO_2e$ during the first year of Project Buildout. As a result, although the Project is consistent with all applicable City and State plans designed to meet California's future GHG goals, this Project is conservatively assumed to result in a significant and unavoidable impact with mitigation incorporated.

Off-Site Improvements

Off-site improvements were modeled in CalEEMod and are assumed to begin construction during the first two years of Phase 1 to support future phases of the Project. Offsite improvements include improvements to Vista del Norte, developing a construction staging area, powerlines, a natural gas regulator station, well supply system, installing low-voltage cables (telephone lines and cable), and a sewer system; refer to **Exhibit 3-11: Off-Site Improvements**. Furthermore, operational GHG emissions impacts associated with the off-site improvements would not be such that they would exceed the impact thresholds, as these uses

do not generate substantial traffic, nor do they produce significant operational GHG emissions. Applicable Project mitigation measures identified will be required for off-site improvement construction. Through adherence and compliance with mitigation measures, guidelines and existing regulations, including 2022 CalGreen Tier 2 standards and the City's General Plan and Municipal Code, impacts are anticipated to be less than significant.

Plans, Programs, and Policies (PPPs):

PPPs are existing requirements that are based on local, state, or federal regulations or laws that are frequently required independently of CEQA review. Typical PPPs include compliance with the provisions of the Building Code, SCAQMD Rules, etc. The City may impose additional conditions during the approval process, as appropriate. Because PPPs are neither project-specific nor a result of development of the Project, they are not considered to be either Project Design Features or Mitigation Measures.

PPP GHG-1 Require diesel powered construction equipment to turn off when not in use per Title 13 of the California Code of Regulations, Section 2449.

PPP GHG-2 Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the City's Water Efficient Landscape requirements (Chapter 8 section 8.44.220 of the City's Municipal Code).

PPP GHG-3 The Project shall be designed in accordance with the applicable Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR], Title 24, Part 6). These standards are updated, nominally every three years, to incorporate improved energy efficiency technologies and methods. The Building Official, or designee shall ensure compliance prior to the issuance of each building permit. The Title 24 Energy Efficiency Standards (Section 110.10(b)) require buildings to be designed to have no less than 15 percent of the total roof area of the building excluding any skylight area be "solar ready" which will structurally accommodate later installation of rooftop solar panels. If future building operators pursue providing rooftop solar panels, they will submit plans for solar panels prior to occupancy.

PPP GHG-4 The Project shall be designed in accordance with the applicable California Green Building Standards (CALGreen) Code (24 CCR, Part 11). The Building Official, or designee shall ensure compliance prior to the issuance of each building permit. These requirements include, but are not limited to:

- Design buildings to be water efficient. Install water-efficient fixtures in accordance with Section 4.303 (residential) and Section 5.303 (nonresidential) of the California Green Building Standards Code Part 11.
- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 4.408.1 (residential) and Section 5.408.1 (nonresidential) of the California Green Building Standards Code Part 11.

- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 4.410 (residential) and Section 5.410 (nonresidential) of the California Green Building Standards Code Part 11.
- To facilitate future installation of electric vehicle supply equipment (EVSE), residential construction shall comply with Section 4.106.4 (residential electric vehicle charging) of the California Green Building Standards Code Part 11 and nonresidential construction shall comply with Section 5.106.5.3 (nonresidential electric vehicle charging) of the California Green Building Standards Code Part 11.

Mitigation Measures

Refer to **MM AQ-1** through **MM AQ-6** in **Section 4.2: Air Quality** and the following **MM GHG-1** through **MM GHG-4**.

MM GHG-1 Prior to the issuance of each building's occupancy permit, the Project Applicant shall be required to install solar photovoltaic (PV) panels or other source of renewable electricity generation on-site, based on the maximum roof area available for solar (i.e., solar-ready zone). The solar-ready zone shall comply with Section 110.10 of the 2022 California Energy Code and shall comply with access, pathway, ventilation, and spacing requirements, and exclude skylight area. All single-family homes shall provide 25 percent of projected electricity demand via on-site solar; multifamily and nonresidential projects shall provide 50 percent of projected energy demand via on-site solar (e.g., rooftop, carports, etc.).

The final PV generation facility size requires approval by Imperial Irrigation District (IID) or applicable electric utility. IID's Rule 21 governs operating and metering requirements for any facility connected to IID's distribution system. Should IID limit the off-site export, the proposed Project may utilize a battery energy storage system (BESS) to lower off-site export while maintaining on-site renewable generation to offset consumption.

The electrical system and infrastructure must be clearly labeled with noticeable and permanent signage. The schedule of photovoltaic system locations may be updated as needed.

MM GHG-2 Prior to the issuance of Phase 1, Phase 2, Phase 3, Phase 4, Phase 5, and Phase 6 building permits, the Project Applicant or successor in interest shall provide documentation to the City of Coachella demonstrating the following:

- The Project shall be designed consistent with 2022 CALGreen Tier 2 standards or incorporate measures that would result in an equivalent reduction.
- The installation of natural gas in all residential uses shall be prohibited.
- The Project shall provide facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A4.106.8.2

(Residential Voluntary Measures) of the 2022 CALGreen Code. Each single-family home shall include one low power Level 2 EV charging receptacle at minimum.

- The Applicant shall coordinate with the City of Coachella and SunLine Transit Agency to ensure that bus pad and shelter improvements are incorporated, as appropriate.

MM GHG-3 The development (Phase 1, Phase 2, Phase 3, Phase 4, Phase 5, and Phase 6) shall divert a minimum of 75 percent of landfill waste. Prior to issuance of certificate of occupancy for each planning area, a recyclables collection and load area shall be constructed in compliance with the City standards for Recyclable Collection and Loading Areas.

MM GHG-4 For residential projects, all major applicant provided appliances (e.g., dishwashers, refrigerators, clothes washers and dryers, and water heaters) provided/installed shall be Energy Star certified or of equivalent energy efficiency where applicable. Prior to the issuance of the certificate of occupancy, the City of Coachella shall verify that the Project's Codes Covenants and Restrictions (CC&Rs) and/or tenant lease agreements require use of Energy Star® certified or equivalent appliances. This requirement shall be verified by the Planning and Building Department during plan check.

4.7.5 CUMULATIVE IMPACTS

CUMULATIVE SETTING

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately one day), GHGs have much longer atmospheric lifetimes of one year to several thousand years that allow them to be dispersed around the globe.

CUMULATIVE IMPACTS

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. For example, global GHG emissions in 2022 totaled 53,786 million tons of CO_2e while the Project at buildout would generate 0.167 million tons of CO_2e. However, GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the proposed Project as well as other cumulative related projects, would be subject to all applicable regulatory requirements, which would further reduce GHG emissions. The proposed Project would be consistent with the applicable GHG reduction plans, including City's CAP, SCAG's Connect SoCal, and the CARB Scoping Plan. However, based on the amount of emissions generated by the Project, the cumulative GHG emissions could be considered significant in the context of the State's GHG reduction targets. As a result, the Project's cumulative contribution of GHG emissions would be cumulatively considerable. Refer to **MM AQ-1** through **MM AQ-6** in **Section 4.2: Air Quality** and **MM GHG-1** through **MM GHG-4**, above.

4.7.6 SIGNIFICANT UNAVOIDABLE IMPACTS

The Project would generate GHG emissions that would have a significant impact on the environment. Additionally, the Project's cumulative contribution of GHG emissions would be cumulatively considerable.

4.7.7 REFERENCES

City of Coachella. 2015. General Plan Update. Sustainability and Natural Environment Element. https://www.coachella.org/departments/general-plan-2035.

City of Coachella. 2015. Climate Action Plan. https://www.coachella.org/home/showpublisheddocument/4572/635991647584770000.

Kimley-Horn and Associates, Inc. 2024. Greenhouse Gas Emissions Assessment.

4.8 HAZARDS AND HAZARDOUS MATERIALS

This section identifies associated regulatory requirements; describes the existing hazardous materials within the vicinity of the Project site; evaluates potential impacts related to routine transport, use, or disposal of hazardous materials such as accidental release of hazardous materials into the environment; emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. This section also evaluates whether the Project site is listed on a hazardous materials list indicating that the location could create a hazard to the public or the environment, is located within an airport land use plan would result in a safety hazard for people residing or working in the Project area. Lastly, this section evaluates whether the Project interferes with an adopted emergency response plan or emergency evacuation plan, and potential for wildland fires. The section identifies applicable mitigation measures related to implementation of the proposed development.

The environmental setting discussion is based largely on review of relevant documents and information including the City of Coachella General Plan (GP); the County of Riverside GP; review of aerial photographs and field observations of the area conducted by Kimley-Horn staff from late August 2022; and review of the Project renderings, and concept maps. Other information in this section, including the regulatory framework, is derived from the various planning documents including the Project Description, City of Coachella GP, and pertinent State of California Building Codes.

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts on hazards and hazardous materials. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors such as proximity to schools or airports.

4.8.1 ENVIRONMENTAL SETTING

SITE HISTORY

The Project site is comprised of undisturbed, open, hilly, and undeveloped desert. Review of aerial photographs dating back to 1953 of the Project site were used to determine the historic land use of the Project site and if there was any evidence of hazardous materials that may affect the environmental quality of the Project site.[1] The aerial photographs were reviewed for the following features: above ground tanks, landfill's, illegal dumping of drums or containers, and general land use. Review of aerial imagery indicates that besides the power lines that traverse the northerly portion of the Project site, the Project site has been vacant since 1953. No sumps, pits, ponds, lagoons, above ground tanks, landfills,

[1] NetrOnline. 1953. *Historic Aerials; City of Coachella (1953).* Available at https://www.historicaerials.com/viewer# (accessed September 2022).

collection of drums or containers, or discoloration of soil was visible during the aerial review and site visits conducted in August 2022 and February and May 2023. Additionally, review of GeoTracker, EnviroStor, and the Solid Waste Information System (SWIS) database found no hazardous materials sites located on the Project site.[2,3,4]

NEARBY AIRPORTS OR AIRSTRIPS

The nearest airports to the Project site are the Jacqueline Cochran Regional Airport, approximately 5.3 miles south, located at 56-850 Higgins Dr, Thermal, CA 92274, and Crown Aero, Bermuda Dunes Airport, approximately 5.5 miles northwest, located at 79880 Ave 42, Bermuda Dunes, CA 92203.

WILDLAND FIRE HAZARDS

According to CAL FIRE's Fire and Resource Assessment Program, FHSZ Viewer the Project site is not located in or near a State Responsibility Area SRA. Portions of the Project site are located in a Local Responsibility Area and a Federal Responsibility Area.[5] In addition, the Project site does not contain lands classified as a very high fire hazard severity zone (VHFHSZ). Review of the City's GP further supports the finding that the Project site is not located in or near an SRA and the Project site is not within a VHFHSZ.[6]

The City manages disaster preparedness through interdepartmental and inter-jurisdictional coordination and collaboration to be prepared for, respond to, and recover from everyday and disaster emergencies. A full range of cost-effective services to the City as part of the regional and integrated fire protection system are provided via a cooperative agreement with the Riverside County Fire Department and CAL FIRE. Services provided include fire suppression, fire prevention and fire protection planning. The City is served by the Riverside County Fire Department, Station 79, and is responsible for the preparation of the community for disasters and the organization of recovery efforts.

SCHOOLS

The closest elementary school to the Project site is Martin Van Buren ES, within the Desert Sands Unified School District (DSUSD), located approximately 2.8 miles southwest of the Project site. The closest middle school is Desert Ridge Academy (DSUSD), located approximately 8.0 miles west of the Project site. The closest high school to the Project site is Amistad (Continuation) HS (DSUSD), located approximately 3.5 miles northwest of the Project site.

4.8.2 REGULATORY SETTING

Hazardous materials and wastes are identified and defined by federal and State regulations for the purpose of protecting public health and the environment. Hazardous materials contain certain chemical,

[2] SWRCB. 2022. GeoTracker. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Coachella (accessed September 2022).
[3] DTSC. 2022. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=coachella%2C+ca (accessed September 2022).
[4] CalRecycle. 2022. SWIS. https://www2.calrecycle.ca.gov/SolidWaste/Site/Search (accessed September 2022).
[5] CAL FIRE. 2025. CAL FIRE, Fire and Resource Assessment Program, FHSZ Viewer. https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9 (accessed October 2025).
[6] City of Coachella. 2013. City of Coachella General Plan, Fire Hazards. Page 03-32. https://www.coachella.org/home/showpublisheddocument/3221/635712771850800000 (accessed September 2022).

physical, or infectious properties that cause them to be considered hazardous. Hazardous wastes are defined in the Code of Federal Regulations Title 40, Volume 25, Parts 260–265 and in the California Code of Regulations (CCR), Title 22 Div. 4.5, Chapter 11, Article 1, Section 66261. Over the years, the laws and regulations have evolved to deal with different aspects of the handling, treatment, storage, and disposal of hazardous substances.

FEDERAL

Federal Toxic Substances Control Act of 1976

The Toxic Substances Control Act of 1976 (TSCA) provides the U.S. Environmental Protection Agency (EPA) with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. TSCA addresses the production, importation, use, and disposal of specific chemicals including PCBs, asbestos, radon, and LBP. Title IV of the TSCA directs the U.S. EPA to regulate LBP hazards.

TSCA Sections 402 and 404 require that those engaged in lead abatements, risk assessments and inspections in homes or child-occupied facilities (such as daycare centers and kindergartens) built prior to 1978 be trained and certified in specific practices to ensure accuracy and safety. TSCA Section 403, sets standards for dangerous levels of lead in paint, household dust, and residential soil.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 (42 United States Code [USC] §6901 et seq.) is the principal federal law that regulates the generation, management, and transportation of waste. Hazardous waste management includes the treatment, storage, or disposal of hazardous waste. The RCRA gave the U.S. EPA the authority to control hazardous waste from “cradle to grave,” that is, from generation to transportation, treatment, storage, and disposal, at active and future facilities. It does not address abandoned or historical sites. The RCRA also set forth a framework for managing nonhazardous wastes. Later amendments required phasing out land disposal of hazardous waste and added underground tanks storing petroleum and other hazardous substances.

Federal Insecticide, Fungicide, and Rodenticide Act

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) (7 United States Code 136 et seq.) provides federal control of pesticide distribution, sale, and use. The U.S. EPA was given authority under FIFRA to study the consequences of pesticide usage and to require users (farmers, utility companies, and others) to register when purchasing pesticides. Later amendments to the law required users to take exams for certification as applicators of pesticides. All pesticides used in the United States must be registered (licensed) by the U.S. EPA. Registration assures that pesticides will be properly labeled and that, if used in accordance with specifications, they will not cause unreasonable harm to the environment.

Comprehensive Environmental Response, Compensation, and Liability Act/Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law (USC Title 42, Chapter 103) provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites; provides for liability of persons responsible for releases of hazardous waste at these sites; and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enables the revision of the National Contingency Plan (NCP). The NCP (Title 40, Code of Federal Regulation [CFR], Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List (NPL). CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

Comprehensive Environmental Response, Compensation, and Liability Information System and the National Priorities List

The U.S. EPA also maintains the Comprehensive Environmental Response Compensation (CERCLIS) and Liability Information System list. This list contains sites that are either proposed to be or on the NPL, as well as sites that are in the screening and assessment phase for possible inclusion on the NPL. The NPL is a list of the worst hazardous waste sites that have been identified by Superfund. There are no NPL sites on the Project site.

Emergency Planning and Community Right-to-Know Act

Title III of the Superfund Amendments and Reauthorization Act (SARA) authorized the Emergency Planning and Community Right-to-Know Act (EPCRA; 42 USC Section 11001 et seq.) to inform communities and citizens of chemical hazards in their areas by requiring businesses to report the locations and quantities of chemicals stored on-site to state and local agencies; releases to the environment of more than 600 designated toxic chemicals; off-site transfers of waste; and pollution prevention measures and activities and to participate in chemical recycling. The U.S. EPA maintains and publishes an online, publicly available, national database of toxic chemical releases and other waste management activities by certain industry groups and federal facilities—the Toxics Release Inventory.

To implement EPCRA, each State appointed a state emergency response commission to coordinate planning and implementation activities associated with hazardous materials. The commissions divided their states into emergency planning districts and named a local emergency planning committee for each district. The federal EPCRA program is implemented and administered in California Governor's Office of Emergency Services (Cal OES), a state commission, six local committees, and 81 Certified Unified Program Agencies (CUPAs). Cal OES coordinates and provides staff support for the state commission and local committees.

Occupational Safety and Health Act

The Federal Occupational Safety and Health Act of 1970 (OSHA) (29 USC Section 651 et seq.) authorizes each State (including California) to establish their own safety and health programs with the U.S. Department of Labor, with OSHA approval. The California Department of Industrial Relations regulates implementation of worker health and safety in California. California OSHA enforcement units conduct on-site evaluations and issue notices of violation to enforce necessary improvements to health and safety practices. California standards for workers dealing with hazardous materials are contained in Title 8 of the CCR and include best practices for all industries (General Industrial Safety Orders), and specific practices for construction and other industries. Workers at hazardous waste sites (or working with hazardous wastes as might be encountered during excavation of contaminated soil) must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations.

OSHA Regulation 29 CFR Standard 1926.62 regulates the demolition, renovation, or construction of buildings involving lead materials. Federal, State, and local requirements also govern the removal of asbestos or suspected ACMs, including the demolition of structures where asbestos is present. All friable (crushable by hand) ACMs, or non-friable ACMs subject to damage, must be abated prior to demolition, following all applicable regulations.

Hazardous Materials Transportation Act

The U.S. Department of Transportation (DOT) receives authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act, as amended and codified (49 U.S.C. Section 5101 et seq.). The DOT is the primary regulatory authority for the interstate transport of hazardous materials and establishes regulations for safe handling procedures (i.e., packaging, marking, labeling, and routing).

In California, Section 31303 of the California Vehicle Code states that any hazardous material being moved from one location to another must use the route with the least travel time. This, in practice, means major roads and highways, although secondary roads are permitted to be used for local delivery. These policies are enforced by both the California Highway Patrol and the California Department of Transportation (Caltrans).

Clean Water Act/Spill Prevention, Control and Countermeasure (SPCC) Rule

The Clean Water Act (CWA) (33 USC Section 1251 et seq.) was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). In California, NPDES permitting authority is delegated to, and administered by, the nine Regional Water Quality Control Boards (RWQCBs). The Project is within the jurisdiction of the Santa Ana RWQCB.

Section 402 of the CWA authorizes the California State Water Resources Control Board (SWRCB) to issue NPDES General Construction Storm Water Permit (Water Quality Order 99-08-DWQ), referred to as the "General Construction Permit."

Construction activities can comply with and be covered under the General Construction Permit provided that they:

- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the U.S.; and
- Perform inspections of all BMPs.

NPDES regulations are administered by the RWQCB. Projects that disturb one or more acres are required to obtain NPDES coverage under the Construction General Permits.

Title 40, Code of Federal Regulations, Section 61 Subpart M

Title 40 CFR Section 61 Subpart M—National Emissions Standards for Asbestos—sets forth emissions standards for asbestos from demolition and renovation activities, and for waste disposal from such activities.

Title 40, Code of Federal Regulations, Part 745

Title 40, CFR, Part 745 contains regulations developed under Sections 402 and 406 of the TSCA and applies to all renovations performed for compensation in target housing and child-occupied facilities.

The purpose of this subpart is to ensure the following:

- Owners and occupants of target housing and child-occupied facilities receive information on LBP hazards before these renovations begin; and
- Individuals performing renovations regulated in accordance with Section 745.82 are properly trained; renovators and firms performing these renovations are certified; and the work practices in Section 745.85 are followed during these renovations.

Title 29, Code of Federal Regulations, Section 1926.62

Title 29 CFR Section 1926.62, sets standards for occupational health and environmental controls for lead exposure in construction, regardless of the lead content of paints and other materials. The standards include requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation and monitoring.

U.S. EPA's Lead Renovation, Repair and Painting Program Rules

The U.S. EPA's 2008 Lead-Based Paint Renovation, Repair and Painting (RRP) Rule (as amended in 2010 and 2011), aims to protect the public from LBP hazards associated with renovation, repair, and painting activities. These activities can create hazardous lead dust when surfaces with lead paint, even from many decades ago, are disturbed. The rule requires workers to be certified and trained in the use of lead-safe work practices, and requires renovation, repair, and painting firms to be U.S. EPA-certified. These requirements became fully effective April 22, 2010.

Federal Aviation Administration

The basic responsibilities of the Federal Aviation Administration, under the U.S. Department of Transportation, are the regulation of civil aviation to promote safety, airspace and air traffic management, and the regulation of commercial space transportation. CFR contains standards for aircraft noise emission levels.

STATE

Primary state agencies with jurisdiction over public health hazards and hazardous chemical materials management are the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board. Other state agencies involved in hazardous materials management are the Department of Industrial Relations (California OSHA (Cal/OSHA) implementation), Office of Emergency Services (Office of Emergency Services–California Accidental Release Prevention Implementation), California Department of Fish and Wildlife, California Air Resources Board (CARB), California Department of Transportation (Caltrans), State Office of Environmental Health Hazard Assessment (Proposition 65 implementation), and the California Integrated Waste Management Board.

The enforcement agencies for hazardous materials transportation regulations are the California Highway Patrol and Caltrans. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations. South Coast Air Quality Management District Rules and Regulations pertain to asbestos abatement (including Rule 1403), Construction Safety Orders 1529 (pertaining to asbestos), and 1532.1 (pertaining to lead) from Title 8 of the CCR. Hazardous chemical and biohazardous materials management laws in California include the following statutes:

- Hazardous Materials Management Act – requires that businesses handling or storing certain amounts of hazardous materials prepare a hazardous materials business plan, which includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program.
- Hazardous Waste Control Act (California Health and Safety Code, Division 20, Chapter 6.5, Article 2, Section 25100, et seq.) – authorizes the DTSC and local certified unified program agencies to regulate facilities that generate or treat hazardous waste.
- Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) – requires the governor to publish and update, at least annually, a list of chemicals known to the State to cause cancer, birth defects, or other reproductive harm, and to inform citizens about exposures to such chemicals.

- Hazardous Waste Management Planning and Facility Siting, also known as the Tanner Act (Assembly Bill (AB) 2948, 1986) – requires counties to prepare, for California DTSC approval, hazardous waste management plans, and prescribes specific public participation activities, which must be carried out during the local land use permit process for siting new or expanding off-site commercial treatment, storage, and disposal facilities.
- Hazardous Materials Storage and Emergency Response (AB 2185) – requires the immediate reporting to local fire departments and Offices of Emergency Services of any release or threatened release of a hazardous material, regardless of the amount handled by the business.
- California Medical Waste Management Act (California Health and Safety Code, Sections 117600–118360) – establishes procedures for the proper handling, storage, treatment, and transportation of medical waste.
- Land Disposal Restrictions (CCR, Chapter 18, Title 22) – set up by Congress in 1984 for the EPA, ensures that toxic constituents present in hazardous waste are properly treated before hazardous waste is land disposed.

State regulations and agencies pertaining to hazardous materials management and worker safety are described in the following subsections.

California Environmental Protection Agency

The California Environmental Protection Agency (Cal/EPA) was created in 1991, unifying California's environmental authority in a single cabinet-level agency and bringing the CARB, State Water Resources Control Board (SWRCB), Regional Water Quality Control Boards (RWQCB), California Department of Resources Recycling and Recovery (known as CalRecycle and formerly the Integrated Waste Management Board), DTSC, Office of Environmental Health Hazard Assessment, and Department of Pesticide Regulation under one agency. These agencies were placed within the Cal/EPA "umbrella" for the protection of human health and the environment and to ensure the coordinated deployment of state resources. Its mission is to restore, protect, and enhance the environment, to ensure public health, environmental quality, and economic vitality.

Department of Toxic Substances Control

The DTSC is a department of Cal/EPA and is the primary agency in California that regulates hazardous waste, clean-up existing contamination, and looks for ways to reduce the hazardous waste produced in California. The DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA and the California HSC (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, clean-up, and emergency planning.

California Government Code (CGC) § 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services (DHS) lists of contaminated drinking water wells, sites listed by the SWRCB as having underground storage tank (UST) leaks and which have had a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

State Water Resources Control Board

Brownfields are underutilized properties where reuse is hindered by the actual or suspected presence of pollution or contamination. The State Water Resources Control Board's (SWRCB) Brownfield Program goals are to:

- Expedite and facilitate site cleanups and closures for brownfield sites to support reuse of those sites;
- Preserve open space and greenfields;
- Protect groundwater and surface water resources, safeguard public health, and promote environmental justice; and
- Streamline site assessment, clean up, monitoring, and closure requirements and procedures within the various SWRCB site cleanup programs.

Site clean-up responsibilities for brownfields primarily reside within four main SWRCB programs: the Underground Storage Tank Program; Site Cleanup Program; Department of Defense Program; and the Land Disposal Program. These SWRCB cleanup programs are charged with ensuring sites are remediated to protect California's surface and groundwater and return them to beneficial uses.

California Government Code Section 65962.5

Pursuant to CGC Section 65962.5, environmental regulatory database lists were reviewed to identify and locate properties with known hazardous substance contamination within the proposed Project area (CGC Section 65960 et seq.). Four state agencies are required to provide lists of facilities that have contributed, harbor, or are responsible for environmental contamination within their jurisdiction. The four state agencies that are required to provide these lists to the Secretary for Environmental Protection include the DTSC, the State Department for Health Services, the SWRCB, and the California Integrated Waste Management Board. The Secretary for Environmental Protection then takes each of the four respective agency lists and forms one list, referred to as the Hazardous Waste and Substances Site List – Site Clean-up (Cortese List), which is made available to every city and/or county in California.

California Health and Safety Code Section 25501

Cal/EPA has established rules governing the use of hazardous materials and the management of hazardous wastes. California HSC Section 25531, et seq. incorporate the requirement of Superfund Amendments and Reauthorization Act and the Clean Air Act as they pertain to hazardous materials. HSC Section 25534 directs owners or operators storing, handling, or using regulated substances exceeding threshold planning quantities to develop and implement a Risk Management Plan. The Risk Management Plans are submitted to the administering agency and possibly U.S. EPA, depending upon the chemical and the amount, for review.

California Occupational Safety and Health Administration

Cal/OSHA is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is

required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337–340). The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

California Hazardous Waste Control Law

The California Hazardous Waste Control Law (California HSC, Division 20, Chapter 6.5) is administered by the CalEPA to regulate the management of hazardous wastes. While the Hazardous Waste Control Law is generally more stringent than the Resource Conservation and Recovery Act, until the EPA approves the California hazardous waste control program (which is charged with regulating the generation, treatment, storage, and disposal of hazardous waste), both the state and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

California Accidental Release Prevention Program

Similar to the Federal Risk Management Program, the California Accidental Release Prevention Program includes additional state requirements as well as an additional list of regulated substances and thresholds. The regulations of the program are contained in CCR Title 19, Division 2, Chapter 4.5. The intent of California Accidental Release Prevention Program is to prevent accidental releases of substances that can cause serious harm to the public and the environment, to minimize the damage if releases do occur, and to satisfy community right-to-know laws.

California Health and Safety Code

The handling and storage of hazardous materials are regulated by Division 20, Chapter 6.95 of the California HSC. Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a hazardous materials business plan (HMBP). HMBPs contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the State. Chapter 6.95 of the HSC establishes minimum statewide standards for HMBPs.

In addition, in the event that a facility stores a quantity of specific acutely hazardous materials above the thresholds set forth by California code, facilities are also required to prepare a risk management plan and California Accidental Release Plan. The risk management plan and California Accidental Release Plan provide information on the potential impact zone of a worst-case release and require plans and programs designed to minimize the probability of a release and mitigate potential impacts (California HSC, Chapter 6.95).

Hazardous Materials Release Response Plans and Inventory Law

The Hazardous Materials Release Response Plans and Inventory Law (HSC Section 25500 et seq.) aims to minimize the potential for accidents involving hazardous materials and to facilitate an appropriate response to possible hazardous materials emergencies. The law requires businesses that use hazardous

materials to provide inventories of those materials to designated emergency response agencies, to illustrate on a diagram where the materials are stored on-site, to prepare an emergency response plan, and to train employees to use the materials safely. Any business that handles hazardous materials in quantities equal to or greater than 55 gallons, 500 pounds, or 200 cubic feet of gas must submit a business plan.

Hazardous Materials Transportation

Section 31303 of the California Vehicle Code and U.S. Department of Transportation regulate hazardous materials transport. The California Highway Patrol and California Department of Transportation are the enforcement agencies. Cal OES provides emergency response services involving hazardous materials incidents.

Worker and Workplace Hazardous Materials Safety

Cal/OSHA is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA obligates many businesses to prepare Injury and Illness Prevention Plans and Chemical Hygiene Plans. The Hazard Communication Standard requires that workers be informed of the hazards associated with the materials they handle.

California Department of Pesticide Regulation

The California Department of Pesticide Regulation (DPR) protects human health and the environment by regulating pesticide sales and use and by fostering reduced-risk pest management relative to chemical applications. The DPR's Guide to Pesticide Regulation in California offers information on pesticide laws and regulations, details about state and local enforcement, and information about initiatives designed to protect people and the environment. State pesticide regulations are some of the most stringent in the country, and they address the effects of pesticide use on water, ground water, soil, and air.

California Department of Food and Agriculture

The State of California Food and Agricultural Code regulates the use of pesticides. Section 12972 requires that the use of pesticides not result in substantial drift to non-target areas. Section 12977 empowers the regional or local agricultural commissioner to enforce this provision. Section 12982 states that the local health officer shall investigate any health hazard from pesticide use and take necessary action, in cooperation with the agricultural commissioner, to abate the hazard. CCR Title 3, section 6614 restricts pesticide application when there is a reasonable possibility of substantial drift to non-target areas; contamination of the bodies or clothing of persons not involved in the application process; damage to non-target crops, animals, or other public or private property; or contamination of public or private property, including the creation of a health hazard that prevents normal use that property.

Hazardous Materials in Structures: Asbestos-Containing Materials and Lead-Based Paint

Several regulations and guidelines pertain to abatement of and protection from exposure to ACM and LBP, including Construction Safety Orders 1529 (pertaining to ACM) and Section 1532.1 (pertaining to LBP)

from Title 8 of the CCR and Part 61, Subpart M, of the CFR (pertaining to ACM). In California, ACM and LBP abatement must be performed and monitored by contractors with appropriate certification from the California DHS. Asbestos is also regulated as a hazardous air pollutant under the Clean Air Act and a potential worker safety hazard under the authority of Cal/OSHA.

Requirements for limiting asbestos emissions from building demolition and renovation are specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). CGC Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and ACMs.

Requirements for Phase I Environmental Site Assessments

Phase I ESAs are required for land purchasers to qualify for the Innocent Landowner Defense under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), to minimize environmental liability under other laws such as RCRA, and as a lender prerequisite to extend a loan for purchase of land.

Certified Unified Program Agency

A CUPA is an agency of a county or city that administers several state programs regulating hazardous materials and hazardous wastes. Riverside County Department of Environmental Health Hazardous Materials Branch is the CUPA for all incorporated cities and towns and unincorporated areas. Riverside County Department of Environmental Health Hazardous Materials Branch administers the following HazMat programs:

- California Accidental Release Prevention Program
- Underground Storage Tanks
- Aboveground Petroleum Storage Tanks
- Waste Generator
- Waste Treatment (Tiered)
- Hazardous Materials Business Plan
- Emergency Response Team

California Health and Safety Code, Sections 17920.10 and 105255

Lead must be contained during demolition activities.

8 CCR Sections 1529 and 1532.1: Worker Safety Standards: Asbestos and Lead

CCR Title 8 Section 1529 sets forth worker safety standards for lead exposure for employees conducting demolition, construction, and renovation work, including painting and decorating.

CCR Title 8 Section 1532.1 sets forth worker safety standards for employees in work including construction, demolition, renovation, and maintenance.

California Aeronautics Act

The State Aeronautics Act included in the California Public Utilities Code establishes statewide requirements for airport land use compatibility planning and requires nearly every county to create an Airport Land Use Commission (ALUC) or other alternative. San Bernardino County opted for an alternative to the ALUC and delegated responsibility to prepare an ALUCP for each airport jurisdiction.

California Airport Land Use Compatibility Planning Handbook

The California Airport Land Use Compatibility Planning Handbook provides planning guidance to ALUCs and counties and cities with jurisdiction over airport area land uses. The purpose of the handbook is to support the State Aeronautics Act. The handbook allows jurisdictions flexibility in determining air safety zones that represent areas of assumed accident potential.

REGIONAL

Riverside County Department of Environmental Health

The Riverside County Department of Environmental Health Hazardous Materials Branch is responsible for overseeing the six hazardous materials programs in the county. The Riverside County Department of Environmental Health Hazardous Materials Branch is the Certified Unified Program Agency (CUPA) for Riverside County responsible for inspecting facilities that handle hazardous materials, generate hazardous waste, treat hazardous waste, own/operate underground storage tanks, own/operate aboveground petroleum storage tanks, or handle other materials subject to the California Accidental Release Program. In addition, the Branch maintains an emergency response team that responds to hazardous materials and other environmental health emergencies 24 hours a day, 7 days a week.[7]

Regional Water Quality Control Board

The RWQCB is a department of Cal/EPA that oversees investigation and clean-up of sites including USTs where wastes have been discharged in order to protect the water quality of the State. The RWQCB regulates wastewater discharges to surface waters and to groundwater. They also regulate storm water discharges from construction, industrial, and municipal activities.

SCAQMD Rule 1403 governs the demolition of buildings containing asbestos materials. Rule 1403 specifies work practices with the goal of minimizing asbestos emissions during building demolition and renovation activities, including the removal and associated disturbance of ACM.

Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan

The Multi-Jurisdictional Local Hazard Mitigation Plan's (LHMP) intent is to serve as a guide for decision-makers as they commit resources and reduce risk related to natural and other disasters. In addition, the LHMP establishes a Hazards List to identify potential hazards in the County. The Hazards List indicates the

[7] County of Riverside Department of Environmental Health. (2022). https://rivcoeh.org/hazardous-materials. Accessed October 2025.

potential impact, specific locations where the hazard may occur, and the magnitude the hazard may have on the economy, infrastructure, and citizens of the county.

As part of preparation of the LHMP, each participating jurisdiction conducted an assessment of hazards for its region in order to identify potential hazards in the county. These hazards include wildfire, flooding, earthquakes, extreme weather, landslides, insect infestation, dam failure, hazardous materials incidents, transportation emergencies, pipeline/aqueduct incidents, blackout, toxic pollution, nuclear incidents, civil unrest, jail and prison incidents, and terrorism. Once potential hazards were identified, a list of mitigation strategies and goals was established to minimize impacts associated with hazards.

Riverside County Operational Emergency Operations Plan

The Emergency Operations Plan (EOP) is a reference tool for coordinating emergencies and serves as a foundation for response and recovery operations. The EOP addresses the planned response to extraordinary situations associated with natural disasters and/or human-caused incidents within the county. The EOP addresses the roles and responsibilities of the county during all-hazards emergency response.

LOCAL

City of Coachella General Plan

Safety Element

The Safety Element[8] establishes the City's long-term goals and policies for providing long-term measures that reflect the City's desire to deal effectively with natural hazards and provide a safe living environment for the community. The primary objective of the Safety Element, as the policies and actions are implemented over the next 20 years, is to make the City increasingly resistant to disasters and become more self-reliant, sustainable, and prosperous. The following goals and policies listed below are related to safety and hazards:

Goal 1. **Earthquake Hazards. A community that is minimally affected by seismic shaking and other earthquake-induced hazards.**

Policy 1.1 Development plan review. Review all plans for new development to be certain new structures are designed in accordance with the most recent California Building Code adopted by City Council, including the provisions regarding seismic loads, lateral forces and grading.

Policy 1.2 Earthquake-resistant new buildings. Require all new habitable buildings and structures to be designed and built to be seismically resistant and not built across the trace of an active fault.

Goal 4 **Fire hazards. A community that is minimally affected by wildland and structure fires.**

[8] City of Coachella. 2015. City of Coachella General Plan Update – Safety Element. https://www.coachella.org/home/showpublisheddocument/8421/637819141302800000. (accessed July 2022).

Policy 4.1 Vegetation control. Require the use of vegetation control methods to reduce the hazard of wildland fire.

Policy 4.2 Construction materials. Require the use of fire-resistant building construction materials to reduce the hazard of structure fires, within the developed areas of the City and at the urban-wildland interface.

Goal 5 Hazardous Materials Management. A community that has reduced the potential for hazardous materials contamination.

Policy 5.1 Enforcement actions. Continue to enforce disclosure laws that require all users, generators and transporters of hazardous materials and wastes to identify the materials they store, use or transport.

Policy 5.2 Effective response. Ensure the City and the county's fire and sheriff departments can respond safely and effectively to a hazardous materials incident in the City, whether as a spill at a permitted facility, a pipeline release or an accident along a section of the I-10 or railroad line that extends across Coachella; ensure all residents, workers and visitors to Coachella are protected from exposure to hazardous materials and waste.

Policy 5.3 Hazardous materials siting. Prohibit the placement of proposed new facilities that will be involved in the production, use, storage, transport or disposal of hazardous materials near existing land uses that may be adversely affected by such activities. Conversely, prohibit the development of new sensitive facilities (like schools, childcare centers, nursing homes, senior housing, etc.) near existing sites that use, store or generate hazardous materials.

Policy 5.5 Hazardous materials transport routes. Identify roadways along which hazardous materials are routinely transported and if schools, medical facilities, child-care centers or other facilities with special evacuation needs are located along these routes, the City, together with these facilities, will identify emergency response actions that can be implemented if a roadway accident results in the unauthorized release of hazardous materials.

Policy 5.7 Green cleaning in public buildings. Require the City use green and non-toxic cleaning supplies in all public buildings to protect the health of workers and users of the facilities. Encourage school districts, health facilities, youth programs and local business within Coachella to use green and non-toxic cleaning supplies.

Policy 5.8 Non-toxic alternatives. Encourage residents and businesses to reduce or eliminate the use of hazardous materials, including pesticides and herbicides, by using nontoxic, safer products and methods that do not pose a threat to the environment or by buying and using only the smallest amount of a hazardous substance needed for the job.

Goal 6 Clean Environment. A community protected from the harmful effects of pollution and hazardous materials, hazardous waste and environmental contamination.

Policy 6.14 Proximity to pollution sources. Avoid locating new sensitive uses such as schools, child-care centers, multifamily housing and senior housing in proximity to sources of pollution

(e.g., I-10, truck routes, busy roadways and agricultural land where pesticides and chemical fertilizers are used regularly) and vice versa. Where such uses are located in proximity to sources of air pollution, use building design, construction and technology techniques to mitigate the negative effects of air pollution on indoor air quality. For guidance consult with the South Coast Air Quality Management District, CARB's Air Quality and Land Use Handbook or other more recent scientific studies or tools.

Goal 8 **Disaster Preparedness. A community that has planned for emergency response and recovery from natural disasters, especially from earthquakes, flooding, and fire, and from civil unrest that may occur following a natural disaster.**

Policy 8.1 Local Hazard Mitigation Plan. Maintain and update on a regular basis, as mandated by FEMA, a Local Hazard Mitigation Plan. Incorporate an assessment of climate change-related hazards in all future Local Hazard Mitigation Plan updates.

Policy 8.2 Emergency response organization. Maintain and update the emergency response organization consisting of representatives from all City departments, the Riverside County Fire and Sheriff Departments, local quasi-governmental agencies, private businesses, citizens, and other community partners involved in emergency relief and/or community-wide emergency-response services.

Policy 8.7 Maintain critical facilities. Ensure to the fullest possible extent that, in the event of a major disaster, critical, dependent care and high-occupancy facilities remain functional. The Riverside County Fire Department, in their annual review of these facilities, will encourage owners and operators to maintain alternate emergency exits, emergency evacuation plans, emergency generators and anchor computers, shelving, and other non-structural elements.

Policy 8.9 Public preparedness. Enhance public awareness and preparedness by encouraging residents and businesses to store supplies for self-reliance following a disaster. Emergency preparedness kits should include, at a minimum, a seven-day supply of drinking water and food for all members of the household or business, including pets.

City of Coachella Local Hazard Mitigation Plan

The purpose of the LHMP is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and man-made hazards.

The plan was prepared pursuant to the requirements of the Disaster Mitigation Act of 2000 to achieve eligibility and potentially secure mitigation funding through Federal Emergency Management Agency (FEMA) Flood Mitigation Assistance, Pre-Disaster Mitigation, and Hazard Mitigation Grant Programs.

Riverside County's continual efforts to maintain a disaster-mitigation strategy is ongoing. The City's goal is to develop and maintain an all-inclusive plan to include all jurisdictions, special districts, businesses, and community organizations rather than them writing their own plan to promote consistency, continuity and unification. The County's planning process followed a methodology presented by FEMA and CALEMA

which included conducting meetings with the Operational Area Planning Committee (OAPC) coordinated by Riverside County Fire – Office of Emergency Services comprised of participating Federal, State, and local jurisdictions agencies, special districts, school districts, non-profit communities, universities, businesses, tribes and general public.

The LHMP identifies vulnerabilities, provides recommendations for prioritized mitigation actions, evaluates resources, and identifies mitigation shortcomings, provides future mitigation planning and maintenance of existing plan.

The City will submit plans to Riverside County Fire – Office of Emergency Services who will forward to CAL EMA for review prior to being submitted to FEMA.

City of Coachella Emergency Operations Plan

The City has adopted an EOP to identify evacuation routes, emergency facilities, and City personnel and equipment available to effectively deal with emergency situations. The EOP is designed as a reference and guidance document and is the foundation for response and recovery operations for the City and is meant to coordinate with the Riverside County Operational Area (OA) EOP and EOC to facilitate effective response to any emergency.

The City EOP establishes the emergency organization, assigns tasks, and specifies policies and general procedures during both response and recovery. It also provides for coordination with the County as the OA Lead Agency. This plan includes the critical elements of the Standardized Emergency Management System, the National Incident Management System, the Incident Command System, and the National Response Framework. The City EOP can be used to coordinate localized emergencies as well as catastrophic disasters. The plan will be reviewed and exercised periodically and revised as necessary to meet changing conditions.

City of Coachella Municipal Code

The Coachella MC Chapter 2.56, Emergency Services, provides for the preparation and carrying out of plans for the protection of persons and property within the City in the event of an emergency; the direction of the emergency organization; and the coordination of the emergency functions of this city with all other public agencies, corporations, organizations, and affected private person.

4.8.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning hazards and hazardous materials. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Create a significant hazard to the public or the environmental through the routine transport, use, or disposal of hazardous materials;

- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;
- Impair implementation of or physically interfere within an adopted emergency response plan or emergency evacuation plan; or
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

METHODOLOGY AND ASSUMPTIONS

The Project is evaluated against the aforementioned significance criteria in order to determine the level of impacts related to hazards and hazardous materials. This analysis also considers existing regulations, laws and standards that serve to avoid or reduce potential environmental impacts, as well as recommendations from existing site evaluations. Where significant impacts may remain, feasible mitigation measures are recommended, where warranted, to avoid or lessen the potential for significant adverse impacts to occur.

APPROACH TO ANALYSIS

This analysis of impacts from hazards and hazardous materials examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects based on application of the significance criteria/thresholds outlined above. Each criterion is discussed in the context of the Project site and the surrounding characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The baseline conditions and impact analyses are based on available information in public databases including local planning documents; a site evaluation of the Project site; review of Project maps and drawings; and analysis of aerial and ground-level photographs. The determination that a Project component would or would not result in "substantial" adverse effects on standards related to hazards and hazardous materials considers the available policies and regulations established by local and regional agencies and the amount of deviation from these policies in the Project's components.

PROJECT DESIGN FEATURES

The Project's potential impacts concerning hazards and hazardous materials would be avoided or reduced through the following Project Design Features (PDF)s:

- The development portions of the Project site would be designated for uses not typically associated with hazards or hazardous materials: Very Low Density Residential, Low Density Residential, Medium Density Residential, High Density Residential, Mixed Use, Institutional, and Entertainment Center/Hotels. Land uses typically associated with hazards and hazardous materials, such as industrial, raw materials processing and storage, and manufacturing, are prohibited on the Project site.
- Roadways and infrastructure would be constructed in compliance with the City's municipal code and general plan.
- Gates would meet Riverside County Fire Department standards.
- A Riverside County Fire Department station would be provided in one of the proposed villages. Phasing will be determined as part of the Conditions of Approval for the Project or the Development Agreement.
- School sites would be located to ensure adequate separation from existing power lines and the adjacent Interstate 10 (I-10), as well as meet minimum distance requirements from earthquake fault zones.

4.8.4 PROJECT IMPACTS AND MITIGATION

Impact 4.8-1: ***Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

Level of Significance: Less Than Significant

CONSTRUCTION

Construction activities would include the use of materials such as fuels, lubricants, and greases in construction equipment and coatings used in construction. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. The use of these materials would also be temporary and short-term or single-use in nature and would cease upon completion of the Project's construction phase. Project construction would involve the use, storage, transport, and disposal of hazardous materials and would therefore be required to comply with federal, State, and local regulations standards, and guidelines related to storage, use, and disposal of hazardous materials. As listed under **Section 4.8.2: Regulatory Setting** above, the Project would adhere to requirements under the TSCA, RCRA, which addresses and regulates the production, importation, use, and disposal of hazardous materials; the DOT under the Hazardous Materials Transportation Act, which establishes regulations for safe handling procedures (i.e., packaging, marking, labeling, and routing) of hazardous materials; Title 29 CFR Section 1926.62, which includes requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs,

recordkeeping, and observation and monitoring; and the City's General Plan Safety Element policies such as Policy 5.1 which require all users, generators and transporters of hazardous materials and wastes to identify the materials they store, use or transport; and Policy 5.5, which identifies roadways along which hazardous materials are routinely transported and if schools, medical facilities, child-care centers or other facilities with special evacuation needs are located along these routes, the City, together with these facilities, will identify emergency response actions that can be implemented if a roadway accident results in the unauthorized release of hazardous materials. CHP and Caltrans would regulate transportation of hazardous materials on roadways and the DTSC would regulate use of these materials. Compliance with applicable laws and regulations concerning hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. Therefore, hazards to the public or the environment arising from the routine transport, use, or disposal of hazardous materials during Project construction would be less than significant.

Grading Activities

Grading activities conducted during Project construction would lead to the disturbance of on-site soils. The handling and transport of these materials and exposure to contaminated soils for workers and the surrounding environment could result in a significant impact. Contaminated soils encountered during grading would be required to be removed and disposed of off-site in accordance with all applicable regulatory guidelines listed previously, such as TSCA and RCRA, which addresses and regulates the production, importation, use, and disposal of hazardous materials. There are no USTs/above-ground storage tanks (ASTs) identified on-site.[9] Therefore, impacts would be less than significant.

OPERATIONS

Operation of the Project would involve the use and storage of hazardous materials typical to residential, commercial, retail, public facility, agricultural, and park uses, which would not result in a significant hazard to employees or community members when used correctly. Operation of the Project would involve the use of small amounts of hazardous materials, such as cleansers, greases, and oils for cleaning and maintenance purposes, as well as the storage and periodic application of pesticides, herbicides, and fertilizers, and use of toxic fuels and solvents. The Project may also involve transport, use, and disposal of hazardous materials; the specific substances and quantities of such materials are presently unknown. The use, storage, transport, and disposal of hazardous materials would be governed by existing regulations of several agencies, including the U.S. EPA, U.S. Department of Transportation, California OSHA, and the Riverside County Fire Protection District. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. Additionally, the Project would also be operated with strict adherence to all emergency response plan requirements set forth by the Riverside County Fire Protection District. Compliance with applicable laws and regulations concerning hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential

[9] Environmental Protection Agency. 2022. UST Finder Map. https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=b03763d3f2754461adf86f121345d7bc. Accessed September 2022.

for significant hazards to the public or the environment. Mandatory compliance with laws and regulations, would ensure that operational impacts would be less than significant.

Additionally, agricultural and landscaping maintenance activities typically include the storage and periodic application of pesticides, herbicides, and fertilizers, as well as the storage and use of toxic fuels and solvents. Properly removing and disposing of on-site hazardous materials in accordance with State and federal regulations before they are accidentally disturbed can reduce impacts associated with these hazards. Household hazardous materials such as cleaners and solvents are not considered significant due to the small volume and low concentration of hazardous materials utilized. Commercial businesses that would operate within the Project site that would regularly receive, store, handle, generate, or dispose of regulated types and quantities of hazardous materials and waste products would be regulated pursuant to appropriate permits and inspected annually to ensure compliance with permit conditions. Accordingly, compliance with existing regulations would be sufficient to reduce potential impacts to a less than significant level and no additional, project specific mitigation measures would be required.

Off-Site Impacts

The Project would also include off-site utility and roadway improvements located to the west and southwest of the Project site. These improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; see **Exhibit 3-11: Off-Site Improvements**. Similarly, these Project components are not usually associated with land uses that involve the routine transport, use, and disposal of hazardous materials. Off-site construction would use and store limited amounts of hazardous materials, including construction materials such as paints and solvents, vehicle fuel, and other common hazardous materials. As discussed above, the routine transport, use, or disposal of these materials during the off-site Project construction is not anticipated to create a significant hazard to the public or the environment, as the routine transport, use, and disposal of these materials must adhere to federal, State, and local regulations for transport, handling, storage, and disposal of hazardous substances. Off-site improvements would comply with all applicable regulatory framework, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Impact 4.8-2: ***Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION

The construction of new developments such as the Project site could result in hazards to the public or the environment through the accidental upset or release of hazardous materials caused by accidental spillage of hazardous materials used during construction phases, or as a result of the exposure of contaminated

soil during grading activities. Database searches did not reveal any leaking underground storage tanks (LUSTs), USTs or ASTs located on the Project site. Furthermore, the Project site itself is not on the Cortese list.[10] Additionally, the Project site has not been cited or issued violation notices by any environmental regulatory agency for improper use or disposal of hazardous materials. Although significant quantities of soil are not anticipated to be exported from the Project site, disposal or transport of demolition materials and any graded soils from the Project site may therefore increase the potential for the exposure of hazardous materials. Implementation of **Mitigation Measures (MMs) HAZ-1** and **HAZ-2** would ensure proper handling of contaminated soils and substances which may be encountered.

Any hazardous materials used and/or stored during operations would be done accordingly with the Department of Transportation Office of Hazardous Materials Safety regulations, the California Building Code, and California Fire Code requirements. All spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable regulations, such as RCRA, for the cleanup and disposal of that contaminant. Furthermore, strict adherence to all emergency response plan requirements set forth by Riverside County Fire Department would be required through the duration of the Project construction phase. Project construction workers would also be required to conduct safe handling of hazardous material, as stated previously. Mandatory compliance with laws and regulations would ensure that construction impacts would be less than significant. While the construction of the Project site is not anticipated to generate significant impacts, mitigation proposed for the Project's construction phase would be necessary to reduce potential impacts to less than significant levels.

OPERATIONS

Operation of the Project would involve the use and storage of hazardous materials typical to residential, commercial, retail, entertainment/ hotel, public facility, agricultural, and park uses. As discussed in Impact 4.8-1 above, any routine transport, use, and disposal of these materials during Project operations must adhere to federal, State, and local regulations for transport, handling, storage, and disposal of hazardous substances. Prior to Project approval, an HMBP also would be required for approval to show conformance with all applicable materials handling protocols. Adherence to these regulations is overseen and enforced by the Riverside County Department of Environmental Health Hazardous Materials Branch. As stated previously, the CUPA program provided by the County is designed to consolidate, coordinate, and uniformly and consistently administer permits, inspection activities, and enforcement activities throughout Riverside County. Furthermore, household hazards such as cleaners and solvents contain such low quantities of liquid and material that they do not pose a significant threat related to the release of hazardous materials into the environment. A less than significant impact would occur.

[10] California, State of, Department of Toxic Substances Control, DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List). EnviroStor. https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29 Accessed September 2022.

Off-Site Impacts

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure. Historical agricultural activity throughout some of the off-site areas associated with conceptual well sites depicted in **Exhibit 3-11**, may have contaminated the soil which would result in the appearance of hazardous materials during construction. Therefore, off-site construction would adhere to all applicable laws and regulations such as FIFRA, DPR, and the State of California Food and Agriculture Code measures which would be taken prior to site selection and grading to identify and minimize effects associated with hazardous materials. Compliance with FIFRA, DPR, and State of California Food and Agricultural Code as listed under Section 4.8.2 above concerning hazardous materials, would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts.

Mitigation Measures

The following measures shall apply to all Project grading and construction activities, including those related to off-site infrastructure or utility improvements that may be necessary to serve the Project:

MM HAZ-1 **Soil Management Plan (SMP).** Prior to issuance of a grading permit or trenching or subsurface excavation for utilities or roadway infrastructure, the Master Developer, Site Developer, or Lead Agency, as applicable, shall retain a qualified environmental consultant to prepare a SMP that details procedures and protocols for on-site management of soils containing potentially hazardous materials.

The SMP shall include, but not be limited to:

- Land use history, including description and locations of known contamination;
- The nature and extent of previous investigations and remediation at the site;
- Identified areas of concern at the site, in relation to proposed activities;
- A listing and description of institutional controls, such as applicable City ordinances and other local, State, and federal regulations and laws that would apply to the project;
- Names and positions of individuals involved with soils management and their specific role;
- An earthwork schedule;
- Requirements for site-specific Health and Safety Plans (HSPs) to be prepared by all contractors at the Project site. The HSP should be prepared by a Certified Industrial Hygienist and would protect on-site workers by including engineering controls, personal protective equipment, monitoring, and security to prevent unauthorized entry and to reduce construction related hazards. The HSP should address the possibility of encountering subsurface hazards including hazardous waste contamination and include procedures to protect workers and the public;

- Hazardous waste determination and disposal procedures for known and previously unidentified contamination, including those associated with any soil export activities, if applicable;
- Requirements for site specific techniques at the site to minimize dust, manage stockpiles, run on and run-off controls, waste disposal procedures, etc.; and
- Copies of relevant permits or closures from regulatory agencies.

MM HAZ-2 If potentially contaminated soil is identified during site disturbance activities for the Project, as evidenced by discoloration, odor, detection by instruments, or other signs, a qualified environmental professional shall inspect the site, determine the need for sampling to confirm the nature and extent of contamination, and provide a written report to the Master Developer, Site Developer, or Lead Agency, as applicable, stating the recommended course of action based on applicable regulations or other standards for handling and disposal (consistent with the required SMP), and remediation or removal of contaminated soils (e.g., DTCS's residential screening levels). Depending on the nature and extent of contamination, the qualified environmental professional shall have the authority to temporarily suspend construction activity at that location for the protection of workers or the public. If, in the opinion of the qualified environmental professional, substantial remediation may be required, the Master Developer, Site Developer, or Lead Agency, as applicable, shall contact representatives of the Riverside County Fire Department and/or DTSC for guidance and oversight and shall comply with all performance standards and requirements of the respective agency for proper removal and disposal of contaminated materials.

Impact 4.8-3: ***Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

Level of Significance: Less Than Significant

CONSTRUCTION AND OPERATIONS

No existing or proposed schools (outside of the Project site) are located within one-quarter mile of the Project site. The nearest operating school to the Project site is located two miles west. John Muir Charter School / Urban Conservation Corps is located at 45630 Citrus Ave Suite B, Indio, CA 92201. The Project would not emit hazardous emissions or include the handling of hazardous or acutely hazardous materials, substances, and/or wastes within one-quarter mile of an existing or proposed school (outside of the Project site). The transport of hazardous substances or materials to-and-from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations intended to reduce public safety hazards. Hazardous substances and wastes would be stored, used, and generated on the Project site during construction. These substances include fuels for construction equipment and vehicles, motor oil, cleaning solvents, paints, and storage containers

and applicators containing such materials. The Project would be required to adhere to all applicable regulations as noted in Impact 4.8-1. A less than significant impact would occur.

Off-Site Impacts

Off-site improvements are not located within proximity to a school. No impact would occur.

Mitigation Measures

No mitigation is necessary.

Impact 4.8-4: ***Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

Level of Significance: Less Than Significant

CONSTRUCTION AND OPERATIONS

Government Code 65962.5 combines several regulatory lists of sites that pose a hazard related to hazardous materials and substances. According to Government Code 65962.5, no hazardous materials or waste sites are located within the Project site as there are no known hazardous waste sites within the Project vicinity. Additionally, the Project site is not included on the hazardous sites list compiled pursuant to CGC Section 65962.5.[11] Therefore, impacts would be less than significant.

Off-Site Impacts

According to CalRecycle's Solid Waste Information System (SWIS) Facility/Site Search,[12] there are three solid waste facilities, operations, and/or disposal sites located approximately 1.3 miles northwest of the Project site as described below:

- Coachella Valley Disposal Site (SWIS Number 33-AA-0012), 87011 Landfill Road, Coachella, CA: The site has an operational status of 'Closed' and a regulatory status of 'Permitted.' An inspection was recently conducted on December 19, 2022. No violations or areas of concern were identified.
- Coachella Valley Compost (SWIS Number 33-AA-0292) at 87011 Landfill Road, Coachella, CA: This site has an operational status of 'Active' and a regulatory status of 'Permitted.' An inspection was recently conducted on February 28, 2023. No violations or areas of concern were identified.
- Coachella Valley Transfer Station (SWIS Number 33-AA-0248) located at 87011-A Landfill Road, Coachella, CA: This site has an operational status of 'Active' and a regulatory status of 'Permitted.' An inspection was conducted on March 6, 2023. No violations or areas of concern were identified.

These off-site sites are not in proximity to any of the off-site improvements and do not pose a risk to the Project.

[11] Ibid.
[12] CalRecycle. 2022. SWIS Facility/Site Search. https://www2.calrecycle.ca.gov/SolidWaste/Site/Search (accessed November 2022).

According to DTSC's EnviroStor Database, there are no sites or facilities of concern in proximity to any off-site improvement areas.[13]

According to SWRCB's GeoTracker,[14] there are two LUST Cleanup Sites located on the northeast and southeast corners of the Dillon Road/Vista Del Norte intersection, where improvements to Vista Del Norte are proposed. They are as follows:

- Chevron Dillon Road at 45760 Dillon Road, Coachella, CA – This site has a status of 'Completed – Case Closed' as of July 17, 2008. This site is still in operation.
- Valley Gas at 45800 Dillon Road, Coachella, CA - This site has a status of 'Completed – Case Closed' as of May 23, 2008. This site is no longer in operation.

Based on the status of 'Completed – Case Closed' for both sites, they are not anticipated to pose an environmental concern for the Vista Del Norte roadway improvements. A less than significant impact would occur.

Mitigation Measures

No mitigation is necessary.

Impact 4.8-5: ***For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?***

Level of Significance: No Impact

CONSTRUCTION AND OPERATION

The Project site is not within two miles of a public airport, public use airport, nor is the Project located within an Airport Influence Area (AIA). Therefore, the Project would not result in a safety hazard for the people residing or working in the area. Refer to ***Section 4.11, Noise***, for impacts related to excessive noise. No impact would occur.

Off-Site Impacts

Off-site improvements are not located within proximity to an airport. No impact would occur.

Mitigation Measures

No mitigation is necessary.

Impact 4.8-6: ***Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

Level of Significance: Less Than Significant

[13] DTSC. 2022. EnviroStor Database. https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=coachella%2C+ca (accessed November 2022).
[14] SWRCB. 2022. GeoTracker. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Coachella (accessed November 2022).

CONSTRUCTION AND OPERATIONS

The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be maintained along public streets that abut the Project site. The City has adopted an Emergency Operations Plan[15] to identify evacuation routes, emergency facilities, and City personnel and equipment available to effectively deal with emergency situations. The Project shall comply with the City's adopted Emergency Operations Plan. The developer is required to design, construct, and maintain structures, roadways, and facilities to comply with the applicable federal, State, and local requirements related to emergency access and evacuation plans. The proposed plan will be reviewed and approved by the fire marshal during the plan review.

The Project Site is bounded by the Little San Bernardino Mountains to the north, the City of Indio to the northwest, I-10 and the City of Coachella to the south and west, and unincorporated Riverside County to the east. I-10 and surrounding arterial roadways can be utilized as emergency evacuation routes for the surrounding Project area. These primary routes surrounding the Project site would not be subject to any lane closures as a result of the Project. The Project would not include or cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Emergency vehicle access to the Project Site would be provided from Vista Del Norte and the Avenue 50/I-10 interchange.

Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project site access and circulation plans would be subject to review and approval by the City Development Services Department, Riverside County Fire Department (RCFD), City of Coachella Police Department, and Riverside County Sheriff's Department.

Furthermore, the City's Safety Element includes policies and procedures to be administered in the event of a disaster to assist with preparedness and response. These policies include: Policy 8.1, which includes a Local Hazard Mitigation Plan that incorporates an assessment of climate change-related hazards; Policy 8.2 ensures maintenance and updates of the emergency response organization consisting of representatives from all City departments, the Riverside County Fire and Sheriff Departments, local quasi-governmental agencies, private businesses, citizens, and other community partners involved in emergency relief and/or community-wide emergency-response services; Policy 8.7 which ensures that, in the event of a major disaster, critical, dependent care and high-occupancy facilities remain functional; and Policy 8.9 which enhances public awareness and preparedness by encouraging residents and businesses to store supplies for self-reliance following a disaster. The City of Coachella manages disaster preparedness through interdepartmental and inter-jurisdictional coordination and collaboration to be prepared for, respond to, and recover from everyday and disaster emergencies. A full range of cost-effective services to the City as part of the regional and integrated fire protection system are provided via a cooperative agreement with the Riverside County Fire Department and CAL FIRE. Services provided include fire suppression, fire prevention and fire protection planning. The City is served by the Riverside

[15] City of Coachella, Emergency Operations Plan. 2021. https://mccmeetingspublic.blob.core.usgovcloudapi.net/coachelaca-meet-9f8743b89337475fb6aa79c328ed82c4/ITEM-Attachment-001-161f355d346b474ca9e536bdf5ca124e.pdf. Accessed September 2022.

County Fire Department, Station 79, and is responsible for the preparation of the community for disasters and the organization of recovery efforts. Because the Project site is undisturbed and in an undeveloped desert area, it is not identified in the City's Local Hazard Mitigation Plan as being an evacuation area.[16] Lastly, construction of the Project would be generally confined to the Project site and would not physically impair access to the site or the Project area. During both construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles as required by the City of Coachella and the Riverside County Fire Department. Because both Project construction and operations would not disrupt or interfere with emergency access to nearby roadways and would not interfere with the City's emergency response plan, impacts would be less than significant.

Off-Site Impacts

Refer to the analysis above.

Mitigation Measures

No mitigation is necessary.

Impact 4.8-7: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Level of Significance: Less Than Significant

CONSTRUCTION AND OPERATIONS

The Project site is located in a Local Responsibility Area and Federal Responsibility Area and is not located within a State Responsibility Area or a very high fire hazard severity zone.[17,18] See **Section 7.4, Wildfire** for additional information. The Project site and surrounding areas generally consist of vacant land and transportation or residential uses, which are generally not associated with wildland fire hazards. The Project would comply with all applicable local and State regulations related to fire safety such as the California Building Code, and California Fire code as well as the City's General Plan Policy 4.1, which requires the use of vegetation control methods to reduce the hazard of wildland fire, and Policy 4.2, which requires the use of fire-resistant building construction materials to reduce the hazard of structure fires, within the developed areas of the City and at the urban-wildland interface. Impacts would be less than significant.

Off-Site Impacts

Refer to the analysis above.

Mitigation Measures

No mitigation is necessary.

[16] City of Coachella. 2014. General Plan, Safety Element, Potential Emergency Shelters and Evacuation Routes. Available at https://www.coachella.org/home/showpublisheddocument/3217/635712766613900000. Accessed on June 17, 2022.
[17] Cal Fire FHSZ Viewer Map. 2021. https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9.
[18] Office of State Fire Marshal. 2022. Fire Hazard Severity Zones in SRA Map. https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/ (accessed December 2022).

4.8.5 CUMULATIVE IMPACTS

Hazards and hazardous waste impacts are typically unique to each site and do not usually contribute to cumulative impacts. Cumulative development projects would be required to assess potential hazardous materials impacts on the development site prior to grading. The Project and other cumulative projects would be required to comply with laws and regulations governing hazardous materials and hazardous wastes used and generated as described previously. Therefore, cumulative impacts related to hazards and hazardous materials would be less than significant after regulatory compliance.

Each project is required to address any issues related to hazardous materials or wastes on a project-specific basis. With adherence to applicable federal, State, and local regulations governing hazardous materials, the potential risks associated with hazardous materials would be less than significant. The incremental effects of the Project related to hazards and hazardous materials, if any, are anticipated to be minimal, and any effects would be site-specific. Therefore, considering the above, Project impacts would be mitigated to less than significant levels with mitigation incorporated, and the Project's contribution to cumulative impacts is not otherwise considered to be "cumulatively considerable."

4.8.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts have been identified.

4.8.7 REFERENCES

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SWRCB. 2022. GeoTracker. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Coachella.

4.9 HYDROLOGY AND WATER QUALITY

This section describes the hydrology and water quality on and around the KPC Coachella Specific Plan (Project) area and evaluates whether the proposed Project would result in adverse effects to such resources.

The setting, context, and impact analysis in this section is based on the KPC Coachella Specific Plan Drainage Master Plan completed by Q3 Consulting (August 2024; **Appendix H1**), the Conceptual Storm Water Quality Analysis (SWQA) completed by Q3 Consulting (November 2022; **Appendix H2**), and the Water Supply Assessment (WSA), completed by Charles Marr Consulting (September 2023; **Appendix K1**). Additional information and data for the analysis in this section was provided by the KPC Coachella Specific Plan Drainage Master Plan, the 2020 Coachella Valley Regional Urban Water Management Plan (UWMP), Coachella Valley 2010 WMP Update Draft Subsequent Program Environmental Impact Report, City of Coachella General Plan, City of Coachella Municipal Code, City of Coachella General Plan Update Draft Environmental Impact Report, and the City of Coachella Water Shortage Contingency Plan.

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts on hydrology and water quality. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors such as surface runoff and flood flows.

4.9.1 ENVIRONMENTAL SETTING

EXISTING HYDROLOGY

According to the Project's Drainage Master Plan and the 2020 Coachella Valley Regional Urban Water Management Plan[1] (UWMP), the Project site, located in the City of Coachella (City), is characterized by undeveloped desert land, including rocky ridges and dry washes that slope from the northeast to the southwest, and is bounded by mountainous terrain. The Project is situated on a piedmont composed of steep-sloped active and inactive alluvial fan surfaces below the Little San Bernardino Mountains in the Whitewater River Watershed (HUC 18100201), which comprises approximately 1,500 square miles. The area of Riverside County in the Whitewater River Region, and under the jurisdiction of the Colorado River Basin Regional Water Quality Control Board (RWQCB), is approximately 367 square miles.

As runoff flows from the mountain canyons it reaches the alluvial fans and disperses into a poorly defined network of braided channels (See **Exhibit 3 2: Local Vicinity Map**). The middle portions of the watershed

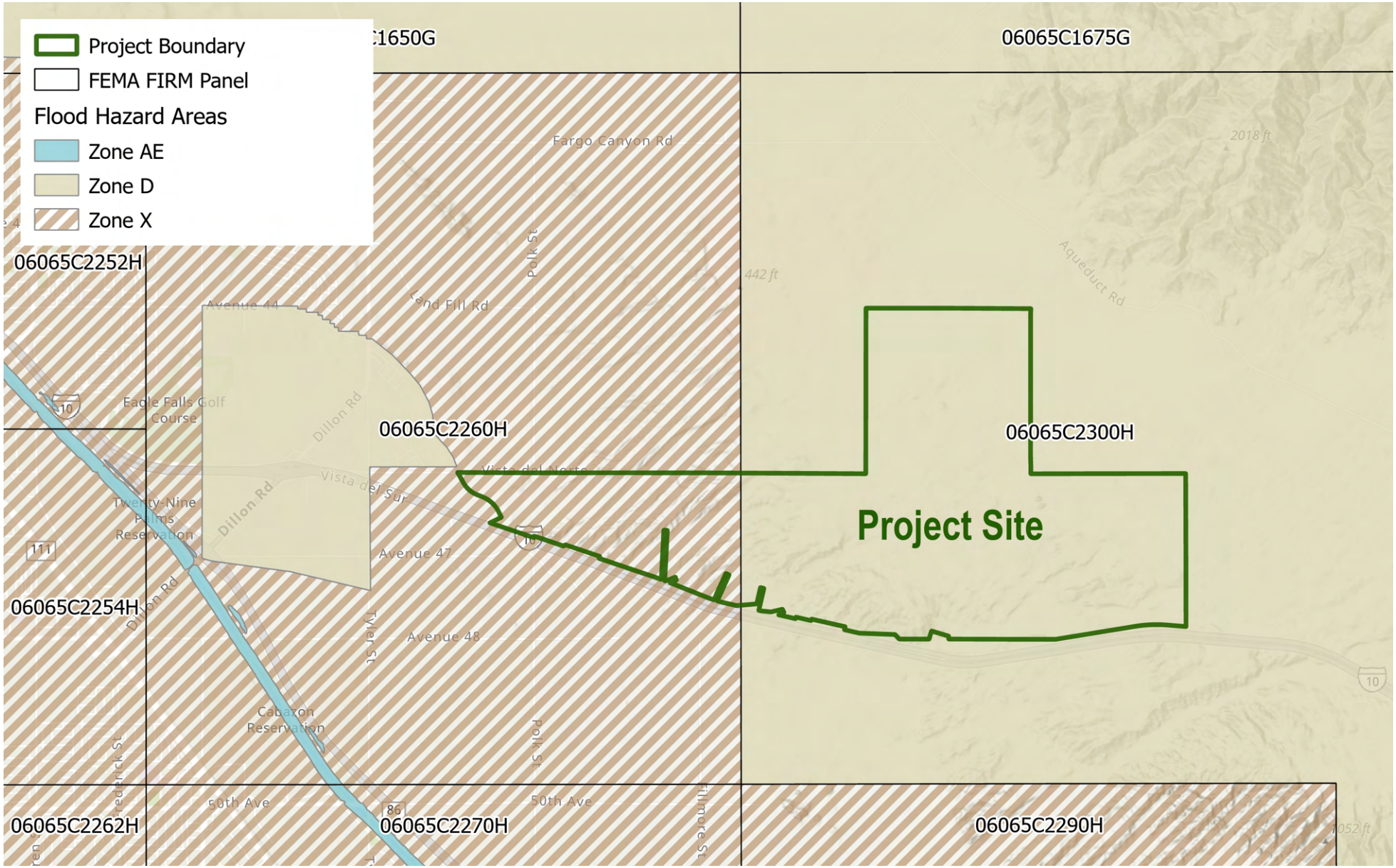
[1] City of Coachella. 2021. 2020 Coachella Valley Regional Urban Water Management Plan. Page 3-1. http://www.cvwd.org/DocumentCenter/View/5482/Coachella-Valley-RUWMP. (accessed July 2022).

areas are defined by active and inactive alluvial fans with braided flow patterns. In some areas, the braided channels confluence in or near the Project site to become better-defined ephemeral stream channels with banks and clearly defined terraces. Under pre- and post-development conditions, the majority of the storm runoff from the Project footprint would traverse the Project site diagonally. Several natural drainage channels that facilitate the movement of water throughout the site run at a diagonal from northeast to southwest, as well as along the perimeter of the Project area.

The Project's runoff and storm flow would drain to the embankment wall of the All-American Canal (Eastside Dike), where it pools, disperses, and is potentially discharged to the Coachella Valley Stormwater Channel/Whitewater River via Wasteway No. 2, a concrete-lined channel approximately 2.2 miles long. Wasteway Number 2 confluences with the Coachella Valley Stormwater Channel below Avenue 52, approximately 7.5 miles downstream from the Indio Boulevard Bridge, and just over 11 miles upstream from the Salton Sea. The Salton Sea is a lake that has no outlet and does not discharge to the ocean. There are no existing culverts or other stormwater facilities located within the Project area. The Drainage Master Plan for the Project includes a series of water quality retention basins, storm drains, and a proposed spreading basin. See **Exhibit 3-9: Drainage Master Plan** for basin locations, existing regional channels, and proposed stormwater infrastructure.

FLOOD HAZARDS

Federal Emergency Management Agency (FEMA) Flood Insurance Rated Map (FIRM) shows the Project is located on mapped Panels 2260 and 2300 (Map No. 06065C2260H and 06065C2300H, effective March 6, 2018). The flood insurance maps indicate that the Project is located within two flood hazard zones, X and D. The Zone D designation is designated for areas where there are possible but undetermined flood hazards and no analysis of flood hazards has been conducted. A portion of the Project site is located within the designated Zone X, which are areas determined to be outside of the 0.2 percent annual chance (500-year) floodplain. Based on a review of these panels, the Project site is not located in a mapped flood plain or floodway. Refer to **Exhibit 4.9-1: FEMA Flood Hazard Zones**.



Source: Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), 2018

EXHIBIT 4.9-1: FE Flood Ha ard Zones

KPC Coachella Specific Plan Project

City of Coachella

Not to scale

Kimley»Horn

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GROUNDWATER

Water is supplied to the City entirely by the Coachella Valley Groundwater Basin, Indio Subbasin; Basin Number 7-21.01 (also referred to as the Whitewater River Subbasin). The Whitewater River Subbasin has native supplies, recycled water, and imported supplies recharged into the Basin. The City supplies 100 percent of its potable water from City-owned and operated wells, all sourced from the Whitewater River Subbasin. The City currently operates six (6) active groundwater wells: Well Nos. 11, 12, 16, 17, 18, and 19, with a total production capacity of approximately 11,400 gallons per minute (gpm) or 16.5 million gallons per day (MGD), which supplied a total demand of 7,216 acre-feet per year (AFY) in 2020.[2]

The Whitewater River Subbasin contains vast reserves of local groundwater (approximately 30 million acre-feet (AF) at depth of 1,000 feet as of June 2021) and has substantial available storage space that will continue to be utilized to store millions of acre-feet of supplemental supplies that become available during normal and above-normal years. Those surplus supplies are recharged to the Whitewater River Subbasin for later use during dry periods. The Whitewater River Subbasin is capable of ensuring a sustainable water supply to serve existing and future developments during normal, single-dry, and multiple-dry years during the course of the 2045 planning horizon.[3]

According to the UWMP, the Project lies within the Desert Hot Springs Subbasin and the Fargo Canyon Subarea. Groundwater pumping does not currently occur within the Desert Hot Springs Subbasin; however, investigatory studies are proposed for the development of groundwater pumping in this area, which has recently been characterized as generally low-quality water with limited yield potential. Therefore, all groundwater pumping would likely be developed within the Whitewater River Subbasin west of the San Andreas Fault to avoid these concerns.[4]

WATER QUALITY

The amount of pollutants in the surface runoff is determined by the quantity of material in the environment and its characteristics. In an urban environment, the quantity of certain pollutants in the stormwater systems is generally associated with the intensity of land use.

The City is covered by the urban Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) permit, which was issued to the Riverside County Flood Control and Water Conservation District, in cooperation with the Coachella Valley Water District (CVWD). A Water Quality Management Plan (WQMP) would be developed for the Project to document compliance of the Project with the MS4 permit. Because the Project would disturb more than one acre of impervious area, the MS4 permit requires the Project-specific WQMP to demonstrate that runoff flow rates, velocities, durations, and volumes from a 2-year and 10-year, 24-hour rainfall event will not significantly impact downstream erosion or stream habitat.

[2] Charles Marr Consulting. 2023. KPC Coachella Water Supply Assessment. Page 3-2. Whittier, CA: Charles Marr Consulting.
[3] City of Coachella. 2021. 2020 Coachella Valley Regional Urban Water Management Plan. Page 5-14. Coachella, CA: City of Coachella. https://www.coachella.org/home/showpublisheddocument/8249/637583312995530000. (accessed January 2023).
[4] City of Coachella. 2021. 2020 Coachella Valley Regional Urban Water Management Plan. Page 3-5. Coachella, CA: City of Coachella. https://www.coachella.org/home/showpublisheddocument/8249/637583312995530000. (accessed January 2023).

4.9.2 REGULATORY SETTING

FEDERAL

Clean Water Act

The Project is subject to federal permit requirements under the Federal Clean Water Act (CWA). The primary goals of the CWA are to maintain the chemical, physical, and biological integrity of the nation's waters and to make all surface waters fishable and swimmable. The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the National Pollutant Discharge Elimination System (NPDES), effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint source discharge programs, and wetlands protection. The United States Environmental Protection Agency (U.S. EPA) has delegated the administrative responsibility for portions of the CWA to state and regional agencies. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The SWRCB works in coordination with the RWQCBs to preserve, protect, enhance, and restore water quality.

Pursuant to Section 404 of the Clean Water Act (33 U.S. Code [USC] Section 1251 et seq.; CWA), the U.S. Army Corps of Engineers (USACE) is authorized to regulate any activity that would result in the discharge of dredged or fill material into waters of the U.S. (including wetlands), which include those waters listed in 33 Code of Federal Regulations (CFR) 328.3 (as amended at 88 Federal Register [FR] 3004, January 18, 2023). The USACE, with oversight from the U.S. EPA has the principal authority to issue CWA Section 404 permits. The USACE would require a Standard Individual Permit (SIP) for more than minimal impacts to waters of the U.S. as determined by the USACE. Projects with minimal individual and cumulative adverse effects on the environment may meet the conditions of an existing Nationwide Permit (NWP).

A water quality certification or waiver pursuant to Section 401 of the CWA is required for all Section 404 permitted actions. The RWQCB, a division of the SWRCB, provides oversight of the 401-certification process in California. The RWQCB is required to provide "certification that there is reasonable assurance that an activity that may result in the discharge to waters of the United States will not violate water quality standards." Water Quality Certification must be based on the finding that proposed discharge will comply with applicable water quality standards.

Under the NPDES permit program, the U.S. EPA establishes regulations for discharging stormwater by municipal and industrial facilities and construction activities. Section 402 of the CWA prohibits the discharge of pollutants into Waters of the United States from any point source unless the discharge is in compliance with an NPDES Permit.

The Anti-degradation Policy under the U.S. EPA's Water Quality Standards Regulations (48 F.R. 51400, 40 CFR 131.12, November 8, 1983), requires states and tribes to establish a three-tiered anti-degradation program to prevent a decrease in water quality standards.

- Tier 1—Maintains and protects existing uses and water quality conditions that support such uses. Tier 1 is applicable to all surface waters.
- Tier 2—Maintains and protects "high quality" waters where existing conditions are better than necessary to support "fishable/swimmable" waters. Water quality can be lowered in such waters but not to the point at which it would interfere with existing or designated uses.
- Tier 3—Maintains and protects water quality in outstanding national resource waters. Water quality cannot be lowered in such waters except for certain temporary changes.

Anti-degradation was explicitly incorporated into the federal CWA through 1987 amendments, codified in Section 303(d)(4)(B), requiring satisfaction of anti-degradation requirements before making certain changes in NPDES permits.

Section 303(d) of the CWA requires the SWRCB to list impaired water bodies that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The law requires that these jurisdictions establish priority rankings for waters on the lists and develop Total Maximum Daily Loads (TMDL) for these waters.

Federal Emergency Management Agency – National Flood Insurance Program

FEMA is tasked with responding to, planning for, recovering from, and mitigating against disasters. Among other things, FEMA is responsible for coordinating the federal response to floods. The Federal Insurance and Mitigation Administration within FEMA is responsible for administering the National Flood Insurance Program (NFIP) and other programs that provide assistance for mitigating damage from natural hazards. Established in 1968 with the passage of the National Flood Insurance Act, the NFIP is a federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for state and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the federal government. This insurance is designed to provide an insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods.

California Toxics Rule

The California Toxics Rule is a federal regulation issued by the U.S. EPA with water quality criteria for potentially toxic constituents in receiving waters with human health or aquatic life designated uses in California. Criteria are applicable to the receiving water body and therefore must be calculated based on the receiving waters' probable hardness values for evaluation of acute (and chronic) toxicity criteria. At higher hardness values for the receiving water, copper, lead, and zinc are more likely to be complexed (bound with) components in the water column. This, in turn, reduces these metals' bioavailability and resulting potential toxicity.

Because of the intermittent nature of stormwater runoff, especially in southern California, the acute criteria are considered to be more applicable to stormwater conditions than the chronic criteria and therefore are used in assessing impacts. The acute criteria represent the highest concentration of a pollutant to which aquatic life can be exposed for a short period of time without deleterious effects; the

chronic criteria equal the highest concentration to which aquatic life can be exposed for an extended period of time (four days) without deleterious effects.

STATE

Porter-Cologne Water Quality Control Act

The Porter-Cologne Act (California Water Code Section 13000 et seq) is the principal law governing water quality regulation in California. It established a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and groundwater and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act, the policy of the State is as follows:

- That the quality of all the waters of the state shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the state must be prepared to exercise its full power and jurisdiction to protect the quality of water in the state from degradation.

The Porter-Cologne Act established nine RWQCB's (based on watershed boundaries as defined by their surrounding mountain chains and ridges) and the SWRCB, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The SWRCB provides program guidance and oversight, allocates funds, and reviews RWQCB decisions. In addition, the SWRCB allocates rights to the use of surface water. The RWQCBs have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrology regions. The SWRCB and RWQCBs have numerous nonpoint source[5] pollution-related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The RWQCBs regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges for contaminants and waste discharge requirements for nonpoint source discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing waste discharge requirements and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also implements many provisions of the CWA, such as the NPDES permitting program. Section 401 of the CWA gives the SWRCB the authority to review any proposed federally permitted or federally licensed activity that may impact water quality and to certify, condition, or deny the activity if it does not comply with state water quality standards. If the SWRCB imposes a condition on

[5] According to the U.S. EPA, "NPS pollution generally results from land runoff, precipitation, atmospheric deposition, drainage, seepage or hydrologic modification." NPS pollution has many diffuse sources whereas point source pollution has a single, identified source. Retrieved from U.S. EPA Website: https://www.epa.gov/nps/basic-information-about-nonpoint-source-nps-pollution (accessed January 24, 2023).

its certification, those conditions must be included in the federal permit or license. Except for dredge and fill activities, injection wells, and solid waste disposal sites, waste discharge requirements may not "specify the design, location, type of construction, or particular manner in which compliance may be had…." (Porter-Cologne Act Section 13360). Thus, waste discharge requirements ordinarily specify the allowable discharge concentration or load or the resulting condition of the receiving water, rather than the manner by which those results are to be achieved. However, the RWQCBs may impose discharge prohibitions and other limitations on the volume, characteristics, area, or timing of discharges and can set discharge limits such that the only practical way to comply is to use management practices. RWQCBs can also waive waste discharge requirements for a specific discharge or category of discharges on the condition that management measures identified in a water quality management plan approved by the SWRCB or RWQCBs are followed.

The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. A number of statewide water quality control plans have been adopted by the SWRCB. In addition, regional water quality control plans (basin plans) have been adopted by each of the RWQCBs and are updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the state, and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. Statewide and regional water quality control plans include enforceable prohibitions against certain types of discharges, including those that may pertain to nonpoint sources. Portions of water quality control plans, the water quality objectives and beneficial use designations, are subject to review by the U.S. EPA. When approved, they become water quality standards under the CWA. The Project is subject to basin plans for the Colorado River Basin RWQCB.

The Porter-Cologne Act establishes a comprehensive program for the protection of beneficial uses of the waters of the state. California Water Code Section 13050(f) describes the beneficial uses of surface and ground waters that may be designated by the state or regional board for protection as follows: "Beneficial uses of the waters of the state that may be protected against quality degradation include, but are not necessarily limited to, domestic, municipal, agricultural and industrial supply; power generation; recreation; aesthetic enjoyment; navigation; and preservation and enhancement of fish, wildlife, and other aquatic resources or preserves." Waterbodies with substantial evidence indicating that the waterbody supports rare, threatened, or endangered species are identified as RARE.

State Water Resources Control Board

The SWRCB administers water rights, water pollution control, and water quality functions throughout the State, while the RWQCBs conduct planning, permitting, and enforcement activities. The City lies within the jurisdiction of the Colorado River Basin RWQCB.

The NPDES permit is broken up into two Phases: I and II. Phase I requires medium and large cities, or certain counties with populations of 100,000 or more to obtain NPDES permit coverage for their stormwater discharges. Phase II requires regulated small MS4s in urbanized areas, as well as small MS4s outside the urbanized areas that are designated by the permitting authority, to obtain NPDES permit coverage for their stormwater discharges. Concerning the Project, the NPDES permit is divided into two

parts: construction and post-construction. The construction permitting is administered by the SWRCB, while the post-construction permitting is administered by the RWQCB. Development projects typically result in the disturbance of soil that requires compliance with the NPDES General Permit, Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with Construction Activities (Order No. 2012-0006-DWQ, NPDES Number CAS000002) (General Construction Permit). This Statewide General Construction Permit regulates discharges from construction sites that disturb one or more acres of soil.

The SWRCB has issued and periodically renews a statewide General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (GCASP) and a statewide General Industrial Activities Stormwater Permit (GIASP) for Projects that do not require an individual permit for these activities. The GCASP was adopted in 2009 and further revised in 2012 (Order No. 2012-0006-DWQ). The most recent GIASP (Order No. 2014-0057-DWQ) was adopted in April 2014 and requires dischargers to develop and implement a Stormwater Pollution Prevention Plan (SWPPP) to reduce or prevent industrial pollutants in stormwater discharges, eliminate unauthorized non-storm discharges, and conduct visual and analytical stormwater discharge monitoring to verify the effectiveness of the SWPPP and submit an annual report.

By law, all stormwater discharges associated with construction activity where clearing, grading, and excavation results in soil disturbance of at least one acre of total land area must comply with the provisions of this NPDES Permit and develop and implement an effective SWPPP. The SWPPP is required to contain a site map(s), which shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the Project site. The SWPPP is required to list Best Management Practices (BMPs) the discharger will use to protect stormwater runoff and the placement of those BMPs. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for “non-visible” pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Construction General Permit (CGP) Section A describes the elements that must be contained in an SWPPP. A Project applicant must submit a Notice of Intent (NOI) to the SWRCB to be covered by the NPDES General Permit and prepare the SWPPP before beginning construction. SWPPP implementation starts with the commencement of construction and continues through Project completion. Upon Project completion, the applicant must submit a Notice of Termination (NOT) to the SWRCB to indicate that construction is completed.

The Municipal Stormwater Permitting Program regulates stormwater discharges from municipal separate storm sewer (drain) systems (MS4s). Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The MS4 permits require the discharger to develop and implement a Stormwater Management Plan/Program with the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP). MEP is the performance standard specified in CWA Section 402(p). The management programs specify what BMPs will be used to address certain program areas. The program areas include public education and outreach; illicit discharge detection and elimination; construction and post-construction; and good housekeeping for municipal operations.

For construction activities that would result in the disturbance of one acre or more, permittees must develop, implement, and enforce a program to reduce pollutant runoff in stormwater. This includes: (1) a program to prevent illicit stormwater discharges; (2) structural and non-structural BMPs to reduce pollutants in runoff from construction sites; and (3) preventing discharges from causing or contributing to violations of water quality standards. Permittees are required to review construction site plans to determine potential water quality impacts and ensure proposed controls are adequate. These include preparation and submission of an Erosion and Sediment Control Plan (ESCP) with elements of an SWPPP, prior to issuance of building or grading permits. The MS4 permit requires that the ESCP be developed by a Qualified SWPPP Developer. Permittees are required to develop a list of BMPs for a range of construction activities.

Watershed Management Initiative

The State and Regional Water Boards are currently focused on looking at entire watersheds when addressing water pollution. The Water Boards adopted the Watershed Management Initiative (WMI) to further their goals. The WMI establishes a broad framework overlying the numerous federal and state-mandated priorities. As such, the WMI helps the Water Boards achieve water resource protection, enhancement and restoration while balancing economic and environmental impacts. The integrated approach of the WMI involves three main ideas:

- Use water quality to identify and prioritize water resource problems within individual watersheds. Involve stakeholders to develop solutions.
- Better coordinate point source and nonpoint source regulatory efforts. Establish working relationships between staff from different programs.
- Better coordinate local, state, and federal activities and programs, especially those relating to regulations and funding, to assist local watershed groups.[6]

Sustainable Groundwater Management Act

The California Department of Water Resources' (DWR's) 2014 Sustainable Groundwater Management Act (SGMA) requires local public agencies and Groundwater Sustainability Agencies (GSAs) in "high"- and "medium"-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs (DWR, 2019). The DWR categorizes the priority of groundwater basins. GSPs are detailed road maps for how groundwater basins will reach long-term sustainability. Section 10720.8(a) of the SGMA exempts adjudicated basins from the SGMA's requirement to prepare a GSP. The Project is located in the Coachella Valley – Indio basin, a medium priority basin.[7]

California Toxics Rule

The California Toxics Rule (CTR) provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated with human health or aquatic life uses. Although the CTR criteria do not apply directly to the discharges of stormwater runoff, the CTR

[6] State Water Resources Control Board. 2017. Watershed Management Initiative (WMI). https://www.waterboards.ca.gov/water_issues/programs/watershed/ (accessed July 2022).
[7] DWR. ND. SGMA Basin Prioritization Dashboard. https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed July 2022).

criteria are utilized as benchmarks for toxics in urban runoff. The CTR and other water quality criteria and targets are used as benchmarks to evaluate the potential ecological impacts of stormwater runoff to receiving waters. The CTR establishes acute and chronic surface water quality standards for certain water bodies. Acute criteria provide benchmarks for the highest permissible concentration below which aquatic life can be exposed for short periods of time without deleterious effects. Chronic criteria provide benchmarks for an extended period of time (i.e., for 4 days or more) without deleterious effects. The acute CTR criteria have a shorter relevant averaging period (less than 4 days) and provide a more appropriate benchmark for comparison for stormwater flows.

CTR criteria are applicable to the receiving water body and therefore must be calculated based on the probable hardness values of the receiving waters. At higher hardness values for receiving waters, certain constituents, including copper, lead, and zinc, are more likely to be bound with components in the water column. This, in turn, reduces the bioavailability and resulting potential toxicity of these metals.

Clean Water Act, Section 303, List of Impaired Water Bodies

As released by the SWRCB, the 2020-2022 Integrated Report (CWA Section 303(d) List/305(b) Report) contains the most recent listing of impaired water bodies within the State. The Coachella Valley Stormwater Channel is listed on the 303(d) list as impaired for dichlorodiphenyltrichloroethane (DDT), dieldrin, disulfoton, dissolved oxygen, indicator bacteria, nitrogen, ammonia (Total Ammonia), polychlorinated biphenyls (PCBs), toxaphene, and toxicity. The Salton Sea is listed on the 303(d) list as impaired for arsenic, chloride, chlorpyrifos, DDT, enterococcus, low dissolved oxygen, ammonia (Total Ammonia), nitrogen, nutrients, salinity, and toxicity.[8]

General Construction Activity Storm Water Permit

The General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2012-0006-DWQ, NPDES No. CAS000002 (CGP), adopted by the SWRCB, regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least one acre (ac) of total land area. The CGP authorizes the discharge of stormwater to surface waters from construction activities. It prohibits the discharge of materials other than stormwater and authorized non-stormwater discharges and all discharges that contain a hazardous substance in excess of reportable quantities established at 40 CFR 117.3 or 40 CFR 302.4, unless a separate NPDES Permit has been issued to regulate those discharges.

REGIONAL

Colorado River Basin Water Quality Control Plan

The Colorado River Basin RWQCB has adopted a Water Quality Control Plan (Basin Plan) for its region of responsibility, which includes the City. The RWQCB has delineated water resource area boundaries based on hydrological features. For purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the hydrologic areas described in the Basin Plan. The Basin

[8] SWRCB. 2022. 2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report). https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html (accessed January 2023).

Plan also establishes implementation programs to achieve water quality objectives to protect beneficial uses and requires monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State antidegradation policy (State Board Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

Storm Water Management Program

To implement the requirements of the MS4 Permit, the co-permittees developed the Whitewater River Region Stormwater Management Plan (SWMP) in 2014 (revised in 2015) that describes the activities and programs implemented by the permittees to manage urban runoff to comply with the requirements of the MS4 Permit. Per the requirements in the Drainage Area Management Plan (DAMP) and the MS4 Permit, the City will approve Water Quality Management Plans (WQMPs) for new development and redevelopment Projects designated as "priority projects" within its jurisdiction as part of the development plan and entitlement approval process. WQMPs for new development and significant redevelopment Projects that fall under specific priority Project categories must include Site Design, Source Control, and Treatment BMPs. The priority Project categories are those determined by the RWQCB to have the greatest potential to impact receiving waters with polluted runoff. Priority Projects include the following:

- Single-family hillside residences that create 10,000 square feet (sf) or more of impervious area where the natural slope is 25 percent or greater;
- Single-family hillside residences that create 10,000 sf or more of impervious area where the natural slope is 10 percent or greater where erosive soil conditions are known;
- Commercial and industrial developments of 100,000 sf or more;
- Automotive repair shops;
- Retail gasoline outlets disturbing greater than 5,000 sf;
- Restaurants disturbing greater than 5,000 sf;
- Home subdivisions with 10 or more housing units; and
- Parking lots of 5,000 sf or more, or with 25 or more parking spaces, and potentially exposed to urban runoff.

Urban Water Management Plan

Water resources in the Coachella Valley are subject to comprehensive planning and management efforts. At the regional level, such efforts are carried out in cooperation with the CVWD and the Desert Water Agency. At the sub-regional and local level, and more specifically in and around the City, water resources are cooperatively managed by regional and retail water agencies such as CVWD, the Coachella Water Authority, the Indio Water Authority, and others.

The Integrated Water Resources Management Planning Act (Water Code Sections 10530 – 10550), CEQA and other laws and policies, several water supply planning documents have been prepared and adopted to ensure a sufficient and reliable long-term water supply within CVWD, including the City and its Sphere of Influence (SOI). Those planning documents include, but are not limited to:

- 2020 Coachella Valley Regional Urban Water Management Plan (2020 UWMP);
- Coachella Valley Water District Coachella Valley Water Management Plan Update Final Subsequent Programmatic Environmental Impact Report (2011 SPEIR);
- Coachella Valley Integrated Regional Water Management Plan/Stormwater Resource Plan (2018 IRWM/SWR);
- 2021-2022 Engineer's Report on Water Supply and Replenishment Assessment;
- 2021 Water Shortage Contingency Plan (WSCP);
- City of Coachella 2017 Water Master Plan; and
- CVWD Regulations Governing Domestic Water Service Ordinance No. 1399.12.

LOCAL

City of Coachella General Plan

Sustainability and Natural Environment Element[9]

The City's Sustainability and Natural Environment Element establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces. Goals and policies from the Sustainability and Natural Environment Element applicable to the Project include:

Goal 1	**Climate Change. A resilient community that is prepared for the health and safety impacts of and minimizes the risks of climate change.**
Policy 1.12	Reduced water supplies: When reviewing development proposals, consider the possibility of constrained future water supplies and require enhanced water conservation measures.
Goal 3	**Water Resources. Protected and readily available water resources for community and environmental use.**
Policy 3.1	Conservation performance targets – new construction: Require new construction to exceed the state's Green Building Code for water conservation by an additional 10 percent.
Policy 3.4	Low impact development: Require the use of low-impact development strategies to minimize urban run-off, increase site infiltration, manage stormwater and recharge groundwater supplies.
Policy 3.7	Landscape design: Encourage the reduction of landscaping water consumption through plant selection and irrigation technology.
Policy 3.8	Groundwater infiltration: Encourage the use of above-ground and natural stormwater facilities in new development and redevelopment, such as grassy or vegetated swales, permeable paving and rain gardens.

[9] City of Coachella. 2015. City of Coachella General Plan – Sustainability and Natural Environment. https://www.coachella.org/home/showpublisheddocument/8419/637819141150600000. (accessed July 2022).

Policy 3.9 Water quality detention basins. Require water detention basins to be aesthetically pleasing and to serve recreational purposes, such as in the form of a Mini Park. Detention basins designed for active uses are intended to supplement park and open space and should not be counted towards a developer's minimum park requirements, unless otherwise determined by the Planning Commission and City Council.

Policy 3.10 Retention Basins. Encourage stormwater retention basins to be underground in future development so as to achieve the most efficient use of land and compact development and promote the urban character goals of the General Plan.

Goal 7 **Waterways. Waterways and desert washes that serve a natural, environmental function and provide aesthetically pleasing open space for the community.**

Policy 7.1 Pollution prevention: Limit the amount and concentration of pollutants released into the City's waterways.

Policy 7.2 Development impacts. When considering development applications, require consideration of on-site detainment of stormwater runoff and require the incorporation of appropriate stormwater treatment and control measures.

Policy 7.3 Soil erosion. Require the prevention of water-born soil erosion from sites, especially those undergoing grading and mining activities.

Policy 7.6 Waterways as amenities. When considering development applications and infrastructure improvements, treat waterways as amenities, not hazards, and encourage designs that embrace the waterways.

Safety Element[10]

The City's Safety Element establishes the City's long-term goals and policies for providing long-term measures that reflect the City's desire to deal effectively with natural hazards and provide a safe living environment for the community. The primary objective of the Safety Element, as the policies and actions are implemented over the next 20 years, is to make Coachella increasingly resistant to disasters and become more self-reliant, sustainable, and prosperous.

Goal 3 **Flood hazards. A community that is minimally disrupted by flooding and inundation hazards.**

Policy 3.1 Hydrological studies: Require new development proposals to include as a condition of approval, hydrological studies prepared by a state-certified engineer with expertise in these kinds of studies, that assess the impact the new development will have on the flooding potential of existing development down-gradient. The studies shall provide mitigation measures to reduce this impact to an acceptable level.

Policy 3.3 Flood mitigation for both existing and new construction: Require all new developments and redevelopments in areas susceptible to flooding (such as the 100-year floodplain and

[10] City of Coachella. 2015. City of Coachella General Plan – Safety Element. https://www.coachella.org/home/showpublisheddocument/8421/637819141302800000 (accessed July 2022).

areas known to flood during intense or prolonged rainfall events) to incorporate mitigation measures designed to minimize or eliminate flood hazards.

Policy 3.5 Storm drainage facilities: Maintain, develop and improve where needed, the storm drain facilities (including bridges and other stormwater channel crossings) with an emphasis on those areas in the City that flood repeatedly.

Infrastructure and Public Services Element[11]

The City's Infrastructure and Public Services Element establishes the City's long-term goals and policies for establishing and managing its infrastructure systems and public services. The Infrastructure and Public Services Element provides information and policy guidance to ensure the provision of public facilities and services in order to support existing and new development in the City.

Goal 2 **Water Supply Facilities. Water supply facilities that meet future growth within the city and assure a high-quality and reliable supply of water to current and future residents.**

Policy 2.5 Water supply for new development: Ensure water supply capacity and infrastructure capacity is in place before granting building permits for new development.

Policy 2.6 Expanding water supply: If water supply is not adequate to supply new development, require new water supplies be secured before granting building permits for new development.

Policy 2.8 Fair-share costs: Establish connection fees to ensure all development has adequate infrastructure for the provision of water and require real property be dedicated when new water facilities are required to serve a development.

Policy 2.13 Water-efficient landscaping: Require the use of water-efficient landscaping in all new development.

Policy 2.14 Grey water: Strongly encourage new development to utilize on-site grey water systems.

Goal 4 **Stormwater Capacity. Sufficient stormwater drainage facilities and services that are environmentally sensitive, accommodate growth and protect residents and property.**

Policy 4.2 New stormwater facilities: Ensure all new drainage facilities are adequately sized and constructed to accommodate stormwater runoff in urbanized areas.

Policy 4.4 Fair-share costs: Require new development fund fair-share costs associated with the provision of stormwater drainage to ensure all development has adequate stormwater drainage protection.

[11] City of Coachella. 2015. City of Coachella General Plan – Infrastructure and Public Services Element. https://www.coachella.org/home/showpublisheddocument/8423/637819141447170000 (accessed July 2022).

Policy 4.5 New development: Require the preparation of drainage studies that evaluate adherence to City stormwater design requirements and incorporate measures to prevent on- or off-site flooding with all new development applications.

Policy 4.6 Stormwater Pollution Prevention: Cooperate in regional programs to implement the National Pollutant Discharge Elimination System program.

Policy 4.9 Property dedication: Require the dedication of real property and improvements of that property when new stormwater drainage facilities are required to serve a development.

City of Coachella Municipal Code

The City of Coachella Municipal Code[12] (Coachella MC) contains several provisions that are expressly designed to ensure the health, safety, and general welfare of the residents of the City by prescribing regulations to effectively prohibit non-stormwater discharges into the City's stormwater drainage system. Specifically, the following provisions of the Coachella MC regulate impacts related water quality throughout all areas of the City:

13.16.047 - Compliance with Best Management Practices (BMPs). Any person undertaking any activity or operation in the city that could potentially cause or contribute to stormwater pollution or a discharge of non-stormwater shall minimize the discharge of pollutants to the stormwater drainage system through the installation, implementation, and maintenance of applicable best management practices (BMPs) consistent with the California Stormwater Best Management Practice Handbooks, or equivalent, the current, Riverside County Stormwater Program's "Report of Waste Discharge," or equivalent, or as required by the public works director.

13.16.241 - General Permit for Stormwater Discharges from Industrial Activities.

A. All facilities described in 40 CFR 122.26(b)(14)(i)-(xi) must obtain coverage under the state's general permit for discharges of stormwater associated with industrial activities, at least fourteen (14) days prior to the startup of business activities. All listed businesses are required to submit a completed notice of intent (NOI) form, site map and application fee to the state board. The state board also requires the listed businesses to prepare a stormwater pollution prevention plan (SWPPP), retain a copy of the SWPPP on site and comply with all the requirements of the general permit. Copies of the NOI form are available from the public works department, environmental section.

13.16.340 - Stormwater Quality Management Plan (WQMP) and BMPs.

A. Plan Review and BMPs. The city will review project plans and impose terms, conditions, and requirements on the project to ensure compliance with this chapter, including but not limited to required BMPs. If a project will be approved without application for a building or grading permit,

[12] City of Coachella. 2022. *City of Coachella Municipal Code. Section 13.16.*

the city will review project plans and impose terms, conditions, and requirements prior to project approval.

B. WQMP. Prior to the issuance of any grading or building permit, all qualifying new and redevelopment projects must submit and have approved a water quality management plan (WQMP) to the city engineer on a form provided by the city. The WQMP shall identify all BMPs that will be incorporated into the project to control stormwater and non-stormwater pollutants during and after construction and shall be revised as necessary during the life of the project. The WQMP submittal applies to construction projects covered by the general permit for stormwater discharges from construction activity, as well as to construction projects less than one acre. Qualifying new and redevelopment projects include:

1. Home subdivisions of ten (10) units or more. This includes single family residences, multi-family residences, condominiums, apartments, etc.;
2. Commercial developments of one hundred thousand (100,000) square feet or more. This includes nonresidential developments such as hospitals, educational institutions, recreational facilities, mini-malls, hotels, office buildings, warehouses, and light industrial facilities;
3. Vehicle maintenance shops (SIC codes 5013, 5014, 5541, 7532-7534, 7536-7539);
4. Food service businesses developing five thousand (5,000) square feet or more of land area;
5. All hillside developments that create ten thousand (10,000) square feet or more of impervious area, which are located on areas with known erosive soil conditions or where the natural slope is twenty-five (25) percent or more, including single family hillside residences that create ten thousand (10,000) square feet or more of impervious area where the natural slope is ten (10) percent or greater or where erosive soil conditions exist;
6. Developments of two thousand five hundred (2,500) square feet of impervious surface or more adjacent to (within two hundred (200) feet) or discharging directly into environmentally sensitive areas such as areas designated in the ocean plan as areas of special biological significance or water bodies listed on the CWA Section 303(d) list of impaired waters;
7. Parking lots of twenty-five (25) spaces or five thousand (5,000) square feet or more exposed to stormwater. "Parking lot" is defined as land area or facility for the temporary storage of motor vehicles;
8. All retail gasoline outlets and restaurants disturbing more than five thousand (5,000) square feet; and
9. All redevelopment projects adding five thousand (5,000) square feet or more of impervious surface on an already developed site. This includes additional buildings and/or structures, extension of an already existing building footprint and construction of parking lots, etc.

13.16.341 - General Permit for Stormwater Discharges from Construction Activity.

A. Plan Review and BMPs. The city will review project plans and impose terms, conditions, and requirements on the project to ensure compliance with this chapter, including but not limited to required BMPs. If a project will be approved without application for a building or grading permit, the city will review project plans and impose terms, conditions, and requirements prior to project approval.

B. WQMP. Prior to the issuance of any grading or building permit, all qualifying new and redevelopment projects must submit and have approved a water quality management plan (WQMP) to the city engineer on a form provided by the city. The WQMP shall identify all BMPs that will be incorporated into the project to control stormwater and non-stormwater pollutants during and after construction and shall be revised as necessary during the life of the project. The WQMP submittal applies to construction projects covered by the general permit for stormwater discharges from construction activity, as well as to construction projects less than one acre.

4.9.3 STANDARDS OF SIGNIFICANCE

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning aesthetics. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

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

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

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

- Result in substantial erosion or siltation on-or off-site;
- Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted run-off;
- Impede or redirect flood flows;

d) In flood hazard, tsunami, or seiche zones, risk release or pollutants due to Project inundation; or

e) Conflict with or obstruct implementation of a water quality control plan or sustainable ground water management plan.

METHODOLOGY AND ASSUMPTIONS

The Project is evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning hydrology and water quality. This analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

Approach to Analysis

This analysis of impacts on hydrology and water quality examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects based on significance criteria/threshold's application outlined above. For each criterion, the analyses are generally divided into two main categories: (1) temporary impacts and (2) permanent impacts. Each criterion is discussed in the context of Project components that share similar characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The foundations for the baseline conditions and impact analyses are field observations conducted by Kimley-Horn; review of Project maps and drawings; analysis of aerial and ground-level photographs; and review of various data available in public records, including local planning documents. The determination that a Project component would or would not result in "substantial" adverse effects on hydrology and water quality considers the available policies and regulations established by local and regional agencies and the amount of deviation from these policies in the Project's components.

The Conceptual Storm Water Quality Analysis was prepared by Q3 Consulting in 2022 and the Drainage Master Plan was prepared by Q3 Consulting in 2024. The Drainage Master Plan contains the 10- and 100-year existing and proposed condition hydrology for the Project site.

Hydrologic Analysis

The Riverside County Flood Control and Water Conservation Districts' (RCFCWCD) *Hydrology Manual* criteria were the basis for the hydrology analyses. The 10- and 100-year existing and proposed condition rational method results are included in the Drainage Master Plan in **Appendix H1**. The overall Project area was divided into five (5) subbasins (East Side Dike basin A (ESD_A), ESD_B, ESD_C, ESD_D, Upper Double Canyon (UDC)). The subbasins are shown in **Exhibit 3-9: Regional Channels and Proposed Mitigation Spreading Basin**.

Hydrograph Analysis

In order to determine peak flow rates and runoff volumes in tributaries to the downstream limits of the Project site, synthetic hydrograph analyses were prepared. Hydrographs were developed for the contributing drainages consisting of five subbasins, based on the 50-percent, 10-percent, and 1-percent

annual chance storm events. Capacity for on-site retention/detention basins within each of the impacted watersheds was determined using the hydrograph analyses.

Flood Routing Analysis

Due to the distributary nature of the flood patterns upstream and throughout the location of the Project site, a second 2-dimensional, rain-on-grid hydrology/hydraulic analysis was prepared for the Project. This flood routing model was prepared using FLO-2D PRO to evaluate the existing flood patterns and will be used to develop the site planning and design in terms of providing sustainable flood protection around and/or through the development footprint and mitigation of flood impacts (in terms of flow depth and velocity) to adjacent properties and facilities as a consequence of the planned development.

PROJECT DESIGN FEATURES

- The Project incorporates comprehensive drainage and water quality infrastructure, consisting of a surface drainage system and water quality features. This will reduce stormwater runoff volume and velocity, improve stormwater runoff water quality during storm events, and low-flow irrigation volumes, and create biological resource habitat.
- All stormwater runoff produced within the Project boundaries has been designed to flow to five Infiltration Basins and 15 Extended Detention Basins that will be distributed across the Project site. The design involves the infiltration, where feasible, or detaining, up to five inches of the 100-year 24-hour storm event runoff. Stormwater will be fully captured by the on-site drainage system and be detained, biotreated, and slowly released to the adjacent storm drain system.
- The Project includes grading improvements on the northwest corner of the Project site to direct flows to a graded stormwater detention/spreading basin located along the western edge of the Project site. The purpose of the basin is to detain and spread flows to match existing conditions within the impacted watersheds.
- The Project will construct bioswales and drainage corridors with amended soil within private development areas and street rights-of-way, sidewalks, walkways, and trails, where grades permit.
- The Project will reduce potable water demand throughout the area by utilizing appropriate landscaping, non-potable reclaimed, well or canal water for irrigation purposes, and high-efficiency plumbing fixtures and appliances.
- The Project will utilize efficient irrigation controls to reduce water demand on landscaped areas.

4.9.4 PROJECT IMPACTS AND MITIGATION

Impact 4.9-1: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION

During construction, grading would occur. Bare soils would be exposed, and stockpiles would be created. Fuels, lubricants, and solid and liquid wastes would be stored within active construction areas. If the construction areas are not properly managed to contain loose soils and liquid and solid contaminants, temporary water quality impacts could occur due to runoff from the active construction site.

The Project would obtain coverage under the CGP pursuant to the NPDES regulations established under the CWA to address the risk of chemicals or soils on the construction site from affecting water quality of the surrounding area. The permit would require the preparation and implementation of a SWPPP which would describe the BMPs that would be implemented to prevent degradation of surface and ground waters during construction activities. Additionally, all grading shall conform to the 2022 California Building Code Chapters 17, 18 & Appendix J.

The Project would be required to comply with the NPDES CGP, the water quality policies of the City of Coachella GP, and the SWRCB, which require the preparation and implementation of a SWPPP in order to obtain grading and building permits. In the Colorado River Basin Region, where the Project resides, the SWRCB is the permitting authority, while the County of Riverside and Colorado River Basin RWQCB provide local oversight and enforcement of the CGP. The SWPPP would identify site-specific construction BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater runoff from the Project site. Construction BMPs would include, but not be limited to, the following:

- Minimization of disturbed areas to the portion of the Project site necessary for construction;
- Scheduling of soil disturbing activities minimized during wet season;
- Stabilization of exposed or stockpiled soils and cleared or graded slopes;
- Establishment of permanent re-vegetation or landscaping as early as is feasible;
- Removal of sediment from surface runoff before it leaves the Project site by silt fences or other similar devices around the site perimeter;
- Diversion of upstream runoff around disturbed areas of the Project site;
- Protection of all storm drain inlets on-site or downstream of the Project site to eliminate entry of sediment;
- Prevention of tracking soils and debris off-site through use of a gravel strip or wash facilities, which will be located at all construction exits from the Project site;
- Proper storage, use, and disposal of construction materials, such as solvents, wood, and gypsum; and

- Continual inspection and maintenance of all BMPs through the duration of construction.

BMPs are designed to control and prevent discharges of pollutants that can adversely impact the downstream surface water quality. Construction activities are also required to comply with the City's Stormwater/Urban Runoff Ordinance, the Erosion and Sediment Control Ordinance, and other required regulations. With the implementation of BMPs as described in the SWPPP (see Mitigation Measure HYD-1 [**MM HYD-1**]), the Project is not anticipated to violate water quality standards during construction.

With adherence to SWPPP and proper BMP utilization according to **MM HYD-1**, impacts would be considered less than significant with mitigation incorporated.

Off-Site Construction Improvements

Construction would occur off-site, which includes the well supply system, conceptual well sites, sewer infrastructure, natural gas facilities, and powerlines; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site construction or improvements are conceptual in nature. Disturbed areas would be limited to existing roadway rights-of-way for Avenue 50, Avenue 48, Tyler Street, and Vista Del Norte. Planned groundwater production sites are proposed at Tyler Street and Avenue 48; Avenue 48 and Polk Street; Avenue 50 and Polk Street; and Avenue 50 and Fillmore Street. As these impacts will be included in the larger common plan of off-site development for the Project, all construction activities would adhere to the SWPPP and proper BMP utilization according to City of Coachella Ordinance 13.16.341 and **MM HYD-1**.

During construction within the off-site areas, sediment and debris would be prevented from leaving the Project area through the implementation of BMPs. Additionally, storm drain inlets downstream of the Project site would also be protected with the implementation of BMPs. With adherence to SWPPP and proper BMP utilization according to **MM HYD-1**, impacts would be considered less than significant with mitigation incorporated.

OPERATIONS

As a result of the recommended site design and source control measures, and the provision of full Infiltration Basins and Extended Detention Basins (**Exhibit 3-9: Regional Channels and Proposed Mitigation Spreading Basin**), water quality exceedances are not anticipated, and pollutants are not expected within Project runoff that would adversely affect beneficial uses in downstream receiving waters.

The on-site drainage system is designed to capture, convey, and mitigate stormwater runoff from within the site development. All runoff shall receive water quality treatment in accordance with City ordinances and MS4 permit requirements. The basins will also provide dead storage to retain and infiltrate the required stormwater quality volume. Because the Project would disturb more than one acre of impervious area, the 2013 MS4 Permit requires the Project-specific WQMP to demonstrate that runoff flow rates, velocities, durations, and volumes from a 2-year and 10-year, 24-hour rainfall event will not significantly impact downstream erosion or stream habitat. Urban runoff and its associated impacts may be reduced by minimizing impervious surfaces through incorporating Site-Design BMP concepts and LID/Site Design BMPs that replicate or reduce impacts to the pre-development condition. The proposed Project would

implement Site-Design BMP Concepts, Source Control BMPs, and LID/Site Design BMPs to meet the Permit criteria.

To collect surface water and runoff from impervious surfaces within the developed Project, an extensive drainage plan would be in place which includes underground storm drains, culverts, open ditches, swales, and detention basins. The basins are designed to weaken the flow of post-development runoff to pre-development conditions, and have been designed to treat runoff for pollutants, pursuant to SWRCB regulations.

Water Quality standards affecting the Project would be stormwater related and the pollutants of concern would be the following:

- Pesticides, and an increase in nutrients from fertilizers used for the landscaped areas;
- Trash/Debris;
- Sediment/Turbidity;
- Organic compounds;
- Oxygen demanding substances;
- Bacteria and viruses;
- Oil and Grease; and
- Heavy Metals.

The City requires pollutants of concern to be treated per California Stormwater Quality Association-Approved Treatment BMPs. The Project would also be required to meet requirements of the City's Municipal Code, which meets all Federal and State water quality requirements related to stormwater runoff. The long-term implementation, operation, and maintenance of all BMPs for the Project belongs to the developer.

The Project currently does not have any 303(d) listed impairments or TMDL pollutants impacting waterways within the Project area. No impacts are anticipated resulting from the lack of known impaired waterways within the site. **Table 4.9-1** below identifies the TMDL of pollutants, which is defined as the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards. The tables list beneficial uses for each of the receiving waters from the Project site, located within the Whitewater River watershed.

Table 4.9-1: Project Site Drainage Receiving Waters (Whitewater River Watershed)

Receiving Waters	303(d) List Impairments and TDML [1] Pollutants	Designated Beneficial Uses [2]
Drainage Facilities and Minor Streams	None	None
Coachella Valley Stormwater Channel	Ammonia, DDT [4], Dieldrin, PCBs [3], Toxaphene, Toxicity, Pathogens	FRSH, REC I, REC II, WARM, WILD, RARE
Salton Sea	Enterococcus, Nutrients, Salinity, Toxicity, Chloride, Ammonia, Arsenic, Chlorpyrifos, Low Dissolved Oxygen, DDT	AQUA, IND, REC I, REC II, WARM, WILD, RARE

Receiving Waters	303(d) List Impairments and TDML [1] Pollutants	Designated Beneficial Uses [2]
Please use the following link for beneficial use designations: https://www.waterboards.ca.gov/coloradoriver/water_issues/programs/basin_planning/docs/2020/rb7bp_e2019.pdf		

(1) TMDL Pollutant is defined as the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards.
(2) "Beneficial Use" is defined as a use by which water provides advantages for people and/or wildlife, and therefore can function as a water quality indicator. 303(d) Impairments from latest approved 2020-2022 combined list. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html
(3) Polychlorinated biphenyls (PBCs) are a group of organic compounds used in manufacturing plastics.
(4) Dichlorodiphenyltrichloroethane (DDT) is found in insecticides and pesticides.

A Water Quality Management Plan (WQMP) will be developed for the Project site. The WQMP is intended to comply with the requirements of City of Coachella Water Quality Control Municipal Code Section 13.16 and has outlined all BMPs designed to meet water quality standards and mitigate any adverse impacts (**MM HYD-2**).

Through adherence to **MM HYD-2**, Coachella MC Section 13.16, Project Design Features, and Coachella GP, impacts would be less than significant with mitigation incorporated.

Off-Site Operations Improvements

The Project WQMP would be intended to address on-site impacts. Off-site construction or improvements are conceptual in nature. Appropriate BMPs as a component of the off-site WQMP would be incorporated with regard to off-site impact areas. Through adherence to **MM HYD-1**, **MM HYD-2**, Coachella MC Section 13.16, and Coachella GP, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM HYD-1 **NPDES Compliance**. Prior to commencing grading, the Project Applicant shall comply with applicable construction water quality regulations including the NPDES General Construction Permit, which shall be obtained from the Regional Water Quality Control Board. This process requires that the applicant electronically submit Permit Registration Documents (PRDs) prior to commencement of construction activities in the Storm Water Multiple Application and Report Tracking System (SMARTS). PRDs consist of the NOI, Risk Assessment, Post-Construction Calculations, a Site Map, the SWPPP, a signed certification statement by the Legally Responsible Person, and the first annual fee.

The required SWPPP must be submitted to the City, identifying specific actions and BMPs to prevent stormwater pollution during construction activities. The SWPPP shall identify a practical sequence for BMP implementation, site restoration, contingency measures, responsible parties, and agency contacts. The SWPPP shall include but not be limited to the following elements:

a. Comply with the requirements of the State of California's most current Construction Stormwater Permit.

b. Temporary erosion control measures shall be implemented on all disturbed areas.

c. Disturbed surfaces shall be treated with erosion control measures during the October 15 to April 15 rainy season.

d. Sediment shall be retained on-site by a system of sediment basins, traps, or other BMPs.

e. The construction contractor shall prepare Standard Operating Procedures for the handling of hazardous materials on the construction site to eliminate discharge of materials to storm drains.

f. BMP performance and effectiveness shall be determined either by visual means where applicable (e.g., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination (such as inadvertent petroleum release) is required by the RWQCB to determine adequacy of the measure.

g. In the event of significant construction delays or delays in final landscape installation, native grasses or other appropriate vegetative cover shall be established on the construction site as soon as possible after disturbance, as an interim erosion control measure throughout the duration of construction.

h. Prior to the issuance of the first grading permit, the Project Applicant shall submit the Final Tentative Tract Map that includes the water quality BMPs for approval by the City Engineer. The City Engineer shall ensure that all applicable water quality standards are met before approving the SWPPP.

MM HYD-2 **Water Quality Management Plan**. The Project Applicant shall prepare a Final Project-Specific WQMP with an Operations & Management (O&M) Plan for submittal together with the associated grading and improvement plans which must be approved prior to the issuance of a building or grading permit. These documents shall be prepared in accordance with applicable City (Coachella) and County (Riverside) water quality requirements, for review and approval by the City, including the following:

- Site Design BMPs;
- Source Control BMPs;
- Treatment Control BMPs;
- BMP Sizing;
- Equivalent Treatment Control Alternatives;
- Regionally-Based Treatment Control BMPs;
- O&M Responsibility for Treatment Control BMPs

Impact 4.9-2: ***Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?***

Level of Significance: Less Than Significant

CONSTRUCTION AND OPERATIONS

The Project site is vacant, does not contain any active or decommissioned groundwater wells, and construction activities do not require the use of groundwater wells. No construction-related impacts are anticipated.

The City and future residents and businesses within the KPC Coachella Specific Plan area rely on groundwater for potable use. Water is currently supplied for the City entirely by the Whitewater River Subbasin. The Whitewater River Subbasin has native supplies, recycled water, and imported supplies recharged into the Whitewater River Subbasin. The City supplies 100 percent of its potable water from City-owned and operated wells. The City currently operates six active groundwater wells with a total production capacity of approximately 11,400 gpm or 16.5 MGD, which supplied a total demand of 7,216 AFY in 2020.

Total retail groundwater volume pumped is 119,700 AF for the Whitewater River Subbasin in 2021. According to the WSA prepared for the Project in September 2023, anticipated water demand from the Whitewater River Subbasin is 4,544 AFY (4.06 MGD), which is dependent on conservation measures implemented by the Project. The Project would be committed to ensuring that buildout would occur at a rate that is consistent with the City's population growth estimates. Based on the 2020 UWMP accounts for a population growth of approximately 70,000 persons from year 2020 to year 2045, or approximately 19,718 additional dwelling units.[13] The Project's total proposed dwelling unit count is 9,538. Therefore, the total dwelling units calculated for the Project, using population growth accounted for in the 2020 UWMP, are estimated to be within the projected overall growth identified for the 20-year planning horizon. Thus, the total projected water demands in the UWMP for the City include the capacity to serve the Project.

New development projects within the City are required to implement water conservation measures to ensure the efficient use of water resources and to meet and maintain the water use reduction achieved pursuant to SBx7-7 and the 2020 UWMP. As a result, the Project would incorporate various water conservation elements adopted by the City and/or CVWD. These include conservation elements for indoor and outdoor uses throughout the Project. These efforts may further reduce the ultimate water demands of the Project. The Project would be committed to ensuring that buildout of would occur in a manner consistent with PDFs as they relate to landscaping irrigation and efficiency.

As discussed in Chapters 3 and 4 of the WSA, the Coachella Valley's 2020 Regional UWMP indicates that the groundwater and recharged groundwater supplies of the Coachella Valley and the Indio Subbasin are and will continue to be sufficient during normal, single dry, and multiple dry years through the year 2045 to meet the projected demand associated with existing and planned future uses within the City and CVWD service areas.

According to the UWMP and the WSA, the Whitewater River Subbasin contains vast reserves of local groundwater (approximately 30 million AF at depth of 1,000 feet as of 2021) and has substantial available

[13] The 2020 UWMP utilizes SCAG population projections. Using the SCAG persons per household factor of 3.55, 70,000 persons amounts to about 19,718 households (70,000 persons / 3.55 persons per household = 19,718 households).

storage space that has been utilized, and would continue to be utilized, to store millions of acre-feet of supplemental supplies that become available during normal and above-normal years. The UWMP and WSA projects water supply to meet existing water demands and the demands associated with projected growth from current projects, along with the KPC Coachella Project, to the year 2045. Surplus supplies are recharged to the basin for later use during dry periods. The large storage capacity of the Whitewater River Subbasin and the large volume of water in storage allow CVWD and other local water providers, such as the City, to pump needed supplies from the Basin during dry years.

Large-scale recharge activities implemented by the CVWD in 2009 stopped previous groundwater level decline and increased water levels in the region. The implementation of several recharge facilities maintained by the CVWD currently recharges each groundwater subbasin within the Whitewater River basin. As set forth throughout CVWD's planning documents, water demands in the Coachella Valley and the future Project area would continue to be met in a sustainable manner by using the groundwater basin as a conjunctive use resource, along with the Colorado River, the State Water Project, and other local water supplies. Although some areas of the Whitewater River Subbasin mid-valley are still experiencing a decline in groundwater levels, the rates of decline have been generally decreasing, while many areas have seen increases. As an overall water supply system, CVWD's service area, including the Project, is uniquely insulated from drought conditions and is capable of ensuring sufficient and reliable water supplies to meet demand resulting from the vast storage volume of the Whitewater River Subbasin.

The CVWD has the ability to supply water to customers through several additional sources in-lieu of groundwater pumping. The Mid-Valley Pipeline (MVP) supplies Coachella Canal water to customers for golf course and landscape irrigation. While the first phase of this pipeline was completed in 2009, implementation of later phases (unknown date) for expansion is planned to further serve the demand for golf courses and other landscape irrigation needs throughout the region that currently primarily use groundwater. The Oasis In-Lieu Recharge Project is an in-lieu source-substitution project which is anticipated to supply agricultural irrigation, and connections to the distribution system is planned to be completed in 2028. Additional sources of water in future years may include desalinated drain water, the treatment of Colorado River water for urban use, development of additional groundwater storage, arsenic treatment facilities, drainage control, stormwater capture, and nitrate treatment. In the event different sources of water becomes available to the Project, such as recycled water, potential use would be reviewed to determine feasibility for on-site landscaped areas to reduce the use of groundwater for irrigation. As discussed in **Section 4.16: Utilities and Service Systems**, the provision of recycled water via a recycled water system is currently infeasible, as the City and CWA lacks the customer base to make economic sense. The City and CWA are open to further exploration in the future.

The City has implemented a Water Shortage Contingency Plan that would be executed by the Coachella City Council during water shortages.[14] The purpose of the WSCP is to provide procedures with voluntary and mandatory provisions to minimize the impact of a water shortage to the City's service area, including the Project area. The six-level plan to reducing demands during mild to severe water supply shortages was

[14] Coachella Valley Water District. 2021. *Water Shortage Contingency Plan*. Retrieved from: http://www.cvwd.org/DocumentCenter/View/5483/CVWD-Water-Shortage-Contingency-Plan-WSCP.

updated in 2021, and ranges in required water use reduction due to shortages of up to, and greater than, 50 percent.

The 20-year projection for water use in the City is generally expected to increase at a similar rate to that of the projected population if per-capita water use is expected to remain constant. The City Development Services Department show active processing for proposed and recently approved development projects, the larger of which range in size from 200 residential units to projects with mixed-use developments, such as KPC Coachella, with 9,538 residential units. The total number of proposed residential units associated with these entitlement applications of the larger projects is approximately 22,419, including the Project, which accounts for approximately 43% of the growth. These units are included in the City's sphere-of-influence (SOI), which is not anticipated for full build out until after year 2050. The City's water demands are projected to grow from 7,216 AFY in 2020 to 18,746 AFY in 2045. According to the WSA, estimated Project demands are 4,554 AFY, representing approximately 39 percent of the City's projected growth in demand. The Whitewater River Subbasin supplying water to the Project currently contains 30 million AF at depth of 1,000 feet as of 2021, simulating the benefits of a very large conjunctive use reservoir. It is capable of meeting the water demands of the Coachella Valley for extended periods during normal, single-dry and multiple-dry year conditions. The determination has been previously made in accordance with CEQA that the City's utilization of groundwater supplies in a manner that is consistent with the implementation of the CVWMP Update will not have significant environmental impacts on the groundwater basin and instead will have a beneficial effect on groundwater resources through the year 2045.[15]

Substantial evidence exists to support a determination that the total projected water supplies available to the City during normal, single-dry, and multiple-dry water years during a 20-year projection are sufficient to meet the projected water demand associated with the Project, in addition to the City's existing and planned future uses, including agricultural and manufacturing uses. This conclusion is based on, among other things, the volume of water available in the regional aquifer; the City's current and planned local water management programs and projects; and CVWD's current and planned local and regional management programs and water supply projects to supplement and sustain regional groundwater supplies.

Therefore, the Project would not substantially deplete groundwater supplies or substantially interfere with groundwater recharge. A less than significant impact would occur.

Off-Site Construction and Operations Improvements

Refer to the construction and operations discussion above.

Mitigation Measures

No mitigation is necessary.

[15] Coachella Valley Water District. 2011. *Coachella Valley 2010 WMP Update Draft Subsequent Program Environmental Impact Report*. Pages 3-24 through 32. Coachella, CA: Coachella Valley Water District. https://www.cvwd.org/DocumentCenter/View/2130/Draft-Subsequent-Program-Environmental-Impact-Report-Part-1-PDF?bidId= (accessed April 2023).

Impact 4.9-3: ***Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATION

Construction of the Project would alter the existing drainage pattern of the site, considering the existing site is generally undeveloped with no existing impervious surfaces. An NPDES Construction Stormwater Permit shall be obtained and a SWPPP would be implemented to minimize soil erosion and siltation on and off the site; see **MM HYD-1**. BMPs as outlined in the WQMP would also be implemented during construction and operation of the site to minimize erosion and sedimentation (see **MM HYD-2**). In addition to the SWPPP and WQMP, the Project would comply with other applicable local and regional water quality requirements described in the Regulatory Setting discussion. Overall drainage patterns would remain consistent, with flows directed to the Whitewater River watershed, with water quality measures applicable to the respective watershed. BMPs as outlined in the WQMP would also be implemented during construction and operation of the site to minimize erosion and sedimentation.

In consideration of PDFs and existing regulations, with implementation of **MM HYD-1** and **MM HYD-2**, impact would be less than significant with mitigation incorporated.

Off-Site Construction and Operations Improvements

Refer to the construction and operations discussion above. Off-site construction or improvements are conceptual in nature. As a result, conceptual off-site construction and operation impacts to existing rights-of-way for domestic water lines are anticipated to result in a less than significant impact to existing drainage patterns.

Mitigation Measures

Refer to **MM HYD-1** and **MM HYD-2**.

Impact 4.9-4: ***Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would sustainably increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATION

Given the significant increase in impervious surfaces on the site, the Project would be expected to increase the rate and amount of surface runoff. To mitigate the increased rate and amount of surface runoff, multiple retention basins and a spreading basin are proposed.

The proposed Project improvements would impact the drainage patterns and runoff peak flow rates and volumes as compared to the existing condition. Runoff volume increases are a result of the change in land use conditions associated with the Project. The Specific Plan requires on-site detention which reduces post-development runoff volumes to pre-development volumes. On-site storm water retention basins are proposed within each of the impacted watersheds and would be designed to reduce the project condition peak runoff flow rates and volumes to meet existing conditions consistent with regulations set by CVWD.

Impacts to the Project and on-site drainage patterns were evaluated using a 2-dimensional hydraulic analysis (can be found in **Appendix H1: Drainage Master Plan**). The results of the analysis indicate that the proposed conceptual design produces flow patterns that are in significant conformance with the existing flow depths and velocities. The primary impacts from the Project on the adjacent parcels are located within the ESD_B and ESD_C watersheds in the western area of the Project. Minor adjustments to the Project grading and storm drain layout would be required in these areas during the detailed design phases to reduce these impacts to less than significant.

A spreading basin proposed for development would additionally mitigate the impact of the Project on the rate and amount of surface runoff. Grading improvements are proposed in the northwest corner of the Project site, which will direct flows to a graded stormwater detention/spreading basin located along the western edge of the Project site. The purpose of the basin is to detain and spread flows to match existing conditions within the impacted watersheds. The proposed spreading basin would be approximately 4,400 ft long, would range from 50 ft to 700 ft wide, and would provide roughly 416 acre-feet of storage. Results of the FLO-2D hydrologic model indicate that the proposed basin is effective in minimizing the Project condition impacts on flow depth to less than 0.5 ft as compared to baseline conditions. Project impacts to velocity are also reduced with the proposed spreading basin.

The regional hydrologic analysis indicates that the Project would result in a slight increase in runoff volume as a result of the increase in impervious area proposed within the Project site. The Project area is a small percentage of the Whitewater River Watershed (0.002 percent) and is unlikely to have a regional hydromodification effect. Additionally, construction and operation of the Project would reduce runoff volume in the tributary that flows into the off-site East Side Dike, north of I-10. Based on the data available, the Project is not expected to cause a hydrologic condition of concern to downstream channels.

Construction and operation of the Project would reduce runoff volume in the tributary that flows into the East Side Dike, north of I-10. Elsewhere in the Project area, the existing conditions of the rate and amount of surface runoff would remain the same upon development of the Project. The Project would not cause additional flooding, exceed the capacity of existing drainage facilities, or impede or redirect flood flows such that on-site areas are significantly impacted.

Through adherence to NPDES compliance guidelines, the pending WQMP (**MM HYD-1** and **MM HYD-2**), PDFs, and existing regulations, impacts would be less than significant with mitigation incorporated.

Off-Site Construction and Operations Improvements

Off-site construction or improvements are conceptual in nature. Appropriate BMPs and mitigation would be incorporated with regard to off-site impact areas. Through adherence to NPDES compliance guidelines and existing regulations, impacts would be less than significant.

Mitigation Measures

Refer to **MM HYD-1** and **MM HYD-2**.

Impact 4.9-5: ***Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATION

With respect to stormwater runoff, the proposed Project would increase the amount of impervious surface which would create additional surface runoff. The Drainage Master Plan completed for the site (see **Appendix H1**), details the detention basins to be constructed within the Project site. All stormwater runoff produced within the Project boundaries would be directed to the 20 LIDs (five Infiltration Basins and 15 Extended Detention Basins) that would be distributed across the Project site. The design would involve the infiltration, where feasible, or detaining, up to five inches of the 100-year 24-hour storm event runoff.

A Synthetic Unit Hydrograph analysis was prepared using the HEC-HMS Hydrologic Modeling System to determine peak flow rates and runoff volumes to the downstream limits of the Project site. The analysis determined the net 2-, 10-, and 100-year peak flow rates and volumes for each watershed that would be mitigated onsite in order to meet the existing condition. Prior to mitigation and installation of on-site stormwater retention basins, peak flow rates would increase in nearly all watersheds found in the Project area. See **Table 4.9-2** below.

Table 4.9-2: Comparison of Flow Rates for Baseline and Project Conditions in Storm Events

Subbasin	10-Percent Annual Chance				1-Percent Annual Chance			
	Existing Q Peak (cfs)	Proposed Q Peak (cfs)	Change in Q Peak (cfs)	Change in Volume (ac-ft)	Existing Q Peak (cfs)	Proposed Q Peak (cfs)	Change in Q Peak (cfs)	Change in Volume (ac-ft)
ESD_A	1610	1610	0	0	3780	3780	0	0
ESD_B	1200	1166	-34	5	2855	2764	-91	18
ESD_C	556	645	89	6	1208	1359	151	9
ESD_D	694	894	200	11	1487	1844	357	19
Upper Double Canyon	2498	2527	29	5	5795	5832	37	15

Source: *Drainage Master Plan*, Q3 Consulting (August 2024)
cfs = cubic feet per second
Q = runoff
ESD = East Side Dike

The on-site drainage system of storm drainpipes and detention/retention basins is illustrated in **Figure 7-1**, and preliminary storm drainpipe sizes and basin storage volumes are identified in **Figure 6-1** in **Appendix H1: Drainage Master Plan**. Additionally, storm flows onsite will sheet flow within the backbone streets of the Project to a network of storm drains ranging in size from 24 inches to 78 inches. **Table 9** in the **Appendix H2: Conceptual Water Quality Assessment** shows the calculation for the conceptual basin volumes. The basin volumes in each watershed, combined with appropriately sized storm drains, would be established to provide the necessary volume to reduce peak flow rates to the baseline condition for the 1-percent annual chance storm event.

The Project's runoff flow rate, volume, velocity, and duration for the post-development condition would not exceed the pre-development condition for the 2-year, 24-hour and 10-year, 24-hour rainfall events. Because the Project would implement Infiltration and Extended Detention Basins, no increase of runoff rate, volume, or velocity is anticipated leaving the Project that would exceed the capacity of existing or proposed stormwater drainage systems. Due to the implementation of Infiltration/Extended Detention Basins, it is anticipated that the annual runoff from the Project site would decrease when compared to the existing condition.

Project plans would include Source Control BMPs to decrease the potential for erosion of slopes and/or channels, consistent with local codes and ordinances and with the approval of all agencies with jurisdiction, e.g., the USACE, the RWQCB, and the California Department of Fish and Game. Runoff sourcing from the irrigation of landscaped surfaces and lawns would be reduced through several different measures, including rain shutoff devices, custom irrigation systems based on water requirements, flow reduction or shutoff valves, minimization of runoff or excess water into MS4s, and landscape plans that are consistent with local regulations and ordinances.

Project runoff from the developed areas would flow through storm drains or within streets and discharge to the alluvial drainages within the Project limits. All of the Project runoff would drain into on-site retention basins to be used to provide water quality treatment and mitigate increases in stormwater runoff. A portion of the runoff would be held there until it percolates into the soil. Flows in excess of the required water quality and mitigation runoff volumes would be discharged through an overflow system into one of the five natural drainages that would be preserved in their existing condition within the Project area (see **Appendix H1: Drainage Master Plan**). These drainages convey stormwater from a large area north of I-10 through the Project area and ultimately to the Whitewater River. The Project would be set-back from the main conveyance areas of these drainages. Where encroachment does occur, the drainages would maintain the soft-bottom condition and included channelized banks with gently sloped 3:1 sidewalls. The open drainages and channelized banks would convey regional and local flows through the site and convey them to the Eastside Dike (north of the I-10 Freeway) or to the I-10 bridge and culvert crossings and from there to the Eastside Dike and further to the Whitewater River via Wasteway No. 2. Project runoff would not exceed the capacity of these drainage features, and less than significant impact is anticipated.

With respect to providing substantial additional sources of polluted runoff, during construction and operation, the Project would follow standard construction protocols as outlined in the Whitewater River

Region Stormwater Management Plan, NPDES Permit Number CAS000002, and the City Municipal Code, to avoid and reduce construction and operational water quality impacts associated with stormwater runoff and erosion control. Stormwater quality is further addressed above, and mitigation would require compliance with NPDES permitting and implementation of BMPs for construction and operational water quality. The Project would implement an integrated stormwater collection and conveyance system designed to treat and convey development-related runoff, which would be accomplished through the construction of bioswales, along with the aforementioned detention and infiltration basins within the site. Each of the basins would be configured for water quality purposes. The facilities are anticipated to be designed as soft bottom earthen structures and sized to capture and infiltrate the required water quality volumes. Further water quality effects of the Project are addressed under **Impact 4.9-1** above.

Prior to grading and building permit issuance, the Project Applicant would be required to submit a WQMP for review and approval by the City, to ensure that the Project does not result in increased flows off-site or otherwise significantly impact pollution in downstream drainage facilities. Through adherence to **MM HYD-3**; Coachella MC Sections 13.16.340(A), 13.16.340(B), and 13.16.341, and PDFs, impacts would be less than significant with mitigation incorporated.

Off-Site Construction and Operations Improvements

Refer to the construction and operations discussion above. Off-site impacts would adhere to **MM HYD-3**; Coachella MC Sections 13.16.340(A), 13.16.340(B), and 13.16.341. As a result, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM HYD-3: **Municipal Code Compliance**. Prior to the issuance of any grading or building permit, the Project will submit and have approved a WQMP to the City engineer on a form provided by the City. The WQMP would identify all BMPs that will be incorporated into the Project to control stormwater and non-stormwater pollutants during and after construction and shall be revised as necessary during the life of the Project.

The WQMP shall demonstrate compliance with applicable City and County drainage plans, policies, design guidelines and regulations including, but not limited to the City of Coachella Municipal Code Chapter 13.16, Water Quality Control.

Impact 4.9-6: ***Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?***

Level of Significance: Less than Significant

CONSTRUCTION AND OPERATION

A review of the FEMA FIRMs was conducted to determine whether the Project site is located within a flood-prone zone. The Project site is located on mapped Panels 2260 and 2300 (Map No. 06065C2260H and 06065C2300H, effective March 6, 2018). The flood insurance maps indicate that the Project is located

within two flood hazard zones, X and D. The Zone D designation is applied for areas where there are possible but undetermined flood hazards. In areas designated Zone D, no analysis of flood hazards has been conducted. A portion of the Project site is located within the designated Zone X, which are areas determined to be outside of the 0.2 percent annual chance (500-year) floodplain.

The construction of structures would increase the impervious area within the Project site, which can increase the rate and volume of storm flows. A hydrologic analysis performed for the Project (can be found in **Appendix H1: Drainage Master Plan**) indicates that the Project would result in a slight increase in storm flow volume as a result of the increase in impervious area proposed within the site. **Table 4.9-2** above in **Impact 4.9-5** lists the peak flow during 1-percent and 10 percent annual chance 24-hour storm events, which could potentially lead to flood flows. However, the basin volumes in each watershed, combined with appropriately sized storm drains, would be established to provide the necessary volume to reduce peak flow rates to the baseline condition for the 1-percent annual chance storm event consistent with regulations set by CVWD.

All basins within the Project, without the development of stormwater facilities, would have higher rates of peak flow rate under the proposed conditions, except for subbasin ESD_B. The increases are a result of the change in land use conditions associated with the proposed development. On-site storm water retention basins are proposed within each of these impacted watersheds and would be designed to reduce the project condition peak runoff flow rates and volumes to meet existing conditions consistent with regulations set by CVWD. A graded stormwater detention/spreading basin is included along the western edge of the Project site to detain and spread storm flows to match existing conditions within impacted watersheds. The spreading basin and on-site detention basins are conceptually designed to reduce the peak flow rates and runoff volumes to the baseline condition. Natural drainage paths would be preserved in the existing condition on-site, which would convey storm flows through the Project.

Through adherence to PDFs, flood flows would not be impeded or redirected, and impact would be less than significant.

Off-Site Construction and Operations Improvements

Refer to the construction and operations discussion above.

Mitigation Measures

No mitigation is necessary.

Impact 4.9-7: ***Is the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?***

Level of Significance: Less than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATION

The proposed Project is inland and is not at risk for inundation due to a tsunami. The Project site is not within a flood hazard zone. The Project site is not within a seiche zone, since no large bodies of water are located in the vicinity the Project.

Inundation of the Project site is unlikely due to portions of the Project being outside of the 0.2 percent annual chance (500-year) floodplain according to a review of FEMA FIRM Maps (Map No. 06065C2260H and 06065C2300H March 6, 2018). However, a flood hazard analysis has not been conducted in flood hazard Zone D, where there are possible but undetermined flood hazards. Prior to construction activities, the Project will obtain a Conditional Letter of Map Revision (CLOMR) from FEMA for the areas of the site within the identified Zone D areas. Additionally, the Project will obtain a Letter of Map Revision (LOMR) to remove the areas of the site within the Special Flood Hazard Areas (SFHA) prior to operation.

Construction and operation of the Project has the potential to introduce pollutants into the stormwater drainage system during inundation from erosion, sediment deposition, debris, and accidental spills. In addition, grading and construction activities would compact soil, and construction of structures would increase the impervious area, which can increase the rate and volume of runoff during construction.

The NPDES CGP requires preparation of a SWPPP (**MM HYD-1)** to implement BMPs during construction and operation to reduce impacts to water quality. Additionally, the Project would implement a comprehensive drainage system to capture and convey storm flows. Potential pollutants would be captured in detention basins found on-site, in accordance with the WQMP (**MM HYD-2)**.

Through adherence to **MM HYD-1** and **MM HYD-2** and PDFs, impacts would be less than significant with mitigation incorporated.

Off-Site Construction and Operations Improvements

Refer to the construction and operations discussion above. Off-site areas in the vicinity of the Project are located outside of the 0.2 percent annual chance (500-year) floodplain according to a review of FEMA FIRM Maps. As a result, impacts would be less than significant.

Mitigation Measures

Refer to **MM HYD-1** and **MM HYD-2**.

Impact 4.9-8: ***Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

Level of Significance: No Impact

CONSTRUCTION AND OPERATION

Per requirements of the Whitewater River Region Stormwater Management Plan, a Project specific WQMP would be prepared for the proposed Project and would be implemented during construction and operation of the Project.

As discussed above under water quality (**Impact 4.9-1**) and sustainable groundwater supplies (**Impact 4.9-2**), the Project would meet applicable local and regional water consumption and water quality goals of the RWQCB, the 2019 Water Quality Control Plan for the Colorado River Basin, and the City of Coachella 2017 Water Master Plan. As a result, no impact would occur.

Off-Site Construction and Operations Improvements

Refer to the construction and operations discussion above.

Mitigation Measures

No mitigation is necessary.

4.9.5 CUMULATIVE IMPACTS

A less than significant impact with mitigation incorporated would occur as a result of the Project in regard to hydrology and water quality. The cumulative study area for hydrology and water quality is the Whitewater River Watershed, the City of Coachella, and Riverside County. Each cumulative project could potentially increase the volume of stormwater runoff and contribute to pollutant loading in runoff reaching both the City's storm drain system and the Whitewater River, resulting in cumulative impacts to hydrology and surface water quality. However, similarly to the proposed Project, each individual project would also be subject to NPDES and MS4 Permit requirements during construction and operation. SWPPPs and WQMPs would be required to be developed for each project and would be evaluated individually to determine appropriate BMPs to minimize impacts to surface water quality. In addition, the City of Coachella Department of Public Works reviews all development projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available.

Implementation of the Project would have the potential to result in sources of polluted runoff during construction and would result in an increase in impervious surfaces following construction that would potentially result in the contribution of nonpoint source pollution. As discussed under **Impact 4.9-1**, prior to construction of the Project, the Project Applicant would be required to prepare and implement a SWPPP that would outline the BMPs that would reduce water quality impacts during construction to a less than significant level. Prior to the issuance of grading permits, the SWPPP would be required to be prepared to the satisfaction of the Coachella City Engineer.

The City of Coachella General Plan Update (CGPU) EIR considers existing and potential development over approximately the next twenty years, the analysis of hydrology-related impacts contained within the CGPU are already cumulative in nature. The City indicates that full build-out of the 2035 General Plan will result in enough water supply for 135,000 residents. With 9,538 residential units proposed for the Project, and the current City population of approximately 42,000 people, growth resulting from the Project is anticipated to have less than a significant impact on water demand accounted for in the CGPU. Environmental impacts from the increased demand and water usage resulting from City population growth are reduced through policy and water management plans. Because of all efforts to conserve water use, recharge groundwater basins, the CGPU impacts on groundwater supplies would be less than significant. In addition to existing regulatory framework, the proposed policies of the CGPU also add a

second level of standards to reduce impacts on, and from, hydrology and water quality for the City. Thus, cumulative impacts are considered less than significant in the CGPU EIR[16].

The County of Riverside Draft Program EIR determined that hydrologic and water quality impacts would be cumulatively significant and unavoidable. Due to the widespread effect of incremental growth accommodated by the General Plan, there is no feasible mitigation available to the County that would reduce impacts below the level of significance. However, notwithstanding the significant impacts of County growth, most urban areas of Riverside County are served by urban water management plans that indicate there are sufficient water supplies to meet projected demands in the near future,[17] such as the CVWD.

Following construction, the Project would comply with the 2020 Coachella Valley Regional Urban Water Management Plan and the Colorado River Basin RWQCB, which would minimize impacts on receiving water quality by incorporating post-construction BMPs into Project design, including LID site design, hydromodification measures, source control, and treatment control. Implementation of the BMPs as PDFs will reduce the impacts of the Project to receiving water quality in both the construction and operation phases. Furthermore, implementation of **MM HYD-1**, **MM HYD-2**, and **MM HYD-3** would further minimize impacts associated with water quality and drainage found within the Project. As a result, the Project's contribution to cumulative impacts to hydrology and water quality would be less than significant.

All Project hydrology and water quality impacts are avoided or mitigated to less than significant, and the Project's contribution toward cumulative impacts is not otherwise considered "cumulatively considerable."

4.9.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable hydrology and water quality resource impacts have been identified for either the construction or operation phases of the Project.

4.9.7 REFERENCES

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4.10 LAND USE AND PLANNING

This section addresses land use and planning impacts that may result from construction and operation of the KPC Coachella Specific Plan Project (Project). The following discussion addresses the existing land use and planning standards and designations in the Project area, identifies regulations, evaluates the Project's consistency with applicable goals and policies, assesses the Project's potential to divide established communities, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the Project.

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts on land use and planning. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors such as proximity to an established community.

4.10.1 ENVIRONMENTAL SETTING

SURROUNDING LAND USES

The Project area consists of 57 vacant parcels in the northeastern portion of the City of Coachella (City) immediately north of Interstate 10 (I-10). Project Assessor Parcel Numbers are listed in **Table 3-1, Project Site Parcels** in **Section 3.0, Project Description**.

As summarized in **Table 3-2, Project Site and Surrounding Parcels Existing Land Use and Zoning** the Project site is surrounded by open space used on all sides. Interstate 10 and the La Entrada Specific Plan are located south of the Project site. The Coachella Canal runs from northwest to southeast along the southwestern boundary of the Project site. The areas north of the Project site include a triangular swath of agricultural land, a transfer facility and compost operation operated by Burrtec Waste Industries, and the foothills of the Little San Bernardino Mountains. A Southern California Edison (SCE) utility easement runs northwest to southeast through northeast portion of the Project site and continues in both directions. Additionally, two separate gas pipeline easements further north run roughly parallel to the SCE easement through the site. The eastern boundary of the Project site runs along the eastern boundary line for the City. The Project site is approximately three miles to the east of the City's downtown business district.

LAND USE AND ZONING

General Plan Designations

The Coachella General Plan 2035 Update (Coachella GP) approved a revision to the City's general plan land use map on in January 2014. According to the Coachella GP land use map, all 57 of the parcels within the Project site each contain Resort District land use designations.[1] The Coachella GP describes Resort Districts as areas which are suitable for the creation of – or use as – a recreational, vacation, entertainment destinations. Specifically, this land use designation allows for the development of residential, lodging, recreation, and support retail/commercial uses with a maximum floor area ratio (FAR) of 0.1, residential density of 8 dwelling units per acre (du/ac), and height limit of 85 feet.[2] Note a small portion of the Project site along the utility corridor easement and Coachella Canal is designated as Open Space.

The Project would be located within Subarea 13: Desert Lakes (Desert Lakes Subarea).[3] This area of the City is intended to be developed for resort uses as well as rural and suburban residential uses. The Coachella GP requires that prior to the approval of future development in this area a specific plan be created and approved which describes the proposed overall vision. Smaller scale specific plans may also be created for developments within the Desert Lakes subarea. Future developments within this subarea must also include rural and clustered development in steeper and topographically constrained areas and limit all resort development to a density of no more than 4 du/ac. The Coachella GP proposed that the ideal mixture of uses within the Desert Lakes should be:

- 20 to 30 percent open space,
- Up to 25 percent agricultural rancho and open space,
- Up to 50 percent rural rancho,
- Up to 10 percent general neighborhood,
- Up to three percent suburban retail district,
- Up to five percent neighborhood center, and
- Up to 60 percent resort.[4]

The Project is surrounded by Open Space land use designations to the northeast and northwest; Open Space, the La Entrada Specific Plan, and Rural Rancho land use designations to the south; Open Space land use designations to the east; and Regional Retail District land use designations to the west; see **Exhibit 3-6, Land Use Plan**.

[1] City of Coachella. 2014. *General Plan Land Use Designations*. Retrieved from: https://www.coachella.org/home/showpublisheddocument/8259/637592601028770000 (accessed April 20, 2023).
[2] City of Coachella. 2015. General Plan Update. Page 04-79. Retrieved from: https://www.coachella.org/home/showpublisheddocument/3221/635712771850800000 (accessed 20, 2023).
[3] Ibid. Page 04-61.
[4] Ibid. Page 04-80.

Zoning Districts

The City's Official Zoning Map was updated in July 2023 and illustrates current zoning designations for parcels within the City. The existing zoning within the Project site is Resort District (R-D) and Open Space;[5] see **Exhibit 3-5, Existing Zoning**.

The R-D designation permits residential, lodging, recreational, and support retail and commercial services, such as theme parks, sports venues, and specialized entertainment uses.

The Project site is surrounded by Residential Single Family (R-S) and Open Space (O-S) zoning designations to the northeast and northwest; R-S, General Commercial (C-G), and O-S zoning designations to the south, and C-G zoning designations to the west. The Project site is also surrounded by City limits to the north and east; see **Exhibit 3-5, Existing Zoning**.

Specific Plans

Specific plans allow for the creation of individual development standards to be created for a defined portion of a municipal area. Developments within a specific plan area would then be subject to any standards that are contained within the approved specific plan for the area. In instances where a specific standard does not exist within a specific plan, the jurisdiction's policy plan such as the Coachella GP would be utilized as the governing planning document. Specific plans within the City must, however, conform to the overall vision, goals, and policies of the Coachella GP.

One specific plan borders the Project along its southern border (south of I-10), the La Entrada Specific Plan. This specific plan area has been entitled for the development of up to 7,800 residential units, mixed uses, elementary schools, parks, trails, and open spaces within its 2,200 acres.[6] However, development of the La Entrada Specific Plan area has not been initiated.

The Coachella Zoning Code requires specific plans to include a development plan which can then be applied to subsequent site plans created for future developments within the specific plan area. Specific plans must also include provisions for building coverage, light and air orientation, building height, sign placement and design, yard requirements, open spaces, off-street parking, screening, and utility infrastructure. Standards should apply to any specific developments proposed within the specific plan area and any subsequent developments that may occur within the specific plan areas.[7] Adopted by Ordinance, the proposed KPC Coachella Specific Plan would implement the City's General Plan as amended. The Specific Plan would be considered by the Planning Commission and City Council and would be adopted by Ordinance and would become the zoning for the Project.

[5] City of Coachella. 2023. Official Zoning Map. https://www.coachella.org/home/showpublisheddocument/9303/638282914790930000 (accessed August 2023).
[6] Ibid. Page 04-47.
[7] City of Coachella. 2023. City of Coachella Municipal Code. Retrieved from: https://library.municode.com/ca/coachella/codes/code_of_ordinances (Accessed April 21, 2023).

4.10.2 REGULATORY SETTING

STATE

State Planning Law

State planning law (California Government Code [CGC] Section 65300) requires every county in California to adopt a comprehensive, long-term general plan for physical development of the county. A general plan should consist of an integrated and internally consistent set of goals and policies that are grouped by topic into a set of elements and are guided by a countywide vision. State law requires that a general plan address nine elements or topics (land use, circulation, housing, conservation, open space, noise, safety, climate adaptation and resiliency, and environmental justice), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in the state planning law should be examined to determine if there are environmental issues within the City that a general plan should address. The Coachella GP serves as the City's general plan and was last updated in April 2015.

REGIONAL

Connect SoCal: 2024-2045 Regional Transportation Plan/Sustainable Communities Strategy

As the metropolitan planning organization for the region's six counties and 191 cities, the Southern California Association of Governments (SCAG) is mandated by law to develop a long-term regional transportation and sustainability plan every four years. On April 4, 2024, SCAG's Regional Council approved and fully adopted Connect SoCal: 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (2024-2050 RTP/SCS). The RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It identifies 10 goals that fall into four categories: economy, mobility, environment, and healthy/complete communities. The goals are as follows:

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase person and goods movement and travel choices within the transportation system
5. Reduce greenhouse gas emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel

9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of habitats

Coachella Valley Multiple Species Habitat Conservation Plan

The Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) is a habitat conservation plan developed for the Coachella Valley. The program is an effort to enhance and maintain biological diversity and ecosystem processes, while allowing future economic growth. The CVMSHCP collectively includes 1.2 million acres (1,850 square miles) of the Coachella Valley and surrounding mountains in central Riverside County and crosses over various diverse habitat and bioregions.

The influence area of the CVMSHCP includes unincorporated land (84 percent) as well as these cities:

- Cathedral City
- Coachella
- Desert Hot Springs
- Indian Wells
- Indio
- La Quinta
- Palm Desert
- Palm Springs
- Rancho Mirage

While the Coachella Valley Conservation Commission (CVCC) provides policy direction for the Plan's implementation, the cities within the CVMSHCP are given control over land-use decisions. This allows them to better balance their development goals with the requirements of both the state and federal Endangered Species Acts.

LOCAL

City of Coachella General Plan

The Project site is located in the City of Coachella and would be required to comply with the regulations set forth in the Coachella GP. Coachella GP elements, goals, and policies relevant to the Project and land use are as follows:

Land Use and Community Character Element

The Land Use and Community Character Element of the Coachella GP is intended to provide a long-term vision, goals and policies for land use and development in Coachella over the next 20 to 30 years.

Goal 1	**Development Regulations. A land development and regulatory system that reinforces the City's desire to grow from a small town to a medium sized city in a sustainable and orderly manner.**
Policy 1.7	Specific Plans. Utilize specific plans as strategic entitlement tools when considering unique projects that bring exceptional value to the community. Periodically review existing, un-built specific plans for relevance and the potential for needed updates.
Goal 2	**Growth and Development. The successful transformation of Coachella from a small town into a medium-sized, full-service City that is a major economic center for the Coachella Valley.**

Policy 2.2	Character and identity. Strive to maintain Coachella's existing small-town character, identity and cultural diversity as development occurs in the future.
Policy 2.3	Urban design as identity. Recognize the City can differentiate itself from other Coachella Valley cities through urban design practices such as the development of complete neighborhoods, preservation of agriculture and open space, pedestrian-oriented design and sustainable development practices.
Policy 2.10	Contiguous development pattern. Encourage and incentivize development to occur contiguous to, or proximate to, existing built areas to facilitate delivery of City services and minimize "leapfrog" development not connected to existing urbanized areas.
Policy 2.11	New growth. Continue to plan for future expansion and new growth on previously undeveloped areas.
Policy 2.14	Reserve development areas. Subareas 13, 15 and 16 shall be maintained as reserve development areas. These areas shall maintain their current land or agricultural use until the identified High Priority Development Areas and Growth Expansion Areas are at least 60 percent developed with urban uses or preserved open spaces.
Policy 2.16	Range of uses. Through Specific Plans, Planned Developments, or other similar master planning processes, allow the designations shown on the General Plan Designation Map to be adjusted within the ranges set forth for each policy area in large, undeveloped areas of the City so long as the visions of the General Plan and the applicable subarea is met.
Policy 2.17	Parks and open space. Establish parks and open space as allowed uses within all General Plan Designations.
Policy 2.19	Community Amenities. Encourage the provision of a high-level of neighborhood and community amenities and design features as a way of balancing increased density, recognizing that the General Plan increases the average planned density by several times and specifies a desire for a very high quality, amenity-rich, livable community.
Goal 3	**Healthy Community Design. Development patterns and urban design comprised of complete, walkable, attractive, family-friendly neighborhoods, districts and corridors that support healthy and active lifestyles.**
Policy 3.1	Physical plan. Facilitate the construction of a built environment that supports a healthy physical and social environment for new and existing neighborhoods.
Policy 3.2	Walkable streets. Regulate new development to ensure new blocks encourage walkability by maximizing connectivity and route choice, create reasonable block lengths to encourage more walking and physical activity and improve the walkability of existing neighborhood streets.
Policy 3.3	Pedestrian barriers. Discourage physical barriers to walking and bicycling between and within neighborhoods and neighborhood centers. If physical barriers are unavoidable, provide safe and comfortable crossings for pedestrians and cyclists. Physical barriers may include arterial streets with speed limits above 35 mph, transit or utility rights-of-way, very long blocks without through-streets, and sound walls, among others.

Policy 3.6 Family-friendly community. Strive to create multi-generational family-friendly public spaces and affordable family-friendly neighborhoods through the following measures.

- The provision of family-friendly amenities, such as libraries, recreation centers and parks in residential neighborhoods.
- Encouraging child-care and schools near employment centers and housing and vice versa.
- Set a minimum proportion or number of two- and three-bedroom units in multi-family and rental housing development.
- Allow family childcare in residential units by right.
- Provide childcare at public meetings.
- Encourage youth participation in the planning process.

Policy 3.7 Culture and entertainment hub. Create opportunities for leisure/cultural activities in Coachella such as a movie theater, music and dancing venue, museum/gallery, cafe, or bowling alley, among many other facilities to ensure teens and young adults have safe ways to enrich their social lives.

Goal 5 **Neighborhoods. Neighborhoods that provide a variety of housing types, densities, designs and mix of uses and services that reflect the diversity and identity of Coachella, provide for diverse needs of residents of all ages, ethnicities, socio-economic groups and abilities, and support healthy and active lifestyles.**

Policy 5.2 Conventional neighborhood design. Discourage the construction of new residential neighborhoods that are characterized by cul-de-sacs, sound walls, long block lengths, single building and housing types and lack of access to goods and services.

Policy 5.3 Variety of types of neighborhoods. Promote a variety of neighborhoods within the City and ensure that neighborhood types are dispersed throughout the City.

Policy 5.4 Balanced neighborhoods. Within the allowed densities and housing types, promote a range of housing and price levels within each neighborhood in order to accommodate diverse ages and incomes. For development projects larger than five acres, require that a diversity of housing types be provided and that these housing types be mixed rather than segregated by unit type.

Policy 5.7 Walkable neighborhoods. Require that all new neighborhoods are designed and constructed to be pedestrian-friendly and include features such as short blocks, wide sidewalks, tree-shaded streets, buildings that define and are oriented to streets or public spaces, traffic-calming features, convenient pedestrian street crossings, and safe streets that are designed for pedestrians, cyclists and vehicles.

Policy 5.11 Connections to key destinations. Require direct pedestrian connections between residential areas and nearby commercial areas.

Policy 5.15 Access to daily activities. Strive to create development patterns such that the majority of residents are within one-half mile walking distance to a variety of neighborhood

goods and services, such as supermarkets, restaurants, churches, cafes, dry cleaners, laundromats, farmers markets, banks, hair care, pharmacies and similar uses.

Policy 5.16 Access to parks and open spaces. Design new neighborhoods and, where feasible, retrofit existing neighborhoods, so that 60 percent of dwelling units are within a one-third mile walk distance of a usable open space such as a tot-lot, neighborhood park, community park or plaza/green.

Policy 5.17 Neighborhood transitions. Require that new neighborhoods provide appropriate transitions in scale, building type and density between different General Plan designations.

Policy 5.21 Subdivision gateways. Discourage the use of signs to distinguish one residential project from another. Strive for neighborhoods to blend seamlessly into one another.

Goal 6 **Centers. A variety of mixed-use, urban centers throughout the City that provides opportunities for shopping, recreation, commerce, employment and arts and culture.**

Policy 6.4 Diverse centers. Encourage the development of local and city-wide centers that address different community needs and market sectors. The centers shall complement and be integrated with surrounding neighborhoods.

Policy 6.7 New neighborhood centers. Create a series of new neighborhood centers throughout Coachella so the majority of dwelling units in each Neighborhood are no more than one-half mile from any neighborhood center.

Policy 6.8 Neighborhood center location. Locate new Neighborhood Centers at the intersections of major roadways such as collectors and arterials.

Goal 7 **Districts. A series of unique, destination-oriented districts throughout Coachella that provide space for large-format retail, industrial and resort uses in order to increase access to jobs, provide amenities for residents and improve the fiscal stability of the City.**

Policy 7.10 Resorts. Actively pursue the establishment of multiple resort complexes in Coachella. Locate resorts in areas of the City where city-wide connectivity will not be negatively affected by the design of the project. Such locations include adjacent to hillsides, on the edge of the Sphere of Influence and city limit where additional annexation is not expected to occur and adjacent to rivers and canals.

Goal 8 **Public Facilities and Buildings. A variety of public facilities and buildings throughout the City that improves the quality of life for residents and maintains a high-level of public services.**

Policy 8.3 School location and design. Work with school districts to size, design and locate schools to better enable students to walk or bicycle to them.

Policy 8.4 Parks and open space. Establish a range of parks and open spaces, including tot lots, neighborhood parks, community parks, plazas/greens and/or greenways/parkways within all new Neighborhoods, Centers and Districts.

Policy 8.5 Civic and institutional uses. Locate civic and institutional uses in Downtown and neighborhood centers and avoid locating these uses in remote, single-use complexes.

Goal 10 **Development requirements. A fair, understandable and predictable approach that ensures new development does not impose a fiscal burden on the City, conforms to regional airport and railroad safety practices, and requires new projects to provide adequate public facilities and services as part of the overall process.**

Policy 10.1 Required contents of Specific Plans and Planned Developments that implement the subarea Master Plans. Require that all Specific Plans, Planned Developments, Master Plans and other master-planned community implementation tools include:

- A plan for the phasing of all off-site infrastructure.
- A performance schedule for the issuance of building permits based on the concurrent availability of public services and amenities, including parks, schools and other public facilities identified in the entitlement documents.
- A clear statement of the minimum public improvements that will be required as part of the first phase of development.
- A statement of the financing mechanisms that will provide for the ongoing funding and financing of the public facilities of the project. These financing tools should be presented and discussed in the entitlement document implementation plan.

Policy 10.4 Airport compatibility. Require new development in the vicinity of Jacqueline Cochran Airport to conform to the County's airport land use and safety plans. Notwithstanding the allowable land use intensities and densities set forth by this Land Use and Community Character Element, there may be more restrictive density and intensity limitations on land use and development parameters, as set forth by the Airport Land Use and Compatibility Plan. Additionally, per the Airport Land Use Plan, there may be additional limits, restrictions, and requirements, such as aviation easements, height limits, occupancy limits, and deed restrictions, required of new developments within the vicinity of the airport.

Policy 10.6 Airport Land Use Commission Review. Before the adoption or amendment of this General Plan, any specific plan, the adoption or amendment of a zoning ordinance or building regulation within the planning boundary of the airport land use compatibility plan, the City shall refer proposed actions for review, determination and processing by the Riverside County Airport Land Use Commission as provided by the Airport Land Use Law. The City shall notify the Airport Land Use Commission office and send a Request for Agency Comments for all new projects, and projects proposing added floor area or change in building occupancy type within 2 miles of the airport.

Policy 10.8 Residential Development near airport. New residential development within Airport Compatibility Zone D shall have a net density of at least five dwelling units per acre. New dwelling units should not be permitted as secondary uses of the Urban Employment Center General Plan Designation within Airport Compatibility Zone C.

Policy 10.9	Nonresidential Development near airport. The land use intensity of nonresidential structures within Airport Compatibility Zones B1, C, and D shall be limited as set forth by Table 2A of the Airport Land Use Compatibility Plan.
Goal 12	**Diversity of uses for economic development. Non-residential uses that creates a complete city and diversifies the local economy.**
Policy 12.4	Entertainment and tourist attractions. Pursue one or more major entertainment destinations for Coachella residents and to draw visitors from around the region. Such entertainment uses could include theme parks, water parks, theme-oriented retail destinations, sports facilities, performance venues and other similar uses. Strive to locate these uses near regional transportation infrastructure and in subareas 9, 11, and 12.
Policy 12.5	Arts and culture. Pursue one or more arts and cultural facilities in Coachella as an economic development strategy. Such uses could include museums, theaters, performing arts centers and similar uses. Strive to locate these uses in or around Downtown.
Policy 12.7	Hospitality. Expand the number and variety of hospitality options with Coachella as a means of providing jobs for residents and expanding the local tax base.
Policy 12.9	Retail base. Encourage economic development of all scales of retail development within Coachella in order to create a stronger tax base and increase the City's tax revenue.

Community Health and Wellness Element

Goal 5	**Local Food System. Strong local food production and ample opportunities to eat locally grown food.**
Policy 5.1	Local food production. Work with local agricultural stakeholders to establish a strategy to encourage existing and new agricultural uses in and near Coachella to grow healthy food for local consumption. Make land use and policy decisions that encourage increased local food production. To the extent feasible, assess and plan for local food processing and distribution needs to connect local agriculture to markets, such as retailers, restaurants, schools, hospitals, and other institutions and encourage certified organic growing practices. Also encourage local growers to consider establishing a co-operative community supported agriculture program.
Policy 5.5	Zoning for small scale food production. Remove regulatory barriers to gardening and urban farming, including modifying the zoning code, to conditionally permit these activities on private property in all zones. Allow "interim agricultural uses" as part of a residential land use within residential districts, and within Specific Plans and Planned Development areas.
Goal 8	**Educational and Community Facilities. Community facilities and school Facilities that support physical activity, civic life and social connections for residents of all ages and interests.**

Policy 8.2	School facilities planning. Continued use of CVAG cooperative agreement for school-related projects and consult with the School District in the early planning stages of any new park or school to encourage walkable school design and accessible location. The City would prefer to have schools in existing and new neighborhoods that are multi-story with a smaller campus size versus large school campuses that are not accessible for most students.
Policy 8.8	Provision of school sites. Encourage the dedication of real property, based on the master plan of the applicable school district, for the provision of necessary public educational facilities within a half-mile of each neighborhood.
Policy 8.23	Distributed community centers. Provide every neighborhood with easy access to recreation and service programs by decentralizing community centers and programs.

6th Cycle Draft Housing Element Update

Goal A	**Facilitate the Development of a Variety of Housing Types to Provide Adequate Housing in the City to all Households**
Policy A-a	Land Use Controls. Use the Land Use Element of the General Plan and the Zoning Code to ensure the availability of adequate sites for a variety of housing types.
Policy A-b	Infill and Contiguous Land. Maximize use of vacant land within the city and contiguous to existing development in order to reduce the cost of off-site improvements and create a compact city form.
Policy A-c	Compatible Uses. Ensure the compatibility of residential areas with surrounding uses through the separation of potentially hazardous or damaging uses, construction of adequate buffers, and other planning and land use techniques.
Goal E	**Remove Constraints to the Maintenance, Improvement, and Development of Housing**
Policy E-a	Building and Zoning Codes. Ensure local building and zoning codes do not overly constrain housing production or cause increases in construction or permitting costs without sacrificing basic health and safety considerations.

City of Coachella Municipal Code

Title 17 - Zoning

Title 17 of the City's Zoning Code ensures consistency with the City's General Plan and proposed development and identifies and defines land use categories, boundaries, and development standards. As illustrated in the City of Coachella's Official Zoning Map (2022), the Project area is zoned R-D, Resort District, along the I-10.

Title 17, Chapter 17.36 – Specific Plan District

Chapter 17.36 of the Coachella Zoning Code outlines the requirements of specific plan designations within the City. Specific plan areas are intended to create unique development standards within an area of a City in order to better suit the overall vision of the City and continue to progress the overall goals of the

Coachella GP. Specific plan areas are required to consist of parcels which are owned by a single or multiple owners with all developments initiated by the applicants or their agents. As stated in **Section 4.10.2, Environmental Setting** above, specific plans contain development standards and regulations which are to be applied to any developments within the specific plan areas. In the absence of standards or regulations within a specific plan document, the Coachella GP must be utilized for development regulations.

4.10.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Review Checklist, which includes questions concerning Land Use and Planning. The questions presented in the Environmental Review Checklist have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

a) Physically divide an established community; or

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

METHODOLOGY AND ASSUMPTIONS

The proposed Project and associated Project Design Features (PDFs) are evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning Land Use. In addition to PDFs, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

Approach to Analysis

This analysis of impacts on land use and planning components examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects based on application of the significance criteria/thresholds outlined above. For each criterion, the analyses are generally divided into two main categories: (1) temporary impacts; and (2) permanent impacts. Each criterion is discussed in the context of Project components that share similar characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The baseline conditions and impact analyses are based on field observations conducted by Kimley-Horn; review of Project maps and drawings; analysis of aerial and ground-level photographs; and review of various data available in public records, including local planning documents. The determination that a Project component would or would not result in "substantial" adverse effects on land use and planning standards considers the available policies and regulations established by local and regional agencies and

the amount of deviation from these policies in the Project's components. For example, due to the set standards for allowed developments within each zoning type.

PROJECT DESIGN FEATURES

- Creation of Open Spaces along the western, northern, and southeastern portions of the Project area that include planned and programmed neighborhood parks, passive recreation corridors, and a trail system that increases connectivity both within and outside of the Project area;
- Conserving over 750 acres of natural open space in association with drainages that traverse the Project site.
- Creation of a multi-use community to accommodate a diverse range of households as well community serving amenities and commercial uses;
- Incorporation of multiple residential zoning types made up of very low density residential, low density residential, medium density residential, and high-density residential zones to serve the existing and future housing needs in the City of Coachella, consistent with the goals and policies established in the Coachella General Plan Land Use, Housing, Community Health and Wellness, and Safety Elements.
- Creation of five villages identified as Village A – Wellness Village; Village B – Entertainment District; Village C – Sport Village; Village D – Active Adult; and Village E – Rural Agriculture.
- Inclusion of institutional land uses, including four schools. In addition, the Project includes an overlay for a potential institution of higher learning and an agricultural education center.
- Transition to medium density, low density, and very-low density single-family residential beyond the core comprised of mixed-use, entertainment center/hotels, and high-density residential.

4.10.4 PROJECT IMPACTS AND MITIGATION

Impact 4.10-1: Would the Project physically divide an established community?

Level of Significance: No Impact

CONSTRUCTION AND OPERATIONS

The Project proposes the creation of a 2,808-acre specific plan in the northeast portion of the City and includes provisions for the creation of residential, commercial, agricultural, educational, and open space uses. Each of these uses would be distributed throughout the Project area via the creation of five "villages." The villages proposed within the Project include:

- **Village A: Wellness Village**. A planned mixture of housing at different densities ranging from very low- to high-density located off of the main circulation route. This village includes two sites for the development of elementary schools.
- **Village B: Entertainment District**. This village is primarily planned for mixed-use and commercial uses including a portion for health and wellness-related industries. Residential units within this village would be comprised exclusively of high-density residential units.

- **Village C: Active Recreation District.** This district allows for the development of active recreation opportunities and a mixture of low- and medium-density residential uses. A middle school and large community sports complex are also planned for this village.
- **Village D: Active Adult Community.** This village is composed of a variety of different residential densities that allow for different housing types of single family detached housing communities, townhomes, and attached residential housing types. This village includes pedestrian passageways that would be designed to accommodate walking, biking, and other forms of exercise and would connect to the larger trail system.
- **Village E: Agricultural Village.** This village would permit larger residential lots and agricultural production areas such as vineyards, growing fruits, vegetables, nuts, or other goods for consumption within the community. An agricultural education center and elementary school are also planned for this village.

The Project specific plan would include the implementation of an individualized development code for the Project area that would govern the allowed development characteristics within each of the five villages. **Table 3-3, Plan Areas Summary** notes the desired densities of each land use type proposed within the Project specific plan as well as the anticipated development quantities and gross cumulative area of each land use type.

The Project would be developed within the Desert Lakes subarea of the City, which has remained undeveloped. Project implementation would modify existing land use designations in the area from the current Resort District land use designation which allows for up to 8 du/ac and an FAR of 0.1. Due to the lack of developments occupying the Project area and the immediate adjacent land, the Project would not physically divide any established communities. Additionally, the Project would provide circulation connections to existing roadways, thus further connection portions of the City. Therefore, no impacts would occur, and no mitigation is necessary.

OFF-SITE IMPROVEMENTS

One specific plan within the City of Coachella (City) borders the Project. The La Entrada Specific plan borders the Project to the south, on the south side of I-10. A separate I-10/Avenue 50 interchange project would extend into the Project area as well as the La Entrada project area and connect to a proposed extension of Avenue 50. The Project proposes the development of a bridge and entrance that would provide access to Vista Del Norte to and from the Project site. These would form connections to both the La Entrada Specific Plan community and other portions of the City. Additional off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. These improvements would not, however, create a physical division of established communities, and would instead provide greater connection to planned and established communities. Therefore, these off-site improvements would not generate additional impacts.

Mitigation Measures

No mitigation is necessary.

Impact 4.10-2: ***Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

Level of Significance: Less Than Significant

CONSTRUCTION AND OPERATIONS

SCAG 2024-2050 RTP/SCS Strategies

The Proposed Project has been designed to be compatible with the strategies proposed by SCAG in their 2024-2050 RTP/SCS. These strategies were a collaborative effort between SCAG and local agencies with the intention of not only manage regional growth, but also maximizing ecological health. **Table 4.10-2, Project Compatibility with SCAG 2024-2050 RTP/SCS Strategies** below describes the Project's compatibility with the land use strategies proposed in SCAG's 2024-2050 RTP/SCS.

Table 4.10-1: Project Compatibility with SCAG 2024-2050 RTP/SCS Strategies

RTP/SCS Strategies [1]	Project Compatibility
Build and maintain an integrated multimodal transportation network.	**Consistent**: The roadways planned for the Project will include pedestrian walkways along each street connecting residential areas to open space, institutional, and commercial zones. Pedestrian/bicycle trails are also proposed. Further, roadways would include neighborhood electric vehicle (NEV) lanes to allow multimodal forms of travel along Project roadways. While not located adjacent to major forms of mass transit, the Project area would connect to a proposed I-10/Avenue 50 interchange and extension of Avenue 50. The Project does propose the extension of Vista Del Norte eastward to connect to the Project. This will create a better connection to downtown Coachella and the Cities of Indio and La Quinta.
Develop, connect and sustain communities that are livable and thriving.	**Consistent**: The Project would expand multi-modal transportation access and allow for open space and trail connectivity to create a livable environment. Access to entertainment, commercial land uses, and education within the Project site would also create a sustainable and thriving community that is designed for the residents living within it.
Create a healthy region for the people of today and tomorrow.	**Consistent**: The Project would provide additional recreational opportunity while promoting active transportation and open space access. Educational agriculture installation would be included to promote health, well-being, and understanding in the community.
Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.	**Consistent**: The Project would be conveniently connected to the rest of the Coachella Valley via I-10 and Avenue 50. This would allow for access to regional employment opportunities. Additionally, implementation of the Project would include the creation of entertainment venues and hotels to spur increased tourism to the area and generate economic benefits to both the City and the region and allow for employment within the Project site.
Source: Southern California Association of Governments (SCAG). 2024. *Connect SoCal. The 2024-2050 Regional Transportation Plan/ Sustainable Communities Strategy of the Southern California Association of Governments*. Page 12. https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf (Accessed July 2025)	

Coachella Zoning Code

The City's Zoning Code Title 17 has established minimum land use standards for each zoning designation. As stated in ***Section 4.10-1, Environmental Setting***, the existing zoning classifications within the Project site is R-D.

The Project would include the implementation of a specific plan which would contain development standards for uses within the Project area. The villages proposed by the Project have been designed to meet these specifications. **Table 3-3, Plan Areas Summary** describes the development standards proposed for each use within the Specific Plan. Once certified, the Specific Plan would act as the guiding document for development within the Project area. In instances where no standard is present in the Project Specific Plan, the Coachella GP and Coachella Zoning Code would act as the guiding documents. However, as summarized in Impact 4.10-1 above, the Project components would remain consistent with the vision of the Desert Lakes subarea and would therefore not conflict with the current Coachella GP and subsequently, the Coachella Zoning Code.

City of Coachella General Plan Update 2035

While the Project would be inconsistent with Policy 2.2: Character and identity, Policy 2.14: Reserve development areas, and Policy 2.16: Range of uses of the Coachella GP Land Use Element, this is due to the Project's development and land use plan proposing a mixture of uses which do not align with the certain goals related to the specific development of the Desert Lakes Subarea. Overall, the Project would include uses which match the overall vision of the Desert Lakes Subarea. The Project has been designed to be generally compliant with any applicable land use related regulation with the Coachella GP. Moreover, the minor policy inconsistencies, as described below, are not related to avoiding or mitigating an environmental impact and the inconsistencies do not result in environmental impacts. Finally, the Project includes an amendment to the General Plan, which would change the applicable policies and goals to reflect the Project, thus alleviating any potential inconsistencies. A summary of the Project's consistency with applicable land use related goals and policies in the Coachella GP can be seen in **Table 4.10-2, Coachella General Plan 2035 Consistency** below.

Table 4.10-2: Coachella General Plan 2035 Consistency

General Plan Policy [1]	Project Consistency
LAND USE AND COMMUNITY CHARACTER ELEMENT	
Goal 1: Development Regulations. A land development and regulatory system that reinforces the City's desire to grow from a small town to a medium sized city in a sustainable and orderly manner.	
Policy 1.7: Specific Plans. Utilize specific plans as strategic entitlement tools when considering unique projects that bring exceptional value to the community. Periodically review existing, un-built specific plans for relevance and the potential for needed updates.	**Consistent:** The Project includes the certification of a specific plan that would comprise the Project area and provide enhanced residential and resort uses to the City.
Goal 2: Growth and Development. The successful transformation of Coachella from a small town into a medium-sized, full-service City that is a major economic center for the Coachella Valley.	
Policy 2.2: Character and identity. Strive to maintain Coachella's existing small-town character, identity and cultural diversity as development occurs in the future.	**Inconsistent:** The Project would be consistent with the vision of the Desert Lakes subarea (Subarea 13) through the creation of suburban neighborhoods with localized centers for recreational and entertainment uses. However, the Project area would exceed the land use goals outlined in page O4-80 of the Coachella GP which proposed a land use designation mix of:

Table 4.10-2: Coachella General Plan 2035 Consistency

General Plan Policy [1]	Project Consistency
	• 20% to 30% Open Space • Up to 25% agricultural Rancho and Open Space • Up to 50% percent Rural Rancho • Up to 10% General Neighborhood • Up to 3% Suburban Retail District • Up to 5% Neighborhood Center • Up to 60% Resort The Project instead proposes a land use mix consisting of approximately: • 19% Very Low and Low density residential • 19% medium and high density residential • 8% mixed use commercial • 2% entertainment and resort uses • 3% agricultural production • 41% non-agricultural open space • 3% institutional uses The Project would provide land uses which exceed the mixtures listed for the subarea except for a greater percentage of open space areas, especially when combined with very low residential uses (0.4 – 1.0 du/ac). However, due to the nature of very low residential and open space uses, additional environmental impacts are not anticipated with their development. Despite not providing for development according to this exact land use mix, the Project would include uses preferred for the subarea in a manner which would not generate additional, substantial environmental effects. This includes entertainment and resort uses, low to high density residential uses, commercial uses, institutional uses, and agricultural uses.
Policy 2.3: Urban design as identity. Recognize the City can differentiate itself from other Coachella Valley cities through urban design practices such as the development of complete neighborhoods, preservation of agriculture and open space, pedestrian-oriented design and sustainable development practices.	**Consistent:** The Project has been designed to create pedestrian scale walkable residential uses beside mixed use and recreational uses. Additionally, the Project includes the creation of agricultural production areas within the specific plan area.
Policy 2.10: Contiguous development pattern. Encourage and incentivize development to occur contiguous to, or proximate to, existing built areas to facilitate delivery of City services and minimize "leapfrog" development not connected to existing urbanized areas.	**Consistent:** While the Project is not immediately surrounded by developed land, the Project would produce a new community within the Project area. Additionally, the Project would include roadway improvements which would increase connectivity between areas of the City and the region.

Table 4.10-2: Coachella General Plan 2035 Consistency

General Plan Policy [1]	Project Consistency
Policy 2.11: New growth. Continue to plan for future expansion and new growth on previously undeveloped areas.	**Consistent:** The Project would be developed in an area of the City that is undeveloped**.**
Policy 2.14: Reserve development areas. Subareas 13, 15 and 16 shall be maintained as reserve development areas. These areas shall maintain their current land or agricultural use until the identified High Priority Development Areas and Growth Expansion Areas are at least 60 percent developed with urban uses or preserved open spaces.	**Inconsistent:** The Project proposes the adoption of a GPA and ZC in order to establish the Specific Plan. This would conflict with the Policy's intent of maintaining existing land and agricultural uses and designations However, the Project would still propose uses that promote the development of residential, lodging, recreational, and commercial uses.
Policy 2.16: Range of uses. Through Specific Plans, Planned Developments, or other similar master planning processes, allow the designations shown on the General Plan Designation Map to be adjusted within the ranges set forth for each policy area in large, undeveloped areas of the City so long as the visions of the General Plan and the applicable subarea is met.	**Inconsistent:** While the Project area would exceed the land use goals outlined in page O4-80 of the Coachella GP, the Project would include uses preferred for the subarea in a manner which would not generate additional, substantial environmental effects. See Policy 2.2 above.
Policy 2.17: Parks and open space. Establish parks and open space as allowed uses within all General Plan Designations.	**Consistent:** The Project includes the creation of 379 acres of parks, greenways, and amenity centers as well as 770 acres of natural open space, including drainage channels and trails.
Policy 2.19: Community Amenities. Encourage the provision of a high-level of neighborhood and community amenities and design features as a way of balancing increased density, recognizing that the General Plan increases the average planned density by several times and specifies a desire for a very high quality, amenity-rich, livable community.	**Consistent:** The Project would implement various residential densities ranging from very low density to high density and mixed uses. Additionally, the Project proposes the development of 379 acres of parks, greenways, and amenity centers.
Goal 3: Healthy Community Design. Development patterns and urban design comprised of complete, walkable, attractive, family-friendly neighborhoods, districts and corridors that support healthy and active lifestyles.	
Policy 3.1: Physical plan. Facilitate the construction of a built environment that supports a healthy physical and social environment for new and existing neighborhoods.	**Consistent:** The Project proposes the development of 379 acres of parks, greenways, and amenity centers to serve residents of the Project area.
Policy 3.2: Walkable streets. Regulate new development to ensure new blocks encourage walkability by maximizing connectivity and route choice, create reasonable block lengths to encourage more walking and physical activity and improve the walkability of existing neighborhood streets.	**Consistent:** The Project area has been designed to create a pedestrian scale neighborhood with sidewalks along all roadways as well as walking trails through open space areas. The Project also proposes bicycle and NEV lanes along Project roadways. Additionally, mixed use areas would be included to allow residents to live in proximity to community-supporting nonresidential uses.
Policy 3.6: Family-friendly community. Strive to create multi-generational family-friendly public spaces and affordable family-friendly neighborhoods through the following measures.	**Consistent:** The Project includes 71 acres of school uses (3 elementary schools and 1 middle school) as well as a college/university overlay to allow for institutions of higher learning with an emphasis on healthcare. The

Table 4.10-2: Coachella General Plan 2035 Consistency

General Plan Policy [1]	Project Consistency
• The provision of family-friendly amenities, such as libraries, recreation centers and parks in residential neighborhoods. • Encouraging child-care and schools near employment centers and housing and vice versa. • Set a minimum proportion or number of two-, and three-bedroom units in multi-family and rental housing development. • Allow family childcare in residential units by right. • Provide childcare at public meetings. • Encourage youth participation in the planning process.	Project also proposes the development of 379 acres of parks, greenways, and amenity centers to serve residents and families of the Project area.
Policy 3.7: Culture and entertainment hub. Create opportunities for leisure/cultural activities in Coachella such as a movie theater, music and dancing venue, museum/gallery, cafe, or bowling alley, among many other facilities to ensure teens and young adults have safe ways to enrich their social lives.	**Consistent:** Consistent with the Coachella GP's goals for Subarea 13, the Project would include the development of 305 acres of commercial areas, which include mixed-use, entertainment center and performing arts theater, entertainment venue, and hotel rooms.
Goal 5: Neighborhoods. Neighborhoods that provide a variety of housing types, densities, designs and mix of uses and services that reflect the diversity and identity of Coachella, provide for diverse needs of residents of all ages, ethnicities, socio-economic groups and abilities, and support healthy and active lifestyles.	
Policy 5.2: Conventional neighborhood design. Discourage the construction of new residential neighborhoods that are characterized by cul-de-sacs, sound walls, long block lengths, single building and housing types and lack of access to goods and services.	**Consistent:** The Project includes multiple housing densities ranging from very low-density to high-density with mixed-use developments.
Policy 5.3: Variety of types of neighborhoods. Promote a variety of neighborhoods within the City and ensure that neighborhood types are dispersed throughout the City.	**Consistent:** The Project includes multiple housing densities ranging from very low-density to high-density with mixed-use developments in a previously undeveloped portion of the City.
Policy 5.4: Balanced neighborhoods. Within the allowed densities and housing types, promote a range of housing and price levels within each neighborhood in order to accommodate diverse ages and incomes. For development projects larger than five acres, require that a diversity of housing types be provided and that these housing types be mixed rather than segregated by unit type.	**Consistent:** The Project includes multiple housing densities ranging from very low-density to high-density with mixed use developments.
Policy 5.7: Walkable neighborhoods. Require that all new neighborhoods are designed and constructed to be pedestrian friendly and include features such as short blocks, wide sidewalks, tree-shaded streets, buildings that define and are oriented to streets or public spaces, traffic-calming features, convenient pedestrian street crossings, and safe streets that are designed for pedestrians, cyclists and vehicles.	**Consistent:** The Project area has been designed to create a pedestrian scale neighborhood with sidewalks along all roadways, walking trails through open space areas, bicycle lanes, and NEV lanes. Additionally, mixed use areas will be included to allow residents to live in proximity to community-supporting nonresidential uses.

Table 4.10-2: Coachella General Plan 2035 Consistency

General Plan Policy [1]	Project Consistency
Policy 5.11: Connections to key destinations. Require direct pedestrian connections between residential areas and nearby commercial areas.	**Consistent:** All roadways within the Project would include sidewalks for pedestrian travel. Additionally, the Project includes multimodal forms of transportation with the inclusion of bicycle lanes and NEV lanes.
Policy 5.15: Access to daily activities. Strive to create development patterns such that the majority of residents are within one-half mile walking distance to a variety of neighborhood goods and services, such as supermarkets, restaurants, churches, cafes, dry cleaners, laundromats, farmers markets, banks, hair care, pharmacies and similar uses.	**Consistent:** Pedestrian connections would be included along all roadways within the Project area allowing for pedestrian travel between villages and blocks. Additionally, bicycle lanes and NEV lanes would be incorporated to roadways within the Project area.
Policy 5.16: Access to parks and open spaces. Design new neighborhoods and, where feasible, retrofit existing neighborhoods, so that 60 percent of dwelling units are within a one-third mile walk distance of a usable open space such as a tot-lot, neighborhood park, community park or plaza/green.	**Consistent:** The Project includes the development of 379 acres of parks, greenways, and amenity centers as well as 770 acres of natural open space, including drainage channels and trails.
Policy 5.17: Neighborhood transitions. Require that new neighborhoods provide appropriate transitions in scale, building type and density between different General Plan designations.	**Consistent:** Each village of the Project will include multiple residential densities arranged throughout the Project area.
Policy 5.21: Subdivision gateways. Discourage the use of signs to distinguish one residential project from another. Strive for neighborhoods to blend seamlessly into one another.	**Inconsistent:** Signage between villages is proposed for the Project. However, these signs would be aesthetically consistent with the character of each village and would not generate additional environmental effects.
Goal 6: Centers. A variety of mixed use, urban centers throughout the City that provides opportunities for shopping, recreation, commerce, employment and arts and culture.	
Policy 6.4: Diverse centers. Encourage the development of local and city-wide centers that address different community needs and market sectors. The centers shall complement and be integrated with surrounding neighborhoods.	**Consistent:** The Project includes the development of residential, commercial, agricultural, educational, and open space uses throughout the Project areas.
Policy 6.7: New neighborhood centers. Create a series of new neighborhood centers throughout Coachella so the majority of dwelling units in each Neighborhood are no more than one-half mile from any neighborhood center.	**Consistent:** The Project would be developed within a previously undeveloped portion of the City and include roadway improvements that will improve connections to other communities of the City.
Policy 6.8: Neighborhood center location. Locate new Neighborhood Centers at the intersections of major roadways such as collectors and arterials.	**Consistent:** The Project's off-site improvements would improve connections to Vista del Norte and Avenue 50.
Goal 7: Districts. A series of unique, destination-oriented districts throughout Coachella that provide space for large-format retail, industrial and resort uses in order to increase access to jobs, provide amenities for residents and improve the fiscal stability of the City.	
Policy 7.10: Resorts. Actively pursue the establishment of multiple resort complexes in	**Consistent:** The Project would include the development of approximately 305 acres of commercial areas, which

Table 4.10-2: Coachella General Plan 2035 Consistency

General Plan Policy [1]	Project Consistency
Coachella. Locate resorts in areas of the City where city-wide connectivity will not be negatively affected by the design of the project. Such locations include adjacent to hillsides, on the edge of the Sphere of Influence and city limit where additional annexation is not expected to occur and adjacent to rivers and canals.	include mixed-use, entertainment center and performing arts theater, entertainment venue, and hotel rooms. This would be within the vision of the Desert Lakes subarea.
Goal 8: Public Facilities and Buildings. A variety of public facilities and buildings throughout the City that improves the quality of life for residents and maintains a high-level of public services.	
Policy 8.3: School location and design. Work with school districts to size, design and locate schools to better enable students to walk or bicycle to them.	**Consistent:** The Project includes 71 acres of school uses (3 elementary schools and 1 middle school) as well as a college/ university overlay to allow for institutions of higher learning with an emphasis on healthcare. The Project would coordinate with the local school district for approval on siting and capacity.
Policy 8.4: Parks and open space. Establish a range of parks and open spaces, including tot lots, neighborhood parks, community parks, plazas/greens and/or greenways/parkways within all new Neighborhoods, Centers and Districts	**Consistent:** The Project would create approximately 379 acres of parks, greenways, and amenity centers as well as 770 acres of natural open space, including drainage channels and trails.
Policy 8.5: Civic and institutional uses. Locate civic and institutional uses in Downtown and neighborhood centers and avoid locating these uses in remote, single-use complexes.	**Consistent:** Villages A, C, and E contain institutional uses in the form of elementary schools, a middle school, and an overlay for healthcare focused higher learning institution.
Goal 10: Development requirements. A fair, understandable and predictable approach that ensures new development does not impose a fiscal burden on the City, conforms to regional airport and railroad safety practices, and requires new projects to provide adequate public facilities and services as part of the overall process.	
Policy 10.1: Required contents of Specific Plans and Planned Developments that implement the subarea Master Plans. Require that all Specific Plans, Planned Developments, Master Plans and other master-planned community implementation tools include: • A plan for the phasing of all off-site infrastructure. • A performance schedule for the issuance of building permits based on the concurrent availability of public services and amenities, including parks, schools and other public facilities identified in the entitlement documents. • A clear statement of the minimum public improvements that will be required as part of the first phase of development. • A statement of the financing mechanisms that will provide for the ongoing funding and financing of the public facilities of the project. These financing	**Consistent:** The Project would include the implementation of a development plan for improvements within the Project area over six stages. The Project specific plan would also comply with required components of a specific plan as outlined in Coachella Zoning Code Chapter 17.36.

Table 4.10-2: Coachella General Plan 2035 Consistency

General Plan Policy [1]	Project Consistency
tools should be presented and discussed in the entitlement document implementation plan.	
Policy 10.4: Airport compatibility. Require new development in the vicinity of Jacqueline Cochran Airport to conform to the County's airport land use and safety plans. Notwithstanding the allowable land use intensities and densities set forth by this Land Use and Community Character Element, there may be more restrictive density and intensity limitations on land use and development parameters, as set forth by the Airport Land Use and Compatibility Plan. Additionally, per the Airport Land Use Plan, there may be additional limits, restrictions, and requirements, such as aviation easements, height limits, occupancy limits, and deed restrictions, required of new developments within the vicinity of the airport.	**Consistent:** The Project is not in the vicinity of the Jacqueline Cochran Airport and is not within any Airport Land Use Compatibility Area.
Policy 10.6: Airport Land Use Commission Review. Before the adoption or amendment of this General Plan, any specific plan, the adoption or amendment of a zoning ordinance or building regulation within the planning boundary of the airport land use compatibility plan, the City shall refer proposed actions for review, determination and processing by the Riverside County Airport Land Use Commission as provided by the Airport Land Use Law. The City shall notify the Airport Land Use Commission office and send a Request for Agency Comments for all new projects, and projects proposing added floor area or change in building occupancy type within 2 miles of the airport.	**Consistent:** The Project is not in the vicinity of the Jacqueline Cochran Airport and is not within any Airport Land Use Compatibility Area.
Policy 10.8: Residential Development near airport. New residential development within Airport Compatibility Zone D shall have a net density of at least five dwelling units per acre. New dwelling units should not be permitted as secondary uses of the Urban Employment Center General Plan Designation within Airport Compatibility Zone C.	**Consistent:** The Project is not in the vicinity of the Jacqueline Cochran Airport and is not within any Airport Land Use Compatibility Area.
Policy 10.9: Nonresidential Development near airport. The land use intensity of nonresidential structures within Airport Compatibility Zones B1, C, and D shall be limited as set forth by Table 2A of the Airport Land Use Compatibility Plan.	**Consistent:** The Project is not in the vicinity of the Jacqueline Cochran Airport and is not within any Airport Land Use Compatibility Area.
Goal 12: Diversity of uses for economic development. Non-residential uses that creates a complete city and diversifies the local economy.	
Policy 12.4: Entertainment and tourist attractions. Pursue one or more major entertainment destinations	**Consistent:** Although not in subareas 9, 11, or 12, the Project would include approximately 305 acres of

Table 4.10-2: Coachella General Plan 2035 Consistency

General Plan Policy [1]	Project Consistency
for Coachella residents and to draw visitors from around the region. Such entertainment uses could include theme parks, water parks, theme-oriented retail destinations, sports facilities, performance venues and other similar uses. Strive to locate these uses near regional transportation infrastructure and in subareas 9, 11, and 12.	commercial areas, which include mixed-use, entertainment center and performing arts theater, entertainment venue, and hotel rooms. This would spur recreational and tourist activity in the area.
Policy 12.5: Arts and culture. Pursue one or more arts and cultural facilities in Coachella as an economic development strategy. Such uses could include museums, theaters, performing arts centers and similar uses. Strive to locate these uses in or around Downtown.	**Consistent:** Proposed development within Village C of the Project would include the creation of a performing arts amphitheater.
Policy 12.7: Hospitality. Expand the number and variety of hospitality options with Coachella as a means of providing jobs for residents and expanding the local tax base.	**Consistent:** The Project would include the development of hotel uses to supplement entertainment and performing arts uses within the Project area.
Policy 12.9: Retail base. Encourage economic development of all scales of retail development within Coachella in order to create a stronger tax base and increase the City's tax revenue.	**Consistent:** The Project would include approximately 305 acres of commercial areas which would generate additional revenue in the area and increase funds earned through tourism.
COMMUNITY HEALTH AND WELLNESS ELEMENT	
Goal 5: Local Food System. Strong local food production and ample opportunities to eat locally grown food.	
Policy 5.1: Local food production. Work with local agricultural stakeholders to establish a strategy to encourage existing and new agricultural uses in and near Coachella to grow healthy food for local consumption. Make land use and policy decisions that encourage increased local food production. To the extent feasible, assess and plan for local food processing and distribution needs to connect local agriculture to markets, such as retailers, restaurants, schools, hospitals, and other institutions and encourage certified organic growing practices. Also encourage local growers to consider establishing a co-operative community supported agriculture program.	**Consistent:** The Project would include the creation of approximately 68 acres of Agricultural Production areas throughout the Project area along with an agricultural Education Center to provide opportunities for residents and students to learn about agricultural practices.
Policy 5.5: Zoning for small-scale food production. Remove regulatory barriers to gardening and urban farming, including modifying the zoning code, to conditionally permit these activities on private property in all zones. Allow "interim agricultural uses" as part of a residential land use within residential districts, and within Specific Plans and Planned Development areas.	**Consistent:** As previously stated, the Project would create agricultural production uses within approximately 68 acres of the Project area for the purpose of growing fruits, vegetables, nuts, or other goods for consumption within the community.
Goal 8: Educational and Community Facilities. Community facilities and school Facilities that support physical activity, civic life and social connections for residents of all ages and interests.	

Table 4.10-2: Coachella General Plan 2035 Consistency

General Plan Policy [1]	Project Consistency
Policy 8.2: School facilities planning. Continued use of CVAG cooperative agreement for school-related projects and consult with the School District in the early planning stages of any new park or school to encourage walkable school design and accessible location. The City would prefer to have schools in existing and new neighborhoods that are multi-story with a smaller campus size versus large school campuses that are not accessible for most students.	**Consistent:** Coordination with the Project area school districts is ongoing. The Project proposes a college/university overlay to allow for institutions of higher learning with an emphasis on healthcare and approximately 71 acres of school uses (3 elementary schools and 1 middle school).
Policy 8.8: Provision of school sites. Encourage the dedication of real property, based on the master plan of the applicable school district, for the provision of necessary public educational facilities within a half mile of each neighborhood.	**Consistent:** The Project would allow for the development of multiple elementary and middle school uses as well as an overlay for higher education institute within the Project specific plan area.
Policy 8.23: Distributed community centers. Provide every neighborhood with easy access to recreation and service programs by decentralizing community centers and programs.	**Consistent:** Each village of the Project contains open space and recreational uses, and each village is separated by open spaces. Further, the Project includes mixed uses to further create blended residential communities.
6TH CYCLE HOUSING ELEMENT UPDATE	
Goal A: Facilitate the Development of a Variety of Housing Types to Provide Adequate Housing in the City to all Households.	
Policy A-a: Land Use Controls. Use the Land Use Element of the General Plan and the Zoning Code to ensure the availability of adequate sites for a variety of housing types.	**Consistent:** The Project would provide a variety of residential land use areas that would range from very low to high-density residential densities to accommodate a diverse range of households.
Policy A-b: Infill and Contiguous Land. Maximize use of vacant land within the city and contiguous to existing development in order to reduce the cost of off-site improvements and create a compact city form.	**Consistent:** The Project would be developed on a site that is comprised of vacant land within Planning Area 13 of the City.
Policy A-c: Compatible Uses. Ensure the compatibility of residential areas with surrounding uses through the separation of potentially hazardous or damaging uses, construction of adequate buffers, and other planning and land use techniques.	**Consistent:** The Project would be developed to allow for the transition to lower density residential moving toward the outer portion of the Project area. This would create a buffer between lower density uses and more active, denser uses.
Goal E: Remove Constraints to the Maintenance, Improvement, and Development of Housing	
Policy E-a: Building and Zoning Codes. Ensure local building and zoning codes do not overly constrain housing production or cause increases in construction or permitting costs without sacrificing basic health and safety considerations.	**Consistent:** The Project would include the establishment of a specific plan that would provide Project site-specific land use standards to efficiently accommodate the Project's diverse range of land uses while remaining consistent with the overall vision of the Desert Lakes planning area.

Source: City of Coachella. 2015. *General Plan Update*. Retrieved from: https://www.coachella.org/home/showpublisheddocument/3221/635712771850800000 (Accessed 20, 2023)
City of Coachella. 2022. 6th Cycle Housing Element City of Coachella. Retrieved from: https://static1.squarespace.com/static/606f64b7c544200772d634be/t/633b4e4748307a51aec0ba19/1664831050769/LWC_Coachella+HEU_PRD_Revised_+093022-combine-R.pdf (Accessed April 28, 2023)

Coachella Valley Multiple Species Habitat Conservation Plan

The western portion of the Project site is within the East Indio Hills Conservation Area (EIHCA). Additionally, there are Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) conserved lands near the west, north, and northeast portions of the Project area including the Desert Tortoise and Linkage Conservation Area; see **Exhibit 4.3-4**. In order to generate an optimal transition into developed portions of the Project site, the Project would adhere to CVMSHCP Section 4.5 Land Use Adjacency Guidelines. These guidelines define allowed uses and practices in relation to drainage, toxic compounds, lighting, noise, invasive non-native species, land barriers, and grading/land development. The Project would comply with the provisions of the CVMSHCP.

The entire Project site is located within the Plan Area for the CVMSHCP. Specifically, the land proposed for the Vista Del Norte Crossing occurs within the southern terminus of the EIHCA. Therefore, the installation of the crossing is subject to the Coachella Valley Conservation Commission's (CVCC) Like Exchange process. Since the Vista Del Norte Crossing, as planned, is wider than the maximum road width to be considered a Covered Activity under the CVMSHP, a Like Exchange (**Appendix C4**) was prepared to compensate for the loss of habitats within the EIHCA. A Like Exchange was drafted in October 2024 which identified three parcels totaling approximately 100 acres as replacement conservation areas (APNs 733-190-010, 733-190-012, and 733-190-01). The proposed three parcel conservation area would abut the Dos Palmas Conservation Area on the parcel's eastern boundary and offset potential impacts associated with the approximately 65-acre Vista Del Norte Crossing impact area.[8] According to the findings of the Like Exchange, the proposed conservation action would result in a biologically superior conservation acreage and benefit.[9]The Like Exchange was approved by the City Council on February 12, 2025 and the County Board of Supervisors on March 11, 2025. Additionally, on September 11, 2025, the CVCC approved the like exchange to the CVMSHCP. Furthermore, the United States Department of Fish and Wildlife (USFW) and California Department of Fish and Wildlife (CDFW) stated their concurrence with the findings of the Like Exchange with the request that the conservation parcels be added to the Dos Palmas Conservation Area.[10]

The Project would comply with all applicable existing land use regulations and guidelines within the Project area. Therefore, impacts are anticipated to be less than significant.

OFF-SITE IMPROVEMENTS

Off-site improvements would constitute circulation and utility improvements; generally consisting of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. These improvements would be done in compliance with applicable State, regional, and local regulations. Therefore, the Project's off-site improvements would not

[8] ELMT Consulting (ELMT). (2024). Coachella Valley Multiple Species Habitat Conservation Plan Like Exchange. Page 6. Santa Ana, CA: ELMT.
[9] Ibid. Page 31.
[10] United States Department of Fish and Wildlife (USFW). Wildlife Agencies' Concurrence Regarding Proposed Like Exchange to Conservation Areas for the KPC Coachella Specific Plan. Palm Springs, CA: USFW.

generate additional impacts in relation to compliance with planning regulations. See **Section 3.0, Project Description,** for additional details regarding proposed off-site improvements.

Mitigation Measures

No mitigation is necessary.

4.10.5 CUMULATIVE IMPACTS

For purposes of cumulative land use impact analysis, cumulative impacts are considered for cumulative development according to the jurisdiction's adopted plan (i.e., the City of Coachella General Plan or SCAG's Connect SoCal RTP/SCS). The geographic context for land use cumulative impact analysis includes local and regional agencies. All Project Land Use and Planning impacts are avoided or found to be less than significant. Therefore, the Project's contribution toward cumulative impacts is not otherwise considered "cumulatively considerable."

4.10.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable land use or planning impacts have been identified.

4.10.7 REFERENCES

City of Coachella. 2023. *City of Coachella Municipal Code*. Retrieved from: https://library.municode.com/ca/coachella/codes/code_of_ordinances (accessed April 21, 2023).

City of Coachella. 2022. 6th Cycle Draft Housing Element City of Coachella. Retrieved from: https://static1.squarespace.com/static/606f64b7c544200772d634be/t/633b4e4748307a51aec0ba19/1664831050769/LWC_Coachella+HEU_PRD_Revised_+093022-combine-R.pdf (accessed April 28, 2023).

City of Coachella. 2015. *General Plan Update*. Retrieved from: https://www.coachella.org/home/showpublisheddocument/10698/638906775782700000 (accessed October 2025).

City of Coachella. 2014. *General Plan Land Use Designations*. Retrieved from: https://www.coachella.org/home/showpublisheddocument/9427/638402980517270000 (accessed October 2025).

ELMT Consulting (ELMT). (2024). Coachella Valley Multiple Species Habitat Conservation Plan Like Exchange. Page 6. Santa Ana, CA: ELMT.

United States Department of Fish and Wildlife (USFW). Wildlife Agencies' Concurrence Regarding Proposed Like Exchange to Conservation Areas for the KPC Coachella Specific Plan. Palm Springs, CA: USFW.

4.11 NOISE

This section evaluates both construction-related and operational noise and vibration impacts to onsite and surrounding land uses resulting from Project implementation. The Project is located in the City of Coachella which may be potentially affected by Project implementation as well as the associated offsite improvements. Mitigation measures are recommended to avoid or lessen the Project's noise impacts to a less than significant level, where appropriate.

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts from noise. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors, such as susceptibility to groundborne vibration or proximity to an airstrip.

4.11.1 ENVIRONMENTAL SETTING

The Project site is approximately three miles northeast of the City of Coachella (City) center in the foothills of the Little San Bernardino Mountains, with views across the Coachella Valley to the San Jacinto and Santa Rosa Mountains. The 2,807-acre Project site is bounded by the Little San Bernardino Mountains to the north, the City of Indio to the northwest, Interstate 10 (I-10) and the City of Coachella to the north, south and west, and unincorporated Riverside County to the east (see **Exhibit 3-2: Local Vicinity**).

SOUND AND ENVIRONMENTAL NOISE

Acoustics is the science of sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).

Noise is defined as loud, unexpected, or annoying sound. The fundamental acoustics model consists of a noise source, a receptor, and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path, determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound. A typical noise environment consists of a base of steady background noise that is the sum of many distant and indistinguishable noise sources. The sound from individual local sources is superimposed on this background noise. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micropascals (µPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness. **Table 4.11-1: Typical Noise Levels** provides typical noise levels.

Table 4.11-1: Typical Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Jet fly-over at 1,000 feet		
	– 100 –	
Gas lawnmower at 3 feet		
	– 90 –	
Diesel truck at 50 feet at 50 miles per hour		Food blender at 3 feet
	– 80 –	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawnmower, 100 feet	**– 70 –**	Vacuum cleaner at 10 feet
Commercial area		Normal Speech at 3 feet
Heavy traffic at 300 feet	**– 60 –**	
		Large business office
Quiet urban daytime	**– 50 –**	Dishwasher in next room
Quiet urban nighttime	**– 40 –**	Theater, large conference room (background)
Quiet suburban nighttime		
	– 30 –	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	– 20 –	
		Broadcast/recording studio
	– 10 –	
Lowest threshold of human hearing	**– 0 –**	Lowest threshold of human hearing

Source: Kimley-Horn. 2024. Acoustical Assessment. Table 2.

NOISE DESCRIPTORS

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Most commonly, environmental sounds are described in terms of equivalent noise level (L_{eq}) that has the same acoustical energy as the summation of all the time-varying events. While L_{eq} represents the continuous sound pressure level over the measurement period, the day-night noise level (L_{dn}) and Community Equivalent Noise Level (CNEL) are measures of energy average during a 24-hour period, with dB weighted sound levels from 7:00 p.m. to 7:00 a.m. Each is applicable to this analysis and defined in **Table 4.11-2: Definitions of Acoustical Terms**.

Table 4.11-2: Definitions of Acoustical Terms

Term	Definitions
Decibel (dB)	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in µPa (or 20 micronewtons per square meter), where 1 pascal is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in dB as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 µPa). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 Hz and 20,000 Hz. Infrasonic sound are below 20 Hz and ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level (dBA)	The sound pressure level in dB as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Equivalent Noise Level (L_{eq})	The average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
Maximum Noise Level (L_{max}) Minimum Noise Level (L_{min})	The maximum and minimum dBA during the measurement period.
Exceeded Noise Levels (L_{01}, L_{10}, L_{50}, L_{90})	The dBA values that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day-Night Noise Level (L_{dn})	A 24-hour average L_{eq} with a 10 dBA weighting added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity at nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.
Community Noise Equivalent Level (CNEL)	A 24-hour average L_{eq} with a 5 dBA weighting during the hours of 7:00 a.m. to 10:00 a.m. and a 10 dBA weighting added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.

Source: Kimley-Horn. 2024. Acoustical Assessment. Table 3.

Because sound levels can vary markedly over a short period of time, a method for describing either the sound's average character (L_{eq}) or the variations' statistical behavior (L_{XX}) must be utilized. The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within about plus or minus 1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The predicted models'

accuracy depends on various factors, such as the distance between the noise receptor and the noise source, the character of the ground surface (e.g., hard or soft), and the presence or absence of structures (e.g., walls or buildings) or topography, and how well model inputs reflect these conditions.

HUMAN RESPONSE TO NOISE

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted:

- Except in carefully controlled laboratory experiments, a 1-dBA change cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A minimum 5-dBA change is required before any noticeable change in community response would be expected. A 5-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

EFFECTS OF NOISE ON PEOPLE

Hearing Loss. While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over 8 hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

Annoyance. Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes

for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources.

GROUNDBORNE VIBRATION

Sources of groundborne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions or heavy equipment use during construction). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is the peak particle velocity (PPV); another is the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave and is expressed in terms of inches-per-second (in/sec). The RMS velocity is defined as the average of the squared amplitude of the signal and is expressed in terms of velocity decibels (VdB). The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Table 4.11-3: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations, displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the individual's sensitivity. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high noise environments, which are more prevalent where groundborne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. Common sources for groundborne vibration are planes, trains, and construction activities such as earth-moving which requires the use of heavy-duty earth moving equipment. For the purposes of this analysis, a PPV descriptor with units of inches per second (in/sec) is used to evaluate construction-generated vibration for building damage and human complaints.

Table 4.11-3: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations

Maximum PPV (in/sec)	Vibration Annoyance Potential Criteria	Vibration Damage Potential Threshold Criteria	FTA Vibration Damage Criteria
0.008	--	Extremely fragile historic buildings, ruins, ancient monuments	--
0.01	Barely Perceptible	--	--
0.04	Distinctly Perceptible	--	--
0.1	Strongly Perceptible	Fragile buildings	--
0.12	--	--	Buildings extremely susceptible to vibration damage
0.2	--	--	Non-engineered timber and masonry buildings
0.25	--	Historic and some old buildings	--
0.3	--	Older residential structures	Engineered concrete and masonry (no plaster)
0.4	Severe	--	--
0.5	--	New residential structures, Modern industrial/ commercial buildings	Reinforced-concrete, steel or timber (no plaster)

PPV = peak particle velocity; in/sec = inches per second; FTA = Federal Transit Administration

Source: Kimley-Horn. 2024. Acoustical Assessment. Table 4.

EXISTING NOISE SOURCES

The City of Coachella is characterized as a predominately urban environment. Much of the City has been developed with residential, commercial, and industrial land uses. Transportation-related noise is the primary noise source in the City. Other noise sources include noise generated from commercial, industrial, residential, institutional, and recreational activities.

Mobile Sources

Existing roadway noise levels were calculated for the roadway segments in the Project vicinity. This task was accomplished using the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and existing traffic volumes from the Project traffic analysis (prepared by Linscott Law & Greenspan Engineers, 2023). The noise prediction model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (also referred to as energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by the California Department of Transportation (Caltrans). The Caltrans data indicates that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along roadway segments proximate to the project site are included in **Table 4.11-4: Existing Traffic Noise Levels**.

Table 4.11-4: Existing Traffic Noise Levels

Roadway	Segment	ADT	dBA CNEL[1]
Dillon Road	I-10 WB Ramps to Vista Del Norte	8,060	63.0
Vista Del Norte	Dillon Road to Tyler Street	670	46.5
	East of Tyler Street	670	46.5
Avenue 50	Leoco Lane to Magnolia Street/Tyler Street	7,960	60.7
	Magnolia Street/Tyler Street to SR-86	7,390	60.3
	Tyler Street to Polk Street	500	50.6
	Polk Street to Fillmore Street	140	45.1
	Fillmore Street to I-10 EB Ramps	--	N/A
Polk Street	Avenue 50 to Avenue 52	290	45.0
Avenue 52	Van Buren Street to Cesar Chavez Street	12,840	61.6
	Cesar Chavez Street to Sunset Drive	7,300	57.8
	Sunset Drive to Tyler Street	8,410	58.5
	Tyler Street to SR-86	5,440	60.1

ADT = average daily traffic; dBA = A-weighted decibels; CNEL = community noise equivalent level

1. Traffic noise levels are at 100 feet from the roadway centerline. The actual sound level at any receptor location is dependent upon such factors as the source-to-receptor distance and the presence of intervening structures, barriers, and topography.

Source: Kimley-Horn. 2024. Acoustical Assessment. Table 8.

As identified in **Table 4.11-4**, the existing traffic-generated noise level on Project-vicinity roadways currently ranges from 45.0 dBA CNEL to 63.0 dBA CNEL 100 feet from the centerline. CNEL is 24-hour average noise level with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Stationary Sources

The stationary noise sources in the vicinity of the Project site are existing residential and commercial properties to the west. Noise sources from residential and commercial uses typically include mechanical equipment such as heating, ventilation, and air conditioning (HVAC), automobile-related noise such as cars starting and doors slamming, and landscaping equipment. The noise associated with these sources may represent a single-event noise occurrence or short-term noise.

NOISE MEASUREMENTS

The Project site is currently vacant and unoccupied. To quantify existing ambient noise levels in the Project area, five short-term noise measurements were conducted on December 14, 2022; see Appendix A: Existing Ambient Noise Measurements of Draft EIR **Appendix I**. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project site. Five noise measurements were taken for representative daytime ambient measurements. Noise measurements were collected during off-peak hours between 11:03 a.m. and 1:30 p.m. on a Wednesday to avoid influences (i.e., noise increases) from traffic or other peak-hour activities. Measurements of L_{eq} are considered representative of the noise levels throughout the day. The average noise levels and sources of noise measured at each location are listed in **Table 4.11-5: Existing Noise Measurements** and shown on **Exhibit 4.11-1: Noise Measurement Locations**.

Table 4.11-5: Existing Noise Measurements

Site	Location	Measurement Period	Duration	L_{eq} (dBA)
ST-1	Along the north side of Vista Del Norte, approximately 750 feet to the west of the Project site boundary.	11:03 – 11:13 a.m.	10 Minutes	55.2
ST-2	Along the southern side of I-10 freeway, approximately 1,100 feet west of the Project site boundary.	11:24 – 11:34 a.m.	10 Minutes	63.5
ST-3	Along the northern side of I-10 freeway, adjacent to the southwest of the Project site boundary.	12:12 – 12:22 p.m.	10 Minutes	76.4
ST-4	Southeast of intersection of Avenue 48 and Polk Street.	1:00 – 1:10 p.m.	10 Minutes	42.0
ST-5	Southeast of intersection of Avenue 50 and Fillmore Street.	1:20 – 1:30 p.m.	10 Minutes	48.7

Source: Kimley-Horn. 2024. Acoustical Assessment. Table 9.

SENSITIVE RECEPTORS

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise sensitive uses typically include residences, hospitals, schools, childcare facilities, and places of assembly. Vibration sensitive receivers are generally similar to noise sensitive receivers but may also include businesses, such as research facilities and laboratories that use vibration-sensitive equipment. The Project site is close to scattered mix of residential and commercial properties to the west. Noise sensitive land uses nearest to the Project site are listed in **Table 4.11-6: Sensitive Receptors**.

Table 4.11-6: Sensitive Receptors

Receptor Description	Distance and Direction from the Project
Single-family Residences	820 feet to the west
Family Worship Center	3,000 feet to the west
Multi-family Residences	3,200 feet to the northwest

Source: Kimley-Horn. 2024. Acoustical Assessment. Table 10.

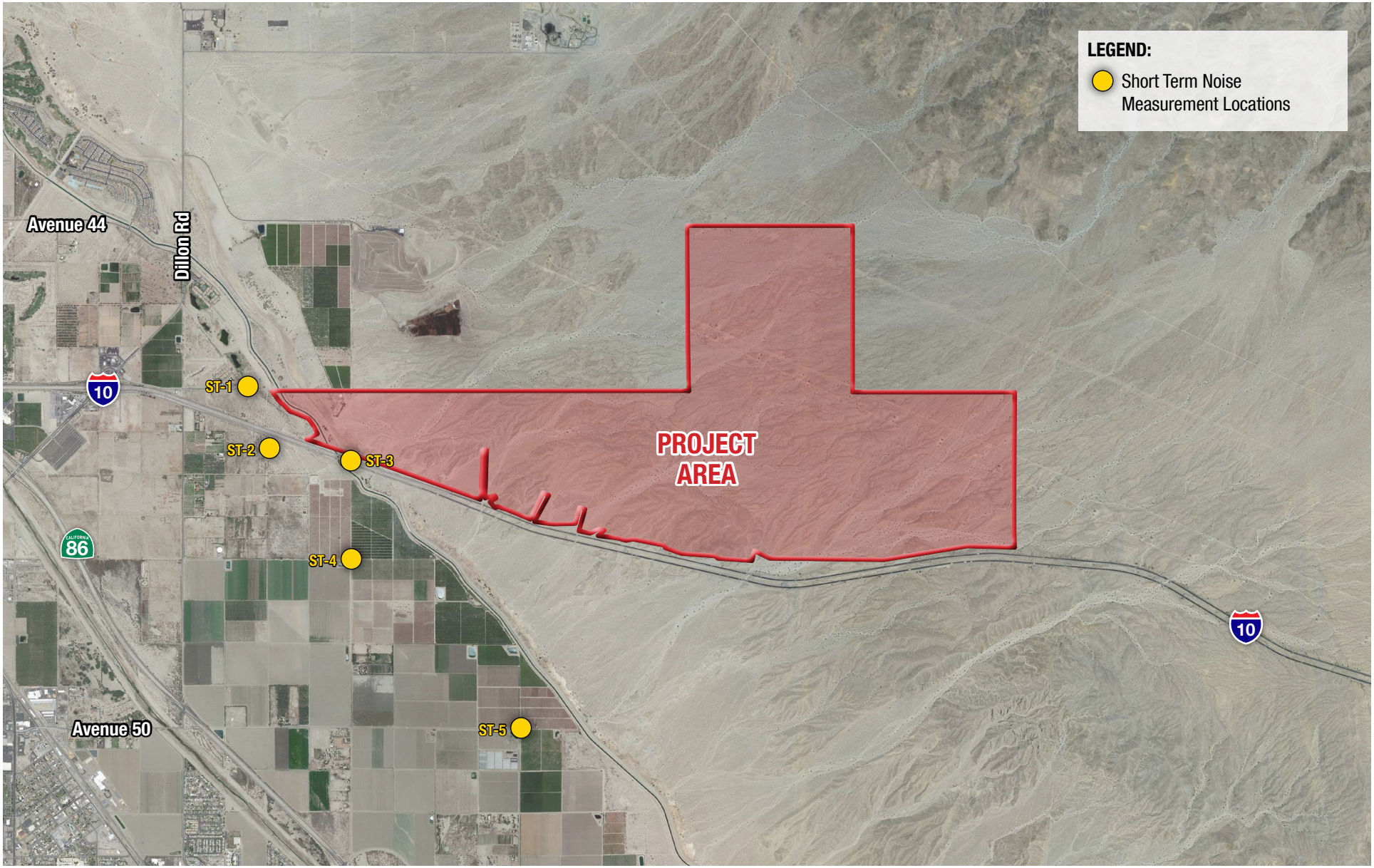


EXHIBIT 4.11-1**:** Noise Measurement Locations
KPC Coachella Specific Plan

Not to Scale

Kimley»Horn
Expect More. Experience Better.

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4.11.2 REGULATORY SETTING

To limit population exposure to physical or psychologically damaging as well as intrusive noise levels, the Federal government, the State of California, various county governments, and most municipalities in the state have established standards and ordinances to control noise.

STATE

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the State Department of Health Services. The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable" noise levels for various land use types. Single-family homes are "normally acceptable" in exterior noise environments up to 60 CNEL and "conditionally acceptable" up to 70 CNEL. Multiple-family residential uses are "normally acceptable" up to 65 CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries, and churches are "normally acceptable" up to 70 CNEL, as are office buildings and business, commercial, and professional uses.

Title 24 – Building Code

The State's noise insulation standards are codified in the California Code of Regulations, Title 24: Part 1, Building Standards Administrative Code, and Part 2, California Building Code. These noise standards are applied to new construction in California for interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, hotel rooms, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new multi-family residential buildings and habitable rooms (including hotels), the acceptable interior noise limit for new construction is 45 dBA CNEL.

LOCAL

City of Coachella General Plan

The City of Coachella General Plan contains the following goals and policies that address noise:

Land Use and Community Character Element

Goal 5. **Neighborhoods. Neighborhoods that provide a variety of housing types, densities, designs and mix of uses and services that reflect the diversity and identity of Coachella, provide for diverse needs of residents of all ages, ethnicities, socio-economic groups and abilities, and support healthy and active lifestyles.**

Policy 5.20: **Soundwalls.** Allow the use of soundwalls to buffer new Neighborhoods from existing sources of noise pollution such as railroads and limited access roadways. Prohibit the

use of soundwalls to buffer residential areas from arterial or collector streets. Instead design approaches such as building setbacks, landscaping and other techniques shall be used.

Noise Element

As Coachella continues to grow, traffic levels and traffic-related noise is expected to increase. **Table 4.11-7: Coachella Land Use/Noise Compatibility Matrix** shows the City's Land Use/Noise Compatibility Matrix to identify which land uses are satisfactory within different noise environments. Green indicates an acceptable noise level within which a use could be located. Red indicates an unacceptable noise level within which a use could be located. The City's Interior and Exterior Noise Standards, shown in **Table 4.11-8: Coachella Interior and Exterior Noise Standards**, defines the maximum acceptable exterior and interior noise levels that should be achieved after placement of the land use.

Table 4.11-7: Coachella Land Use/Noise Compatibility Matrix

Land Use Categories		CNEL						
Categories	**Uses**	**55**	**60**	**65**	**70**	**75**	**80**	
Residential	Single Family, Duplex, Multiple Family							
Residential	Mobile Homes							
Commercial – Regional, District	Hotel, Motel, Transient Lodging							
Commercial – Regional, Village District, Special	Commercial Retail, Bank, Restaurant, Movie Theater							
Commercial Industrial	Office Building, Research and Development, Professional Offices, City Office Building							
Commercial – Recreation Institutional – Civic Center	Amphitheater, Concert Hall Auditorium, Meeting Hall							
Commercial – Recreation	Children's Amusement Park, Miniature Golf Course, Go-Cart Track, Equestrian Center, Sports Club							
Commercial – General, Special Industrial, Institutional	Automobile Service Station, Auto Dealership, Manufacturing, Warehousing, Wholesale, Utilities							
Institutional – General	Hospital, Church, Library, School Classroom							
Open Space	Parks							
Open Space	Golf Couse, Cemeteries, Nature Centers, Wildlife Reserves, Wildlife Habitat							
Agricultural	Agriculture							

ZONE A (GREEN) CLEARLY COMPATIBLE: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal construction, without any special noise insulation requirements.

ZONE B (YELLOW) NORMALLY COMPATIBLE: New construction or development should be undertaken only after an analysis of the noise reduction requirements is made and needed noise insulation features included in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning will normally suffice.

ZONE C (ORANGE) NORMALLY INCOMPATIBLE: New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

ZONE D (RED) CLEARLY INCOMPATIBLE: New construction or development should generally not be undertaken.

* Construction of new residential uses will not be allowed within the 65 dBA CNEL contour for airport noise.

Source: Kimley-Horn. 2023. Acoustical Assessment. Table 5.

Table 4.11-8: Coachella Interior and Exterior Noise Standards

Land Use Categories		Average CNEL (DB)	
Categories	**Uses**	**Interior[1]**	**Exterior[2]**
Residential	Single Family, Duplex, Multiple Family	45	65
	Mobile Homes	-	65[4]
Commercial Industrial Institutional	Hotel, Motel, Transient Lodging	45	65[5]
	Commercial Retail, Bank, Restaurant	55	-
	Office Building, Research and Development, Professional Offices, City Office Building	50	-
	Amphitheater, Concert Hall, Meeting Hall	45	-
	Gymnasium (Multipurpose)	50	-
	Sports Club	55	-
	Manufacturing, Warehousing, Wholesale, Utilities	65	-
	Movie Theaters	45	-
Institutional	Hospitals, Schools Classroom	45	65
	Church, Library	45	-
Open Space	Parks	-	65

1. Indoor environment excluding: bathrooms, toilets, closets, corridors.
2. Outdoor environment limited to:
   * Private Yard of Single-Family Residence
   * Multi-Purpose Private Patio or Balcony which is served by means of exit from inside
   * Mobile Home Park
   * Hospital Patio
   * Park Picnic Area
   * School Playground
   * Hotel and Motel Recreation Area
3. Noise level requirement with closed windows. Mechanical ventilating system or other means of natural ventilation shall be provided as of Chapter 12, Section 1205 of the Uniform Building Code.
4. Exterior noise level should be such that interior noise level will not exceed 45 CNEL
5. Except those areas affected by aircraft noise.

Source: Kimley-Horn. 2024. Acoustical Assessment. Table 6.

Goal N-1 **Land Use Planning and Design. A community where noise compatibility between differing types of land uses is ensured through land use planning and design strategies.**

Policy 1.1 **Noise Compatibility.** Use the City's Land Use/Noise Compatibility Matrix shown in Figure 10-1 within the General Plan as a guide for planning and development decisions.

Policy 1.2 **Noise Analysis and Mitigation.** Require projects involving new development or modifications to existing development to implement mitigation measures, where necessary, to reduce noise levels to at least the normally compatible range shown in the City's Land Use/Noise Compatibility Matrix in Figure 10-1 in the General Plan. Mitigation measures should focus on architectural features, building design and construction, rather than site design features such as excessive setbacks, berms and sound walls, to maintain compatibility with adjacent and surrounding uses.

Policy 1.3 **Mixed-Use.** Require mixed-use structures and areas be designed to prevent transfer of noise from commercial uses to residential uses, and ensure a 45 dBA CNEL level or lower for all interior living spaces.

Policy 1.4 **County and Regional Plans.** Periodically review county and regional plans for transportation facilities and airport operation, to identify and mitigate the potential impact of noise on future development.

Policy 1.5 **Airport Land Use Planning.** Comply with all applicable policies contained in the Riverside County General Plan Noise Element relating to airport noise, including those policies requiring compliance with the airport land use noise compatibility criteria contained in the airport land use compatibility plan for Jacqueline Cochran Regional Airport; and those policies prohibiting new residential land uses, except construction of single-family dwellings on legal residential lots of record, within the 60 dB CNEL contour of this airport.

Policy 1.6 **Land Use and Community Design.** Except in cases where noise levels are in the clearly incompatible range as shown in the City's Land Use/Noise Compatibility Matrix shown in Figure 10-1 within the General Plan, prioritize the building design and character policies in the Land Use and Community Design Element over those in the Noise Element to ensure that new development meets the design vision of the City.

Goal N-2 **Stationary Source Noise. A community where excessive noise from stationary sources is minimized.**

Policy 2.1 **Noise Ordinance.** Minimize noise conflicts between neighboring properties through enforcement of applicable regulations such as the City's noise ordinance.

Policy 2.2 **Noise Control.** Minimize stationary noise impacts on sensitive receptors and noise emanating from construction activities, private developments/residences, landscaping activities, night clubs and bars and special events.

Policy 2.3 **Entertainment Uses.** Require entertainment, restaurants, and bars engage in responsible management and operation to control activities of their patrons on-site, within reasonable and legally justifiable proximity to minimize noise impacts on adjacent residences and other noise-sensitive receptors, require mitigation, as needed, for development of entertainment uses near noise-sensitive receptors.

Goal N-3 **Mobile Source Noise. A community where excessive noise from mobile sources is minimized.**

Policy 3.1 **Roadway Noise.** Where roadway noise exceeds the normally compatible range shown in the City's Land Use/Noise Compatibility Matrix shown in Figure 10-1 within the General Plan, implement policies listed under Goal 1 to reduce the impacts of roadway noise on noise-sensitive receptors.

Policy 3.2 **Traffic Calming.** Where roadway noise exceeds the normally compatible range shown in the City's Land Use/Noise Compatibility Matrix shown in Figure 10-1 within the General Plan, consider the implementation of traffic calming measures such as reduced speed limits or roadway design features to reduce noise levels through reduced vehicle speeds and/or diversion of vehicle traffic.

City of Coachella Municipal Code

The Coachella Municipal Code establishes the following noise provisions relative to the Project:

Section 7.04.030 - Sound level limits as related to fixed noise sources.

The following ten-minute average sound level limits shown in **Table 4.11-9: Coachella Noise Standards**, unless otherwise specifically indicated, shall apply as indicated in the following table as it relates to a fixed noise source or leaf blowers.

Table 4.11-9: Coachella Noise Standards

Zone	Time	Applicable Ten-Minute Average Decibel Limit (A-weighted)
Residential – All zones	6:00 a.m. to 10:00 p.m.	55
	10:00 p.m. to 6:00 a.m.	45
Commercial – All zones	6:00 a.m. to 10:00 p.m.	65
	10:00 p.m. to 6:00 a.m.	55

Source: Kimley-Horn. 2024. Acoustical Assessment. Table 7.

Section 7.04.070 - Construction activities exemptions

No person shall perform, nor shall any person be employed, nor shall any person cause any other person to be employed to work for which a building permit is required by the city in any work of construction, erection, demolition, alteration, repair, addition to or improvement of any building, structure, road or improvement to realty except between the hours as set forth as follows:

October 1st through April 30th:	May 1st through September 30th:
Monday—Friday: 6:00 a.m. to 5:30 p.m.	Monday—Friday: 5:00 a.m. to 7:00 p.m.
Saturday: 8:00 a.m. to 5:00 p.m.	Saturday: 8:00 a.m. to 5:00 p.m.
Sunday: 8:00 a.m. to 5:00 p.m.	Sunday: 8:00 a.m. to 5:00 p.m.
Holidays: 8:00 a.m. to 5:00 p.m.	Holidays: 8:00 a.m. to 5:00 p.m.

Section 7.04.075 - Property maintenance activities exemptions:

A. Noise sources associated with property maintenance activity and all portable blowers, lawnmowers, edgers or similar devices shall be prohibited except during the following hours:

October 1st through April 30th:	May 1st through September 30th:
Monday—Sunday: 9:00 a.m. to 5:30 p.m.	Monday—Friday: 8:00 a.m. to 5:30 p.m.
Holidays: Not allowed.	Saturday and Sunday: 9:00 a.m. to 5:30 p.m.
	Holidays: Not allowed.

Notwithstanding the hours of permitted operations, such equipment that constitutes a public nuisance may be abated as otherwise provided in this Code.

B. No person shall willfully make or continue, or willfully cause to be made or continued, any noise from any portable powered blower at a level which exceeds seventy (70) decibels dBA measured at the midpoint of a wall area twenty (20) feet long and ten (10) feet high and at the horizontal distance fifty (50) feet away from the midpoint of the wall, or not more than seventy-six (76) decibels dBA at a horizontal distance of twenty-four (24) feet using a sound level meter.

C. No portable powered blower shall be operated in a manner which will permit dirt, dust, debris, leaves, grass clippings, cuttings, or trimmings from trees or shrubs to be blown or deposited onto neighboring property or public right-of-way. All waste shall be removed and disposed of in a sanitary manner by the use or property occupant.

D. Leaf blowers shall not be operated within a horizontal distance of ten (10) feet of any operable window, door, or mechanical air intake opening or duct.

4.11.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions pertaining to noise. The issues presented in the Environmental Checklist have been utilized as thresholds of significance in this section. Accordingly, the Project would have a significant adverse environmental impact if it would result in:

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

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

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

THRESHOLDS

Construction Noise

The City of Coachella's General Plan and Municipal Code does not establish maximum numerical construction noise levels for potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes as the generation of noise levels in excess of standards or as a substantial temporary or periodic noise increase. To evaluate whether the Project will generate potentially significant temporary construction noise levels at sensitive receiver locations, a construction-related noise level threshold has been adopted from the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for evaluating construction noise impacts. Therefore, this analysis conservatively uses the FTA's threshold of 80 dBA (8-hour L_{eq}) for residential uses and 90 dBA (8-hour L_{eq}) for non-residential uses.

Operational Noise

Non-Transportation Noise. Non-transportation related noise generators are commonly called "stationary," "fixed," "area," or "point" sources of noise. Industrial processing, mechanical equipment, pumping stations, and HVAC equipment are examples of fixed location, non-transportation noise sources.

Operational noise is evaluated based on the standards within the City's Noise Ordinance and General Plan. Section 7.04.030 of the City's Municipal Code identifies a daytime (6:00 a.m. – 10:00 p.m.) standard of 55 dBA and a nighttime (10:00 p.m. – 6:00 a.m.) standard of 45 dBA for residential receptors; refer to **Table 4.11-8**). The City's non-residential standards are 65 dBA and 55 dBA during the daytime and nighttime, respectively.

Mobile Noise. Traffic noise, including automobiles, trucks, and other motor vehicles is the most pervasive source of noise in the City of Coachella. Traffic generated noise impacts are evaluated based on standards within the General Plan. For traffic noise the City of Coachella General Plan has provide noise and land use compatibility matrix which indicates noise standards using a 24-hour metric such as L_{dn} or CNEL and with Clearly Compatible, Normally Compatible, Normally Incompatible, and Clearly Incompatible designations for different types of land uses. According to the matrix (**Table 4.11-7**), generally noise levels up to 60 dBA CNEL are Clearly Compatible for all land uses except Commercial-Recreation and Institutional – Civic Center which are considered as Normally Compatible and noise levels above 75 dBA are considered as Clearly Incompatible for the majority of land uses. For off-site roadways, the proposed Project would result in a significant increase in existing traffic noise levels if Project traffic would increase the noise level by 3 dBA CNEL and exceed the Clearly Compatible Standard at an outdoor use area of a designated land use. The environmental baseline is the Without Project condition.

For future on-site roadways, because such roadways do not currently exist, there are no existing receptors, and no baseline noise levels against which to judge a potential increase, Project traffic would result in a significant impact if it would result in traffic volumes that generate noise exceeding the Normally Compatible standard. That standard is consistent with General Plan Policy 1.2, discussed above.

Vibration

The City currently does not have a significance threshold to assess vibration impacts. The Caltrans 2020 Transportation and Construction Vibration Guidance Manual identifies the vibration threshold for human annoyance, vibrations levels of 0.04 in/sec begin to cause annoyance and levels of 0.2 in/sec is used for building damage.

METHODOLOGY

Construction

Construction noise levels were based on typical noise levels generated by construction equipment published by the FTA and the FHWA. Construction noise is assessed in dBA L_{eq}. This unit is appropriate because L_{eq} can be used to describe noise level from operation of each piece of equipment separately,

and levels can be combined to represent the noise level from all equipment operating during a given period.

Construction noise was modeled to conservatively determine worst-case exterior construction noise levels for each phase of the Project. Construction noise modeling was conducting using the FHWA Roadway Construction Noise Model (RCNM) and includes all equipment running concurrently. Starting at the site perimeter nearest to sensitive receptors, equipment was evenly distributed based on a 30-foot safety zone for heavy construction equipment. The loudest construction equipment were placed nearest to sensitive receptors while less noisy equipment were placed further away. The construction noise level estimates do not account for the presence of intervening structures or topography, which may reduce noise levels at receptor locations. Therefore, the noise levels presented herein represent a conservative, reasonable worst-case estimate of actual temporary construction noise. The City of Coachella does not establish quantitative construction noise standards. This analysis conservatively uses the FTA's threshold of 80 dBA (8-hour $L_{eq)}$ for residential uses and 90 dBA (8-hour L_{eq}) for commercial/non-residential uses to evaluate construction noise impacts.

Operations

The analysis of the "Without Project" and "With Project" noise environments is based on noise prediction modeling and empirical observations. Reference noise level data are used to estimate the Project's operational noise levels from stationary sources. Noise levels are collected from field noise measurements and other published sources from similar types of activities are used to estimate noise levels expected with the Project's stationary sources. The reference noise levels are used to represent a worst-case noise environment as noise level from stationary sources can vary throughout the day. Operational noise is evaluated based on the City's Noise Ordinance and General Plan standards.

An analysis was conducted of the Project's effect on traffic noise conditions at off-site land uses. "Without Project" traffic noise levels were compared to "With Project" traffic noise levels. The environmental baseline is the "Without Project" condition. The "Without Project" and "With Project" traffic noise levels in the Project vicinity were calculated using the FHWA Highway Noise Prediction Model (FHWA-RD-77-108). The actual sound level at any receptor location is dependent upon such factors as the source-to-receptor distance and the presence of intervening structures (walls and buildings), barriers, and topography. The noise attenuating effects of changes in elevation, topography, and intervening structures were not included in the model. Therefore, the modeling effort is considered a worst-case representation of the roadway noise. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable.

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (California Building Industry Association (CBIA) v. Bay Area Air Quality Management District (BAAQMD), 62 Cal. 4th 369 (No. S 213478) issued December 17, 2015), it is generally no longer the purview of the CEQA process to evaluate the impact of existing environmental conditions on any given project. As a result, while the noise from existing sources is considered as part of the baseline, the direct effects of exterior noise from nearby noise sources relative to land use compatibility is not a required topic for impact evaluation under CEQA.

Vibration

Groundborne vibration levels associated with Project construction-related activities were evaluated utilizing typical groundborne vibration levels associated with construction equipment, obtained from FTA published data for construction equipment. Potential groundborne vibration impacts related to building/structure damage and interference with sensitive existing operations were evaluated, considering the distance from construction activities to nearby land uses and typically applied criteria.

For a structure built traditionally, without assistance from qualified engineers, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any vibration damage. FTA guidelines show that modern engineered buildings built with reinforced-concrete, steel or timber can withstand vibration levels up to 0.50 in/sec and not experience vibration damage. The Caltrans 2020 Transportation and Construction Vibration Guidance Manual identifies the vibration threshold for human annoyance, vibrations levels of 0.04 in/sec begin to cause annoyance and levels of 0.2 in/sec is used for building damage.

PROJECT DESIGN FEATURES

- The Specific Plan will be constructed in compliance with all applicable provisions in the City's Municipal Code, including observing all time limitations on construction noise that exceeds Base Ambient Noise Levels.
- Based on a design-level acoustical study, all residential structures built on the Project site shall incorporate design measures to ensure that interior noise levels for residential development do not exceed 45 dBA, in accordance with Title 24, Section 4370 (Noise Insulation Standards) and the City's Municipal Code (Title 7).
- During the preparation of construction drawings for project-specific development, the exact acoustical specifications for window glass in buildings with unshielded first- and second-floor windows shall be determined pursuant to an acoustical study, pursuant to the requirements of the City's General Plan and the City's Municipal Code.
- All development on the Project site shall comply with State Code requirements for unit-to-unit airborne sound insulation, both laterally and vertically, and for vertical impact sound isolation in multi-family residential construction.

4.11.4 PROJECT IMPACTS AND MITIGATION

Impact 4.11-1: ***Would the 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: Less than Significant with Mitigation Incorporated

CONSTRUCTION

Construction noise typically occurs intermittently and varies depending on the construction activity's nature or phase (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect noise-sensitive receptors near the construction site. The nearest sensitive receptors to the Project site construction area are existing residential uses to the west with the nearest residential building located approximately 820 feet from the on-site construction area. However, it is noted that construction activities would occur throughout the Project site and would not be concentrated at a single point near noise-sensitive receptors.

Construction activities would include site preparation, grading, building construction, paving, and architectural coating. Such activities would require:

- Dozers and tractors during site preparation;
- Excavators, graders, dozers, scrapers, and tractors during grading;
- Cranes, forklifts, generators, tractors, and welders during building construction;
- Pavers, rollers, and paving equipment during paving; and
- Air compressors during architectural coating.

Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Typical noise levels associated with individual construction equipment are listed in **Table 4.11-10: Typical Construction Noise Levels**.

Although the construction equipment noise levels in **Table 4.11-10** are from FTA's 2018 Transit Noise and Vibration Impact Assessment Manual, the noise levels are based on measured data from a U.S. Environmental Protection Agency report which uses data from the 1970s, the FHWA Roadway Construction Noise Model which uses data from the early 1990s, and other measured data. Since that time, construction equipment has been required to meet more stringent emissions standards and the additional necessary exhaust systems also reduce noise from what is shown in the table.

Table 4.1-10: Typical Construction Noise Levels

Equipment	Typical Noise Level (dBA) at 50 feet from Source	Typical Noise Level (dBA) at 820 feet from Source[1]
Air Compressor	80	55.7
Backhoe	80	55.7
Compactor	82	57.7
Concrete Mixer	85	60.7
Concrete Pump	82	57.7
Concrete Vibrator	76	51.7
Crane, Mobile	83	58.7

Equipment	Typical Noise Level (dBA) at 50 feet from Source	Typical Noise Level (dBA) at 820 feet from Source[1]
Dozer	85	60.7
Generator	82	57.7
Grader	85	60.7
Impact Wrench	85	60.7
Jack Hammer	88	63.7
Loader	80	55.7
Paver	85	60.7
Pile-Driver (Impact) [2]	101	76.7
Pneumatic Tool	85	60.7
Pump	77	52.7
Roller	85	60.7
Saw	76	51.7
Scraper	85	60.7
Shovel	82	57.7
Truck	84	59.7
1. Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1+20Log(d_1/d_2)$ Where: dBA_2 = estimated noise level at receptor; dBA_1 = reference noise level; d_1 = reference distance; d_2 = receptor location distance 2. Pile driving not anticipated during Project construction		
Source: Kimley-Horn. 2024. Acoustical Assessment. Table 11.		

Section 7.04.070 (Construction Activities) of the City of Coachella Municipal Code exempts noise sources associated with construction activities from the City's established noise standards as long as the activities do not take place except between the hours as set forth as follows:

October 1st through April 30th:	May 1st through September 30th:
Monday—Friday: 6:00 a.m. to 5:30 p.m.	Monday—Friday: 5:00 a.m. to 7:00 p.m.
Saturday: 8:00 a.m. to 5:00 p.m.	Saturday: 8:00 a.m. to 5:00 p.m.
Sunday: 8:00 a.m. to 5:00 p.m.	Sunday: 8:00 a.m. to 5:00 p.m.
Holidays: 8:00 a.m. to 5:00 p.m.	Holidays: 8:00 a.m. to 5:00 p.m.

While the City establishes limits to the hours during which construction activity may take place, it does not identify specific noise level limits for construction noise levels. The City's permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant impact. However, this analysis conservatively uses the FTA's threshold of 80 dBA and 85 dBA (8-hour L_{eq}) to evaluate construction noise impacts for residential and commercial uses, respectively.

The noise levels calculated in **Table 4.11-11: Construction Noise Levels**, shows estimated exterior construction noise for Phase 1 through Phase 6 with respect to their closest corresponding sensitive receptors. Construction noise levels drop off at a rate of about 6 dBA per doubling of distance between the noise source and receptor. Construction equipment would operate throughout the Project site and the associated noise levels would not occur at a fixed location for extended periods of time.

The nearest existing sensitive receptors are located approximately 820 feet from the Project site perimeter, however during Phase 1 construction those receptors are approximately 11,800 feet from the Phase 1 construction area. The nearest sensitive receptors to Phase 2 would be future occupants of Phase 1 located approximately 480 feet from the boundary of the Phase 2 area. The nearest sensitive receptors to Phase 3 would be future occupants of Phase 2 located approximately 430 feet from the boundary of the Phase 3 area. The nearest sensitive receptors to Phase 4 would be future occupants of Phase 1 located approximately 165 feet from of the boundary of the Phase 4 area. The nearest sensitive receptors to Phase 5 would be future occupants of Phase 2 located approximately 425 feet from the boundary of the Phase 5 area. The nearest sensitive receptors to Phase 6 would be future occupants of Phase 4 located approximately 200 feet from the boundary of the Phase 6 area. It should be noted, construction noise levels shown in **Table 4.11-11**, focus on the closest receptors. Noise levels at receptors further away would be lower.

Table 4.11-11 shows that construction noise levels would not exceed the FTA's 80-dBA threshold in any of the phases. Additionally, compliance with Section 7.04.070 (Construction activities exemptions) of the City of Coachella Municipal Code would minimize impacts from construction noise, as construction would be limited to daytime hours. Therefore, Phase 1, Phase 2, Phase 3, Phase 4, Phase 5, and Phase 6 construction activities would result in a less than significant noise impact.

Table 4.11-21: Construction Noise Levels

Construction Phase	Nearest Sensitive Receptor Location			Worst Case Modeled Exterior Noise Level (dBA L_{eq})	Noise Threshold (dBA L_{eq})[2]	Exceeded ?
	Land Use	Direction	Distance (feet)[1]			
Phase 1						
Site Preparation	Existing Off-Site Residential	West	11,800	43.1	80	No
Grading	Existing Off-Site Residential	West	11,800	43.3	80	No
Building Construction	Existing Off-Site Residential	West	11,800	74.0	80	No
Paving	Existing Off-Site Residential	West	11,800	42.0	80	No
Architectural Coating	Existing Off-Site Residential	West	11,800	36.2	80	No
Phase 2						
Site Preparation	Phase 1	Southeast	480	68.3	80	No
Grading	Phase 1	Southeast	480	68.7	80	No
Building Construction	Phase 1	Southeast	480	76.0	80	No
Paving	Phase 1	Southeast	480	68.7	80	No
Architectural Coating	Phase 1	Southeast	480	62.2	80	No

Construction Phase	Nearest Sensitive Receptor Location			Worst Case Modeled Exterior Noise Level (dBA L_{eq})	Noise Threshold (dBA L_{eq})[2]	Exceeded ?
	Land Use	Direction	Distance (feet)[1]			
Phase 3						
Site Preparation	Phase 2	East	430	69.5	80	No
Grading	Phase 2	East	430	69.5	80	No
Building Construction	Phase 2	East	430	76.2	80	No
Paving	Phase 2	East	430	69.6	80	No
Architectural Coating	Phase 2	East	430	63.0	80	No
Phase 4						
Site Preparation	Phase 1	West	165	75.8	80	No
Grading	Phase 1	West	165	75.7	80	No
Building Construction	Phase 1	West	165	79.6	80	No
Paving	Phase 1	West	165	76.7	80	No
Architectural Coating	Phase 1	West	165	69.4	80	No
Phase 5						
Site Preparation	Phase 2	West	425	69.6	80	No
Grading	Phase 2	West	425	69.6	80	No
Building Construction	Phase 2	West	425	76.3	80	No
Paving	Phase 2	West	425	69.7	80	No
Architectural Coating	Phase 2	West	425	63.1	80	No
Phase 6						
Site Preparation	Phase 4	West	200	74.6	80	No
Grading	Phase 4	West	200	74.5	80	No
Building Construction	Phase 4	West	200	78.8	80	No
Paving	Phase 4	West	200	75.3	80	No
Architectural Coating	Phase 4	West	200	68.2	80	No

1. Distance is measured from the nearest receptor to the perimeter of each Phase. Equipment was distributed evenly at 30-foot intervals based on a 30-foot safety zone for heavy construction equipment.
2. Threshold from Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual,* Table 7-3, 2018.

Source: Kimley-Horn. 2024. Acoustical Assessment. Table 12.

OPERATIONS

Project implementation would create new sources of noise in the site vicinity. The mixed-use development's major noise sources include the following:

- Mechanical equipment (i.e., trash compactors, air conditioners, etc.);
- Landscape Maintenance Activities;
- Parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by); and
- Off-Site Traffic Noise.

Mechanical Equipment

The nearest existing sensitive receptors are residential properties approximately 820 feet to the west of the Project site, while north, east, and south of the Project site are vacant. Potential stationary noise sources related to long-term operation of the Project site would include mechanical equipment. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 52 dBA at 50 feet. Based on current site plans, the nearest Project structure would be medium density residential buildings located east of the proposed drainage and other open space areas, approximately 5,000 feet from the nearest offsite residential property (The Villas at the Vineyards). At a minimum distance of 5,000 feet, mechanical equipment noise levels would attenuate to 12 dBA, which is below the City's ambient noise standards of 45 dBA for nighttime (10:00 p.m. to 6:00 a.m.) and 55 dBA for daytime (6:00 a.m. to 10:00 p.m.) for residential receptors (refer to **Table 4.11-9**). Noise from mechanical equipment would also be below the City's non-residential 55 dBA nighttime standard and 65 dBA daytime standards. Noise impacts associated with HVAC equipment would be less than significant. Operation of mechanical equipment would not increase ambient noise levels beyond the acceptable compatible land use noise levels.

At the time of this analysis, identification of specific mechanical equipment and detailed site plans have not been developed. Assuming HVAC units would be located as close as 50 feet from on-site receptors, HVAC noise levels could be approximately 52 dBA which would exceed the City's nighttime noise standard (i.e., 45 dBA). Therefore, **MM NOI-2** would be implemented to ensure noise-generating stationary source equipment would not exceed the City's noise regulations at on-site and off-site receptors. Implementation of **MM NOI-2** would result in a less than significant impact related to stationary noise levels. Further, the Project would be required to comply with the General Plan and Municipal Code noise standards.

Landscape Maintenance Activities

Development and operation of the Project includes new landscaping that would require periodic maintenance. Noise generated by a gasoline-powered and/or electric-powered lawnmower is estimated to be approximately 64.4 dBA at 50 feet. Maintenance activities would operate during daytime hours for brief periods of time as allowed by the City of Coachella Municipal Code Section 7.04.075 and would not permanently increase ambient noise levels in the Project vicinity and would be consistent with activities that currently occur at other developed areas in the City. The closest existing sensitive receptor to the Project site is residential unit located approximately 820 feet to the west (The Villas at the Vineyards). At

this distance, a gasoline-powered equipment noise level would be attenuated to 40.1 dBA which is below the City's ambient noise daytime standards of 55 dBA for residential receptors. For future on-site receptors, detailed site plans have not been developed and the distances between residential and commercial properties are unknown. However, to reduce GHG emissions, **MM GHG-4** requires all landscape equipment to be 100 percent electric. Electric landscape equipment would generate significantly less noise than gasoline-powered equipment, reducing noise levels at both off-site and future on-site sensitive receptors below the City's daytime noise standard. Therefore, the Project would result in a less than significant impact related to landscape maintenance noise levels.

Parking Noise

Parking would be scattered throughout the Project site. Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. The instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys range from 53 to 61 dBA. Conversations in parking areas may also be an annoyance to adjacent sensitive receptors. Sound levels of speech typically range from 33 dBA at 50 feet for normal speech to 50 dBA at 50 feet for very loud speech. It should be noted that parking lot noises are instantaneous noise levels compared to noise standards in the hourly L_{eq} metric, which are averaged over the entire duration of a time period. As a result, actual noise levels over time resulting from parking lot activities would be far lower than the reference levels identified above.

For the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated from the vehicles entering and exiting the parking lot, the methodology recommended by FTA for the general assessment of stationary transit noise sources is used. Using the methodology, the Project's peak hourly noise level that would be generated by the on-site parking levels was estimated using the following FTA equation for a parking lot:

$$L_{eq(h)} = SEL_{ref} + 10 \log (NA/1{,}000) - 35.6$$

Where:

$L_{eq(h)}$ = hourly L_{eq} noise level at 50 feet

SEL_{ref} = reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet

NA = number of automobiles per hour

35.6 is a constant in the formula, calculated as 10 times the logarithm of the number of seconds in an hour

Based on the peak hour trip generation in the Traffic Study, the worst-case planning area (B-5) would have approximately 1,438 trips during the worst-case peak hour. Using the FTA's reference noise level of 92 dBA SEL at 50 feet from the noise source, the Project's highest peak hour vehicle trips would generate noise levels of approximately 58 dBA L_{eq} at 50 feet from the parking lot. The nearest off-site residential property is 820 feet west of the Project site. Based strictly on distance attenuation, parking lot noise at

the nearest receptor would be 33.7 dBA which is below the City's residential 45 dBA nighttime standard and 55 dBA daytime standards.

For future on-site receptors, detailed site plans have not been developed and the distances between residential and commercial properties are unknown. Assuming on-site sensitive receptors could be located approximately 30 feet from parking areas within the Project site, parking area noise levels would reach approximately 62.4 dBA. Therefore, parking lot noise levels at the nearest on-site sensitive receptor may exceed the City's residential 45 dBA nighttime standard and 55 dBA daytime standards. **MM NOI-2** would ensure that on-site sensitive receptors are not exposed to noise levels above the City's noise standards. Thus, noise impacts associated with parking lot activity would be less than significant with implementation of **MM NOI-2.** Therefore, noise impacts from parking would be less than significant.

On-Site Traffic Noise

The California Supreme Court in a December 2015 opinion (California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal. 4th 369 [No. S 213478]) confirmed that CEQA, with several specific exceptions, is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project. Therefore, the analysis of on-site noise is not required under CEQA and is included for informational purposes only. However, because the Project is phased, construction and traffic noise would potentially impact future on-site uses. Therefore, an evaluation of the significance of Project impacts is provided to ensure compliance with City and State Building Code noise standards.

Table 4.11-12 shows that the following on-site roadway segments would exceed the 60 dBA Clearly Compatible land use compatibility standard (refer to **Exhibit 4.11-2: On-Site Traffic Noise Impacts** for locations):

- Internal Road from internal intersection 2 and internal intersection 3 (Village B, Planning Areas B-2, B-3, B-4, B-7, OS-6, and OS-7)
- Avenue 50 south of internal intersection 2 (Village B, Planning Areas B-1 and B-3)

Future residents along internal roads within Village B would be exposed to mobile traffic noise that exceed the City's Clearly Compatible standard at 100 feet from the roadway centerline. However, noise levels would range from 60.6 dBA and 62.8 dBA, which would be within the City's 70 dBA Normally Compatible residential standard. Normally Compatible means that new construction or development should be undertaken only after an analysis of the noise reduction requirements is made and needed noise insulation features included in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning will normally suffice. Traffic noise levels along these on-site roadway segments would attenuate to below the 60 dBA Clearly Compatible standard at 160 feet from the roadway centerline.



EXHIBIT 4.11-2: On-Site Traffic Noise

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City of Coachella

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As noted above, the highest exterior noise levels at 100 feet from the roadway centerline would range from 60.6 dBA and 62.8 dBA. Based on an outdoor to indoor attenuation rate of 25 dB interior noise levels would not exceed the 45 dBA interior standard.

General Plan Policy 5.20 prohibits the use of soundwalls to buffer residential areas from arterial or collector streets. Policy 5.20 recommends designing approaches such as building setbacks, landscaping and other techniques shall be used. Additionally, General Plan Policy 1.2 requires new development projects to implement mitigation measures, where necessary, to reduce noise levels to at least the Normally Compatible standard. Mitigation measures should focus on architectural features, building design and construction, rather than site design features such as excessive setbacks, berms, and sound walls, to maintain compatibility with adjacent and surrounding uses.

As noted above, new development that exceed the Normally Compatible standard are required to conduct a noise study to identify noise insulation features for the design. **Mitigation Measure NOI-1** is required to ensure compliance with General Plan Policy 1.2 and Policy 5.20 which requires a detailed acoustical study demonstrating that new residential units would meet the City's Normally Compatible standard by incorporating architectural features instead of excessive setbacks or sound walls. Implementation of **MM NOI-1** would result in a less than significant impact.

Off-Site Traffic Noise

Implementation of the Project would generate increased traffic volumes along nearby roadway segments. Based on the Traffic Impact Analysis, the Project would result in approximately 84,917 net daily trips in total. **Table 4.11-12: Existing Off-Site Traffic Noise Levels** identifies the traffic noise effects along roadway segments in the Project vicinity for "Existing," "Horizon Year Without Project," and "Horizon Year With Project." The Horizon Year "2045 Without Project" and "2045 With Project" scenarios were compared in **Table 4.11-13: Horizon Year Traffic Noise Levels**. As shown in **Table 4.11-13**, roadway noise levels would range between 46.6 dBA CNEL and 67.1 dBA CNEL at 100 feet from the centerline without the Project and between 55.6 dBA CNEL and 67.6 dBA CNEL with the Project. Project generated traffic would result in a maximum increase of 12.0 dBA. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Potential impacts occur when the Project change exceeds 3 dBA and the land use compatibility standard is exceeded at the nearest use (i.e., both must occur).

Table 4.11-12: Existing Off-Site Traffic Noise Levels

Roadway Segment		Existing[1] (dBA)	Horizon Year Without Project[1] (dBA)	Horizon Year With Project[1] (dBA)
Dillon Road	I-10 WB Ramps to Vista Del Norte	63.0	67.1	67.6
Vista Del Norte	Dillon Road to Tyler St.	46.5	46.6	58.6
	East of Tyler Street	46.5	46.6	55.6
Avenue 50	Leoco Lane to Magnolia Street/Tyler Street	60.7	63.1	63.1
	Magnolia Street/ Tyler Street to SR-86	60.3	64.4	64.6

Roadway Segment		Existing[1] (dBA)	Horizon Year Without Project[1] (dBA)	Horizon Year With Project[1] (dBA)
	Tyler Street to Polk St.	50.6	63.2	64.6
	Polk Street to Fillmore Street	45.1	63.4	66.4
	Fillmore Street to I-10 EB Ramps	N/A	59.3	63.6
Polk Street	Avenue 50 to Ave. 52	45.0	56.3	60.3
Avenue 52	Van Buren Street to Cesar Chavez Street	61.6	64.0	64.1
	Cesar Chavez Street to Sunset Drive	57.8	61.8	62.3
	Sunset Drive to Tyler St.	58.5	61.8	62.4
	Tyler Street to SR-86	60.1	63.7	64.8
Internal Road [9]	West of Internal Intersection 1	N/A	N/A	54.8
	East of Internal Intersection 1	N/A	N/A	59.1
	North of Internal Intersection 5	N/A	N/A	53.7
	East of Internal Intersection 5	N/A	N/A	46.3
	Between Internal Intersection 1 and Internal Intersection 5	N/A	N/A	59.8
	Between Internal Intersection 5 and Internal Intersection 4	N/A	N/A	57.9
	Between Internal Intersection 2 and Internal Intersection 3	N/A	N/A	60.6
	Between Internal Intersection 3 and Internal Intersection 4	N/A	N/A	58.0
Ave. 50 (Internal) [2]	South of Internal Intersection 2	N/A	N/A	62.8
Internal Road [2]	South of Internal Intersection 4	N/A	N/A	53.2

1. Traffic noise levels are at 100 feet from the roadway centerline. The actual sound level at any receptor location is dependent upon such factors as the source-to-receptor distance and the presence of intervening structures, barriers, and topography.
2. Internal roads are future roadways proposed within the project site.

Source: Kimley-Horn and Associates, Inc. 2024. Acoustical Assessment. Table 15.

Table 4.11-13: Horizon Year Traffic Noise Levels

Roadway Segment		2045 Without Project		2045 With Project		Change	Clearly/ Normally Compatible Standard2	Significant Impact
		ADT	dBA CNEL[1]	ADT	dBA CNEL[1]			
Dillon Road	I-10 WB Ramps to Vista Del Norte	20,570	67.1	23,220	67.6	0.5	70 / 80	No
Vista Del Norte	Dillon Road to Tyler Street	690	46.6	10,880	58.6	12.0	60 / 65	No
	East of Tyler Street	690	46.6	5,480	55.6	9.0	60 / 70	No
Avenue 50	Leoco Lane to Magnolia Street/Tyler Street	13,830	63.1	13,970	63.1	0.0	60 / 70	No
	Magnolia Street/ Tyler Street to SR-86	19,030	64.4	20,020	64.6	0.2	85	No
	Tyler Street to Polk Street	8,990	63.2	12,470	64.6	1.4	60 / 70	No
	Polk Street to Fillmore Street	9,320	63.4	19,000	66.4	3.1	85	No
	Fillmore Street to I-10 EB Ramps	7,730	59.3	20,770	63.6	4.3	60 / 70	No[3]

Roadway Segment		2045 Without Project		2045 With Project		Change	Clearly/ Normally Compatible Standard2	Significant Impact
		ADT	dBA CNEL[1]	ADT	dBA CNEL[1]			
Polk Street	Avenue 50 to Avenue 52	3,940	56.3	9,790	60.3	4.0	60 / 70	No[4]
Avenue 52	Van Buren Street to Cesar Chavez Street	22,590	64.0	22,900	64.1	0.1	60 / 70	No
	Cesar Chavez Street to Sunset Drive	18,150	61.8	20,430	62.3	0.5	60 / 70	No
	Sunset Drive to Tyler Street	18,220	61.8	20,680	62.4	0.6	70 / 80	No
	Tyler Street to SR-86	12,580	63.7	15,980	64.8	1.0	60 / 70	No
Internal Road[5]	West of Internal Intersection 1	--	N/A	6,250	54.8	N/A	60 / 70	No
	East of Internal Intersection 1	--	N/A	16,840	59.1	N/A	60 / 70	No
	North of Internal Intersection 5	--	N/A	4,940	53.7	N/A	60 / 70	No
	East of Internal Intersection 5	--	N/A	890	46.3	N/A	60 / 70	No
	Between Internal Intersection 1 and Internal Intersection 5	--	N/A	20,130	59.8	N/A	60 / 70	No
	Between Internal Intersection 5 and Internal Intersection 4	--	N/A	12,880	57.9	N/A	60 / 70	No
	Between Internal Intersection 2 and Internal Intersection 3	--	N/A	24,090	60.6	N/A	60 / 70	No
	Between Internal Intersection 3 and Internal Intersection 4	--	N/A	13,310	58.0	N/A	60 / 70	No
Avenue 50 (Internal)[5]	South of Internal Intersection 2	--	N/A	39,900	62.8	N/A	60 / 70	No
Internal Road[5]	South of Internal Intersection 4	--	N/A	4,330	53.2	N/A	60 / 70	No

ADT = average daily traffic; dBA = A-weighted decibels; CNEL = community noise equivalent level.

1. Traffic noise levels are at 100 feet from the roadway centerline. The actual sound level at any receptor location is dependent upon such factors as the source-to-receptor distance and the presence of intervening structures, barriers, and topography.
2. Land use/noise compatibility is based on the land use along each roadway segment and the standards in *General Plan Update Final EIR* Figure 10-5 (see Table 5). Potential impacts occur when the Project change exceeds 3 dBA and the land use compatibility standard is exceeded at the nearest use (i.e., both must occur).
3. The Avenue 50 from Fillmore Street to I-10 eastbound ramps segment is currently surrounded by vacant land. Planned future development is already required to mitigate traffic noise. Additionally, noise levels are below the Normally Compatible Standard. Therefore, no impact would occur.
4. Noise levels are below the Normally Compatible standard. Additionally, the closest residence to this segment is 130 feet away from the roadway centerline. At 130 feet, the noise level attenuates to 58.0 dBA, which is within the 60 dBA Clearly Compatible standard and impacts are less than significant.
5. Internal roads are future roadways proposed within the project site.

Source: Kimley-Horn and Associates, Inc. 2024. Acoustical Assessment. Table 13.

Table 4.11-13 shows that an increase in traffic noise levels along the following roadway segments would exceed 3.0 dBA (refer to **Exhibit 4.11-3: Off-Site Traffic Noise Impacts** for locations):

- **Vista Del Norte, between Dillon Road and Tyler Street.** Although the 12.0 dBA increase in traffic noise may be subjectively heard as a doubling in loudness, the "With Project" noise level (58.6

dBA) would not exceed the 60 dBA Clearly Compatible noise standard for churches and therefore would not result in a significant impact. Impacts along this segment would be less than significant.

- **Vista Del Norte, east of Tyler Street.** Although the 9.0 dBA increase in traffic noise may be substantial, the "With Project" noise levels (55.6 dBA) would not exceed the 60 dBA Clearly Compatible noise standard for residential uses and therefore would not result in a significant impact. In addition, a solid block wall surrounds the existing residences which would reduce traffic noise by 8 dBA. Impacts along this segment would be less than significant.
- **Avenue 50 from Polk Street to Fillmore Street.** Although the addition of Project-related traffic would increase noise levels by 3.1 dBA, the With Project noise level (66.4 dBA) would not exceed the 85 dBA Clearly Compatible noise standard for agricultural land uses. Impacts along this segment would be less than significant.
- **Avenue 50 from Fillmore Street to I-10 Eastbound Ramps.** The With Project noise level along this future segment (63.6 dBA) would be 4.3 dBA over No Project conditions at 100 feet from the centerline. However, it should be noted that no sensitive receptors currently exist along the planned roadway. Future receptors may be constructed as part of the approved La Entrada project. Noise along this roadway segment was also analyzed within the La Entrada Environmental Impact Report (EIR) (2013), which required future development to include sound walls and upgraded windows along Avenue 50 (Mitigation Measure 4.12.3 in the La Entrada EIR). La Entrada EIR Table 4.12.P identifies the noise level along this segment, which is similar to the noise level shown in **Table 4.11-13**. The La Entrada EIR determined that mitigation would reduce roadway noise impacts to less than significant levels. Therefore, as planned future development along this roadway is already required to mitigate traffic noise, impacts would be reduced to meet the City's Clearly Compatible standard.
- **Polk Street from Avenue 50 to Avenue 52.** The majority of land uses surrounding this segment are agricultural lands with few scattered residences. Noise levels along this segment (60.3 dBA) would exceed the 60 dBA Clearly Compatible noise standard for residential uses at 100 feet from the roadway centerline. However, the closest residence along this segment is 130 feet from the road centerline. At this distance, traffic noise levels would attenuate to 58.0 dBA, which is within the 60 dBA Clearly Compatible residential standard. Impacts along this segment would be less than significant.

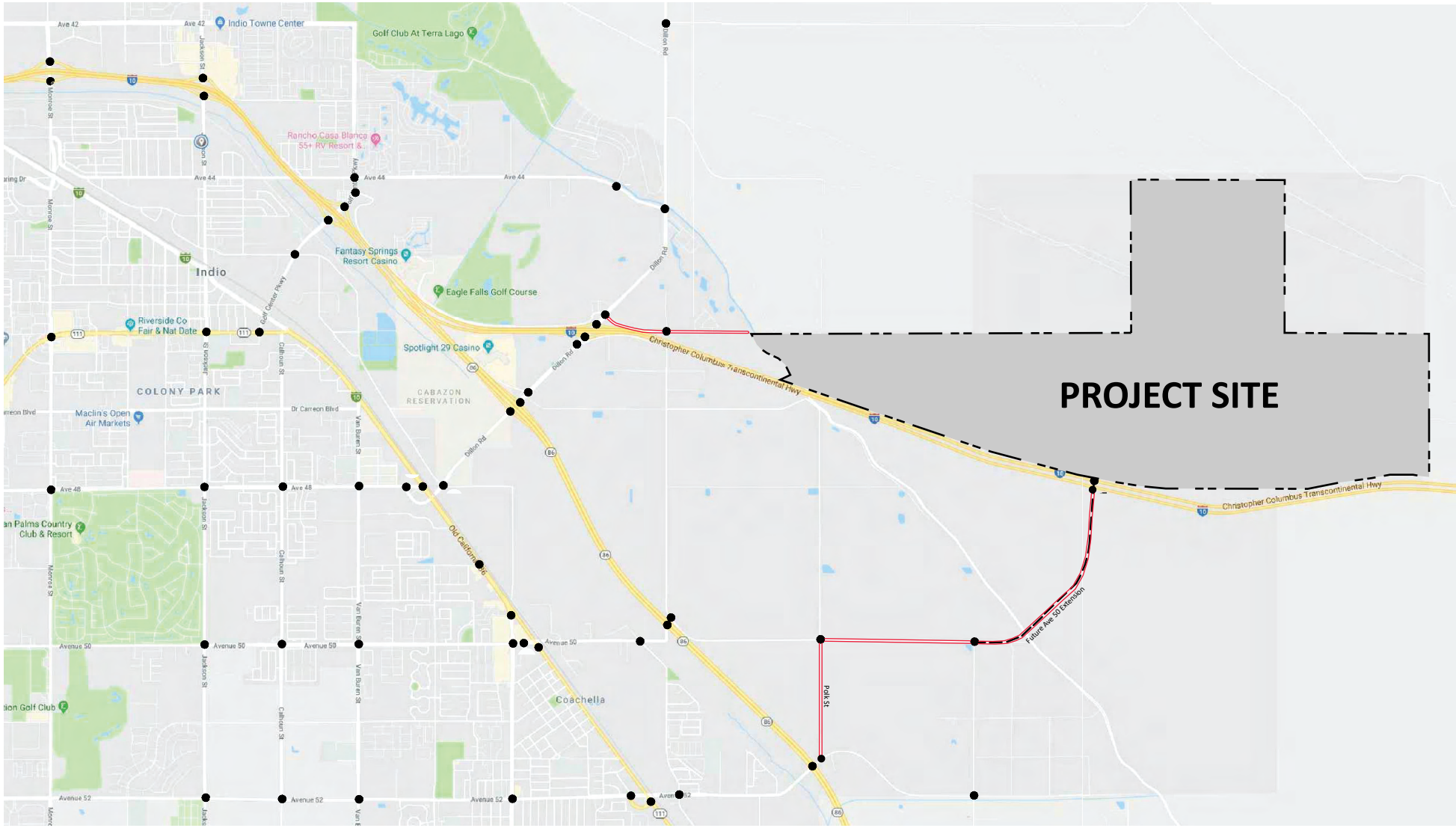


EXHIBIT 4.11-3: ff-Site Traffi Noise Impa ts

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Off-Site Improvements

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site construction associated with roadway and infrastructure improvements are conceptual in nature. However, modeling for the Project conservatively assumed an additional 47 acres of asphalt surfaces during construction to account for future off-site improvements. It is assumed that these off-site improvements would be constructed either within existing roadways or within disturbed/developed areas and would not otherwise have unique impacts that have not been evaluated in the EIR. All off-site improvements would comply with applicable local, state, and federal requirements as well as applicable EIR mitigation measures. As a result, impacts would be less than significant.

Mitigation Measures

MM NOI-1 Prior to issuance of building permits, detailed project-specific acoustical studies for projects within Villages A through E based on architectural plans shall be prepared by a qualified acoustical consultant to demonstrate compliance with General Plan Policy 1.2. The project-specific acoustical studies shall be submitted to the City's Development Services Department to demonstrate that all residential units would meet the City's 70 dBA exterior noise standard and 45 dBA interior noise standard to the satisfaction of the Development Services Director. This mitigation measure complies with the applicable sections of the California Building Code (Title 24 of the California Code of Regulations). The necessary noise reduction may be achieved by implementing noise control measures at the receiver locations such as placing barriers between noise sources and receivers or enclosing loud equipment. The required noise attenuation measures shall be incorporated into the applicable building plans and specifications.

MM NOI-2 Prior to issuance of building permits, detailed project-specific Noise Assessment for projects with Villages A through E shall be prepared, for submittal and approval of the City of Coachella Development Services Department, which demonstrates on-site placement of stationary noise sources at commercial uses would not exceed noise standards established in the City of Coachella General Plan and City of Coachella Municipal Code Section 7.04.030. The Noise Assessment shall verify that stationary noise sources (e.g., loading dock facilities, mechanical equipment, and parking lots) are adequately shielded and/or located at an adequate distance from on-site and off-site sensitive receptors and residences in order to comply with noise regulations established by the City of Coachella.

Impact 4.11-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Level of Significance: Less Than Significant

CONSTRUCTION

Construction can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. Construction on the Project site would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved.

The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Transportation and Construction Vibration Guidance Manual prepared by Caltrans, has identified vibration at the level of 0.04 in/sec PPV is barely perceptible and would be considered as annoyance threshold.

The FTA has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any construction vibration damage.

Table 4.11-14: Typical Construction Equipment Vibration Levels, lists vibration levels at 25 feet for typical construction equipment. Vibration levels at 60 feet, the distance from the Project boundary to the nearest existing structure (to the north) is also included in **Table 4.11-14**. Groundborne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in **Table 4.11-14**, based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

Table 4.11-14: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 60 Feet (in/sec)[1]
Large Bulldozer	0.089	0.024
Caisson Drilling	0.089	0.024
Loaded Trucks	0.076	0.020
Jackhammer	0.035	0.009
Small Bulldozer/Tractors	0.003	0.001

1. Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance; PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018; D = the distance from the equipment to the receiver.

Source: Kimley-Horn. 2024. Acoustical Assessment. Table 14.

The nearest structure to the Project construction site is approximately 60 feet away from the Phase 3 boundary. **Table 4.11-14** shows that at 60 feet the vibration velocities from individual construction equipment would not exceed 0.024 in/sec PPV, which is below the FTA's 0.20 in/sec PPV threshold for building damage. Assuming all six large bulldozers and eight tractors anticipated during the site preparation phase of construction were operating along the Phase 3 boundary at the time, the combined vibration would be 0.15 in/sec PPV which is below the FTA's 0.20 in/sec PPV threshold for building damage. Therefore, vibration impacts associated with Project construction would be less than significant.

OPERATIONS

Once operational, the Project would not be a significant source of groundborne vibration. Groundborne vibration nearby the Project currently result from heavy-duty vehicular travel (e.g., refuse trucks, heavy duty trucks, delivery trucks, and transit buses) on the nearby freeways and local roadways. Operations of the Project would include activities associated with residential, commercial, and educational developments that typically would not cause excessive ground-borne vibrations. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. According to the FTA Noise and Vibration Manual, trucks rarely create vibration levels that exceed 70 VdB (equivalent to 0.012 in/sec PPV) when they are on roadways. Therefore, automobiles accessing the Project site or traveling along surrounding roadways would not exceed FTA thresholds for building damage or annoyance. Impacts would be less than significant in this regard.

Off-Site Improvements

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site construction associated with roadway and infrastructure improvements are conceptual in nature. However, modeling for the Project conservatively assumed an additional 47 acres of asphalt surfaces during construction to account for future off-site improvements. It is assumed that these off-site improvements would be constructed either within existing roadways or within disturbed/developed areas and would not otherwise have unique impacts that have not been evaluated in the EIR. All off-site

improvements would comply with applicable local, state, and federal requirements as well as applicable EIR mitigation measures. As a result, impacts would be less than significant.

Mitigation Measures

No mitigation is necessary.

Impact 4.11-3: ***For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

Level of Significance: No Impact

CONSTRUCTION AND OPERATIONS

The closest airport to the Project site is the Jacqueline Cochran Regional Airport located approximately five miles to the southwest. The Project is not within 2.0 miles of a public airport or within an airport land use plan. Additionally, there are no private airstrips located within the Project vicinity. Therefore, the Project would not expose people working in the Project area to excessive airport- or airstrip-related noise levels and no mitigation is required.

Off-Site impacts

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. None of the off-site improvements are located within 2.0 miles of a public airport or within an airport land use plan. Additionally, there are no private airstrips located within the vicinity of the off-site improvements. No impact would occur.

Mitigation Measures

No mitigation is necessary.

4.11.5 CUMULATIVE IMPACTS

CUMULATIVE CONSTRUCTION NOISE

The Project's construction activities would not result in a substantial temporary increase in ambient noise levels. Construction noise would be periodic and temporary noise impacts that would cease upon completion of construction activities. The Project would contribute to other proximate construction project noise impacts if construction activities were conducted concurrently. However, based on the noise analysis above, the Project's construction-related noise impacts would be less than significant following the City of Coachella Municipal Code.

Construction activities at other planned and approved projects near the Project site would be required to comply with applicable City rules related to noise and would take place during daytime hours on the days

permitted by the applicable Municipal Code, and projects requiring discretionary City approvals would be required to evaluate construction noise impacts, comply with the City's standard conditions of approval, and implement mitigation, if necessary, to minimize noise impacts. Construction noise impacts are by nature localized. Based on the fact that noise dissipates as it travels away from its source, noise impacts would be limited to the Project site and vicinity. Therefore, Project construction would not result in a cumulatively considerable contribution to significant cumulative impacts, assuming such a cumulative impact existed, and impacts in this regard are not cumulatively considerable.

CUMULATIVE OPERATIONAL NOISE

Cumulative Traffic Noise

Cumulative noise impacts describe how much noise levels are projected to increase over existing conditions with the development of the Project and other foreseeable projects. Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to buildout of the Project and other projects in the vicinity. Cumulative increases in traffic noise levels were estimated by comparing the Existing and Horizon Year Without Project scenarios to the Horizon Year With Project scenario. The traffic analysis considers cumulative traffic from future growth assumed in the transportation model, as well as cumulative projects.

A project's contribution to a cumulative traffic noise increase would be considered significant when the combined effect exceeds perception level (i.e., auditory level increase) threshold. The following criteria is used to evaluate the combined and incremental effects of the cumulative noise increase.

- **Combined Effect.** The cumulative with Project noise level ("Horizon Year With Project") would cause a significant cumulative impact if a 3.0 dB increase over "Existing" conditions occurs and the resulting noise level exceeds the applicable exterior standard at a sensitive use. Although there may be a significant noise increase due to the Project in combination with other related projects (combined effects), it must also be demonstrated that the Project has an incremental effect. In other words, a significant portion of the noise increase must be due to the Project.
- **Incremental Effects.** The "Horizon Year With Project" causes a 1.0 dBA increase in noise over the "Opening Year Without Project" noise level.

A significant impact would result only if both the combined and incremental effects criteria have been exceeded. Noise by definition is a localized phenomenon and reduces as distance from the source increases. Consequently, only the Project and growth due to occur in the general area would contribute to cumulative noise impacts.

Table 4.11-15: Cumulative Traffic Noise Levels identifies the traffic noise effects along roadway segments in the Project vicinity for "Existing," "Horizon Year Without Project," and "Horizon Year With Project," conditions, including incremental and net cumulative impacts.

Table 4.11-15: Cumulative Off-Site Traffic Noise Levels

Roadway Segment		Existing[1] (dBA)	Horizon Year Without Project[1] (dBA)	Horizon Year With Project[1] (dBA)	Combined Effects: Difference Between Existing and Horizon Year With Project	Incremental Effects: Difference Between Horizon Year Without Project and Horizon Year With Project	Clearly/ Normally Compatible Standard	Cumulatively Significant Impact? [2]
Dillon Road	I-10 WB Ramps to Vista Del Norte	63.0	67.1	67.6	4.6	0.5	70 / 80	No
Vista Del Norte	Dillon Road to Tyler St.	46.5	46.6	58.6	12.1	12.0	70 / 80	No [3]
	East of Tyler Street	46.5	46.6	55.6	9.1	9.0	60 / 70	No [4]
Avenue 50	Leoco Lane to Magnolia Street/Tyler Street	60.7	63.1	63.1	2.4	0.0	60 / 70	No
	Magnolia Street/ Tyler Street to SR-86	60.3	64.4	64.6	4.3	0.2	85	No
	Tyler Street to Polk St.	50.6	63.2	64.6	14.0	1.4	60 / 70	No [5]
	Polk Street to Fillmore Street	45.1	63.4	66.4	21.3	3.1	85	No [6]
	Fillmore Street to I-10 EB Ramps	N/A	59.3	63.6	N/A	4.3	60 / 70	No [7]
Polk Street	Avenue 50 to Ave. 52	45.0	56.3	60.3	15.3	4.0	60 / 70	No [8]
Avenue 52	Van Buren Street to Cesar Chavez Street	61.6	64.0	64.1	2.5	0.1	60 / 70	No
	Cesar Chavez Street to Sunset Drive	57.8	61.8	62.3	4.5	0.5	60 / 70	No
	Sunset Drive to Tyler St.	58.5	61.8	62.4	3.9	0.6	70 / 80	No
	Tyler Street to SR-86	60.1	63.7	64.8	4.7	1.1	60 / 65	No [9]
Internal Road [9]	West of Internal Intersection 1	N/A	N/A	54.8	N/A	N/A	60 / 70	No
	East of Internal Intersection 1	N/A	N/A	59.1	N/A	N/A	60 / 70	No
	North of Internal Intersection 5	N/A	N/A	53.7	N/A	N/A	60 / 70	No
	East of Internal Intersection 5	N/A	N/A	46.3	N/A	N/A	60 / 70	No
	Between Internal Intersection 1 and Internal Intersection 5	N/A	N/A	59.8	N/A	N/A	60 / 70	No
	Between Internal Intersection 5 and Internal Intersection 4	N/A	N/A	57.9	N/A	N/A	60 / 70	No
	Between Internal Intersection 2 and Internal Intersection 3	N/A	N/A	60.6	N/A	N/A	60 / 70	No
	Between Internal Intersection 3 and Internal Intersection 4	N/A	N/A	58.0	N/A	N/A	60 / 70	No
Ave. 50 (Internal) [10]	South of Internal Intersection 2	N/A	N/A	62.8	N/A	N/A	60 / 70	No
Internal Road [10]	South of Internal Intersection 4	N/A	N/A	53.2	N/A	N/A	60 / 70	No

ADT = average daily traffic; dBA = A-weighted decibels; CNEL = community noise equivalent level.

1. Traffic noise levels are at 100 feet from the roadway centerline. The actual sound level at any receptor location is dependent upon such factors as the source-to-receptor distance and the presence of intervening structures, barriers, and topography.

Roadway Segment	Existing[1] (dBA)	Horizon Year Without Project[1] (dBA)	Horizon Year With Project[1] (dBA)	Combined Effects: Difference Between Existing and Horizon Year With Project	Incremental Effects: Difference Between Horizon Year Without Project and Horizon Year With Project	Clearly/ Normally Compatible Standard	Cumulatively Significant Impact? [2]

2. Potential impacts occur when the Project change exceeds 65 dBA CNEL and a 3 dBA increase (i.e., both must occur) at the receiving noise-sensitive land use.
3. Noise levels would not exceed the 70 dBA Clearly Compatible noise standard for commercial land uses.
4. Noise levels would not exceed the 60 dBA Clearly Compatible noise standard for residential land uses.
5. Noise levels are below the Normally Compatible standard of 70 dBA for residential land uses.
6. Noise levels would be 66.4 dBA and would not exceed the 85 dBA Clearly Compatible noise standard for agricultural land uses.
7. The Avenue 50 from Fillmore Street to I-10 eastbound ramps segment is currently surrounded by vacant land. Planned future development is already required to mitigate traffic noise. Additionally, noise levels are below the Normally Compatible Standard. Therefore, no impact would occur.
8. Noise levels are below the Normally Compatible standard. Additionally, the closest residence to this segment is 130 feet away from the roadway centerline. At 130 feet, the noise level attenuates to 58.0 dBA, which is within the 60 dBA Clearly Compatible standard and impacts are less than significant.
9. Noise levels are below the Normally Compatible standard of 65 dBA Institutional-General (School).
10. Internal roads are future roadways proposed within the project site.

Source: Kimley-Horn and Associates, Inc. 2024. Acoustical Assessment. Table 15.

Table 4.11-15 shows the volume of traffic generated by the Project would potentially meet the criteria for cumulative noise increases along several road segments. The noise levels along the following roadway segments result in combined effects and incremental effects:

- **Vista Del Norte from Dillon Road to Tyler Street.** Although noise levels would exceed the incremental threshold, the With Project noise levels would be 58.6 dBA and would not exceed the 70 dBA Clearly Compatible noise standard for commercial land uses. Impacts along this segment would be less than significant.
- **Avenue 50 from Tyler Street to Polk Street.** Although noise levels at 100 feet from the centerline of this segment would exceed the 60 dBA Clearly Compatible residential noise standard, the 70 dBA Normally Compatible residential noise standard would not be exceeded. There are few residences located along this segment. However, the primary outdoor space appears to be in the back yard and not along the roadway. Impacts along this segment would be less than significant.
- **Avenue 50 from Polk Street to Fillmore Street.** Noise levels would be 66.4 dBA and would not exceed the 85 dBA Clearly Compatible noise standard for agricultural land uses. Impacts along this segment would be less than significant.
- **Polk Street from Avenue 50 to Avenue 52.** The majority of land uses surrounding this segment are agricultural lands with few scattered residences. Noise levels in this segment would be 60.3 dBA and would exceed the 60 dBA Clearly Compatible noise standard for residential uses at 100 feet from the roadway centerline. However, the closest residence along this segment is 130 feet from the road centerline. At this distance, traffic noise levels would attenuate to 58.0 dBA CNEL, which is below the 60 dBA residential standard. Impacts along this segment would be less than significant.
- **Avenue 52 from Tyler Street to SR-86.** Although noise levels in this segment would exceed the 60 dBA Clearly Compatible Institutional-General (School) noise standard, the 65 dBA Normally

Compatible residential noise standard would not be exceeded. The With Project noise level would be 64.8 dBA. Interior noise levels would be 39.8 dBA with the standard 25 dBA exterior-to-interior attenuation rate. As interior noise levels would not exceed the 45 dBA interior standard [1](refer to **Table 4.11-8: Coachella Interior and Exterior Noise Standards**), impacts along this segment would be less than significant.

As noted above, these five roadway segments would exceed the combined and incremental effect thresholds but do not exceed the Normally Acceptable standard which is applicable for existing buildings that use conventional construction, are able to close their windows, and include a fresh air supply system or air conditioning. Standard construction provides 25 dBA of exterior-to-interior noise attenuation with windows closed and interior noise levels would be below the 45 dBA CNEL standard. However, it cannot be assumed that all houses along these roadway segments have air conditioning and as a result may require the windows to be open for cooling. Therefore, these roadway segments have also been conservatively analyzed assuming an "open window condition". The exterior-to-interior noise attenuation rate is 15 dBA with windows open and, as a result, interior noise levels could exceed the 45 dBA standard for existing residential units along Avenue 50 from Tyler Street to Polk Street and Avenue 52 from Tyler Street to SR-86, resulting in a potentially significant impact if windows were left open. **Exhibit 4.11-4: Cumulative Traffic Noise** shows the location of roadway segments with potentially significant cumulative noise impacts.

Feasible mitigation is not available to reduce traffic noise. Typically, feasible mitigation measures for off-site roadway noise impacts includes repairing the roads with rubberized asphalt and developing sound walls or attenuation barriers to minimize noise impacts. However, this mitigation can only be imposed on on-site roadways since the Applicant would not have authorization or control to make off-site improvements. As impacts would also occur on off-site roadways and properties, it is usually infeasible for the Applicant to implement these measures. Sound walls would be infeasible due to impacts on right of way, restricted views, and not being proportional to the barely perceptible increase in sound compared with the No Project scenario. Rubberized asphalt could be considered by the City's public works department in the future as part of scheduled maintenance funding, but it would not be roughly proportional to impose paving costs on the Project for a barely perceptible sound level increase. Therefore, mitigation measures to reduce the potentially significant traffic noise impact along Avenue 50 from Tyler Street to Polk Street and Avenue 52 from Tyler Street to SR-86 (i.e., the segments that exceed the Clearly Compatible Standard) are not feasible. Noise levels along these segments would still be within the Normally Compatible standard. However, as the Clearly Compatible standard would be exceeded, the Normally Compatible standard would only apply to buildings that were built using conventional construction methods, can close their windows, and include a fresh air supply or air conditioning. As these conditions cannot be confirmed it is conservatively assumed that Project-specific noise impacts would be cumulatively considerable along these roadway segments and impacts would be significant and unavoidable.

[11] Receptors within the normally compatible standard (see Table 4.11-7) are acceptable as long as additional noise insulation features are not needed to achieve interior noise standards. As this location is within the normally compatible standard, and receiver buildings consist of standard construction, the interior noise levels would not exceed the 45 dB interior noise standard.

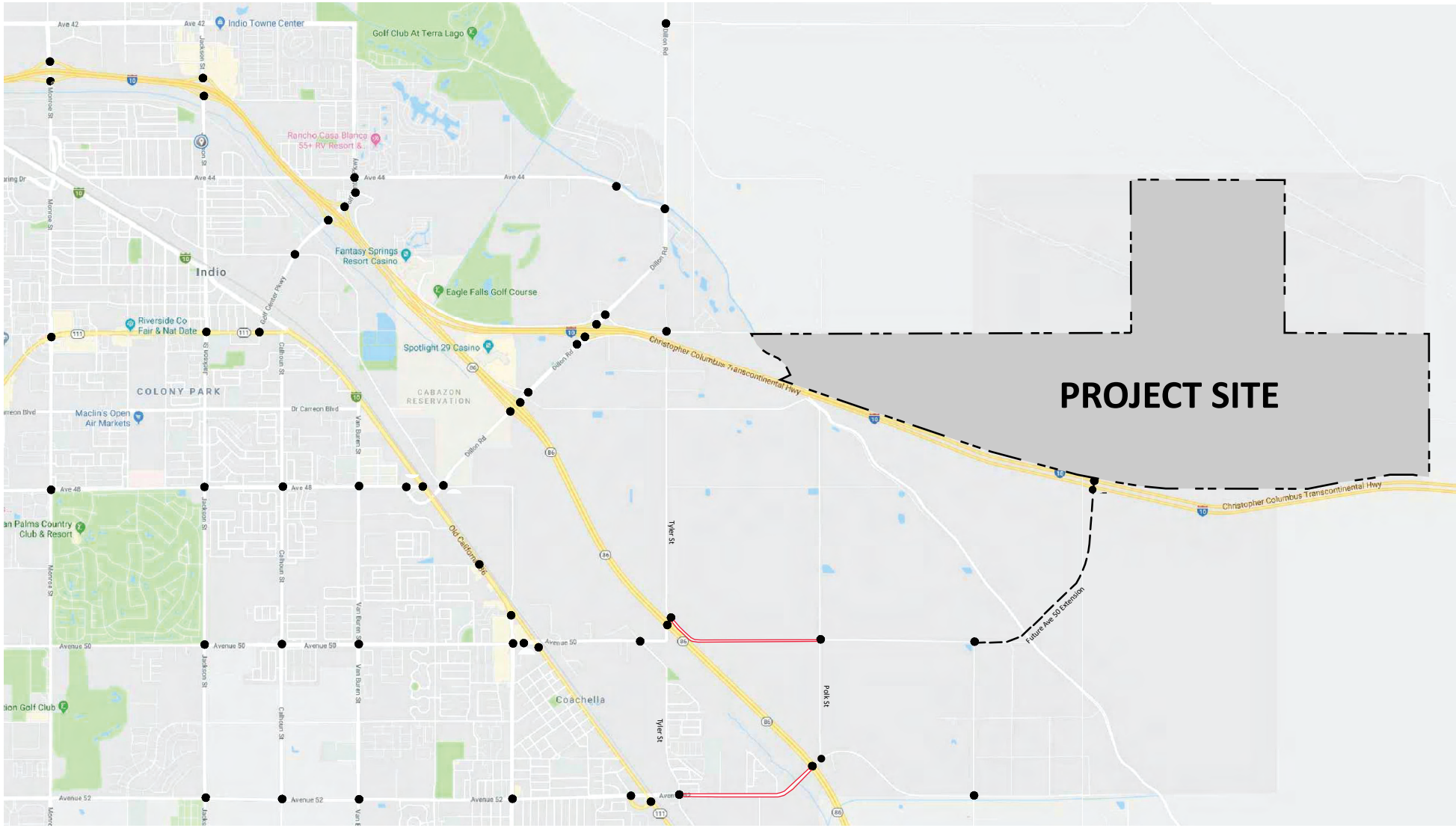


EXHIBIT 4.11-4: Cumulative Traffi Noise

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Cumulative Stationary Noise

Stationary noise sources of the Project would result in an incremental increase in non-transportation noise sources in the Project vicinity. However, as discussed above, operational stationary noise caused by the Project would be less than significant with mitigation. Similar to the Project, other planned and approved projects would be required to mitigate for stationary noise impacts at nearby sensitive receptors, if necessary. As stationary noise sources are generally localized, there is a limited potential for other projects to contribute to cumulative noise impacts.

No known past, present, or reasonably foreseeable projects would combine with the operational noise levels generated by the Project to increase noise levels above acceptable standards because each project must comply with applicable City regulations that limit operational noise. Therefore, the Project, together with other projects, would not create a significant cumulative impact, and even if there was such a significant cumulative impact, the Project would not make a cumulatively considerable contribution to significant cumulative operational noises.

Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the Project site and vicinity. Thus, cumulative operational noise impacts from related projects, in conjunction with Project specific stationary noise impacts, would not be cumulatively significant.

4.11.6 SIGNIFICANT UNAVOIDABLE IMPACTS

The normally compatible standard would not be exceeded with windows closed, therefore the cumulative traffic noise impacts from related projects in conjunction with Project-specific traffic noise impacts would not be cumulatively considerable. However, because it cannot be confirmed that all existing residential units are able to keep their windows closed and as a result, traffic noise from surrounding projects in addition to Project-specific traffic noise impacts along Avenue 50 from Tyler Street to Polk Street and Avenue 52 from Tyler Street to SR-86 would result in a significant and unavoidable impact in a windows open condition.

4.11.7 REFERENCES

City of Coachella. 2015. General Plan Update. Land Use and Community Character and Noise Elements. https://www.coachella.org/home/showpublisheddocument/9429/638402981406830000.

Kimley-Horn and Associates, Inc. 2024. Acoustical Assessment.

4.12 POPULATION AND HOUSING

The purpose of this section is to describe the existing population, employment, and housing characteristics of the City of Coachella (City). This section identifies potential impacts to population and housing that could result from implementation of the Project, and as necessary, recommends mitigation measures to reduce the significance of impacts. Available data from the U.S. Bureau of the Census (USCB), Coachella Valley Association of Governments (CVAG), the Southern California Association of Governments (SCAG), the State of California Department of Finance (DOF), and the City was used for this analysis.

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts on population and housing. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors such as potential displacements.

4.12.1 ENVIRONMENTAL SETTING

The approximately 2,807-acre Project site is currently vacant and contains no housing or places of employment. It is also located entirely within the limits of the City. Portions of the Project site's limits coincide with the City's limits. Interstate 10 (I-10) comprises the southern border of the Project site. Places of employment in the Project's vicinity include the Coachella Valley Transfer Station and Compost Facility, northwest of the Project site, a golf course, and agricultural production located west of the site. Residential communities are located at The Villas, The Vineyards, and The Vineyards Luxury Motor Coach RV Resort, also located west-northwest of the Project site.

The Project site is presently composed of one General Plan land use designation, Resort District, which allows for residential, lodging, recreational, and support retail and commercial services, including theme parks, sports venues and specialized entertainment uses.[1] The Resort District allows a development intensity of eight dwelling units per acre and a floor area ratio equal to 0.10 max with exceptions potentially made for certain entertainment uses such as theme parks.[2] The existing zoning within the Project site is Resort District (R-D).[3]

[1] City of Coachella. 2015. Figure 4-23, General Plan Designation Map, of the Coachella General Plan Update 2035. https://www.coachella.org/home/showpublisheddocument/8407/637818910797370000 (accessed March 2023).
[2] City of Coachella. 2017. General Plan, Page 04-45. https://www.coachella.org/home/showpublisheddocument/3221/635712771850800000. (accessed March 2023).
[3] City of Coachella. 2023. Official Zoning Map. https://acrobat.adobe.com/link/review?uri=urn%3Aaaid%3Ascds%3AUS%3Ab87288e4-eb64-3614-bae7-bdd4f328766f (accessed August 2023).

The following regional and local population, housing, and employment conditions provide the context for the environmental analysis.

POPULATION

County of Riverside

Table 4.12-1: County of Riverside Population, displays population estimates and forecasts for the County based on SCAG's adopted Connect SoCal (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]) demographic data and DOF's E-5 population and housing estimates. As identified in **Table 4.12-1**, the County's estimated 2024 population as of January 1, 2024, was 2,491,037 persons. The County's population is forecasted to increase to 2,992,000 persons by 2050 which equates to an approximate 20 percent increase of population growth between 2024 and 2050.

Table 4.12-1: County of Riverside Population

	2010[a]	2016[a]	2024[b]	2050 Forecast[c]
County Total (persons)	2,189,641	2,364,000	2,491,037	2,992,000

a) State of California, DOF. (2020). *E-5 Population Estimates for Cities, Counties, and the States, 2010-2020, with 2010 Census Benchmark.* Sacramento, California. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2020/ (accessed September 2022).
b) State of California, DOF. (2025) *E-5 Population Estimates for Cities, Counties, and the State, 2020-2025, with 2020 Census Benchmark*. Sacramento, California. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/ (accessed August 2025)
c) SCAG. (2024). *SCAG RTP/SCS: Connect SoCal Plan – Demographics and Growth Forecast*. https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed July 2025)

City of Coachella

Table 4.12-2: City of Coachella Population, displays the City's population estimates and forecasts based on SCAG's Connect SoCal demographic data and DOF's E-5 population estimates. As shown in **Table 4.12-2**, the City's estimated 2024 population as of January 1, 2024 was 44,050 persons. The City's population is forecasted to increase to 153,080 persons by 2050, which equates to an approximate 248 percent increase of population growth between 2024 to 2050.

Table 4.12-2: City of Coachella Population

	2010[a]	2016[a]	2024[b]	2050 Forecast[c,d]
City Total (persons)	40,704	45,683	44,050	153,080

a) State of California, DOF. 2020. *E-5 Population Estimates for Cities, Counties, and the States, 2010-2020, with 2010 Census Benchmark.* Sacramento, California. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2020/ (accessed September 2022).
b) State of California, DOF. 2025. *E-5 Population Estimates for Cities, Counties, and the State, 2020-2025, with 2020 Census Benchmark*. Sacramento, California. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/ (accessed August 2025).
c) SCAG. 2024. *SCAG RTP/SCS: Connect SoCal Plan – Demographics and Growth Forecast*. https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed July 2025)
d) Calculated by 2050 predicted household size multiplied by current household size: (35,600 *4.3) = 153,080

Housing

County of Riverside

Table 4.12-3: County of Riverside Housing Characteristics, displays the County's past and estimated 2024 housing supply. As indicated in **Table 4.12-3**, the County's housing supply as of January 1, 2024, totaled

approximately 882,389 units, with an average of 3.09 persons per household. Single-detached dwelling units represented a majority of the County's housing stock, comprising approximately 69 percent of total housing units. The County's 2024 overall vacancy rate was 10 percent (approximately 88,593 unoccupied housing units).

SCAG uses existing census, historical trends and expert-derived demographic and economic assumptions to determine its growth forecasts through Connect SoCal's horizon planning year of 2050. Based on SCAG's Connect SoCal growth forecast for the County, the County's households are forecast to increase to 1,062,000 by 2050, representing an approximate 20 percent increase over the existing 882,389 households.

Table 4.12-3: County of Riverside Housing Characteristics

Units	2010[a]	2016[a]	2024[b]	2050 Forecast[c]
Single Detached	543,209	564,348	611,115	-
Single Attached	50,784	51,593	54,825	-
Multi-Family, Two to Four Units	38,409	38,630	38,559	-
Multi-Family, Five or More Units	89,577	94,477	100,194	-
Mobile Homes	78,728	79,335	77,696	-
Total Housing Units	**800,707**	**828,383**	**882,389**	**1,062,000**
Occupied	686,260	717,126	793,796	-
Vacancy Rate	14.3%	13.4%	10.0%	-
Persons per Household	3.14	3.22	3.09	-

a) State of California, DOF. 2020. *E-5 Population Estimates for Cities, Counties, and the State, 2010-2020, with 2010 Census Benchmark*. Sacramento, California. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2020/ (accessed September 2022).
b) State of California, DOF. 2025. E-5 Population Estimates for Cities, Counties, and the State, 2020-2025, with 2020 Census Benchmark. Sacramento, California. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/ (accessed August 2025).
c) SCAG. 2024. *SCAG RTP/SCS: Connect SoCal Plan – Demographics and Growth Forecast*. https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed July 2025)

City of Coachella

Table 4.12-4: City of Coachella Housing Characteristics, shows the City's past and present housing supply data. As noted in **Table 4.12-4**, the City's 2024 housing supply totaled 10,679 units, with an average of 4.23 persons per household. The City's 2024 housing supply represents 1.2 percent of the County's total 2024 housing supply. Based on SCAG's Connect SoCal growth forecast for the City, the City's total number of housing units is forecasted to increase to 35,600 by 2050, representing a significant increase of 233 percent over the existing 2024 housing units.

Similar to the County, single detached dwelling units represent the majority of the City's housing supply, comprising approximately 71 percent of total housing units. The City's 2024 vacancy rate of 2.7 percent is significantly lower than the County's 2024 vacancy rate of 10.0 percent. However, the average household size of 4.23 persons per household is nominally higher than the County's average of 3.09 persons per household. Additionally, the City's forecasted growth of 233 percent is significantly higher than the County's forecasted growth of 20 percent.

Table 4.12-4: City of Coachella Housing Characteristics

Units	2010[a]	2016[a]	2024[b]	2050 Forecast[c]
Single Detached	6,903	7,343	7,564	-
Single Attached	312	312	404	-
Multi-Family, Two to Four Units	998	1,002	933	-
Multi-Family, Five or More Units	1,055	1,111	1,210	-
Mobile Homes	629	629	568	-
Total Housing Units	**9,903**	**45,683**	**10,679**	**35,600**
Occupied	8,998	9,819	10,391	-
Vacancy Rate	9.1%	5.6%	2.7%	-
Persons per Household	4.52	4.65	4.23	-

a) State of California, DOF. (2020). *E-5 Population Estimates for Cities, Counties, and the State, 2010-2020, with 2010 Census Benchmark*. Sacramento, California. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2020/ (accessed September 2022).
b) State of California, DOF. 2025. E-5 Population Estimates for Cities, Counties, and the State, 2020-2025, with 2020 Census Benchmark. Sacramento, California. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/ (accessed August 2025).
c) SCAG. (2024). *SCAG RTP/SCS: Connect SoCal Plan – Demographics and Growth Forecast*. https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed July 2025)

Employment

County of Riverside

The USCB has provided the employment estimates for the County through the 2020 America Community Survey (ACS) 5-Year Estimates Data Profile. The County was estimated to contain a total civilian labor force population of 1,132,864 people. Of this, 1,050,497 were employed.[4] The County employment data provided by the ACS is summarized in **Table 4.12-5: County of Riverside Employment by Industry (2020)** below.

Table 4.12-5: County of Riverside Employment by Industry (2020)

Industry	Amount	Percent of Workforce
Agriculture, forestry, fishing and hunting, and mining	13,512	1.3%
Construction	94,227	9.0%
Manufacturing	88,824	8.5%
Wholesale trade	29,188	2.8%
Retail trade	132,902	12.7%
Transportation and warehousing, and utilities	72,935	6.9%
Information	15,269	1.5%
Finance and insurance, and real estate and rental and leasing	52,073	5.0%
Professional, scientific, and management, and administrative and waste management services	105,247	10.0%
Educational services, and health care and social assistance	220,044	20.9%
Arts, entertainment, and recreation, and accommodation and food services	119,359	11.4%
Other services, except public administration	53,053	5.1%
Public administration	53,864	5.1%
Total	**1,050,497**	**100%**

Source: United States Census Bureau. 2022. 2020 America Community Survey 5-Year Estimates Data Profiles. Industry by Occupation for the Civilian Employed Population 16 Years and Over. https://data.census.gov/cedsci/table?t=Employment&g=0500000US06065&tid=ACSDP5Y2020.DP03. (accessed September 2022).

[4] USCB. 2022. *2020 America Community Survey 5-Year Estimates Data Profiles*. Selected Employment Characteristics. https://data.census.gov/cedsci/table?t=Employment&g=0500000US06065&tid=ACSDP5Y2020.DP03&moe=false. (accessed September 2022).

Education services, health care, and social assistance occupations make up the largest percentage of County's 1,050,497-person workforce (20.9 percent). The lowest percentage of the County's workforce has occupations within the Agriculture industry (1.3 percent). In 2020, the County's employment totaled 1,050,497 jobs. When compared to the 2022 total housing units of 863,784 units (see **Table 4.12-3: County of Riverside Housing Characteristics**), this leads to a jobs-to-housing ratio of 1.2:1.[5] This means that in 2020, there were 1.2 jobs for every housing unit in the County. A jobs-to-housing ratio greater than one implies there is suitable housing available in the area to accommodate the workforce.

According to the 2024-2050 RTP/SCS, the County is projected to experience an increase in employment of 134,503 by 2050 for a total of 1,185,000 jobs.[6] The County is also projected to experience an increase of 1,062,000 housing units. This would create a jobs-to-housing ratio of approximately 1.12:1 in 2050. The County experienced a 7.3 percent unemployment rate in 2020.[7] Although there are suitable housing units in the County, additional job creation in the County would support a better balance of jobs-to-housing ratio.

City of Coachella

The USCB has provided the employment estimates for the City through the 2020 ACS 5-Year Estimates Data Profile. The City was estimated to contain a total civilian labor force population of 26,456 people. Of this, 22,077 were employed.[8] The County employment data provided by the ACS is summarized in **Table 4.12-6: City of Coachella Employment by Industry (2020)** below.

Table 4.12-6: City of Coachella Employment by Industry (2020)

Industry	Amount	Percent of Workforce
Agriculture, forestry, fishing and hunting, and mining	1,480	6.7%
Construction	2,448	11.1%
Manufacturing	1,071	4.9%
Wholesale trade	624	2.8%
Retail trade	3,912	17.7%
Transportation and warehousing, and utilities	801	3.6%
Information	142	0.6%
Finance and insurance, and real estate and rental and leasing	629	2.8%
Professional, scientific, management, administrative, and waste management services	2,530	11.5%
Educational services, and health care and social assistance	2,936	13.3%
Arts, entertainment, and recreation, and accommodation and food services	3,629	16.4%
Other services, except public administration	1,401	6.3%
Public administration	474	2.1%
Total	**22,077**	**100%**

Source: United States Census Bureau. 2022. 2020 America Community Survey 5-Year Estimates Data Profiles. Industry by Occupation for the Civilian Employed Population 16 Years and Over. https://data.census.gov/cedsci/table?q=Coachella%20city,%20California&t=Employment&tid=ACSDP5Y2020.DP03&moe=false (accessed September 2022).

[5] California DOF. 2022. *E-5 City/County Population and Housing Estimates*. Sacramento, CA: Department of Finance. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2020/. (accessed September 2022).

[6] SCAG. 2020. *Current Context Demographics and Growth Forecast*. Page 29. Los Angeles, CA: SCAG. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579. (accessed September 2022).

[7] USCB. 2022. *2020 America Community Survey 5-Year Estimates Data Profiles*. Selected Employment Characteristics. https://data.census.gov/cedsci/table?t=Employment&g=0500000US06065&tid=ACSDP5Y2020.DP03. (accessed September 2022).

[8] USCB. 2022. 2020 America Community Survey 5-Year Estimates Data Profiles. Selected Employment Characteristics. https://data.census.gov/cedsci/table?t=Employment&g=1600000US0614260 (accessed September 2022).

Retail trade, make up the largest percentage of City's 22,077-person workforce (17.7 percent), followed by arts, entertainment, and recreation, and accommodation and food services (16.4 percent) The lowest percentage of the City's workforce has occupations within the Information industry (0.6 percent). In 2020, the City's employment totaled 22,077 jobs. When compared to the 2022 total housing units of 10,178 units (see **Table 4.12-4: City of Coachella Housing Characteristics***)*, this leads to a jobs-to-housing ratio of 2.2:1.[9] This means that in 2020, there were 2.2 jobs for every housing unit in the City. A jobs-to-housing ratio greater than one implies there is suitable housing available in the area to accommodate the workforce.

According to the 2024-2050 RTP/SCS, the City is projected to experience an increase in employment of 1,223 jobs by 2050 for a total of 23,200 jobs.[10] The City is also projected to experience an increase of 35,600 housing units by 2050. This would create a jobs-to-housing ratio of approximately 0.64:1 in 2045.[11] Thus, it is implied that the City is currently housing-rich and in need for more employment opportunities to accommodate the City's labor force. The City experienced a 16.5 percent unemployment rate in 2020.[12] Although there are suitable housing units in the City, additional job creation in the City would support a better balance of jobs-to-housing ratio.

4.12.2 REGULATORY SETTING

FEDERAL

There are no federal regulations that pertain to regulations for housing and population.[13]

STATE

California Planning and Zoning Law

California planning and zoning law requires each city and county to adopt a general plan for future growth (California Government Code [CGC] Section 65300). This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the state level, the Housing and Community Development Department (HCD) estimates the relative share of California's projected population growth in each county based on California DOF population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. The RHNA is a tool used for SCAG and its member local governments in planning for growth. The RHNA quantifies the need for housing within each jurisdiction. Communities then plan, consider, and decide how they will address this need through the process of completing the Housing Elements of their General Plans. The RHNA does not necessarily

[9] California DOF. 2022. *E-5 City/County Population and Housing Estimates*. Sacramento, CA: Department of Finance. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2020/ (accessed September 2022).

[10] SCAG. 2020. *Current Context Demographics and Growth Forecast*. Page 29. Los Angeles, CA: SCAG https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/ (accessed September 2022).

[11] Ibid.

[12] USCB. 2022. *2020 America Community Survey 5-Year Estimates Data Profiles*. Selected Employment Characteristics. https://data.census.gov/cedsci/table?t=Employment&g=1600000US0614260 (accessed September 2022).

[13] At this time all residential units are anticipated to be market rate. Should any residential developments within the Project seek federal funding, applicable federal housing regulations would apply, such as HUD Section 8 community development block grant programs for affordable housing.

encourage or promote growth but allows communities to prepare for growth in a way that enhances quality of life and mobility; improves access to jobs, transportation, and housing; and in a way that would not adversely impact the environment.

State law recognizes the vital role that local governments play in the supply and affordability of housing. To that end, the California Government Code requires that the housing element achieve legislative goals to:

- Identify adequate sites to facilitate and encourage the development, maintenance, and improvement of housing for households of all economic levels, including persons with disabilities.
- Remove, as legally feasible and appropriate, governmental constraints to the production, maintenance, and improvement of housing for persons of all incomes, including those with disabilities.
- Assist in the development of adequate housing to meet the needs of low- and moderate-income households.
- Conserve and improve the condition of housing and neighborhoods, including existing affordable housing. Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.
- Preserve for lower-income households the publicly assisted multifamily housing developments in each community.

California housing element laws (CGC Sections 65580–65589) require that each city and county identify and analyze existing and projected housing needs within its jurisdiction and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community commensurate with local housing needs.

REGIONAL

Southern California Association of Governments (SCAG) Regional Housing Needs Assessment

Since 1980, local jurisdictions are required by State law (Government Code Section 65580 – 65589.8 et seq.) to plan for their fair share of projected housing construction needs in their region, requiring each city and county as part of its general plan to revise and update a detailed housing element every five to eight years. The preparation and update of the housing element occurs, generally, on eight-year cycles (five years for some rural counties). It begins with the State Department of Housing and Community Development (HCD) and Department of Finance (DOF) determining the Regional Housing Need Allocation (RHNA) and allocating to each region in the state its “fair share” of the need; then sets housing unit construction goals and allocates these goals to cities through regional planning agencies such as SCAG.

SCAG is a council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG is the federally recognized metropolitan planning organization (MPO) for this region, which encompasses over 38,000 square miles. It serves as a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG develops,

refines, and maintains SCAG's regional and small area socio-economic forecasting/allocation models. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the Southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District, the California Department of Transportation, and other agencies in preparing regional planning documents. The socioeconomic estimates and projections are used for federal and state-mandated long-range planning efforts such as the RTP/SCS, the Air Quality Management Plan, the Federal Transportation Improvement Program, and the RHNA.

The RHNA is an assessment process performed periodically as part of Housing Element and General Plan updates at the local level. The RHNA quantifies the need for housing by income group within each jurisdiction during specific planning periods. The RHNA is used in land use planning, to prioritize local resource allocation and to help decide how to address existing and future housing needs. The RHNA allows communities to anticipate growth, so that collectively the region can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, and address social equity and fair share housing needs.

The RHNA is determined for the income categories of very low, low, moderate and above moderate, and the locality must also determine what portion of the very low-income need is the need for extremely low-income households (50 percent being the default). In many cases the community must allow development at multifamily densities by right (i.e., without a conditional use permit or other discretionary permits).

The RHNA is not a mandate to construct the full number of housing units assigned a region; rather, the RHNA allocation process establishes short-term construction needs and the fair distribution of housing needs among income groups. The housing construction "targets" identified in the RHNA obligate jurisdictions to take steps to 1) to remove local governmental constraints to affordable housing development, housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters; 2) conserve and improve unsubsidized affordable housing; 3) further fair housing; and 4) preserve subsidized affordable housing.[14]

Each jurisdiction's future housing need is calculated in terms of four factors: (1) the number of units needed to accommodate forecasted global household growth; (2) the number of units needed to replace residential units lost due to attrition (i.e., fire damage, obsolescence, redevelopment, and conversion to non-housing uses); (3) maintenance of an ideal vacancy rate for a well-functioning housing market; and (4) an adjustment to avoid an overconcentration of lower-income households in any one jurisdiction.

The City of Coachella's assigned allocation for new housing during the 2021–2029 planning period is 7,886 units.[15] The RHNA target number was based on projected household growth and the resultant need for

[14] California Housing Element Manual –5th Edition, Law, Advocacy, and Litigation, California Affordable Housing Law Project of The Public Interest Law Project, March 2023. https://assets-global.website-files.com/63d82febb450e64e1fb3eb47/6449d46ea51b974a74ce400b_California%20Housing%20Element%20Manual,%20Law,%20Advocacy,%20and%20Litigation,%205th%20Edition,%20March%202023.pdf (accessed October 2025).

[15] 6th Cycle Regional Housing Needs Assessment Final Allocation Plan, 1/1/2021–10/1/2029, Southern California Association of Governments, March 2021. https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-proposed-final-allocation-plan.pdf?1614911196 (accessed September 2022).

construction of additional housing units allocated over the 8-year planning period (2021–2029). **Table 4.12-7** provides a summary of units needed for various income groups.

Table 4.12-7: 2021–2029 City of Coachella RHNA Allocations

Income Level	Number of Units	Percent of Total RHNA Units
Very Low Income	1,033	13%
Low Income	999	13%
Moderate Income	1,367	17%
Above Moderate Income	4,487	57%
Total	**7,886**	**100%**

Source(s): 6th Cycle Housing Element, City of Coachella, September 2021. https://static1.squarespace.com/static/606f64b7c544200772d634be/t/6154e85c080f8b0b62e9b29d/1632954468933/LWC_Coachella+HEU_PRD_092221_Combined.pdf (accessed September 2022).
6th Cycle Regional Housing Needs Assessment Final Allocation Plan, 1/1/2021–10/1/2029, Southern California Association of Governments, March 2021. https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-proposed-final-allocation-plan.pdf?1614911196 (accessed September 2022).
RHNA = Regional Housing Needs Assessment

From 2000 to 2018, Coachella issued building permits for a total of 2,381 units, the majority of which were single family units. Total permits issued decreased during the Great Recession and have not recovered to similar levels of permit activity since. Compared to the larger SCAG region, Coachella permitted more units per 1,000 residents prior to the Great Recession but has since permitted fewer units per 1,000 residents than the SCAG region overall. In 2018, the SCAG region had four times the rate of permit activity per 1,000 residents compared to Coachella.

As stated above, California State law requires local jurisdictions to update their General Plan Housing Element every eight years (five years for some rural counties) due to the fact that housing needs are recognized as a statewide concern. Pursuant to State law, the Housing Element must identify the City's housing needs, sites that can accommodate those needs, and policies to assure that the housing units necessary to meet those needs can be provided. The Revised Public Review Draft of the 6th Cycle Housing Element for the 2021–2029 period is currently available for review, as of September 2022. The State's review of the City's 2021–2029 Draft Housing Element, includes revisions which the revised Housing Element will comply with State housing element law (Article 10.6 of the Government Code) when these revisions are adopted and submitted to the HCD Department, pursuant to Government Code Section 65585(g).[16]

LOCAL

City of Coachella General Plan

Housing Element

As noted earlier, California State law requires local jurisdictions to update their General Plan Housing Element every five to eight years because housing needs are recognized as a statewide concern. The Housing Element is the only element of a General Plan that is subject to approval by the State. Pursuant to State law, the Housing Element must identify the City's housing needs, sites that can accommodate

[16] Review of the City of Coachella's 6th Cycle (2021-2029) Draft Housing Element, Department of Housing and Community Development, Division of Housing Policy Development, State of California – Business, Transportation, and Housing Agency, letter dated November 24, 2021. https://www.hcd.ca.gov/community-development/housing-element/docs/rivCoachellaDraftout112421.pdf (accessed September 2022).

these needs, and policies to assure that the housing units necessary to meet these needs can be provided. The main goal of the Housing Element is to provide housing opportunities for all members of the community.

The City's Draft 6th Cycle Housing Element Update[17] serves as a guide for meeting the City's growth and housing challenges. The Draft 6th Cycle Housing Element Update identifies housing needs and conditions, and reiterates goals, objectives, and policies that embody the City's growth and housing strategy. The following goals, objectives, and policies in the City's Draft Housing Element Update are applicable to the Project:

Goal 1	**Facilitate the Development of a Variety of Housing Types to Provide Adequate Housing in the City to all Households.**
Policy 1.2	Varying Densities. Employ a range of housing densities to provide housing for all economic segments of the community consistent with good planning practice.
Policy 1.6	Services and Facilities. Require that adequate public and private services and facilities are or will be provided to all new residential developments as a prerequisite for their approval.
Policy 1.8	Innovative Construction. Promote and encourage the use of innovative construction techniques.
Goal 2	**Conserve and Improve the Condition of the Existing Affordable Housing Stock.**
Policy 2.5	Code Enforcement. Ensure that all new housing units constructed in the city are safe and livable through vigorous enforcement of the Uniform Building Code.
Goal 3	**Encourage Energy Conservation to Reduce Housing Costs.**
Policy 3.1	Conservation Techniques. Encourage the use of energy-conserving techniques in the siting and design of new housing.
Policy 3.2	State Requirements. Actively enforce state energy conservation requirements for new residential construction.
Goal 4	**Promote Fair Housing Opportunity for All Persons [regardless of race, religion, marital status, age, sex, gender, nationality, physical or developmental disability, family size, and level and source of income].**
Policy 4.1	Equal Opportunity. Advocate equal housing opportunity for all residents.
Policy 4.2	Fair Housing. Utilize local fair housing agencies to investigate promptly and aggressively any complaints involving housing discrimination.
Policy 4.4	Access. Promote reasonable accommodation in new housing developments and in existing housing.

[17] City of Coachella. 2021. Draft 6th Cycle Housing Element Update. https://www.hcd.ca.gov/community-development/housing-element/docs/rivCoachellaDraftout112421.pdf (accessed October 2025).

4.12.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning population and housing. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

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

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

METHODOLOGY

The Project's demographics were examined in the context of existing and projected population for the City and consistency with relevant planning documents is considered. Information on population, housing, and employment for the Project area is available from several sources including the 2024-2050 RTP/SCS and population and housing data from the DOF and ACS.

Approach to Analysis

This analysis examines the Project's potential impacts on population and housing based on application of the significance criteria/thresholds outlined above. Each criterion is discussed in the context of the Project site and the surrounding characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The baseline conditions and impact analyses are based on review of Project maps and drawings; analysis of aerial and ground-level photographs; and review of various data available in public records, including local planning documents. The determination that the Project would or would not result in "significant" adverse effects on population and housing considers the established population and housing plans for the City and reviews any deviation from these plans in the analysis of the Project.

PROJECT DESIGN FEATURES

- The Project provides a variety of housing types, opportunities, and densities to meet a diverse housing demand.

4.12.4 PROJECT IMPACTS AND MITIGATION

Impact 4.12-1: ***Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

Level of Significance: Less Than Significant

CONSTRUCTION

The approved Specific Plan Project site would be designated on the City's General Plan Land Use Diagram and Zoning Map as the KPC Coachella Specific Plan. This would allow for the maximum development of 9,538 residential dwelling units, as well as a maximum of 305 acres of commercial development which includes a maximum of 844 multiple-family dwelling units. In addition, 395 acres of parks, greenways, and amenity centers; 68 acres of agricultural production; and 754 acres of drainage and other open space. The KPC Coachella Specific Plan would also include 179 acres of right-of-way/streets.

The Project site is presently composed of one General Plan land use designation, Resort District, which allows for residential, lodging, recreational, and support retail and commercial services, including theme parks, sports venues and specialized entertainment uses.[18] The Resort District allows a development intensity of eight dwelling units per acre and a floor area ratio equal to 0.10 max with exceptions potentially made for certain entertainment uses such as theme parks.[19] Within the Resort District, the Project site would allow up to 10,944 dwelling units (estimated at eight dwelling units/acre).[20,21] However, this designation is proposed to be modified through a General Plan Amendment under the Project. This General Plan Amendment would allow for the maximum development of 9,538 residential dwelling units, inclusive of a maximum of 305 acres of mixed-use development which includes a maximum of 844 multiple-family dwelling units. The Project would generate fewer dwelling units than what is forecasted for the Resort District. Therefore, the Project would not exceed the amount of dwelling units allowed within the General Plan.

Employment Growth

The construction phase of the Project would generate employment opportunities, including construction management, engineering, and labor. Construction related jobs are not considered significantly inducing because they are temporary in nature and are anticipated to be filled by persons in the surrounding area.

Construction of the Project would generate temporary employment opportunities, including short-term design, engineering, and construction jobs. Construction related jobs would not result in a significant population increase because those jobs are temporary in nature and are expected to be filled by persons within the local area. This expectation is based, among other things, on the City's 16.5 percent

[18] City of Coachella. 2015. Figure 4-23, General Plan Designation Map, of the Coachella General Plan Update 2035. https://www.coachella.org/home/showpublisheddocument/8407/637818910797370000 (accessed March 2023).
[19] City of Coachella. 2017. General Plan, Page 04-45. https://www.coachella.org/home/showpublisheddocument/3221/635712771850800000 (accessed March 2023).
[20] City of Coachella. 2015. General Plan, Page 04-45. https://www.coachella.org/home/showpublisheddocument/3221/635712771850800000
[21] Land uses not designated for open space/drainage facilities were utilized to estimate the maximum amount of dwelling units per acre according to the Resort District designation (1,368/2,807 acres * 8 dwelling units/acre = 10,944 dwelling units).

unemployment rate. Furthermore, the skilled and managerial construction-related positions could either be filled by the local workforce or by persons from the larger region. Therefore, Project construction would not directly or indirectly induce substantial, unplanned population growth in the County resulting in a less than significant impact.

OPERATIONS

Table 4.12-8: Project Land Use and Population Projections, presents the projected maximum residential land use and population at City buildout in 2035, SCAG projection buildout in 2050, and Project buildout in 2045. As indicated in **Table 4.12-8**, the City's housing stock is forecasted to be approximately 33,469 dwelling units and the City's population is forecast to approximately 135,000 persons in 2035 with buildout of the General Plan projections. Project phases one through four would occur through 2034, estimating a total of 4,604 dwelling units which would increase population by 19,657 residents, by 2035. This increase in growth is accounted for in the City's General Plan Buildout and would occur through 2035. The City's housing stock is forecasted to be approximately 35,600 dwelling units and the City's population is forecast to approximately 153,080 persons in 2050 with buildout of SCAG projections. The Project's housing stock is forecasted to be approximately 9,538 dwelling units and the Project's population is forecast to approximately 40,537 persons in 2045 with buildout. This increase in growth is accounted for within SCAG projections.

Table 4.12-8: Project Land Use and Population Projections

Description	Existing (2022)[1]	General Plan Buildout (2035)[2]	SCAG Projections (2050)[4]	Proposed Project (2045)[5]
Residential Land Uses (Dwelling Units)	10,178 Dwelling Units	33,469 Dwelling Units	35,600 Dwelling Units	9,538 Dwelling Units
Persons per Household	4.25	4.03[3]	4.3	4.25[6]
Population (Persons)	42,158 Persons	135,000 Persons	153,080 Persons	40,537 Persons

Notes:

1. State of California Department of Finance. 2022. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2021-2022 with 2020 Census Benchmark. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/(accessed October 2025).
2. City of Coachella. 2015. General Plan 2035 Draft Environmental Impact Report, Section 4.13, Population and Housing, page 4.13-8. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.13_-_population_housing.pdf (accessed December 2022).
3. 135,000 persons / 33,469 Dwelling Units = 4.03 persons per household
4. SCAG. (2024). *SCAG RTP/SCS: Connect SoCal Plan – Demographics and Growth Forecast*. https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed July 2025)
5. Table 3-3: Plan Areas Summary
6. State of California Department of Finance. 2022. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2022 with 2020 Census Benchmark. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/. (accessed October 2025).

Employment Growth

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with the increase in project population and thus reducing or removing the barriers to growth. This can occur in suburban or rural areas where population growth results in increased demand for service and commodity markets responding to the new population. This type of growth is, however, a regional phenomenon resulting from introduction of a major employment center or regionally significant housing projects. Additional commercial uses may be drawn to the area by the increased number of residents in the area as a result of the Project; however, it is expected that any such development

associated with the Project would occur consistent with planned growth identified in the City's General Plan.

As identified in **Table 3-3: Plan Areas Summary** and **Table 4.12-9: Anticipated Employment Opportunities** below, the projected number of employees that would result from the implementation of the Project was calculated based on the County of Riverside General Plan factors as the City of Coachella does not have City-specific employment generation factors. The Project would provide new additional commercial, residential, educational, employment, and recreational opportunities for residents and visitors within the City, spread out among the five villages resulting in the generation of up to 4,314 job opportunities. Currently, the City has a 22,077-person workforce. The Project would be developed in six phases, an increase in demand in employment is not anticipated to impact 2035 buildout of the City General Plan. Project phases one through four would occur through 2034, estimating a total of 4,604 dwelling units which would increase population by 19,657 residents, by 2035, and generate less than 4,000 jobs. Although the Project could result in an increase of up to 4,000 jobs, this increase in employment is accounted for in the City's General Plan Buildout of 32,000 employees and would occur through 2035. According to the 2024-2050 RTP/SCS, the City is projected to experience an increase in employment of 1,423 jobs by 2045 for a total of 23,500 jobs.[22] Project employment opportunities are expected to be filled by the locally and regionally employed and unemployed. The estimated generation of 4,314 job opportunities is within the 2050 SCAG projected job total of 23,200 for the City.

Table 4.12-9: Anticipated Employment Opportunities

Land Use	Units	Employment Generation Factor	Total Employees
Village A,B,C,D,E			
Commercial (Mixed-Use and Entertainment)	2,040,518 square feet	1 employee/500 sf of commercial retail use[1]	4,081
Agriculture	68 acres	0.05 employee / acre[1]	3.4
Open Space (Parks, Greenways, and Amenity Centers)	379 acres	0.15 employee / acre[1]	56.85
Institutional (1 middle school; DSUSD)	8,380 dwelling units	0.0867[2]	34.2[4]
Institutional (2 elementary schools; DSUSD)	8,380 dwelling units	0.1543[2]	121.7[5]
Institutional (1 elementary school; CVUSD)	1,156 dwelling units	0.2942[3]	16.9[6]
		Total	4,314

Source:
[1] County of Riverside. 2015. Volume 1: Draft Program EIR No. 521, State Clearinghouse No. 2009041065, Part 1 of 2 – Table 4.1-D, Employment Factors. Page 4.1-6. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2015-DEIR-521-DEIR-No.-521.pdf
[2] Desert Sands Unified School District (DSUSD). 2020. Fee Justification Study for New Residential and Commercial/Industrial Development, Table VI District Wide Student Generation Rate. https://cdnsm5-ss18.sharpschool.com/Userfiles/DBFiles/server_24405182/202005/30304416.pdf. (accessed October 2025).

[22] SCAG. 2020. *Current Context Demographics and Growth Forecast*. Page 29. Los Angeles, CA: SCAG https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/. (accessed September 2022).

Land Use	Units	Employment Generation Factor	Total Employees

[3] Coachella Valley Unified School District (CVUSD). 2022. Fee Justification Study for New Residential and Commercial/Industrial Development. https://resources.finalsite.net/images/v1667510285/cvusdus/yqk5hsau0ixfqot1kezu/CVUSDFeeJustReportDraft11-2-2022Final.pdf. (accessed December 2022).

[4] Project generated 8,380 Dwelling Units x 0.0867 DSUSD student generation factor for 1 middle school = 727 students. Teachers per Student ratio = 22.7:1. https://www.ed-data.org/district/Riverside/Desert-Sands-Unified. Administrators and Pupil Services per Student is 334.6:1. https://www.ed-data.org/district/Riverside/Desert-Sands-Unified. 32 teachers generated plus 2.2 administrative and pupil services generated = 34.2 employees generated per Project.

[5] Project generated 8,380 Dwelling Units x 0.1543 DSUSD student generation factor for 2 elementary schools = 2,586 students. Teachers per Student ratio = 22.7:1. https://www.ed-data.org/district/Riverside/Desert-Sands-Unified. Administrators and Pupil Services per Student is 334.6:1. https://www.ed-data.org/district/Riverside/Desert-Sands-Unified. 114 teachers generated plus 7.7 administrative and pupil services generated = 121.7 employees generated per Project.

[6] Project generated 1,156 Dwelling Units x 0.2942 CVUSD student generation factor for 1 elementary school = 340 students. Teachers per Student ratio = 21.9:1. https://www.ed-data.org/district/Riverside/Coachella-Valley-Unified. Administrators and Pupil Services per Student is 247.4:1. https://www.ed-data.org/district/Riverside/Coachella-Valley-Unified. 15.5 teachers generated plus 1.4 administrative and pupil services generated = 16.9 employees generated per Project.

Population Growth

As previously noted, the City's population has grown steadily over the past decades. As identified in **Table 4.12-2**, SCAG population projections estimate the City's population will reach nearly 153,080 persons by 2050. As previously identified in **Section 3.0: Project Description**, **Table 3-3: Plan Areas Summary,** the Project could result in the development of up to 9,538 dwelling units. Utilizing the DOF factor of 4.25 people per household[23] and, assuming every resident was a new citizen of the City, these residential uses would result in a population increase in the City of up to 40,537 people.[24]

There is also the potential that relocating for Project employment (4,314) could generate additional population. This analysis assumes 118 of these employees would relocate from elsewhere and newly establish themselves in Coachella.[25] Assuming 118 employees and 4.25 PPH, the Project's forecast population growth due to employment opportunities is approximately 502 persons. Combined growth due proposed housing and jobs is 41,030

As discussed in **Table 4.12-2** above, the City's population in 2022, is 42,158 residents and is expected to increase to 153,080 residents by 2050. Project development could result in a population increase of up to 41,030 residents by 2045. Cumulative development for the current City population and Project is 82,188 residents by 2045. Full buildout for the City's General Plan is approximated for 2035; however, Project approximate buildout is estimated for 2045. As the Project would be developed in six phases, an increase in demand in housing is not anticipated to impact 2035 buildout of the City General Plan. Project phases one through four would occur through 2034, estimating a total of 4,604 dwelling units which would increase population by 19,657 residents, by 2035.[26] Although the Project could result in a population increase of up to 19,657 people by 2035, this increase in population is accounted for in the City's General Plan Buildout of 135,000 which would occur through 2035 (see additional discussion below). The

[23] State of California, DOF. 2022. E-5 Population Estimates for Cities, Counties, and the State, 2020-2022, with 2020 Census Benchmark. Sacramento, California. Retrieved at https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2021/ (September 2022).

[24] 4.25 people/household × 9,538 dwelling units = 40,537 people.

[25] Data from the Joint Center for Housing Studies of Harvard University found that approximately 13 percent of Americans move each year, and of those 21 percent move for job-related reasons. This analysis assumes an employee population of 4,314. 13 percent of 4,314 is 561 people and 21 percent of 561 people is 118 people. Therefore, the project is estimated to generate 118 new employees in Coachella. https://www.jchs.harvard.edu/blog/who-is-moving-and-why-seven-questions-about-residential-mobility.

[26] 4.25 people/household x 4,604 dwelling units = 19,567 people.

cumulative development of current population with the anticipated Project residents estimates to about 82,188 residents. This increase in population is accounted for in the City's General Plan Buildout of 135,000 residents by 2035, and SCAG projections of 153,080 by 2050, and would occur through 2045, approximate build out of the Project; see **Table 4.12-8**.

Additionally, the Project site is presently composed of one General Plan land use designation, Resort District, which allows for residential, lodging, recreational, and support retail and commercial services, including theme parks, sports venues and specialized entertainment uses. Within the Resort District, the Project site would allow up to 10,944 dwelling units (estimated at eight Dwelling Units/Acre).[27,28] However, this designation is proposed to be modified through a General Plan Amendment under the Project. This General Plan Amendment would allow for the maximum development of 9,538 residential dwelling units, inclusive of a maximum of 305 acres of mixed-use development which includes a maximum of 844 multiple-family dwelling units. The Project would generate fewer dwelling units than what is forecasted for Resort District. Therefore, the Project would not exceed the amount of dwelling units allowed within the General Plan. Further, upon approval of the General Plan Amendment and Zone Change for the Project site, the Project would align with the City's goals for regional growth as accounted for in the City's General Plan buildout and SCAG projections. Therefore, implementation of the Project would have a less than significant impact related to population growth as a greater increase in population has already been taken into account at the City and regional levels.

Housing Units

Table 4.12-4 shows the City's past and present housing supply data. As noted in **Table 4.12-4**, the City's 2022 housing supply totaled 10,178 units, with an average of 4.25 persons per household. The City's 2022 housing supply represents 1.2 percent of the County's total 2022 housing supply. Based on SCAG's Connect SoCal growth forecast for the City, the City's total number of housing units is forecasted to increase to 35,600 by 2050, representing a significant increase of 250 percent over the existing 2022 housing units. The Project would introduce approximately 9,538 housing units to the City, with a mix of very low to high density units, by 2045. As depicted in **Table 4.12-8,** the City's housing stock is forecasted to be approximately 43,005 dwelling units, with cumulative buildout of the General Plan and the Project; and approximately 45,138 dwelling units, in 2050 with cumulative buildout of SCAG projections and the Project.

The approximately 9,538 housing units represent 27 percent of the SCAG forecasted 35,600 housing units by 2050, which is based on existing General Plan buildout assumptions. The Project's housing units are, therefore, accounted for the SCAG projections and would not result in unplanned growth. Additionally, as the Project will be developed in six phases, an increase in demand in housing is not anticipated to impact 2035 buildout of the City General Plan. Project phases one through four would occur through 2034, estimating a total of 4,604 housing units. These approximately 4,604 housing units represent 14 percent of the City's General Plan buildout estimation of 33,469 housing units by 2035. Furthermore, the Project

[27] City of Coachella. 2015. General Plan, Page 04-45. https://www.coachella.org/home/showpublisheddocument/3221/635712771850800000.
[28] Land uses not designated for open space/drainage facilities were utilized to estimate the maximum amount of dwelling units per acre according to the Resort District designation (1,368/2,807 acres * 8 dwelling units/acre = 10,944 dwelling units).

would be consistent with City policies such as City Housing Element Policy 1.2, which encourages a range of housing densities be provided for all economic segments of the community consistent with good planning practice. The Project is consistent with the planned future growth of the City's General Plan and would generate fewer dwelling units than what is forecasted for Resort District. Because the Project would introduce a variety of very low to high density housing units, this would align with the City's goals for future growth.

Therefore, Project implementation would have a less than significant impact related to housing growth as the Project's related housing growth impacts are not anticipated to be significant since the City is forecasted for a 250 percent increase in housing by 2050, and this increase would be adequately served by the additional 9,538 housing units provided by the Project.

Off-site Impacts

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site circulation and utility improvements would not stimulate population growth nor the need for additional housing. Nor would they result in any residential displacements. These off-site improvements would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including population and housing resources. No impact to population and housing would occur as a result of the off-site improvements.

CONCLUSION

As noted above, the Project would generate approximately 41,030 new residents and 9,538 additional housing units, in the City. All growth is planned and consistent with and according to the City General Plan, the City's Draft Housing Element Update policies, and the SCAG Connect SoCal Plan. A less than significant impact is expected to occur.

Mitigation Measures

No mitigation is necessary.

Impact 4.12-2: Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Level of Significance: No Impact

CONSTRUCTION AND OPERATION

The Project site is currently vacant and undeveloped. In addition, the Project site has not been historically utilized for residential uses, and no residential structures are currently located within the Project limits. Therefore, implementation of the proposed project would not result in the displacement of substantial numbers of people, and no mitigation is necessary. No impact would occur.

Off-Site Impacts

See Impact 4.1-1 above. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site circulation and utility improvements would not stimulate population growth, the need for additional housing, nor would they result in any residential displacements. These off-site improvements would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including population and housing resources. No impact to population and housing would occur as a result of the off-site improvements.

Mitigation Measures

No mitigation is necessary.

4.12.5 CUMULATIVE IMPACTS

As defined in the CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for population and housing. The cumulative study area used to assess potential cumulative population and housing impacts includes the City of Coachella and the County of Riverside because employees at the proposed Project site may live outside the City's jurisdictional boundaries.

According to the County of Riverside EIR No. 521 (a companion document to the County GP which analyzes impacts of the GP and mitigation), buildout of the Riverside County GP would result in a less than significant impact with GP policies implemented for population and housing.[29] According to the City of Coachella GP 2035 EIR, buildout of the Coachella GP would result in less than significant impacts to population and housing.[30]

The City's housing stock is forecasted to be approximately 33,469 dwelling units, the City's population is forecast to approximately 135,000 persons, and provide approximately 32,000 jobs in 2035 with buildout of the General Plan and the Project. The City's housing stock is forecasted to be approximately 35,600 dwelling units, the City's population is forecast to approximately 153,080 persons and provide approximately 23,200 jobs in 2050 with buildout of SCAG projections and the Project. As shown in **Table 4.12-2**, SCAG projects the City population to increase to 153,080 persons by 2050. Similarly, SCAG projects City employment to increase to 23,200 jobs by 2050 and the County employment to increase to 1,185,000 jobs by 2050. As discussed previously, the Project would potentially increase employment in the City by 4,314 employees and its population by 41,030 people. The Project includes development of a variety of uses including residential and commercial. Commercial uses are typically developed to provide a sound and diversified economic base and ample employment opportunities for the citizens of Coachella. The Project together with other commercial and residential developments within the City would serve an

[29] Riverside County. 2015. County of Riverside Environmental Impact Report No. 521. Page 4.3-21. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2015-DEIR-521-DEIR-No.-521.pdf (accessed October 2025).

[30] City of Coachella. 2014. Section 4.13 Population and Housing. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.13_-_population_housing.pdf (accessed November 2022).

existing demand for employment, while also meeting the cumulative demand of employment that would result from the City's projected future population. These increases for population, housing, and employment are accounted for within the forecasted total projected growth for 2045. Implementation of the Project would not result in a cumulatively significant population or housing impact and the Project land uses would not significantly induce growth in areas where growth was not previously anticipated.

4.12.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable population and housing impacts have been identified.

4.12.7 REFERENCES

6th Cycle Regional Housing Needs Assessment Final Allocation Plan, 1/1/2021–10/1/2029, Southern California Association of Governments, March 2021.

California Housing Element Manual –5th Edition, Law, Advocacy, and Litigation, California Affordable Housing Law Project of The Public Interest Law Project, March 2023. https://assets-global.website-files.com/63d82febb450e64e1fb3eb47/6449d46ea51b974a74ce400b_California%20Housing%20Element%20Manual,%20Law,%20Advocacy,%20and%20Litigation,%205th%20Edition,%20March%202023.pdf.

City of Coachella. 2014. Section 4.13 Population and Housing. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.13_-_population_housing.pdf.

City of Coachella. 2015. City of Coachella General Plan – Housing Element. https://www.coachella.org/home/showpublisheddocument/8427/637819141838130000.

Review of the City of Coachella's 6th Cycle. 2021-2029. Draft Housing Element, Department of Housing and Community Development, Division of Housing Policy Development, State of California – Business, Transportation, and Housing Agency, letter dated November 24, 2021. https://www.hcd.ca.gov/community-development/housing-element/docs/rivCoachellaDraftout112421.pdf.

Riverside County. 2008. Appendix E: Socioeconomic Build-Out Projections Assumptions & Methodology, https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2016-appendices-Appendix-E-1-120815.pdf.

Riverside County. 2015. County of Riverside Environmental Impact Report No. 521. Page 4.3-21. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2015-DEIR-521-DEIR-No.-521.pdf.

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State of California, DOF. 2020. E-5 Population Estimates for Cities, Counties, and the States, 2010-2020, with 2010 Census Benchmark. Sacramento, California. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2020/.

State of California, DOF. 2025. E-5 Population Estimates for Cities, Counties, and the State, 2020-2025, with 2020 Census Benchmark. Sacramento, California. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/.

USCB. 2022. 2020 America Community Survey 5-Year Estimates Data Profiles. Selected Employment Characteristics. https://data.census.gov/cedsci/table?t=Employment&g=0500000US06065&tid=ACSDP5Y2020.DP03&moe=false.

4.13 PUBLIC SERVICES

This section evaluates potential Project impacts on the City of Coachella's (City) existing public services by identifying anticipated demand and evaluating its relationship to existing and planned public services facilities and availability. Per CEQA, this EIR emphasizes impacts to public services by the Project that could require construction or expansion of existing public service facilities resulting in a physical impact on the environment. For purposes of this EIR, public services consist of fire and police protection, schools, parks, and library services. Information provided in this section was primarily obtained from the City's General Plan Update 2035 (Coachella GP) and the City's Municipal Code (MC).

In addition, this section describes the environmental and regulatory setting for public services, as it pertains to implementation of the proposed Project. Information given in this section is based on resource information obtained from available public resources including, but not limited to, the Coachella GP. The analyses for each Project component are considered with respect to the applicable plan, policy, or regulation of the agency with jurisdiction over that Project component.

The environmental setting discussion is based largely on review of relevant documents and information, review of aerial photographs and field observations of the area conducted by Kimley-Horn staff in August 2022 and renderings and maps of the Project and its surroundings. Other information in this section, such as regulatory framework, is derived from the various planning documents including the Coachella GP, Coachella MC, and pertinent State of California Building Codes.

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts on public services. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors such as the potential to adversely impact governmental facilities.

4.13.1 ENVIRONMENTAL SETTING

CITY OF COACHELLA PUBLIC SERVICES

Fire Protection

The Specific Plan area would be served by the Riverside County Fire Department (RCFD). The nearest fire station within City of Coachella jurisdictional boundaries is Fire Station No. 79, located at 1377 Sixth Street in Coachella. The fire station is approximately five road miles from the Project entrance via Vista Del Norte, which would be constructed within Phase I of Project construction. The proposed extension of Avenue 50 and the proposed I-10/Avenue 50 interchange would provide more direct access between the station and the Project site. Fire Station 87, within the City of Indio, is located 3.8 road miles away from the Project

Vista Del Norte entrance. Two other stations are close to Coachella, including Station No. 87 located at 42-9010 Golf Center Parkway, Indio, approximately 3.8 road miles northwest from the Project Vista Del Norte entrance and Station No. 86 located at Jackson and 47th Street in Indio.

The RCFD is responsible for providing fire suppression and emergency medical services to the residents and businesses of Coachella. Additionally, the Office of the County Fire Marshal works in conjunction with the City's Housing, Code Enforcement, and Building Divisions to ensure that all new construction and remodels are built in compliance with local and State building and fire codes, including the provision of adequate emergency access and on-site fire protection measures.

The RCFD currently oversees approximately 97 fire stations located throughout the County of Riverside to provide service to residents and visitors of the County, 20 partner cities, local cooperator fire agencies, and the State.[1] In addition, the Emergency Medical Services (EMS) Bureau is responsible for ensuring that EMS provided by the RCFD meet and exceed standards of care in accordance with applicable protocols and laws.

Additionally, a fire station is planned to serve the La Entrada Specific Plan area. The La Entrada Specific Plan encompasses a 2,200-acre area within the City of Coachella and its Sphere of Influence, located south of Interstate (I-) 10 and the proposed KPC Coachella Specific Plan area. The Project would be connected to the La Entrada Specific Plan area via a planned extension of Avenue 50 and a new interchange with I-10. The La Entrada Specific Plan fire station would be planned at a site approved by the fire department and that maximizes emergency service considerations like response area, traffic, and vehicle/pedestrian circulation. The planned La Entrada fire station would be funded by revenues from approved Development Impact Fees which establish a charge per residential unit on new subdivisions for fire.[2]

Police Protection

The Riverside County Sheriff's Department (RCSD), which is contracted to provide comprehensive law enforcement services through the Coachella Police Department (CPD), currently provides services to the Specific Plan area. The RCSD operates 11 Patrol Stations with the closest station to the Project Site located at 86625 Airport Boulevard, approximately nine road miles south of the Project site. Staff levels include 32 sworn officers. Of these, 19 are dedicated to the patrol division and the remaining are dedicated to special assignments (e.g., Community Action Team, School Resource Officers, and Gang and Narcotics Enforcement). The Thermal Station serves the eastern half of the Coachella Valley, including the Cities of Coachella and La Quinta, the Southern Coachella Valley Community Services District, and other incorporated areas, communities, and tribal nations.

Additionally, a police station is planned to serve the La Entrada Specific Plan area. The planned La Entrada police station will be funded primarily by revenues from approved Development Impact Fees which establish a charge per residential unit and per square foot of non-residential space on new subdivisions

[1] Bryan White. 2022. *Proposed KPC Development – Request for information: Fire Protection Services.*
[2] City of Coachella. 2013. *La Entrada Specific Plan*. Page 2-66 through 2-68. https://laentradacommunity.com/ (accessed May 2023).

for police. The revenue from these charges offsets the estimated general fund police costs of new residential development.[3]

The CPD also employs investigators, the Chief of Police, the Assistant Chief of Police, one sergeant, and multiple volunteers. The Department currently has 36 sworn officers and two non-sworn personnel for a total of 38 positions. With a population of approximately 42,158 residents, the ratio of sworn officers to residents is currently 0.85 or approximately 1 officer/1,000 residents.[4] These current staffing levels do not meet the City's General Plan Update 2035 or the RCSD's recommendations of 1.3 and 1.2 staff per 1,000 residents, respectively.

In addition to law enforcement services provided by the CPD and RCSD, the California Highway Patrol (CHP) provides law enforcement services along I-10 and SR 86 in the vicinity of the Project site. The nearest CHP off is in Indio at 79650 Varner Road, Indio, CA 92203.

Schools

The Specific Plan area is within both the Desert Sands Unified School District (DSUSD) and the Coachella Valley Unified School District (CVUSD). **Exhibit 4.13-1: School Districts Map** shows that approximately 2,237 acres of the Project site are within the DSUSD and approximately 570 acres are within the CVUSD. The DSUSD consists of two early childhood education programs, 20 elementary schools, one charter elementary school, eight middle schools, one charter middle school, seven comprehensive high schools, and one continuation high school. The 2024-2025 student enrollment for DSUSD was 25,615 students.[5]

CVUSD consists of 14 elementary schools, four middle schools, four high schools, and one adult school. The 2024-2025 student enrollment for CVUSD was 16,052 students. The following schools are within four miles of the Project site:

- Martin Van Buren Elementary School at 47733 Van Buren Street, Indio (DSUSD)
- Andrew Jackson Elementary School at 82850 Kenner Avenue, Indio (DSUSD)
- Amistad High (Continuation) School at 83501 Dillon Avenue, Indio (DSUSD)
- Theodore Roosevelt Elementary School at 83200 Drive Carreon Boulevard, Indio (DSUSD)
- Roosevelt Elementary School at 83200 Drive Carreon Boulevard, Indio (DSUSD)
- Campesinos Unidos at 51996 Tyler Street, Coachella (CVUSD)
- Coral Mountain Academy at 51375 Van Buren Street (CVUSD)
- Valle Del Sol Elementary School at 51433 Education Way, Coachella (CVUSD)
- Valley View Elementary School at 85270 Valley Road, Coachella (CVUSD)

[3] City of Coachella. 2013. *La Entrada Specific Plan*. Page 2-66 through 2-68. https://laentradacommunity.com/. (accessed May 2023). With a 2022 population of 42,158 persons, and 36 sworn personnel currently with the Coachella Police Department, the current ratio of sworn officers to residents is currently 0.85. ([36 police personnel/[42,158 residents/1000 residents]=0.85 sworn officers per 1,000 residents).

[5] California Department of Education. 2025. *DataQuest*. https://dq.cde.ca.gov/dataquest/ (accessed August 2025).

- Peter Pendleton Elementary School at 84750 Calle Rojo, Coachella (CVUSD)
- Palm View Elementary School at 1390 7th Street, Coachella (CVUSD)

Based on **Exhibit 3-7: Village Organization**, the Specific Plan identifies sites planned for 2 elementary schools and 1 middle school within the DSUSD and 1 elementary school, as well as a proposed Agricultural Educational Center in Village E that could provide classes and programs on topics such as gardening, food production, and the local ecosystem.

The closest elementary school to the Project site is Martin Van Buren Elementary School (DSUSD) located approximately 2.8 miles southwest of the Project site. In 2023-2024, enrollment at Martin Van Buren Elementary School was 535 students. The closest middle school is Desert Ridge Academy (DSUSD), located approximately 8.0 miles west of the Project site. During the 2023-2024 school year, this school has a total of 1,018 students enrolled. The closest high school to the Project site is Amistad High (Continuation) School located approximately 3.5 miles northwest of the Project site. Enrollment at this school was 196 during the 2023-2024 school year.[6]

Additionally, the La Entrada Specific Plan allocated four school sites, three elementary and one middle school site, ranging from 14 to 25 acres, which would be offered to the CVUSD to accommodate the estimated 5,970 additional students that the La Entrada project would generate upon project buildout. Buildout of the La Entrada Specific Plan is anticipated to take place through approximately 2045. However, if the CVUSD does not take the school sites upon project build-out or upon written communication from CVUSD that school sites are not needed, the school sites will revert to an underlying Low Density residential land use.[7]

PARKS/TRAILS

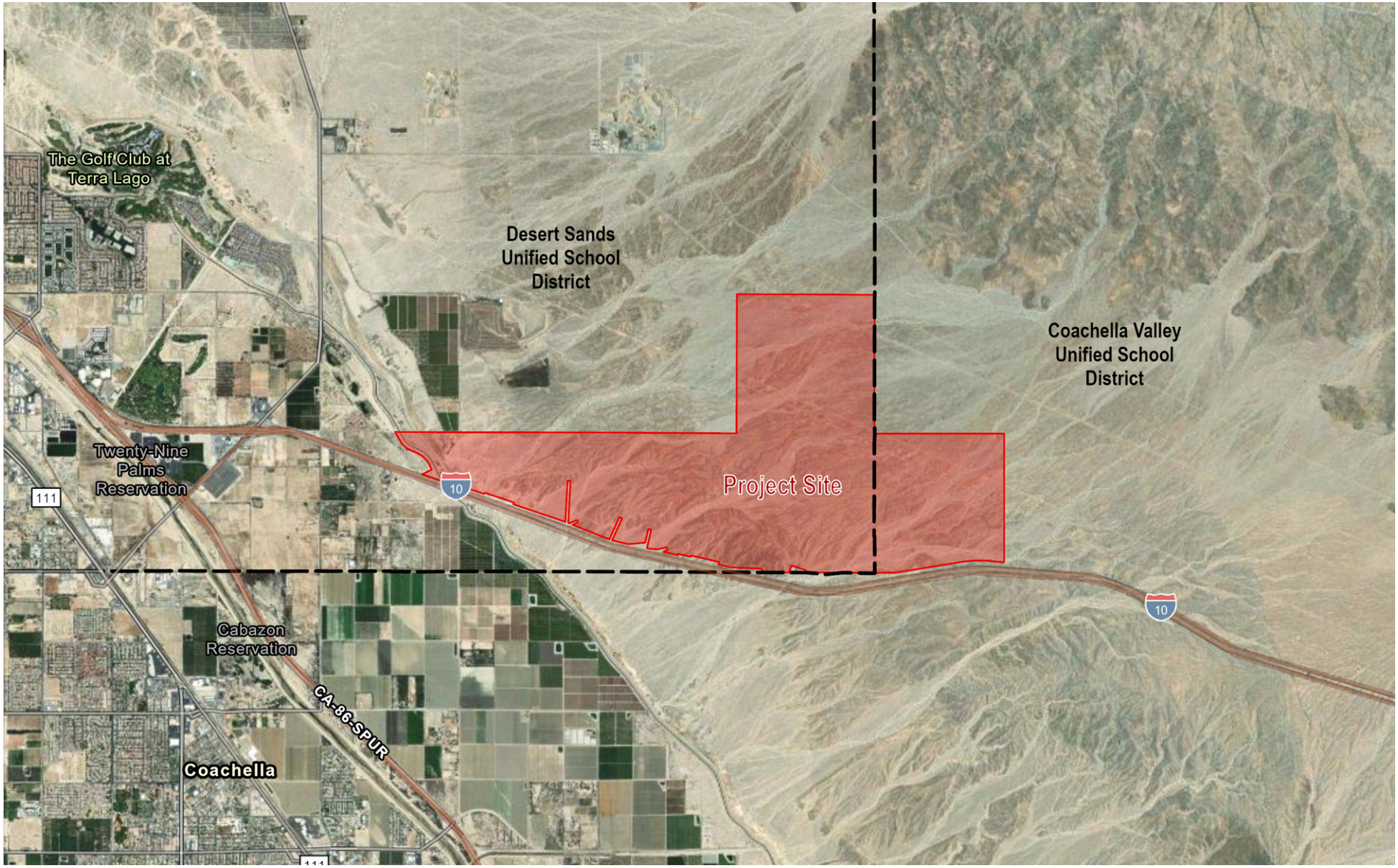
There are seven public parks, three mini parks, two community parks, two neighborhood parks, and one tot lot in the City, totaling approximately 60.2 acres of parkland.[8] Other recreational facilities are the Coachella Valley Boxing Club, Jack Delgado Karate Club, the Eleanor Shadowen Senior Citizen Center, and the Bagdouma Pool and Community Center.[9] The nearest hiking trail, the Indio Hills trail, is located approximately 3.24 miles from the Project site.[10] The closest walking trails to the Project site are three mini parks at Placitas de la Paz Parks located in the housing subdivision at Avenue 50 and Frederick Street, approximately 2.9 miles southwest of Project site.[11] Within the Project site, there are various proposed recreational facilities, including a sports complex, cycling park, central park, and a sports field and trail connectors. There are also various circulation paths for residents, employees, and visitors to walk throughout the Project site.

[6] National Center for Education Statistics. 2025. *Search for Public Schools.* https://nces.ed.gov/ccd/schoolsearch/school_list.asp?Search=1&DistrictID=0611110. (accessed August 2025).
[7] City of Coachella. 2013. *La Entrada Specific Plan*. Page 2-66 through 2-68. https://laentradacommunity.com/. (accessed May 2023).
[8] City of Coachella. 2014. *Coachella General Plan Update Draft EIR*, Table 4.15-6: City of Coachella Parks. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.15_-_public_services.pdf. (accessed January 2023).
[9] City of Coachella. 2022. *Parks and Recreation*. https://www.coachella.org/residents/parks-and-recreation. (accessed July 2022).
[10] Google Maps. 2022. https://www.google.com/maps/search/trail/@33.7212382,-116.207991,14400m/data=!3m1!1e3. (accessed December 2022).
[11] City of Coachella. 2006. *City of Coachella, California Parks and Recreation Master Plan.* Page 16. https://www.coachella.org/home/showpublisheddocument/1450/635176278696970000. (accessed July 2022).

Public Libraries

The Riverside County Library System (RCLS) consists of 34 libraries and two bookmobiles serving the County. Residents may obtain a free RCLS card and gain access to all library resources. Existing libraries within the vicinity of the Project site include the RCLS Coachella Branch at 1500 Sixth Street, Coachella and the Indio Branch at 200 Civic Center Mall. These are located 5.4 and 4.6 road miles from the Project site, respectively. Other libraries include the Riverside County Law Library, Indio Branch at 82-995 US Highway 111, Indio which is located 4.5 road miles from the Project site.

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Project Site School Districts Boundary

EXHIBIT 4.13-1: S ool istri ts ap
KPC Coachella Specific Plan Project
City of Coachella

Not to scale

Kimley»Horn

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4.13.2 REGULATORY SETTING

FEDERAL

National Fire Protection Association

The National Fire Protection Association, an organization that develops national standards for the fire service, established a new standard, which contains minimum requirements relating to the organization and deployment of fire suppression operations, emergency medical operations, and special operations to the public by substantially all career fire departments. This proposal is known as "1710" and it established a nationwide standard of four-person Fire Engine staffing.

It should be noted that, according to the RCFD FY 17-18 Service Alternatives, prepared March 7, 2017, the current RCFD staffing standard is a 3-person, municipally staffed, paramedic Type 1 engine company. This standard was enacted by the Board of Supervisors on January 24, 2012. The City's Fire and Emergency Medical Services Master Plan, dated July 2007, acknowledges that it is the recommendation of the Coachella Master Plan that Engine Company Staffing be increased to four firefighters, which is more operationally efficient, would meet the current municipal standard. The City's Fire and Emergency Medical Services Master Plan also states that the construction and occupancy of these facilities will be based on actual development timetables and funded as part of the "development agreements" or as part of a "Cost Share" agreement with adjoining agencies or jurisdictions.

STATE

Mitigation Fee Act (California Government Code Sections 66000 through 66008)

Enacted as Assembly Bill (AB) 1600, the Mitigation Fee Act requires a local agency, such as the City's, establishing, increasing, or imposing an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put. The agency must also demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and between the fee and the type of development Project on which it is to be levied. This Act became enforceable on January 1, 1989.

California State Assembly Bill 2926

The State of California has traditionally been responsible for the funding of local public schools. To assist in providing facilities to serve students generated by new development projects, the State passed AB 2926 in 1986. This bill allowed school districts to collect impact fees from developers of new residential and commercial building space. Development impact fees (DIFs) were also referenced in the Leroy F. Greene School Facilities Act of 1998, which required school districts to contribute a matching share of project costs for construction, modernization, or reconstruction.

California State Assembly Bill 97

Approved in July 2013, AB 97 revises existing regulations related to financing for public schools, by requiring State funding for county superintendents and charter schools that previously received a general-purpose entitlement. The bill authorizes local educational agencies to spend, for any local educational

purpose, the funds previously required to be spent for specified categorical education programs, including, among others, programs for teacher training and class size reduction.

California Senate Bill 50 and California Government Code (Section 65995[b]) and Education Code (Section 17620)

California Senate Bill (SB) 50 places limitations on the power of local governments to require mitigation of school facilities by developers. Under the provisions of SB 50, school districts can collect fees to offset the cost of expanding school capacity, which becomes necessary as development occurs. These fees are determined based on the square footage of proposed uses. As a part of this Bill, school districts must base their long-term facilities needs and costs on long-term population growth in order to qualify for this source of funding. Payment of statutory school fees is deemed to be adequate mitigation of school impacts under CEQA. Prior to SB 50, case law allowed cities to consider and impose conditions to mitigate impacts of new development on school facilities.

SB 50 amended California Government Code Section 65995, which contains limitations on Education Code Section 17620, the statute that authorizes school districts to assess development fees within school district boundaries. Government Code Section 65995(b)(3) requires the maximum square footage assessment for development to be increased every two years, according to inflation adjustments. In January 2024, the State Allocation Board adjusted the allowable statutory fees. Currently, the maximum impact fees allowed by SB 50 are as follows[12]:

- In the case of residential construction, five dollars and seventeen cents ($5.17) per square foot of assessable space.
- In the case of any commercial or industrial construction, eighty-four cents ($0.84) per square foot of chargeable covered and enclosed space. (Gov. Code Section 65995, subd. [b]).

According to California Government Code Section 65995(3)(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities." The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

California Department of Education Code Section 17212.5

The California Department of Education Code Section 17212.5 states that "no school building shall be constructed, reconstructed, or relocated on the trace of a geological fault along which surface rupture can be reasonably expected to occur within the life of the school building."

[12] Coachella Valley Unified School District. 2022. *Fee Justification Study for New Residential and Commercial/Industrial Development*. https://resources.finalsite.net/images/v1667510285/cvusdus/yqk5hsau0ixfqot1kezu/CVUSDFeeJustReportDraft11-2-2022Final.pdf. (accessed May 2024).

California Fire Code

California Code of Regulations (CCR) Title 24, Part 9 (2019 California Fire Code) contains regulations relating to construction and maintenance of buildings, the use of premises, and the management of wildland-urban interface areas, among other issues. The California Fire Code is updated every three years by the California Building Standards Commission and was last updated in 2022 (effective January 1, 2023). The Fire Code sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. Development of the Project would be subject to applicable regulations of the California Fire Code.

Title 8 California Code of Regulations Sections 1270 and 6773

In accordance with CCR, Title 8 Section 1270 “Fire Prevention” and Section 6773 “Fire Protection and Fire Equipment,” the California Occupational Safety and Health Administration (Cal-OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

California Health and Safety Code

State fire regulations are set forth in California Health and Safety Code Section 13000 et seq., and include provisions concerning building standards, fire protection and notification systems, fire protection devices, and fire suppression training, as also set forth in the 2016, 2019, and 2022 CBSC and related updated codes.

Mutual Aid Agreements (MAA)

The Emergency Management Mutual Aid (EMMA) system is a collaborative effort between city and county emergency managers in the Office of Emergency Services (OES) in the coastal, southern, and inland regions of the state. EMMA provides service in the emergency response and recovery efforts at the Southern Regional Emergency Operations Center (REOC), local Emergency Operations Centers (EOCs), the Disaster Field Office (DFO), and community service centers. The purpose of EMMA is to support disaster operations in affected jurisdictions by providing professional emergency management personnel. In accordance with the MAA, local and state emergency managers have responded in support of each other under a variety of plans and procedures.

California Governor’s Office of Emergency Management Agency (Cal-EMA)

In 2009, the State of California passed legislation creating the Cal-EMA and authorizing it to prepare a Standardized Emergency Management System (SEMS) program (Title 19 CCR Section 2400 et seq.), which

sets forth measures by which a jurisdiction should handle emergency disasters. Non-compliance with SEMS could result in the state withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster.

Cal-EMA serves as the lead state agency for emergency management in the state. Cal-EMA coordinates the state response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as these are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system. In California, the SEMS provides the mechanism by which local government requests assistance. Cal-EMA serves as the lead agency for mobilizing the state's resources and obtaining federal resources; it also maintains oversight of the state's mutual aid system.

California Penal Code

All law enforcement agencies within the State of California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers. There are no relevant State regulations pertaining to police protection.

California Building Code

California building standards are published in the CCR, Title 24, also known as the California Building Standards Code (CBSC). The 2019 CBSC (Cal. Code Regs., Title 24) was published July 1, 2022, with an effective date of January 1, 2023. The CBSC, which applies to all applications for building permits, consists of 12 parts that contain administrative regulations for the California Building Standards Commission and for all state agencies that implement or enforce building standards. Local agencies must ensure development complies with the CBSC guidelines. Cities and counties can adopt additional building standards beyond the CBSC. CBSC Part 2, named the California Building Code (CBC), is based upon the 2018 International Building Code. Project construction will comply with the 2022 CBSC.

The Quimby Act

The Quimby Act (California Government Code, Section 66477) was established by the California legislature in 1965 to develop new or rehabilitate existing neighborhood or community park or recreation facilities. This legislation was enacted in response to the need to provide parks and recreation facilities for California's growing communities. The Quimby Act gives the legislative body of a city or county the authority, by ordinance, to require the dedication of land or payment of in-lieu fees, or a combination of both, for park and recreational purposes as a condition of approval of a tract map or parcel map.

California Proposition 12

The Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond Act of 2000 provides funds to preserve open space and repair and improve safety of neighborhood parks in the State of

California; the City's utilizes funds from Proposition 12 for preserving open space and repairing/improving the safety of neighborhood parks.

California Proposition 40

The California Clean Water, Clean Air, and Safe Neighborhood Parks and Coastal Protection Act of 2002 allows California to continue to acquire, develop, restore, and protect parkland, following Proposition 12; the City's utilizes funding from Proposition 40 for acquiring, developing, restoring, and protecting parkland.

LOCAL

City of Coachella General Plan

The City adopted the Coachella GP on April 22, 2015. The Coachella GP guides long-term growth, development, and conservation in the City and the sphere of influence. The following goals and policies of the Coachella GP are relevant to the Project:

Land Use and Community Character Element

The Land Use and Community Character Element is intended to provide a long-term vision, goals and policies for land use and development in Coachella over the next 20 to 30 years.

Goal 8	**Public Facilities and Buildings. A variety of public facilities and buildings throughout the City that improves the quality of life for residents and maintains a high-level of public services.**
Policy 8.2	Phasing of public facilities. Require new parks, open spaces and public facilities be constructed concurrent with, or prior to, the development of each Neighborhood. All required parks, open spaces and public facilities should be constructed before 75 percent of the dwelling units are constructed.
Policy 8.4	Parks and open space. Establish a range of parks and open spaces, including tot lots, neighborhood parks, community parks, plazas/greens and/or greenways/parkways within all new Neighborhoods, Centers and Districts.
Goal 10	**Development requirements. A fair, understandable and predictable approach that ensures new development does not impose a fiscal burden on the City, conforms to regional airport and railroad safety practices, and requires new projects to provide adequate public facilities and services as part of the overall process.**
Policy 10.3	Phasing of Project site improvements. Require that new subdivisions complete the public improvements before occupancy inspections unless a development agreement is implemented.

Community Health and Wellness Element

The Community Health and Wellness Element provides framework and policies that would enhance the social and environmental conditions to improve health outcomes and behaviors, quality of life and social equity. The following goals and polices are applicable to the Project:

Goal 8 **Educational and Community Facilities. Community facilities and school Facilities that support physical activity, civic life and social connections for residents of all ages and interests.**

Policy 8.1 Joint use with schools. Create joint-use agreements with Coachella Valley Unified School District to maximize community use of school facilities and expand school use of City park facilities, where appropriate and community space to expand opportunities for physical activity.

Policy 8.2 School facilities planning. Continued use of CVAG cooperative agreement for school-related projects and consult with the School District in the early planning stages of any new park or school to encourage walkable school design and accessible location. The City would prefer to have schools in existing and new neighborhoods that are multi-story with a smaller campus size verses large school campuses that are not accessible for most students.

Policy 8.3 Neighborhood schools. Prioritize new school locations that maximize the number of students who can walk or bike to school over locations that are further away. Consider reducing parking minimums if the school is accessible.

Policy 8.5 Co-locate parks and schools. Work to acquire park sites adjacent to existing and proposed schools, where possible, and develop these sites as joint use facilities, develop joint use agreements to ensure public accessibility while ensuring safety and security. Provide for sustainable resources to maintain parks.

Policy 8.7 Education impact fees. Coordinate with the school districts in the assessment of the impact of new development on existing public educational facilities.

Policy 8.23 Distributed community centers. Provide every neighborhood with easy access to recreation and service programs by decentralizing community centers and programs.

Policy 8.24 Public Plazas. Create public plazas with shaded urban open space, seating, art and play features near shopping and business districts.

Policy 8.27 Recreational and community programs. Prioritize the continued provision of high quality recreational and community programs since these highly subscribed programs increase social connection, physical activity and quality of life.

Policy 8.28 Range of recreational opportunities. Provide a full range of park and recreational opportunities and active and passive public space for residents.

Sustainability and Natural Environment Element

The Sustainability and Natural Environment Element establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces. The following goals and polices are applicable to the Project:

Goal 10 **Passive Open Space. Preserved open space areas that represent significant aesthetic, cultural, environmental, economic and recreational resources for the community.**

Policy 10.1 Open space network. Require new development to contribute land and/or funding to expand the community's open space network.

Goal 13 **Parks and Open Space. Increased access to parks, recreation, and natural open spaces to support and increase physical activity.**

Policy 13.3 New parks. Ensure existing and new neighborhoods have sufficient access to park facilities that meet the needs of all residents, and increases in new residents do not overburden existing parks.

Policy 13.4 Accessibility to parks. Seek new park locations that will serve residential areas that are more than a quarter mile from an existing or planned park or separated from an existing or planned park by a street that consists of four or more travel lanes. Where possible, parks shall be associated with and connected to the trail network.

Policy 13.5 New development needs. Work with new development to provide at least three acres of parkland for every 1,000 residents and ensure new development complies with this requirement. School playgrounds and fields shall be counted where access is ensured by a joint use agreement.

Policy 13.22 Park fees. Collect land dedications or in lieu fees from new development for the provision of parks and recreation facilities, in pursuit of a minimum parkland standard of three acres per 1,000 residents, as allowed by the California Quimby Act. Establish policies for identifying neighborhoods that have a preference for the physical provision of park and recreation infrastructure over in lieu fees and administer a fee through which new development can provide parkland in lieu of certain development fees.

Infrastructure and Public Services Element

The Infrastructure and Public Services Element establishes the City's long-term goals and policies for establishing and managing its infrastructure systems and public services. The following goals and policies are applicable to the Project:

Goal 7 **Police and Fire Services. Improved public safety, increased fire safety and quality emergency medical services.**

Policy 7.5 Review of new development. Encourage the police department will continue to work with the Community Development Department to review and modify development proposals

to incorporate "defensible space" concepts and other public safety design concepts into new development.

Policy 7.8 Development impacts. Require new development in the City to mitigate project-related impacts to police and fire services.

Policy 7.14 Service funding. Explore funding sources, such as impact fees from development or parcel taxes, to ensure a high level of fire services for the City.

Policy 7.16 Fair-share contributions. Establish a development impact fee program that requires individual development projects to pay fair-share contributions to public safety infrastructure needs.

City of Coachella Municipal Code

Coachella Municipal Code Title 4

Coachella MC Chapter 4.45 – Development Impact Fees establishes required residential and non-residential public facilities development impact fees. Public facilities could include general government facilities; library facilities; park and recreation facilities; street facilities; fire facilities; and police facilities.

Coachella Municipal Code Titles 8 and 9

Coachella MC Title 8 establishes requirements and regulations for the City relating to health and safety and Title 9 establishes requirements and regulations for the City relating to public peace, morals, and welfare.

Coachella Municipal Code Title 16

Subchapter 16.36.060 – Dedication of land and/or payment of fees for park and recreation purposes pursuant to the Quimby Act, of the Coachella MC provides for the dedication of land, payment of fees in lieu thereof, or a combination of both, for park or recreational purposes in conjunction with the approval of a residential development. The City's park dedication requirement is three acres of land for each 1,000 persons residing within a subdivision. In-lieu fees are placed in a separate park trust fund to be used only for the purpose of developing new or rehabilitating existing park and recreational facilities. This ordinance also allows for a credit to be given to private developers when private areas for park and recreational facilities are provided for in a subdivision and such areas are for active recreational uses.

City of Coachella Fire and Emergency Medical Services Master Plan

The City's Fire and Emergency Medical Services Master Plan (July 2007) is the long-range comprehensive Fire and Emergency Medical Services Master Plan document for the City. This plan includes the following components:

- Defines the current and future fire-emergency medical protection environment.
- Defines acceptable life and property risk levels.
- Defines the optimal fire protection-emergency medical system which provides the level of service commensurate with the level of accepted risk.

- Establishes policy in advance of change, permitting control of, rather than reaction to, the fire emergency-medical environment.
- Identifies and justifies the resources necessary to develop and operate the fire protection-emergency medical system.

The Riverside County Fire Department (RCFD) implements the City's Fire and Emergency Medical Services Master Plan 2007. This Master Plan identifies present and future operational needs so that cost effective programs, budgeting and program solutions may be defined, rather than reacting to an undefined fire-emergency medical problem. The RCFD uses response time to determine the need for additional FPER services and facilities.

The availability of sufficient on-site water pressure is also a basic requirement of the RCFD. The RCFD requires sufficient capacity for fire flow for public hydrants at a minimum fire flow 2,500 gallons per minute (gpm) for multi-family residential development, 4,000 gpm for commercial uses, and 2,500 gpm for heavy industrial.

4.13.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning Public Services and Recreation. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant environmental impact if one or more of the following occurs:

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    - Fire protection
    - Police protection
    - Schools
    - Parks
    - Other public facilities

METHODOLOGY AND ASSUMPTIONS

The proposed Project and associated Project Design Features (PDFs) are evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning Public Services and Recreation. In addition to PDFs, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with

the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

PROJECT DESIGN FEATURES

- In addition to the required fire facility fees, a fire station would be required to serve the KPC Coachella community, with the location to be associated with one of the mixed-use planning areas and the location and size to be determined in coordination with the Fire Department.
- The Specific Plan identifies three elementary school and one middle school sites. In addition, the Project includes an overlay for a potential institution of higher learning for which potential uses include a public or private community college, medical, dental, optometry, or chiropractic college, or other similar educational facility.
- The Project would be located entirely with the limits of the City.

4.13.4 PROJECT IMPACTS AND MITIGATION

Impact 4.13-1: ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:***

Fire protection?

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION

Construction may result in temporary lane closures and detours for affected roadway segments. However, the Project is not anticipated to result in any significant emergency access impacts during construction, as described further in **Section 4.14: Transportation**. During construction of the Project, adequate emergency access for emergency vehicles would be maintained along public streets that abut the Project site. The City has adopted an Emergency Operations Plan[13] to identify evacuation routes, emergency facilities, and City personnel and equipment available to effectively deal with emergency situations. The Project shall comply with the City's adopted Emergency Operations Plan. The developer is required to design, construct, and maintain structures, roadways, and facilities to comply with the applicable federal, state, and local requirements related to emergency access and evacuation plans. The proposed plan would be reviewed and approved by the fire marshal during the plan review. All construction activities would be subject to compliance with applicable emergency response and fire safety requirements of RCFD, the California Fire Code, and Coachella MC regulations.

In addition, the Project site is secluded and has no present access that meets fire department standards. The Project would be phased to provide adequate infrastructure to service the Project. During Phase 1,

[13] City of Coachella. 2021. *Emergency Operations Plan.* https://mccmeetingspublic.blob.core.usgovcloudapi.net/coachelaca-meet-9f8743b89337475fb6aa79c328ed82c4/ITEM-Attachment-001-161f355d346b474ca9e536bdf5ca124e.pdf. Accessed July 2023.

direct access to the Project site would be provided from Vista Del Norte and the proposed Avenue 50/I-10 interchange access point, which are adjacent to the Project site. Therefore, these improvements would establish emergency access via Vista Del Norte that would be further enhanced by the eventual construction of Avenue 50 and the I-10/Avenue 50 interchange, thereby improving response times. As discussed in **Section 4.14: Transportation**, implementation of **MM TRF-2, MM TRF-6**, and **Condition of Approval (COA) TRANS-1** and payment of DIFs, the City/Project applicant would provide adequate emergency access during construction and operational activity. **MM TRF-2** would be implemented to reduce potential impacts to less than significant levels, by requiring such measures as adequate signage, emergency service provider notification, and traffic control during construction. **MM TRF-6** and **COA TRANS-1** would ensure that Project construction would not commerce until completion of both the I-10/Avenue 50 Interchange and Vista Del Norte extension. Therefore, compliance with applicable local and state design regulations would ensure that the Project construction would result in a less than significant impact to fire protection services.

OPERATIONS

The Project includes the development of currently vacant land with 1,035 gross acres of residential uses, 305 gross acres of commercial uses including 220 acres of mixed-use commercial, 71 acres of institutional (school) uses, and 1,217 acres of open space and parks/recreation uses. As described further in **Section 4.12: Population and Housing**, the Project would result in a population of approximately 40,536 people[14], as well as up to 4,314 employees[15] associated with the proposed commercial uses on the Project site. This increase in population would result in an increased demand on existing fire facilities and may increase response times.

The RCFD, in cooperation with CAL FIRE, would provide services to the Project. As of 2019, the RCFD has 20 partner cities and 97 fully operational fire stations that are manned seven days per week, 24 hours per day. **Table 4.13-1: Riverside County Fire Department Station Locations and Equipment** summarizes the existing fire stations that are anticipated to serve the Project site. In absence of the Project's proposed fire station, three existing fire stations could be expected to serve the Project: Stations 79, 86, and 87. The Project site is within the jurisdictional boundaries of Coachella Fire Station No. 79, which is approximately five road miles from the Project entrance via Vista Del Norte. Travel time from Station 79 to the southwestern portion of the Project site is estimated at 9 minutes during non-peak hour traffic. Station 79 is equipped one Fire Engine and staffed by 11 personnel including two Battalion Chiefs, three Fire Captains, two Fire Apparatus Engineer, three Firefighter II/Paramedics, and one Firefighter II.[16] During 2022, Fire Station No. 79 responded to 2,297 incidents including 1,496 medical incidents. This is an increase of 35 percent from a 2009 incident level of 1,697 calls for service within the City of Coachella.[17]

[14] Projected population growth is a function of the number of proposed dwelling units and persons per household rate derived from the State of California Department of Finance *Population and Housing Elements*: (9,538 proposed dwelling units * 4.25 persons per household) =40,536 persons.

[15] Projected number of commercial employees (excluding employees from institutional, open space, and agriculture land uses) is calculated by the total square footage of commercial land uses times an employment generation factor derived from the County of Riverside: (2,040,518 sf of commercial land use * [1 employee/500 sf of commercial retail use])=4,081.

[16] Personal communication via email with Marisa Duran of CAL FIRE/Riverside County Fire Department on May 8, 2023.

[17] Bryan White. December 2022. *Proposed KPC Development – Request for information: Fire Protection Services.*

The three existing fire stations closest to the Project site are currently below RCFD's standards of coverage for a four-minute travel time. Although it is anticipated that these stations would be able to accommodate some of the increase in demand for fire services resulting from the Project, because the Project would increase the population in the City by up to 40,536 residents and 4,314 total employees, these existing fire stations would not be able to accommodate the total increase in demand for fire services at time of Project vertical construction improvements.

Table 4.13-1: Riverside County Fire Department Station Locations and Equipment

Station No.	Location[1]	Equipment and Staffing[2]
No. 79	1377 6th Street, Coachella, CA 92236	1 Fire Engine 2 Battalion Chief 3 Fire Captain 2 Fire Apparatus Engineer 3 Firefighter II/Paramedic 1 Firefighter II **Total 11 personnel**
No. 87	42-900 Golf Center Pkwy, Indio, CA 92203	1 Fire Engine 1 Battalion Chief 1 Fire Captain 1 Fire Apparatus Engineer 1 Fire Apparatus Engineer/Paramedic 2 Firefighter II/Paramedic **Total 6 personnel**
No. 86	46-990 Jackson Street, Indio, CA 92201	1 Fire Engine 1 Ladder Truck 1 Medic Ambulance 1 Battalion Chief 2 Fire Captain 3 Fire Captains Tiller 2 Fire Apparatus Engineer 2 Fire Apparatus Engineer Tiller 1 Fire Apparatus Engineer/Paramedic 1 Fire Apparatus/Paramedic Tiller 1 Fire Apparatus Engineer/Hazmat 6 Firefighter II/Paramedic 3 Firefighter II/Paramedic Tiller 2 Firefighter II Tiller 1 Firefighter II Truck **Total 25 personnel**

Source:
[1] Riverside County Fire. (n.d). Riverside County Fire Stations.
[2] Personal communication via email with Marisa Duran of CAL FIRE/Riverside County Fire Department on May 8, 2023.

As discussed further in **Section 4.12: Population and Housing**, the Project's housing stock is forecasted to be approximately 9,538 dwelling units and the Project's population is forecast to approximately 40,536 persons in 2045 with buildout. This increase in growth is accounted for within Southern California Association of Governments' (SCAG) population projections. Under this assumed population growth, the

Coachella GP EIR had concluded that Fire Station 79 alone could not meet the current municipal standard of safety for this future population.

Impacts associated with these land uses are evaluated throughout this Draft EIR. It is likely a project of this size will require that a new fire station facility be constructed to serve the Project site. In order to provide adequate public services to the new KPC Coachella community, the Project includes an on-site fire station in one of the proposed mixed-use planning areas. The station shall be built, equipped, and minimally staffed prior to vertical construction beginning, per **MM PS-1**. Public safety facilities, including fire stations, are permitted in mixed-use and entertainment center uses within the Specific Plan. Phasing will be determined as part of the Conditions of Approval and Development Agreement for the Project. Per the Specific Plan, an on-site fire station would be provided in one of the proposed villages. The location, size, and staffing of the fire station would be determined in coordination with the RCFD and included in the Development Agreement for the Project. In addition to providing on-site fire facilities, the Project applicant would pay applicable fire impact fees as established by the City of Coachella. Future development of public safety facilities within the Specific Plan area, including fire stations, would go through a project level environmental analysis. Note that, with the provision of a new fire station facility, the Project may be subject to certain DIF Credits described in Coachella MC Section 4.45.110 – Project credit. Operation of the proposed Project would generate property and sales taxes that could potentially be used to support the ongoing maintenance and operation of this facility.

Each development project within the Project site would be designed to comply with California Building Standards Code, Chapters 7 and 7A, and the California Fire Code (California Code of Regulations, Title 24, Part 9). In addition, the RCFD provides fire protection engineering, building inspections for code compliance, and hazardous materials inspections. Development of a fire station on the Project site would result in additional staff and facilities that would provide sufficient fire services to the Project at Project build out. In addition, the additional staff provided by the on-site fire station is anticipated to reduce response times within the Project site.

Mitigation Measure (MM) PS-1 would be implemented to ensure that sufficient funding is acquired upon issuance of the 1st building permit to secure construction of the permanent fire station within the Project at a time as required by the RCFD. A fully operational fire station shall be constructed before Developer is permitted to commence with the first on-site Precise Grading Permit associated with the access road improvements. Subsequent to the development of the proposed fire station pursuant to **MM PS-1**, impacts to fire facilities would be less than significant.

OFF-SITE IMPROVEMENTS

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure. Off-site circulation and utility improvements would involve grading and construction equipment. The grading and other construction-related activity would be temporary and would not result in an increased demand for fire protection. As mentioned above, all construction activities would be subject to compliance with applicable emergency response and fire safety requirements of RCFD, the California Fire Code, and Coachella MC regulations. The off-site improvement

areas are spread out to the west and southwest of the Project site, and not concentrated in a single area; as depicted in **Exhibit 3-11: Off-site Improvements**. The conceptual off-site installation and upsizing of domestic water, sewer, and dry utilities, as described in **Section 3.0: Project Description**, would not create an adverse impact to fire protection services.

The off-site improvements are small in scale and predominantly would occur in already disturbed areas. The short-term construction of off-site improvements would not result in a substantial increase in demand for fire protection services. Therefore, the provision of off-site improvements would not result in a need for new or physically altered fire protection facilities such that a substantial adverse impact would occur, nor would construction of these off-site improvements result in an increased demand for fire protection services. In addition, construction of off-site improvements may result in temporary lane closures and detours for affected roadway segments. However, the Project is not anticipated to result in any significant emergency access impacts during construction with implementation of **MM TRF-2** and **MM TRF-6**, as described further in **Section 4.14: Transportation**. Therefore, the off-site improvements would not result in a substantial adverse physical impact to fire protection, and less than significant impact would occur.

Mitigation Measures

Refer to **MM TRF-2** and **MM TRF-6** in **Section 4.14: Transportation**.

MM PS-1 **Funding for Permanent Fire Station.** Upon issuance of the 1st on-site Precise Grading Permit associated with the access road improvements, the Master Developer shall provide a bond to the City sufficient to secure construction of a permanent fire station within the Project. The amount of the bond shall be determined based on the costs for a permanent facility as outlined in the then-current City's Fee Nexus Study, but in no event shall exceed an amount equal to the cost to build a typical (non-headquarter) fire station completed during the last ten (10) years in the Coachella Valley. This would allow for the development of the Fire Station, acquisition of the required equipment and tentative staffing during the early development phases and prior to vertical construction beginning. A fully operational (i.e., built, equipped, and staffed) fire station shall be constructed before Developer is permitted to commence with the release of the 1st (non-utility/infrastructure) occupiable Building Permit and allowing vertical construction. The Fire Station would require an Advanced Life Support Fire Engine staffed 24 hours per day, 365 days per year.

Impact 4.13-2: ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:***

Police protection?

Level of Significance: Less Than Significant

CONSTRUCTION

Project construction does not include or require construction of any new or physically altered police protection facilities. Individual Project construction activities within the Project site would create a temporary incrementally increased demand for police protection services to the construction site of individual projects within the Project site. Prior to commencement of construction activities, the Project plans would be reviewed by applicable local agencies to ensure compliance with the Coachella MC as well as all applicable regulations to ensure adequate site signage, lighting, and other crime safety preventative measures. In addition, construction may result in temporary lane closures and detours for affected roadway segments. However, the Project is not anticipated to result in any significant emergency access impacts during construction, as described further in **Section 4.14: Transportation**. During construction of the Project, adequate emergency access for emergency vehicles would be maintained along public streets that abut the Project site. The City has adopted an Emergency Operations Plan[18] to identify evacuation routes, emergency facilities, and City personnel and equipment available to effectively deal with emergency situations. The Project shall comply with the City's adopted Emergency Operations Plan. The developer is required to design, construct, and maintain structures, roadways, and facilities to comply with the applicable federal, state, and local requirements related to emergency access and evacuation plans. The proposed plan will be reviewed and approved by the fire marshal, and any relevant City departments, during the plan review.

In addition, note that the Project site is secluded and has no present access that meets fire department standards. Direct access to the Project site would be provided from Vista Del Norte and the proposed Avenue 50/I-10 interchange access point, which are adjacent to the Project site. As discussed in **Section 4.14: Transportation**, implementation of **MM TRF-2, MM TRF-6**, and **COA TRANS-1** and payment of DIFs, the City/Project applicant would provide adequate emergency access during construction and operational activity. **MM TRF-2** would be implemented to reduce potential impacts to less than significant levels, by requiring such measures as adequate signage, emergency service provider notification, and traffic control during construction. **MM TRF-6** and **COA TRANS-1** would ensure that Project construction would not commence until completion of both the I-10/Avenue 50 Interchange and Vista Del Norte extension. Therefore, construction of individual projects within the Project site are not anticipated to result in adverse physical impacts associated with the provision of or need for new or physically altered police protection facilities, and would not adversely affect service ratios, response times, or other performance objectives. However, future development projects under the Project would undergo separate, project-specific CEQA review. Impacts would be less than significant in this regard. Compliance with applicable local regulations would ensure that Project construction would result in a less than significant impact to police protection services.

OPERATIONS

The Riverside County Sheriff's Department would provide services to the Project site through the CPD, including receiving and dispatching emergency calls for services (police, fire, medical) via the 911 system;

[18] City of Coachella. 2021. *Emergency Operations Plan.* https://mccmeetingspublic.blob.core.usgovcloudapi.net/coachelaca-meet-9f8743b89337475fb6aa79c328ed82c4/ITEM-Attachment-001-161f355d346b474ca9e536bdf5ca124e.pdf. Accessed July 2023.

responding to police calls for service; providing visible patrols; enforcing all laws; investigating traffic collisions; and providing crime prevention educational programs. Currently, the Riverside County Thermal Sheriff Station serves the City of Coachella. Existing police facilities are located at 86625 Airport Boulevard, in the community of Thermal, approximately 4.5 miles southwest of the Project site.

Individual development projects within the Specific Plan area would be designed to comply with the Coachella MC and applicable KPC Coachella SP design guidelines and development standards, including the following:

- Efficient circulation for pedestrians, vehicles, and police patrols.
- Quality lighting of streets, walkways, bikeways, building entries, plazas or outdoor seating areas, parking lots and structures, and refuse disposal areas.
- Visibility of doors and windows from the street and between buildings.
- Fencing of property.

According to the Coachella GP, the Riverside County Sheriff's Department – which provides law protection operations for the eastern portion of the Coachella Valley – historically recommends 1.3 police officers per 1,000 residents. The City has a current service ratio of 0.85 officers per 1,000 residents and exhibited response times of roughly three minutes for emergency calls. Under the current police protection standard of 1.3 police officers per 1,000 residents, the City is considered underserved, and future population projections would result in an increased need for law enforcement. The Project has the potential to result in a population increase of up to 40,536 and 4,314 total employees of commercial (4,081 employees), agriculture (3.4 employees), open space (56.85 employees), and institutional uses (172.8 total employees). Using the Coachella GP's current standard for police protection, the Project would potentially result in a demand for police protection of up to 53 police personnel.[19]

The Project does not include the construction of any new or physically altered police protection facilities. Additionally, the Riverside County Sheriff's Department does not anticipate the need for any new or modified police protection facilities based on current or projected City population.[20] As discussed in **Section 4.12**, the City's estimated 2024 population as of January 1, 2024 was 44,050 persons. The City's population is forecasted to increase to 129,300 persons by 2045, which equates to an approximate 194 percent increase of population growth between 2024 to 2045. Based on the current and projected City population, the Riverside County Sheriff's Department anticipates adding three personnel by 2045.[21] As discussed further in **Section 4.12**, the Project's housing stock is forecasted to be approximately 9,538 dwelling units and the Project's population is forecast to approximately 40,536 persons in 2045 with buildout. This increase in growth is accounted for within SCAG population projections. Additionally, the nearby La Entrada Specific Plan is proposed to develop a new police station upon La Entrada project buildout. Under this assumed population growth, the Riverside County Sheriff's Departments has concluded that no additional or expanded police protection facilities are required.

[19] To accommodate a projected population growth of 40,536 residents, the proposed fire station Project would potentially result in a demand for police protection of up to 53 police personnel ([1.3 police personnel*40,536 residents]/1000 residents=52.6 police personnel).
[20] Personal communication via email with Lt. Robert Garcia of the Riverside County Sheriff's Department on August 19, 2025.
[21] Ibid.

The Project would be required to compensate for its increased demand through the payment of DIFs in the form of police facility fees, pursuant to Chapter 4.45 of the Coachella MC. As of 2024, Police Facilities Impact Fees were $306.54 per unit for single family units, $257.49 per unit for multi-family units, and between $12.10 and $30.57 per 1,000 square feet of non-residential (commercial, office, industrial) development.[22] Police facility fees would fund future police facilities and equipment that would ensure the Project site and the City have adequate police protection. As mentioned, the Riverside County Sheriff's Department has no current plans for the provision of new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the police protection services. Additionally, public facilities and services would be required concurrent with the proposed development to ensure a high quality of life for residents. With implementation of the aforementioned design guidelines and compliance with the City's goals and policies including the payment of DIFs, development associated with the Project would result in a less than significant impact to police protection services.

OFF-SITE IMPROVEMENTS

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure. Off-site circulation and utility improvements would involve grading and construction equipment. The grading and other construction-related activity would be temporary and would not result in an increased demand for police protection. The off-site improvement areas are spread out to the west and southwest of the Project site and not concentrated in a single area; as depicted in **Exhibit 3-11: Off-site Improvements**. The conceptual off-site installation and upsizing of domestic water, sewer, and dry utilities, as described in **Section 3.0: Project Description**, would not create an adverse impact to police protection services.

The off-site improvements are small in scale and predominantly would occur in already disturbed areas. The short-term construction of off-site improvements would not result in a substantial increase in demand for police services. Therefore, the provision of off-site improvements would not result in a need for new or physically altered police facilities such that a substantial adverse impact would occur, nor would construction of these off-site improvements result in an increased demand for police protection services. In addition, construction of off-site improvements may result in temporary lane closures and detours for affected roadway segments. However, the Project is not anticipated to result in any significant emergency access impacts during construction, as described further in **Section 4.14: Transportation**. Therefore, the off-site improvements would not result in a substantial adverse physical impact to police protection, and less than significant impact would occur.

Mitigation Measures

No mitigation is necessary.

[22] City of Coachella. 2024. City of Coachella Development Impact Fees Annual Report 2024. https://www.coachella.org/home/showpublisheddocument/10692/638905011207570000. (accessed August 2025).

Impact 4.13-3: ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:***

Schools?

Level of Significance: Less than Significant

Both the DSUSD and CVUSD provided written comment to the notice of Public Scoping Meeting during the 30-day NOP public review period. The CVUSD provided conceptual plans for an Agricultural/Natural Resources Academy similar to the proposed Agricultural Educational Center. The DSUSD acknowledged that the DSUSD does not currently have the capacity to provide the needed facilities necessary to accommodate students generated by the Project. The DSUSD desires to arrive at a mutually acceptable level of mitigation to address anticipated impacts on school facilities including: land dedications to the DSUSD in lieu of statutory school fees which would enable additional classrooms to be available; a per dwelling unit mitigation amount to offset the anticipated costs from construction of the new residential development; and the potential formation of a Mello-Roos Community Facilities District to finance mitigation payments for DSUSD.

CONSTRUCTION

Construction activities within the Project site would not impact school facilities or student capacities. Further, construction would be temporary. The nearest schools discussed previously would not be physically altered during the construction phase of the Project. Therefore, there would be no impact.

OPERATIONS

Approximately 71 acres of the Project site are proposed to be utilized for new school facilities – 3 elementary schools and 1 middle school. Based on **Exhibit 3-7: Village Organization**, 2 elementary schools and 1 middle school would be located within the DSUSD and 1 elementary school, as well as a proposed Agricultural Educational Center, would be located within the CVUSD.

The majority of the Project site, approximately 2,237 acres, is within the DSUSD and approximately 570 acres are within the CVUSD. Student generation rates are used by school districts to estimate the number of students generated by new development to determine whether existing school facilities would be adequate for future student enrollment. As identified in **Table 4.13-2: Student Generation**, using these student generation rates for each school district, the development of up to approximately 9,538 residential units in the Project site would introduce approximately 640 students into the attendance area of the CVUSD and 3,028 students into the attendance area of the DSUSD.

Table 4.13-2: Student Generation

School Level	Generation Rate	Number of Units	Students Generated
CVUSD[1]			
Elementary School (Grades TK-6)	0.2942	1,158	341
Middle Schools (Grades 7-8)	0.0849	1,158	98
High School (Grades 9-12)	0.1742	1,158	202
Total	***0.5533***		***641***
DSUSD [2, 3]			
Elementary School	0.1543	8,380	1,293
Middle School	0.0867	8,380	727
High School	0.1203	8,380	1,008
Total	***0.3613***		***3,028***

[1] CVUSD. November 2022. *Fee Justification Study for New Residential and Commercial/Industrial Development*. https://resources.finalsite.net/images/v1667510285/cvusdus/yqk5hsau0ixfqot1kezu/CVUSDFeeJustReportDraft11-2-2022Final.pdf. (accessed December 2022).
[2] DSUSD. February 2020. *Fee Justification Study for New Residential and Commercial/Industrial Development, Table VI District Wide Student Generation Rate*. https://cdnsm5-ss18.sharpschool.com/Userfiles/DBFiles/server_24405182/202005/30304416.pdf. (accessed December 2022).
[3] City of Coachella. October 2014. *General Plan Update Final EIR, 4.15 Public Services*. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.15_-_public_services.pdf. (accessed December 2022).

According to the Coachella GP, development of a new school facility is planned to be located near Monroe and 49th Avenue, within the CVUSD service boundary, approximately 4.8 miles from the Project site that would serve 7th to 12th grades, supporting the high school student population. Additionally, the Project would accommodate the elementary and middle school populations with the proposed on-site schools, which would have locations within both the CVUSD and DSUSD service boundaries; refer to **Exhibit 3-6: Land Use Plan** for proposed school locations. In response to the NOP during the public comment period, DSUSD has stated that the district does not currently have capacity to provide the needed facilities to accommodate anticipated students. Therefore, DSUSD would require new or physically altered facilities, the construction of which could cause significant environmental impacts in order to maintain adequate capacity and potentially other performance objectives prior to mitigation.

School funding comes predominantly from federal, State, and local sources, such as business and personal income taxes, sales tax, and property taxes. California Government Code Section 65995 requires developers to pay the school district a fee at the time of issuance of building permits to offset potential impacts from new development on school facilities. These fees are collected by the district at the time of issuance of building permits. In 2022, CVUSD required approximately $21.83 per square foot of assessable space of new residential development to mitigate impacts to school facilities impacts. Additionally, CVUSD requires between $1.01 and $161.42 per square foot of chargeable covered and enclosed space of commercial/industrial development to mitigate the net school facilities impacts resulting from new commercial and industrial development after the collection of the statutory Level 1 Fee.[23] DSUSD currently requires approximately $5.17 per square foot of new residential development to mitigate impacts to school facilities impacts. Additionally, DSUSD currently requires $0.84 per square foot of commercial

[23] CVUSD. November 2022. Fee Justification Study for New Residential and Commercial/Industrial Development. https://resources.finalsite.net/images/v1667510285/cvusdus/yqk5hsau0ixfqot1kezu/CVUSDFeeJustReportDraft11-2-2022Final.pdf. (accessed December 2022).

development to mitigate the net school facilities impacts resulting from new commercial development.[24] Pursuant to California Government Code Section 65995 and Education Code Section 17620, payment of fees is deemed full and complete mitigation of impacts on school facilities as a matter of law. Payment of statutory school fees is deemed to be adequate mitigation of school impacts under CEQA. Therefore, payment of these fees would offset potential impacts from increased demand for school services associated with development of the Project by providing an adequate financial base to construct and equip new and existing schools.

Therefore, payment of applicable statutory fees to CVUSD, impacts associated with the need for new or physically altered school facilities would be less than significant. Further, while the Project would result in the need for new or physically altered DSUSD school facilities, in order to maintain acceptable service ratios, the Project would not result in a significant impact with the payment of applicable impact fees. A less than significant impact would occur in this regard, and no mitigation is required. Therefore, impacts associated with the need for new or physically altered school facilities would be less than significant.

OFF-SITE IMPROVEMENTS

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure. The off-site improvement areas are spread out to the west and southwest of the Project site, and not concentrated in a single area; as depicted in **Exhibit 3-11: Off-site Improvements**. The conceptual off-site installation and upsizing of domestic water, sewer, and dry utilities, as described in **Section 3.0: Project Description**, would not create an adverse impact to schools. Palm View Elementary school is the nearest to any potential future construction activities involving the upsizing of East-side Trunk Sewer lines or the construction of the proposed off-site well supply system. Palm View Elementary school lies approximately one mile southwest of the nearest off-site improvement, separated by the Whitewater River and Highways 111 and 86 which buffers the school from any potential physical impacts from construction of sewer or well supply improvements.

The off-site improvements are also smaller in scale and predominantly would occur in already disturbed areas not in the proximity of existing schools. The provision of off-site improvements would not result in a need for new or physically altered school facilities such that a substantial adverse impact would occur, nor would construction of these off-site improvements result in an increased demand to schools or inadequate access to schools. Therefore, the off-site improvements would not result in a substantial adverse physical impact to schools, and a less than significant impact would occur.

Mitigation Measures

No mitigation is necessary.

[24] DSUSD. 2024. School Impact/Developer Fees. https://www.dsusd.us/departments/business_services/facilities_services. (accessed August 2025).

Impact 4.13-4: ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:***

Parks?

Level of Significance: Less Than Significant

CONSTRUCTION

Construction activities within the Project site would not impact park facilities. Further, construction would be temporary. The nearest parks discussed previously would not be physically altered during the construction phase of the Project. Therefore, there would be no impact.

OPERATIONS

The Project proposes approximately 395 acres of parks, greenways, and amenity centers as well as 754 acres of natural open space, including drainage channels and recreational trails. The impacts of constructing and operating on-site park and recreational facilities are addressed throughout this EIR. Furthermore, the Project does not propose any off-site park or recreational facilities.

The Project proposes up to 9,538 residential units along with commercial and institutional (school) areas that would create additional demand for park and recreational facilities. This increased need for parks would be addressed through the Project's allocation of 395 acres of park space which would include parks, greenways, and amenity centers. Additionally, approximately 754 acres would remain as natural open space.

The Coachella GP standard for parkland is three acres of parkland per 1,000 people. According to the Coachella GP, the City currently contains approximately 60.2 acres of park, and 109 acres of parkland and open space. At the time of the Coachella GP EIR, the City was deficient in parkland by 61.91 acres and does not meet the current standard for parkland. Under the aforementioned standard for parkland, the City is currently substantially underserved, and future population projections would create a more significant need for parkland. As discussed in **Section 4.12: Population and Housing**, the anticipated increase in population as a result of the Project would be within the total projected growth forecasts for 2045, as accounted for in the Coachella GP EIR. The Project has the potential to result in a population increase of up to 40,536. To maintain the current standard for parkland within the Project site alone, the Project would additionally require approximately 122 acres of parkland.[25] Pursuant to Chapter 4.45 of the Coachella MC, the applicant would be required to pay Development Impact Fees including Park and recreation facilities fees based on the number of dwelling units proposed, that would be used to provide

[25] ([3 acres*40,536 residents]/1000 residents=121.6 acres)

necessary parkland and open space to meet the needs of new residential construction. As of 2024, Park Land Impact Fees were $3,056.94 for single family units and $2,567.83 for multi-family units.[26]

As mentioned above, the Project proposes approximately 395 acres of parks, greenways, and amenity centers as well as 754 acres of publicly accessible natural open space. Parks would connect the surrounding neighborhoods to the natural open space within the community through a series of pedestrian and bicycle trails that run through the Project site. With Project implementation, recreational uses would be permitted within the open space land use designation including pedestrian or equestrian trails, interpretive areas and associated facilities, and public parking. Additionally, sporting and other camps would be permitted within the open space land use designation with a conditional use permit. Pursuant to the Coachella GP, new parks, open spaces and public facilities would be constructed concurrent with, or prior to, the development of each neighborhood. And per the KPC Coachella SP, parks will generally be constructed in the associated development phase. Therefore, while the population growth associated with the Project would result in an increased demand for parks in exceedance of the City's current available parkland, the Project would fully accommodate this increased demand. Therefore, subsequent to the development of the proposed parkland and open space, impacts to parks are anticipated to be less than significant.

OFF-SITE IMPROVEMENTS

The nearest parks discussed previously would not be physically altered during construction of off-site improvements. The off-site installation and upsizing of domestic water, sewer, and dry utilities, as described in **Section 3.0: Project Description**, would not be located in the vicinity of existing parks. Therefore, the off-site improvements would not result in a substantial adverse physical impact to parks, and less than significant impact would occur.

Mitigation Measures

No mitigation is necessary.

Impact 4.13-5: ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:***

Other public facilities?

Level of Significance: Significant and Unavoidable Impact

[26] City of Coachella. 2024. City of Coachella Development Impact Fees Annual Report 2024. https://www.coachella.org/home/showpublisheddocument/10692/638905011207570000. (accessed August 2025).

CONSTRUCTION

Construction activities within the Project site would not impact other public facilities. Further, construction would be temporary. The nearest other public facilities discussed previously would not be physically altered during the construction phase of the Project. Therefore, there would be no impact.

OPERATIONS

The Project does not propose construction of any new or physically altered other public facilities, such as libraries. The Riverside County Library – Coachella Library branch, located at 1500 Sixth Street, approximately 2.5 miles southwest of the Project site, is the only public library located within the City of Coachella. Other nearby libraries available to the future residents of the Project site include the Indio Branch located at 200 Civic Center Mall, Indio, and the Riverside County Law Library – Indio Branch located at 82-995 US Highway 111, Indio.

The Coachella GP standard for libraries is 0.5 square-feet (sf) of library services and 1.2 materials per resident. According to the Coachella GP, the Coachella Library currently consists of a 3,000 square foot (sf) building and contains approximately 28,300 materials. As discussed in **Section 4.12: Population and Housing**, the current population of the City is estimated at approximately 42,158. Under the aforementioned standard for libraries, the City is currently substantially underserved with regards to library square footage and library materials, with a deficit of 18,079 sf and 22,290 materials, respectively. The Project has the potential to result in a population increase of up to 40,536. To maintain the current standard for libraries within the Project site alone, the City would need to provide an additional 20,268 sf of library services and 48,643 library materials to meet the Project's additional demand.[27] Therefore, the Project would result in increased demand for library square footage and materials that would exceed existing library facilities.

Pursuant to Chapter 4.45 of the Coachella MC, the applicant would be required to pay Development Impact Fees including Library Facilities Impact fees based on the number of dwelling units proposed, that would be used for the land acquisition and construction costs of new public libraries throughout the City. As of 2024, Library Facilities Impact fees are $577.88 for single family units and $485.42 for multi-family units.[28] The Project would include four school sites – and a university overlay district – that, if built out, would likely include libraries that would serve the students in these schools. In addition, increasingly, access to library collections and programs is via the internet and the library system maintains an effective interactive websites for that purpose. Though not every household has access to internet technology, enough do to make it difficult to anticipate what facility needs will be in the future or how those needs will be met. However, although the Project Design Features and required DIFs would potentially supplement the demand for new library facilities and materials (i.e., school facilities), the increase in population associated with the buildout of the Project would result in the need for additional library facilities and materials not accommodated for by Project development. Due to the increased demand for

[27] Library Services: ([0.5 sf*40,536 residents]/1 resident= 20,268 sf); Library Materials: ([1.2 materials per resident*40,536]/1 resident=48,643 materials)

[28] City of Coachella. 2024. *City of Coachella Development Impact Fees Annual Report 2024.* https://www.coachella.org/home/showpublisheddocument/10692/638905011207570000. (accessed August 2025).

City library resources, the Project's impact to library facilities would be significant and unavoidable until additional library resources are provided. Unlike the school facilities fees mandated in Education Code Section 17620, payment of Library Facilities Impact fees alone would not mitigate the facilities impact under CEQA. Therefore, impacts are potentially significant.

OFF-SITE IMPROVEMENTS

Construction activities for the off-site improvements would not impact other public facilities. Further, construction would be temporary. The nearest other public facilities discussed previously would not be physically altered during the construction of these off-site improvements. Therefore, there would be no impact.

Mitigation Measures

The applicant would be required to pay Development Impact Fees on behalf of the Project, including Library Facilities Impact fees. Revenue from these DIFs would supplement the City's general fund, along with the Project's future tax contributions, which the City may allocate at its discretion. No additional feasible mitigation measures are available to address impacts related to the need for new library facilities. Therefore, impacts would remain significant and unavoidable.

4.13.5 CUMULATIVE IMPACTS

For purposes of public services, cumulative impacts are considered for cumulative projects located within the City of Coachella. A project's individual impacts would be "cumulatively considerable" when "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (CEQA Guidelines Section 15064[h][1]). The Project development, along with additional development projects in the City of Coachella boundaries, would result in incremental increases in the demand for public services as the number of people, buildings, roads, and utilities would increase. However, each individual development project within the City, including future developments within the Project site, would be required to pay DIFs – including general government facility fees, library facility fees, park and recreation facility fees, fire facility fees, and police facility fees that would be used to provide additional public facilities as the population increases. These potential future new public facilities, as part of City-wide buildout consistent with the Coachella GP, would be subject to additional site-specific CEQA review. Where deficiencies in public services already exist that could require new or expanded governmental facilities, the construction of which may cause environmental effects, the City's inability to meet established performance objectives does not, by itself, demonstrate that the Project's individual impacts would be cumulatively considerable (CEQA Guidelines Section 15064[h][4]).

The Coachella GP EIR found that impacts to public facilities at GP buildout would be less than significant. Additionally, the Coachella GP EIR addressed cumulative impacts of City buildout. The Coachella GP relies on population projections provided by SCAG. According to **Section 4.12: Population and Housing**, the anticipated increase in population as a result of the Project would be within the total projected growth forecasts for 2045.

As discussed above, the Project would have a less than significant impact related to the need for new or expanded fire protection facilities with the incorporation of **MM PS-1**, which provides for the funding for a permanent fire station within or in close proximity to the Project site. The Coachella GP EIR found that impacts to fire protection would be less than significant with implementation of the goals and policies of the Coachella GP that pertain to new and improved fire facilities. However, according to the Coachella GP EIR, the City is currently underserved and below the required level of service times and ratio of firefighter people per 1000 residents. The Project is proposing a fire station which could aid in improving the City's ratio of firefighter personnel per 1,000 residents. Therefore, in consideration of the above, the Project's contribution toward potential future fire protection impacts in the City is not cumulatively considerable.

As discussed above, the Project would have a less than significant impact related to the need for new or expanded police protection facilities. The Coachella GP EIR found that impacts to police protection would be less than significant with implementation of the goals and policies of the Coachella GP that pertain to new and improved police facilities. As discussed above, the Riverside County Sheriff's Department does not anticipate the need for any new or modified police protection facilities based on current or project City population, which includes the Project. Therefore, in consideration of the above, the Project's contribution toward potential future police protection impacts in the City is not cumulatively considerable.

As discussed above, the Project would have a less than significant impact related to the need for new or expanded school facilities. The Coachella GP EIR found that impacts related to school facilities would be less than significant with implementation of the goals and policies of the Coachella GP that pertain to new and improved school facilities. As discussed above, the payment of applicable statutory fees constitutes full and complete mitigation of impacts on school facilities, pursuant to California Government Code Section 65955 and Education Code Section 17620. Future projects within the City would similarly be subject to these statutory fees, and impacts would be less than significant. Therefore, the Project's contribution toward potential future school impacts in the City is not cumulatively considerable.

As discussed above, the Project would have a less than significant impact related to the need for new or expanded park facilities. The Coachella GP EIR found that impacts related to park facilities would be less than significant with implementation of the goals and policies of the Coachella GP that pertain to new and improved park facilities. According to Section 4.15 of the GP EIR, the City has a parkland standard of three acres per 1,000 residents. As of 2014, the standard was not being met. No mitigation beyond the goals and policies of the Coachella GP that pertain to parkland and open space conservation were required. Note that the Project was not considered in the City of Coachella's cumulative impacts analysis. The parks and recreational facilities proposed as part of the Project would aid in reducing the City's parkland deficit through the proposed allocation of 395 acres of park space and 754 acres of natural open space. As discussed above in **Section 4.13.4: Project Impacts and Mitigation**, all Project impacts to parks are considered less than significant as a result of the Project and payment of applicable development impact fees and mitigation. Therefore, the Project's contribution toward potential future cumulative park impacts in the City is not cumulatively considerable.

As discussed above, the Project would have a significant and unavoidable impact related to the need for new or expanded "other" public facilities (i.e., libraries) until future library facilities are built. Specifically, the Project would result in increased demand for library square footage and materials that would exceed existing library facilities and no feasible mitigation exists, beyond the payment of required DIFs, that would reduce impacts to a less than significant level. Currently, the City is substantially underserved with regards to library square footage and library materials. The Project, in combination with other planned development within the City (e.g., the La Entrada Specific Plan buildout, which similarly identified a significant and unavoidable impact related to library services), would contribute to the City's nonattainment of certain established performance objectives related to libraries. Therefore, the Project's contribution toward potential cumulative library impacts in the City is cumulatively considerable.

4.13.6 SIGNIFICANT UNAVOIDABLE IMPACTS

The Project would result in significant and unavoidable adverse impacts related to the need for new library facilities because there are no feasible mitigation measures to reduce impacts associated with the increased demand on library facilities to a less than significant impact.

4.13.7 REFERENCES

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4.14 TRANSPORTATION

This section addresses transportation impacts that may result from construction and operation of the Project. The following discussion addresses the existing transportation conditions in the Project area, identifies regulations, evaluates the Project's consistency with applicable goals and policies, identifies and analyzes potential environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the Project.

The environmental setting and transportation analysis is based largely on the following documentation found in **Appendix J** of this EIR:

- KPC Coachella Specific Plan Vehicle Miles Traveled Analysis, prepared by Linscott Law & Greenspan (LLG; December 2022) (**Appendix J1**); and
- KPC Coachella Specific Plan Traffic Impact Analysis (TIA) (LLG, November 2023). (**Appendix J2**)

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo its own independent CEQA analysis, including but not limited to an analysis of any impacts on transportation. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors such as hazards due to geometric design features and emergency access.

SCOPE OF THE TRANSPORTATION EVALUATION AND CEQA REQUIREMENTS

In 2018, the California state legislature, in approving Senate Bill (SB) 743, directed the Office of Planning and Research (OPR) to develop guidelines for assessing transportation impacts based on vehicle miles traveled, or VMT. In response to SB 743, CEQA and its implementing guidelines (CEQA Guidelines) were significantly amended regarding the methods by which lead agencies are to evaluate a project's transportation impacts. As described in CEQA Guidelines Section 15064.3(a):

> *Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact.*

As of July 1, 2020, all lead agencies, including the City, were required to implement the new SB 743 CEQA mandates and to analyze a project's transportation impacts using VMT. The "level of service" or "LOS" methodology can no longer be used under CEQA. In fact, a December 2019 Court of Appeal decision (Citizens for Positive Growth & Preservation v. City of Sacramento (2019) 43 Cal.App.5th 609), ruled that automobile delay (as measured solely by roadway capacity or traffic congestion using the traditional LOS

methodology) cannot constitute a significant environmental impact under CEQA. Moreover, this decision applied to an EIR that was certified in 2015. With this decision, the courts were clear: congestion-based LOS analysis is no longer the recognized standard of review (except for informational and disclosure purposes), and lead agencies need to now adopt new thresholds and evaluate changes in VMT as caused by a project. Since 2020, lead agencies preparing CEQA documents have been in a transitional period as they begin to implement the new VMT analysis requirements.

The reason for these changes, in short, is to acknowledge that traditional operational or engineering solutions to traffic congestion that focus on accommodating the automobile – such as roadway widening – lead to unintended consequences. Inefficient land use, more VMT, exacerbated air pollutant and greenhouse gas (GHG) emissions and secondary effects of constructing roadway projects are part of the rationale behind SB 743. The State has therefore taken a bold step to pivot away from automobile-centered land planning, and to promote planning decisions and other trip reduction measures intended to reduce reliance on individual automobile trips in the course of daily living.

Understanding how the local roadway network functions from an engineering standpoint is still critical to local land use agencies to monitor traffic flow, identify safety issues, establish fees and manage congestion. However, for the purposes of evaluating environmental impacts under CEQA, the new regulations have removed congestion from the range of required subjects analyzed within CEQA documents. Similarly, and for different reasons, parking requirements were removed from the CEQA Guidelines several years ago.

Although this section of the Draft EIR contains a VMT analysis and has been prepared based on these new requirements, additional information regarding the Project's trip generation and predicted trip distribution on the roadway network is provided as well. However, this analysis is provided for informational purposes only, as additional delay – to an intersection or roadway segment – can no longer be considered a significant impact under CEQA. Refer to **Appendix J2** and **Section 4.14.7: Supplemental LOS Information**, for further LOS discussion.

Level of Service Analysis Methodology

As stated in SB 743, automobile delay, as measured by "level of service" and other similar metrics, no longer constitute a significant environmental effect under CEQA.[1] As such, the following information is provided solely for informational purposes and does not require a significance determination.

The peak hour Delay/LOS calculations are based on the Highway Capacity Manual 7th Edition methodology for signalized and unsignalized intersections and will be consistent with the City of Coachella (City), County of Riverside and Caltrans capacity analysis methodology. The Highway Capacity Manual 7th Edition was used to perform intersection LOS analysis for the following scenarios:

- Existing Traffic Conditions;
- Year 2045 Without Project Traffic Conditions;

[1] State of California. (2018). *SB 743 – Technical Advisory on Evaluating Transportation Impacts in CEQA*. Available at: https://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf (accessed June 2023).

- Year 2045 With Project Traffic Conditions; and
- Scenario (3) With Mitigation, if any

LOS measures transportation quality of service from the traveler's perspective. Per the HCM7, LOS rankings at intersections use a letter-grade scale ranging from LOS A (Little or no delay) to LOS F (severe congestion) based on average control delay in seconds per vehicle, or how long a vehicle typically waits before proceeding through the intersection. This delay is compared with free-flow conditions, and includes slowing before an intersection, waiting in queues, and stopping at the intersection. The HCM Delay and corresponding LOS calculations at the key study locations were used to evaluate the potential traffic-related impacts associated with existing, future, and the Project traffic.

The Traffic Impact Analysis (TIA; **Appendix J2**) included recommended improvements for study intersections that would operate below applicable LOS policies in given jurisdictions. These recommendations include a combination of fee payments to established programs, construction of specific improvements, payment of a fair-share contribution toward future improvements, or a combination of these approaches. The recommended improvements are intended to improve operational conditions consistent with City of Coachella General Plan (Coachella GP) LOS policies. However, as stated above, the recommended improvements are conceptual in nature and not required to be enforced as additional delay – to an intersection or roadway segment – is no longer considered a significant impact under CEQA.

4.14.1 ENVIRONMENTAL SETTING

EXISTING TRANSPORTATION SYSTEM

Roadway Characteristics

Regional vehicular access near the Project site is provided via Interstate (I-) 10. I-10 is a major east–west freeway corridor adjacent to the southern boundary of the Project area, extending from the Pacific Ocean at California State Route (SR) 1 (Pacific Coast Highway) in Santa Monica, California, to I-95 in Jacksonville, Florida. The I-10 Freeway is located directly south, and adjacent to the Project site.

Local access to the Project site is provided via a combination of major local and regional roadways. Characteristics of the surrounding major roadway system in the Project study area are described below, although these roadways do not connect directly to the Project site (refer to **Exhibit 3-2, Local Vicinity** in **Section 3.0: Project Description**):

- Highway 111 – Old California 86 is an east-west State Highway which provides regional connectivity to the City of Coachella (City). Although this route does not connect to the Project site directly, it does contain connections to roadways which would border the Project site including Avenue 50. A new Avenue 50 Interchange with I-10 is also proposed; however, not as part of this Project.
- Avenue 48 is classified as a major arterial roadway within the Coachella GP and is noted to contain bicycle facilities. However, aerial imaging of the segment of Avenue 48 closest to the Project site shows that the roadway is unpaved, with no striping present.

- Avenue 50 is classified as a major arterial roadway within the Coachella GP and is noted to contain bicycle facilities. Aerial photography of the roadway nearest to the Project site shows that the roadway transitions from a paved, striped condition to an unpaved, unstriped condition as it nears the Project site. As noted above, A new Avenue 50 Interchange with I-10 is also proposed but however; not as part of this Project. Upon buildout of the Avenue 50/I-10 Interchange, Avenue 50 would be considered a Major Arterial.
- Avenue 52 is classified as a major arterial roadway within the Coachella GP and is noted to contain bicycle facilities. Aerial photography of the roadway nearest to the Project site shows that the roadway is paved and unstriped.
- Dillon Road is classified as a major arterial roadway within the City and is noted to contain bicycle facilities. Aerial photography of the roadway nearest to the Project site shows that the roadway is paved and striped.
- Vista Del Norte is classified as a collector roadway within the City that currently ends west of the All-American Canal. Vista Del Norte runs in an east-west direction and is planned with bicycle facilities.

There are no officially designated city streets or roadways within the Project area. The Project area is crossed by various dirt roads utilized by off-road vehicles and dirt roads used to access overhead utilities that are located in the northern portion of the Project area. Landfill Road is located northwest of the Project area and Aqueduct Road is located northeast of the Project area. Landfill Road is a two-lane paved road that extends from Dillon Road to the Coachella Valley Transfer Station and Compost Facility. Aqueduct Road is a two-way dirt road that extends from Fargo Canyon Road to Pinkham Canyon Trail (see **Exhibit 3-2**).

Bus Service

Sunline Transit Agency (STA) provides public bus services to the Coachella Valley. Routes with stops in the City are 1EV, 6, 7, 8, and 10. No bus lines traverse the Project site, and no bus stops are located in the Project vicinity. The closest bus stop to Project site is located on the southwest corner of Avenue 48 and Old California 86, approximately 2.4 miles to the southwest.

All STA fixed-route buses are accessible to persons with disabilities. However, for seniors and persons with disabilities, Sundial is also available which is an origin-destination advance reservation transportation service. Sundial vehicles travel to areas within three-quarters of a mile to the closest route.

Bicycle and Pedestrian Paths

The Project site is undeveloped and vacant. The Project area does not currently have internal access roads or existing accessways. As discussed above, the surrounding area contains roadways that are planned to include bicycle facilities.

4.14.2 REGULATORY SETTING

FEDERAL

Federal rules and regulations govern many facets of the City's transportation system, including transportation planning and programming; funding; and design, construction, and operation of facilities. The City complies with all applicable rules and regulations of the Federal Highway Administration, the Urban Mass Transit Administration, the Federal Railroad Administration, the Federal Aviation Administration, and other Federal agencies. In addition, the City coordinates with Federal resource agencies where appropriate in the environmental clearance process for transportation facilities.

STATE

Assembly Bill 1358 – Complete Streets

Assembly Bill (AB) 1358, also referred as the California Complete Streets Act, requires that the circulation elements of local general plans accommodate a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways in manners that are suitable to applicable rural, suburban, or urban contexts. Users are defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and riders of public transportation.

Senate Bill 375 – Sustainable Communities and Climate Protection Act

The Sustainable Communities and Climate Protection Act, or SB 375, provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. The goal is to reduce the number and length of automobile commuting trips, which will help to meet the statewide targets for reducing GHG emissions set by AB 32.

SB 375 requires each Metropolitan Planning Organization to add a broader vision for growth, called a Sustainable Communities Strategy (SCS), to its transportation plan. The SCS must lay out a plan to meet the region's transportation, housing, economic, and environmental needs in a way that enables the area to lower GHG emissions. The SCS should integrate transportation, land-use, and housing policies to plan for achieving the emissions target for their region. The latest Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and SCS were adopted in 2024.

California Department of Transportation

The California Department of Transportation (Caltrans) oversees the state's highway system. Caltrans is the public agency responsible for designing, building, operating, and maintaining the state's highway system, which consists of freeways, highways, expressways, toll roads, and the area between the roadways and property lines. Caltrans is also responsible for permitting and regulating the use of state roadways. Caltrans' construction practices require temporary traffic control planning during activities that interfere with the normal function of a roadway.

Senate Bill 743 – Amending CEQA with Respect to Evaluating Transportation Impacts

In January 2019, the Natural Resources Agency finalized updates to the CEQA Guidelines including the incorporation of SB 743 modifications. The changes to the Guidelines were approved by the Office of Administrative Law and are now in effect. The updated guidelines shift traffic analysis from delay and operations to vehicle miles traveled (VMT) when evaluating transportation impacts under CEQA. This change in methodology is a result of SB 743, which was signed into law in September 2013. SB 743 created a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA guidelines to provide a mandatory alternative to level of service (LOS) for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses.

Measurements of transportation impacts may include VMT, VMT per capita, automobile trip generation rates, or automobile trips generated. According to SB 743, projects should aim to reduce VMT and mitigate potential VMT impacts through the implementation of transportation demand management (TDM) strategies. By July 1, 2020, all CEQA lead agencies must analyze a project's transportation impacts using VMT. Specific to SB 743, Section 15064.3I states, "The provisions of the section shall apply prospectively as described in Section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide." In order to implement these new CEQA guidelines, each lead agency needed to identify their preferred VMT metric; VMT methodology; VMT impact significance threshold; and VMT mitigation scenarios. However, Section 15007(d) also states, "Public agencies shall have complied with new requirements in amendments to the Guidelines beginning with the earlier of the following dates: (1) The effective date of the agency's (County's) procedures amended to conform to the new Guideline amendments; or (2) The 120th day after the effective date of the Guideline amendments giving the County a grace period of 120 days following the July 1st date for the County to implement the new VMT CEQA guidelines."

In developing the new CEQA guidelines, the OPR prepared a Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory). The final version of the Technical Advisory is dated December 2018 and provides guidance for local jurisdictions in developing methodologies and thresholds for evaluating VMT.

State Transportation Improvement Program

The State Transportation Improvement Program (STIP) is a multi-year capital improvement program for transportation projects on and off the State Highway System, funded with revenues from the Transportation Investment Fund and other funding sources. STIP programming generally occurs every two years. The programming cycle begins with the release of a proposed fund estimate in July of odd numbered years, followed by California Transportation Commission (CTC) adoption of the fund estimate in August (odd years). The fund estimate serves to identify the amount of new funds available for the programming of transportation projects. Once the fund estimate is adopted, Caltrans and the regional planning agencies prepare transportation improvement plans for submittal to the CTC by December 15th (odd years). Caltrans prepares the Interregional Transportation Improvement Program (ITIP), and regional

agencies prepare the Regional Transportation Improvement Plans (RTIPs). Public hearings are held in January (even years) in both northern and southern California. The STIP is adopted by the CTC by April (even years) (CDOT).

Technical Advisory on Evaluating Transportation Impacts in CEQA

The Governor's OPR released the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) in December 2018. The Technical Advisory aids in the transition from LOS to VMT methodology for transportation impact analysis under CEQA. The advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.

REGIONAL

Coachella Valley Association of Governments (CVAG) Transportation Uniform Mitigation Fee (TUMF)

CVAG's Transportation Uniform Mitigation Fee (TUMF) Program is a regional fee program designed to provide transportation and transit infrastructure that mitigates the impact of new growth in the Coachella Valley. CVAG administers the TUMF program for the Coachella Valley and applies fee revenues toward priority projects in the regional arterial system as determined by the Transportation Project Prioritization Study (TPPS) and Nexus Report. The TUMF, like all impact fees, is authorized through California's Mitigation Fee Act, government code §66000-66025.

Coachella Valley Link (CV LINK)

Led by the CVAG, the CV LINK is a multi-modal transportation facility that aims to provide significant environmental, health, and economic benefits to the Coachella Valley area. The CV LINK CV Link is a 50-mile, alternative transportation corridor for bicycles, pedestrians, and low-speed (up to 25 mph) electric vehicles along the Whitewater River and Tahquitz Creek that will initially stretch from the City of Palm Springs to the City of Coachella.

Riverside County Long Range Transportation Study

The Riverside County Long Range Transportation Study (LRTS) is meant to address the challenges of a growing population and growing industrial and warehousing base. The RCTC is the Regional Transportation Planning Agency (RTPA) for Riverside County. RCTC is charged with coordinating transportation planning, funding, and facilitation of all modes of transportation in Riverside County. Short and long-range transportation is a key responsibility of RCTC. RCTC plans and implements transportation and transit improvements, particularly those that affect more than one jurisdiction. The agency also assists local governments with money for local streets and roads and develops plans and programs to improve commuting and goods movement. Policies adopted by RCTC also aim to ensure that all persons have equitable access to transportation.

The purpose of the LRTS is meant to strengthen transportation in the region in order to improve mobility, safety, and economic prosperity for Riverside Country residents. The LRTS dovetails with and bridges local plans and Southern California Association of Government (SCAG)'s Regional Transportation Plan/

Sustainable Communities Strategy (RTP/SCS) or Connect SoCal. It supports the County's economy and quality of life through smart planning, project development and implementation. The Study is multimodal in nature and encompasses all forms of transportation: highways, local roads, transit, rail, pedestrian, and bicycle facilities.

The four basic purposes of the LRTS are to:

- Develop strategies to address transportation challenges.
- Provide a realistic vision of transportation in Riverside County in 2045.
- Develop a list of high priority feasible and fundable projects.
- Comprise RCTC's input to SCAG's Connect SoCal, which was released in 2024.

SCAG's Connect SoCal, is a long-range regional plan covering the six counties within the SCAG region. The Riverside County LRTS focuses only on Riverside County and its cities. SCAG's Connect SoCal is required to address transportation and related elements such as housing, aviation, air quality conformity, public health, environmental justice, and conservation lands. The LRTS focuses on transportation projects and funding.

RCTC also functions as the County Congestion Management Agency and contained within the LRTS is the County of Riverside Congestion Management Program (CMP), the purpose of which is provided immediately below.

County of Riverside Congestion Management Program

The passage of Proposition 111 in June 1990 established a process for each metropolitan county in California that has an urbanized area with a population over 50,000 (which would include the County of Riverside) to prepare a CMP. The CMP that was prepared by the RCTC in 2011 in consultation with the county and cities in Riverside County is an effort to more directly align land use, transportation, and air quality management efforts and to promote reasonable growth management programs that effectively use statewide transportation funds while ensuring that new development pays its fair share of needed transportation improvements. Additionally, the passage of Proposition 111 provided additional transportation funding through a $0.09 per gallon increase in the state gas tax.

The focus of the CMP is the development of an Enhanced Traffic Monitoring System in which real-time traffic count data can be accessed by the RCTC to evaluate the condition of the Congestion Management System, as well as meeting other monitoring requirements at the state and federal levels. Per the CMP-adopted LOS standard of E, when a Congestion Management System segment falls to LOS F, a deficiency plan is required. Preparation of a deficiency plan would be the responsibility of the local agency where the deficiency is located. Other agencies identified as contributors to the deficiency would also be required to coordinate with the development of the plan. The plan must contain mitigation measures, including transportation demand management strategies and transit alternatives, and a schedule of mitigating the deficiency. To ensure that the Congestion Management System is appropriately monitored to reduce the occurrence of CMP deficiencies, it is the responsibility of local agencies, when reviewing

and approving development proposals, to consider the traffic impacts on the Congestion Management System.

The CMP requires that a TIA be conducted for any project generating 2,400 or more daily trips, or 1,600 or more daily trips for projects that directly access the CMP Highway System. Per the CMP guidelines, this number is based on the desire to analyze any impacts that comprise three percent or more of the existing CMP Highway System facilities' capacity. The CMP Highway System includes specific roadways, including State highways, smart streets, and CMP arterial monitoring locations/intersections. Therefore, the CMP TIA requirements relate only to the designated CMP Highway System. The CMP system near the Project site consists of Interstate I-10 which forms the southern border of the Project site.

LOCAL

City of Coachella General Plan

The Project site is located in the City and would be required to comply with the regulations set forth in the Coachella GP. Coachella GP elements, goals, and policies relevant to the Project are as follows:

Land Use and Community Character Element

The Coachella GP Land Use and Community Character Element provides a long-term vision, goals and policies for land use and development in Coachella over the next 20 to 30 years. It also balances the need for long-term flexibility with necessary regulations to meet the City's vision. Goals and policies in the element are critical to the overall success of the City. [2]

Goal 3	**Healthy Community Design. Development patterns and urban design comprised of complete, walkable, attractive, family-friendly neighborhoods, districts and corridors that support healthy and active lifestyles.**
Policy 3.2	Walkable streets: Regulate new development to ensure new blocks encourage walkability by maximizing connectivity and route choice, create reasonable block lengths to encourage more walking and physical activity and improve the walkability of existing neighborhood streets.
Policy 3.3	Pedestrian barriers: Discourage physical barriers to walking and bicycling between and within neighborhoods and neighborhood centers. If physical barriers are unavoidable, provide safe and comfortable crossings for pedestrians and cyclists. Physical barriers may include arterial streets with speed limits above 35 mph, transit or utility rights-of-way, very long blocks without through-streets, and sound walls, among others.
Policy 3.4	Shared driveways. Allow and encourage new commercial and residential developments to have common driveways serving multiple units, to minimize the number of curb cuts along any given block to improve pedestrian safety.
Goal 5	**Neighborhoods. Neighborhoods that provide a variety of housing types, densities, designs and mix of uses and services that reflect the diversity and identity of**

[2] City of Coachella. (2015). City of Coachella General Plan – Land and Community Character Element. https://www.coachella.org/home/showpublisheddocument/8407/637818910797370000 (accessed April 2023).

Coachella, provide for diverse needs of residents of all ages, ethnicities, socio-economic groups and abilities, and support healthy and active lifestyles. (The following policies apply to all locations with a "Neighborhood" General Plan Designation.)

Policy 5.2 Conventional neighborhood design. Discourage the construction of new residential neighborhoods that are characterized by cul-de-sacs, soundwalls, long block lengths, single building and housing types and lack of access to goods and services.

Policy 5.7 Walkable neighborhoods: Require that all new neighborhoods are designed and constructed to be pedestrian friendly and include features such as short blocks, wide sidewalks, tree-shaded streets, buildings that define and are oriented to streets or public spaces, traffic-calming features, convenient pedestrian street crossings, and safe streets that are designed for pedestrians, cyclists and vehicles.

Policy 5.8 Provision of sidewalks: Except within designated rural areas, require sidewalks of at least six feet in width on both sides of streets in neighborhoods.

Policy 5.9 Street network: Except where infeasible because of topographic conditions, require new Neighborhoods to be designed with a traditional grid pattern and block sizes ranging from 300 to 600 feet, depending on the General Plan Designations.

Policy 5.10 Street layout. Design streets and lot layouts to provide a majority of lots within 20 degrees of a north-south orientation for increased energy conservation.

Policy 5.11 Connections to key destinations: Require direct pedestrian connections between residential areas and nearby commercial areas.

Goal 9 Corridors and Connectivity. A network of transportation and open space corridors throughout the City that provides a high level of connectivity for vehicles, cyclists and pedestrians.

Policy 9.2 Subarea connectivity: Ensure a high-level of connectivity in all Neighborhoods, Centers and Districts throughout the City. The connectivity shall be measured as block perimeter and in external connectivity on the perimeter of a new development project.

Policy 9.3 Connections between development projects: Require the continuation of the street network between adjacent development projects and discourage the use of cul-de-sacs except where necessary because connections cannot be made due to existing development, topographic conditions or limited access to transportation systems.

Mobility Element

The Coachella GP Mobility Element contains goals and policies intended to guide the development of adequate roadways and transit connections to accommodate the City's growth for the next 20 years. This Element encourages the development of multimodal transportation systems balancing vehicular, transit, and pedestrian byways to serve future populations.[3]

[3] City of Coachella. (2015). *City of Coachella General Plan – Mobility Element.* https://www.coachella.org/home/showpublisheddocument/8415/637818911636900000 (accessed April 2023).

Goal 1	**Complete Streets. A balanced transportation system that accommodates all modes of travel safely and efficiently without prioritizing automobile travel at the expense of other modes.**
Policy 1.1	Complete streets for new construction. Require that the planning, design and construction of all new transportation projects consider the needs of all modes of travel to create safe, livable and inviting environments for pedestrians, bicyclists, motorists and public transit users of all ages and abilities.
Policy 1.3	Transportation system impacts. Evaluate impacts to all modes of travel when considering transportation system performance.
Goal 2	**Traffic Calming. A transportation system that limits negative impacts from vehicular travel on residents and workers.**
Policy 2.2	Traffic calming for future streets: Apply traffic calming techniques to future residential streets to limit cut-through traffic and speeding on these roadway streets. Potential traffic calming applications can include clearly marked bicycle and pedestrian zones, bicycle boulevards, bulb outs, median islands, speed humps, traffic circles, speed tables, center island narrowings, raised crosswalks, blinking crosswalks, chicanes, chokers, raised intersections, realigned intersections, and textured pavements, among other effective enhancements.
Goal 3	**Pedestrian Network. A safe pedestrian network that provides direct connections between residences, employment, shopping and civic uses.**
Policy 3.1	Pedestrian network: Improve health outcomes by creating a safe and convenient circulation system for pedestrians that focuses on crosswalks, improves the connections between neighborhoods and commercial areas, provides places to sit or gather, pedestrian-scaled street lighting, buffers from moving vehicle traffic, and includes amenities that attract people of all ages and abilities.
Policy 3.3	Sidewalks for roadways. Require that the City provide wide sidewalks along all roadways which are built or reconstructed in the City except in those instances in which there is insufficient right-of-way or other physical limitations.
Policy 3.4	Pedestrian connections for development: Require that all development or redevelopment projects provide pedestrian connections to the external pedestrian network.
Policy 3.5	Pedestrian access to gated communities: Require that all new communities, regardless of the presence of gates and sound walls, provide pedestrian connections from external areas into the community.
Policy 3.8	Park once: Design dense nodes of commercial and retail businesses with reduced off-street parking that is accessible to public parking locations so people can park once for many errands/trips.
Goal 4	**Bicycle Trail Network. A bicycle and multi-use trail network that facilitates bicycling for commuting, school, shopping and recreational trips.**

Policy 4.3	Bicycle access to gated communities: Require that all new communities, regardless of the presence of gates and sound walls, provide bicycle connections from external areas into the community.
Policy 4.4	Bicycle parking: Require that the public and private development in the City provide sufficient bicycle parking.
Goal 5	**Transit Supportive Development Patterns. An integrated land use and transportation network that supports transit ridership.**
Policy 5.3	Promote bus shelters: Encourage bus shelters in new development, if a stop is determined necessary by SunLine. Bus shelters should be designed as public art or to be compatible with the building architecture of the site.
Policy 5.4	Transit accessible development: Encourage new large residential or commercial developments to locate on existing and planned transit routes.
Goal 6	**Sustainable Transportation. A sustainable transportation system that can be built, operated and maintained within the City's existing and future resource limitations.**
Policy 6.1	Fair share costs: Require that new development pay for its fair share of construction costs for new and/or upgraded transportation infrastructure needed to accommodate this development.
Policy 6.3	Development contributions to O&M costs: Require the new development and redevelopment contribute to the operations and maintenance of new transportation infrastructure.

4.14.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

Appendix G of the State CEQA Guidelines contains the Environmental Checklist Form, which includes questions related to transportation. The issues presented in the Environmental Checklist Form have been utilized as Thresholds of Significance in this section. Accordingly, a project may create a significant environmental impact if it would:

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

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);

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

d) Result in inadequate emergency access.

METHODOLOGY AND ASSUMPTIONS

The Project is evaluated against the aforementioned significance criteria, as the basis for determining the level of impacts related to transportation. This analysis considers existing regulations, laws and standards that serve to avoid or reduce potential environmental impacts. Where significant impacts remain, feasible

mitigation measures are recommended, where warranted, to avoid or lessen the Project's significant adverse impacts. Further details regarding traffic analysis methods are provided in Appendix J of this EIR.

CEQA Guidelines Section 15064.3(b), Determining the Significance of Transportation Impacts, provides the following guidance on how VMT from various types of projects can be evaluated:

b) Criteria for Analyzing Transportation Impacts.

1. **Land Use Projects**. VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

2. **Transportation Projects**. Transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, a lead agency may tier from that analysis as provided in Section 15152.

3. **Qualitative Analysis**. If existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may analyze a Project's VMT qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

4. **Methodology**. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's VMT and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate VMT and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

The analysis for VMT for the Project was completed in December 2022 by LLG and is included in **Appendix J1** of this EIR. The analysis below utilizes the VMT significance criteria to determine the Project's potential impacts related to VMT and if mitigation is needed to reduce impacts to less than significant levels.

VMT Analysis Methodology

As required by the County of Riverside's 2020 Transportation Analysis Guidelines for LOS and VMT, projects not screened out through the steps above should complete VMT analysis and forecasting through the RIVCOM model to determine if they have a significant VMT impact. The VMT analysis conducted for

the Project included both "Project-generated VMT" and "Project's effect on VMT" estimates under the four scenarios listed below:

- Baseline Conditions[4]
- Baseline Plus Project[5]
- Cumulative No Project[6]
- Cumulative Plus Project[7]

County VMT Thresholds

As described in the County of Riverside's traffic impact study guidelines and shown in **Table 4.14-1** below, VMT significance thresholds are based on land use type, broadly categorized as efficiency and net change metrics. Efficiency metrics include VMT/Capita and Work VMT/employee. "Net Change" refers to the net change in regional VMT and it is used for elements that include a significant customer base, such as commercial uses.

Table 4.14-1: Threshold Basis

Threshold Basis	Efficiency	Net Change
Example Land Use	Residential, Office, Industrial	Retail, Medical Office, Sports Venue
Measure for VMT	Per Capita, Per employee	Regional VMT change
Customer Component	No	Yes

Source: LLG. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis.* Page 6 -Table 1. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J1**

Based on the threshold basis above, the VMT analysis for the Project was conducted utilizing RIVCOM to determine the County of Riverside average and Project's residential VMT, office VMT and retail VMT, and the County of Riverside, and the following:

- VMT per Capita
- VMT per Employee
- Regional VMT Change

The County adopted the county-wide average VMT as the threshold of significance (note that at the time of this report the City does not have VMT thresholds). The thresholds of significance are summarized in **Table 4.14-2: VMT Threshold of Significance**.

Table 4.14-2: VMT Threshold of Significance

Land Use	Threshold of Significance
Residential	Existing county-wide average VMT per capita
Office	Existing county-wide average VMT per employee
Retail	Net increase in total VMT

Source: LLG. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis*. Page 7 – Table 2. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J**

[4] Baseline conditions entails the existing conditions at the time that VMT is analyzed without the Project.
[5] Baseline plus Project entails the overall VMT conditions with the Project VMT included.
[6] Cumulative conditions entail the overall cumulative VMT at Buildout Year 2045 without the Project's VMT.
[7] Cumulative Plus Project entails the overall cumulative VMT at Building Year 2045 with the Project's VMT included.

A project would result in a significant project generated VMT impact if its VMT exceeds the VMT threshold based on its respective land use. Results of the VMT analysis prepared for the Project is discussed in Impact 4.14-2 below.

PROJECT DESIGN FEATURES

- The Project site is in close proximity to local and regional access routes, reducing the travel time on local City streets during construction and operations once all proposed roadways are constructed.
- The Project's Looped Roadway system connects all internal land use areas and provides connections to the external roadway network.
- The Vista Del Norte Road Extension would allow access from the site's western boundary to other portions of the City.
- New I-10 exit and entrance ramps along the Project's southern border via the proposed I-10/ Avenue 50 interchange project (by others) would connect the Project to surrounding regional resources such as emergency services.
- The Project is a mixed-use development providing employment, recreation, education, and housing opportunities all within the same Specific Plan, reducing vehicle miles traveled for Project residents.

4.14.4 PROJECT IMPACTS AND MITIGATION

Impact 4.14-1: Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION AND OPERATIONS

The Project would be consistent with SB 375 by complying with SCAG's Connect SoCal and RCTC's CMP. The Project's consistency analysis with SCAG's Connect SoCal goals is further discussed in **Table 4.10-2: Project Compatibility with SCAG 2024-2050 RTP/SCS Strategies** within **Section 4.10: Land Use and Planning** of this EIR. The Project would be consistent with RCTC's CMP goals which include, but are not limited to, enhancing and maintaining the current Congestion Management system, as well as providing on-site circulation system that operates in compliance with the CMP goals related to the reduction of CMP deficiencies; improving the system of bicycle and pedestrian facilities by providing bicycle and Neighborhood Electric Vehicle (NEV) lanes, and pedestrian walkways via a trail system. Additionally, the Project would comply with Caltrans SB 743 guidance pertaining to off-ramp traffic safety. An analysis of the Project's effect on off-ramp queuing was prepared as part of the TIA which concluded that the Project is not anticipated to negatively influence safety on the State Highway System. Refer to **Appendix J2** for further LOS and safety discussion.

The Project would also comply with the Complete Streets Act of 2008 by being consistent with the Coachella GP Mobility Element. The Complete Streets Act of 2008 requires General Plans to accommodate

a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways in manners that are suitable to applicable rural, suburban, or urban contexts. More specifically, the Project's circulation system would be constructed and operate in conformance with relevant goals and policies in the Coachella GP Land Use and Community Character Element and Mobility Element that pertain to the Project's circulation system, as shown in **Table 4.14-3: Coachella General Plan Consistency**.

Table 4.14-3: Coachella General Plan Consistency

General Plan Goal Policy	Project Consistency
LAND USE AND COMMUNITY CHARACTER ELEMENT	
Goal 3: Healthy Community Design. Development patterns and urban design comprised of complete, walkable, attractive, family-friendly neighborhoods, districts and corridors that support healthy and active lifestyles.	
Policy 3.2: Walkable streets: Regulate new development to ensure new blocks encourage walkability by maximizing connectivity and route choice, create reasonable block lengths to encourage more walking and physical activity and improve the walkability of existing neighborhood streets.	**Consisten**t: The Project area has been designed to create a pedestrian scale neighborhood with sidewalks along all roadways as well as walking trails through open space areas. The Project also proposes bicycle and NEV lanes along Project roadways. Additionally, mixed use areas would be included to allow residents to live in proximity to community-supporting nonresidential uses.
Policy 3.3: Pedestrian barriers: Discourage physical barriers to walking and bicycling between and within neighborhoods and neighborhood centers. If physical barriers are unavoidable, provide safe and comfortable crossings for pedestrians and cyclists. Physical barriers may include arterial streets with speed limits above 35 mph, transit or utility rights-of-way, very long blocks without through-streets, and sound walls, among others.	**Consistent**: The Project's proposed components would be designed to accommodate walking and bicycling throughout the Project area. Any physical barriers would be designed in conformance with this policy.
Policy 3.4: Shared driveways. Allow and encourage new commercial and residential developments to have common driveways serving multiple units, to minimize the number of curb cuts along any given block to improve pedestrian safety.	**Consistent**: Where applicable, the Project's proposed commercial (mixed-use), and residential development would utilize shared driveways in compliance with this policy.
Goal 5 Neighborhoods. Neighborhoods that provide a variety of housing types, densities, designs and mix of uses and services that reflect the diversity and identity of Coachella, provide for diverse needs of residents of all ages, ethnicities, socio-economic groups and abilities, and support healthy and active lifestyles. (The following policies apply to all locations with a "Neighborhood" General Plan Designation.)	
Policy 5.2: Conventional neighborhood design. Discourage the construction of new residential neighborhoods that are characterized by cul-de-sacs, soundwalls, long block lengths, single building and housing types and lack of access to goods and services.	**Consistent**: The Project includes multiple housing densities ranging from very low density to high density with mixed use developments that are subject to compliance with all applicable local design standards. The Project's circulation system would accommodate resident's access to good and services throughout the Project site and the surrounding area.
Policy 5.7: Walkable neighborhoods: Require that all new neighborhoods are designed and constructed to be pedestrian friendly and include features such as short blocks, wide sidewalks, tree-shaded streets, buildings that define and are oriented to streets or public spaces, traffic-calming features, convenient pedestrian street crossings, and safe streets that are designed for pedestrians, cyclists and vehicles.	**Consistent**: The Project area would be designed to create a pedestrian scale neighborhood with sidewalks along all roadways, walking trails through open space areas, bicycle lanes, and NEV lanes. Additionally, mixed use areas would be included to allow residents to live in proximity to community-supporting nonresidential uses.

General Plan Goal Policy	Project Consistency
Policy 5.8: Provision of sidewalks: Except within designated rural areas, require sidewalks of at least six feet in width on both sides of streets in neighborhoods.	**Consistent**: The Project area has been designed to create a pedestrian scale neighborhood with sidewalks along all roadways, walking trails through open space areas, bicycle lanes, and NEV lanes. Sidewalks would be provided at least six feet in width on both sides of streets in neighborhoods.
Policy 5.9: Street network: Except where infeasible because of topographic conditions, require new Neighborhoods to be designed with a traditional grid pattern and block sizes ranging from 300 to 600 feet, depending on the General Plan Designations	**Consistent**: The Project's circulation system would be designed to accommodate the proposed residential and mixed-use developments. The proposed Specific Plan contains development standards that all residential neighborhoods would adhere to.
Policy 5.10: Street layout. Design streets and lot layouts to provide a majority of lots within 20 degrees of a north-south orientation for increased energy conservation.	**Consistent**: The Project's proposed circulation system would be designed in accordance with this Policy.
Policy 5.11: Connections to key destinations: Require direct pedestrian connections between residential areas and nearby commercial areas.	**Consistent**: The Project area has been designed to create a pedestrian scale neighborhood with sidewalks along all roadways, walking trails through open space areas, bicycle lanes, and NEV lanes. Additionally, mixed use areas would be included to allow residents to live in proximity to community-supporting nonresidential uses.
Goal 9: Corridors and Connectivity. A network of transportation and open space corridors throughout the City that provides a high level of connectivity for vehicles, cyclists and pedestrians.	
Policy 9.2: Subarea connectivity: Ensure a high-level of connectivity in all Neighborhoods, Centers and Districts throughout the City. The connectivity shall be measured as block perimeter and in external connectivity on the perimeter of a new development project.	**Consistent**: The Project area has been designed to create a pedestrian scale neighborhood with sidewalks along all roadways, walking trails through open space areas, bicycle lanes, and NEV lanes. Additionally, mixed use areas would be included to allow residents to live in proximity to community-supporting nonresidential uses. Furthermore, the Project would be required to pay development impact fees, and/or fair share fees that could be used to fund existing and planned streets and interchanges which would improve connectivity within the City.
Policy 9.3: Connections between development projects: Require the continuation of the street network between adjacent development projects and discourage the use of cul-de-sacs except where necessary because connections cannot be made due to existing development, topographic conditions or limited access to transportation systems.	**Consistent**: The Project's Circulation Plan consists of approximately 179 acres of land dedicated to the roadway network necessary to serve the proposed project. In addition to this, a network of multi-use trails (promenades and paseos), bikeways and multi-purpose pathways will be developed within the project, to provide residents with additional mobility options throughout the development. The Project also proposes roadway improvements that would improve both regional and local access to and from the Project site.
MOBILITY ELEMENT	
Goal 1: Complete Streets. A balanced transportation system that accommodates all modes of travel safely and efficiently without prioritizing automobile travel at the expense of other modes.	
Policy 1.1: Complete streets for new construction. Require that the planning, design and construction of all new transportation projects consider the needs of all modes of travel to create safe, livable and inviting	**Consistent**: The Project's Circulation Plan consists of approximately 179 acres of land dedicated to the roadway network necessary to serve the Project. In addition to this, a network of multi-use trails

General Plan Goal Policy	Project Consistency
environments for pedestrians, bicyclists, motorists and public transit users of all ages and abilities.	(promenades and paseos), bikeways and multi-purpose pathways will be developed within the Project, to provide residents with additional mobility options throughout the development. The Project also proposes roadway improvements that would improve both regional and local access to and from the Project site. The Project would be designed to create a pedestrian scale neighborhood with sidewalks along all roadways, walking trails through open space areas, bicycle lanes, and NEV lanes. The KPC Coachella Specific Plan, coupled with the proposed La Entrada Specific Plan, would provide the opportunity for the extension of the Sunline Transit Agency service area further east. Potential bus lines along Avenue 50 and Vista Del Norte would serve to increase connectivity between the Project area, La Entrada Specific Plan area, and the City. An extension of service to the plan area would expand access to housing, commercial retail, entertainment, open space, and recreational opportunities to residents around the region.
Policy 1.3: Transportation system impacts. Evaluate impacts to all modes of travel when considering transportation system performance.	**Consistent**: This section was written to determine the Project's impacts pertaining to transportation and traffic.
Goal 2: Traffic Calming. A transportation system that limits negative impacts from vehicular travel on residents and workers.	
Policy 2.2: Traffic calming for future streets: Apply traffic calming techniques to future residential streets to limit cut-through traffic and speeding on these roadway streets. Potential traffic calming applications can include clearly marked bicycle and pedestrian zones, bicycle boulevards, bulb outs, median islands, speed humps, traffic circles, speed tables, center island narrowings, raised crosswalks, blinking crosswalks, chicanes, chokers, raised intersections, realigned intersections, and textured pavements, among other effective enhancements.	**Consistent**: Pursuant to MM TRF-2, the Applicant shall submit for review and approval a Construction Traffic Control Plan (TCP) to the City in compliance with this Policy prior to construction start.
Goal 3: Pedestrian Network. A safe pedestrian network that provides direct connections between residences, employment, shopping and civic uses.	
Policy 3.1: Pedestrian network: Improve health outcomes by creating a safe and convenient circulation system for pedestrians that focuses on crosswalks, improves the connections between neighborhoods and commercial areas, provides places to sit or gather, pedestrian-scaled street lighting, buffers from moving vehicle traffic, and includes amenities that attract people of all ages and abilities.	**Consistent**: The Project would be designed to create a pedestrian scale neighborhood with sidewalks along all roadways, walking trails through open space areas, bicycle lanes, and NEV lanes. Therefore, the Project would be consistent with this Policy.
Policy 3.3. Sidewalks for roadways. Require that the City provide wide sidewalks along all roadways which are built or reconstructed in the City except in those instances in which there is insufficient right-of-way or	**Consistent**: The Project would be designed to create a pedestrian scale neighborhood with sidewalks along all roadways, walking trails through open space areas, bicycle lanes, and NEV lanes. Therefore, the Project

General Plan Goal Policy	Project Consistency
other physical limitations.	would be consistent with this Policy.
Policy 3.4: Pedestrian connections for development: Require that all development or redevelopment projects provide pedestrian connections to the external pedestrian network.	**Consistent**: The Project would be designed to create a pedestrian scale neighborhood with sidewalks along all roadways, walking trails through open space areas, bicycle lanes, and NEV lanes. Therefore, the Project would be consistent with this Policy.
Policy 3.5: Pedestrian access to gated communities: Require that all new communities, regardless of the presence of gates and sound walls, provide pedestrian connections from external areas into the community.	**Consistent**: The Project would be designed to create a pedestrian scale neighborhood with sidewalks along all roadways, walking trails through open space areas, bicycle lanes, and NEV lanes. Therefore, the Project would be consistent with this Policy.
Policy 3.8: Park once: Design dense nodes of commercial and retail businesses with reduced off-street parking that is accessible to public parking locations so people can park once for many errands/ trips.	**Consistent**: The Project's local roadways may be designed with 7-foot on-street parallel parking. Additional width may be provided for parking on alleys, subject to design review and approval by the City.
Goal 4: Bicycle Trail Network. A bicycle and multi-use trail network that facilitates bicycling for commuting, school, shopping and recreational trips.	
Policy 4.3: Bicycle access to gated communities: Require that all new communities, regardless of the presence of gates and sound walls, provide bicycle connections from external areas into the community.	**Consistent**: The Project's residential uses would be designed to create a pedestrian scale neighborhood with bicycle/NEV travel lanes that would provide bicycle connections throughout the Project site.
Policy 4.4: Bicycle parking: Require that the public and private development in the City provide sufficient bicycle parking.	**Consistent**: The Project would provide bicycle parking in accordance with this Policy.
Goal 5: Transit Supportive Development Patterns. An integrated land use and transportation network that supports transit ridership.	
Policy 5.3: Promote bus shelters: Encourage bus shelters in new development, if a stop is determined necessary by SunLine. Bus shelters should be designed as public art or to be compatible with the building architecture of the site.	**Consistent**: The Project, coupled with the proposed La Entrada Specific Plan area, would provide the opportunity for the extension of the Sunline Transit Agency service area further east. Potential bus lines along Avenue 50 and Vista Del Norte will serve to increase connectivity between the plan area, La Entrada Specific Plan area, and the City.
Policy 5.4: Transit accessible development: Encourage new large residential or commercial developments to locate on existing and planned transit routes.	**Consistent**: The Project, coupled with the proposed La Entrada Specific Plan area, would provide the opportunity for the extension of the Sunline Transit Agency service area further east. Potential bus lines along Avenue 50 and Vista Del Norte will serve to increase connectivity between the plan area, La Entrada Specific Plan area, and the City.
Goal 6: Sustainable Transportation. A sustainable transportation system that can be built, operated and maintained within the City's existing and future resource limitations.	
Policy 6.1: Fair share costs: Require that new development pay for its fair share of construction costs for new and/or upgraded transportation infrastructure needed to accommodate this development.	**Consistent**: As further discussed in Appendix J, the Project would be required to pay its fair share of construction costs to the study intersections/ and or roads in compliance with this Policy.
Policy 6.3: Development contributions to O&M costs: Require the new development and redevelopment contribute to the operations and maintenance of new transportation infrastructure.	**Consistent**: As further discussed in Appendix J1, the Project would be required to pay its fair share of construction costs to the study intersections/ and or roads in compliance with this Policy. Furthermore, the

General Plan Goal Policy	Project Consistency
	Project's Circulation Plan consists of approximately 179 acres of land dedicated to the roadway network necessary to serve the proposed project. Therefore, the Project would provide new transportation infrastructure in compliance with this Policy,

Source: City of Coachella. (2015). *General Plan 2035.* Available at: https://www.coachella.org/departments/general-plan-2035 (accessed June 2023).

As demonstrated in the above table, the Project's circulation elements will be consistent with the Coachella GP elements pertaining to the circulation system, including transit, roadway, bicycle and pedestrian facilities.

As previously discussed in **Table 4.14-3,** the Project includes a Circulation Plan that consists of approximately 179 acres of land dedicated to the Project's roadway network necessary to serve the Project's future development. The Project's proposed roadway network is comprised of a hierarchy of roadways that include arterial, major, and secondary roadways that would allow vehicular movement within the Project area and its connections to I-10 and the existing Vista Del Norte Road. All roadways would be designed to meet the Coachella's GP and MC design standards for roadways.

Major arterials within the Project site are proposed as six-lane roadways and are planned to include a 14-foot-wide raised landscaped median and incorporate a 12-foot-wide improved off-street trail on both sides of the road which includes a six-foot wide bicycle lane and 6-foot-wide pedestrian path. Major arterials within the Project site include Avenue 50 and a portion of C loop fronting the proposed hotel entertainment center. Avenue 50 would extend northward from the planned Avenue 50 interchange with I-10, providing regional access to the Project site.

Primary arterials within the Project site are proposed as four-lane roadways with a 14-foot raised median and 12-foot multipurpose trail. The primary arterials would comprise the backbone of the circulation network, extending from Vista Del Norte to the west through a system of loops providing access within the Project site.

Major roadways within the Project site are proposed as four-lane roadways and would include a four-foot-wide raised landscape median. Major roadways would also include a 12-foot bike/Neighborhood Electric Vehicle (NEV) lane, separated from the road by a five-foot-wide shoulder and a five-foot wide landscaped buffer in both directions. Major roadways for canal crossing are proposed as four-lane roadways and would include four-foot-wide raised landscaped medians. The Major Roadways for canal crossing are also proposed to include an eight-foot-wide bike/NEV lane and six-foot wide pedestrian path in both directions.

The Collector roads within the Project site are proposed as two-lane roadways with a striped 12-foot center turn lane and eight-foot bike/NEV lanes in both directions. Collector roads are currently proposed in the Project site where residential densities are lower.

Local streets are proposed within the Project to facilitate movement of vehicles and pedestrians and to connect to proposed Arterial and Collector roadways. More specifically, the proposed local streets would

include a two-lane roadway with 10-foot-wide drive aisle and seven-foot on-street parking and no on-street bicycle facilities; and a two-lane roadway with no on-street parking or bicycle facilities.

As identified in Mitigation Measure (**MM**) **TRF-1,** prior to commencing Project construction, the Applicant would develop and implement a Parking and Staging Plan for all phases of construction to require that all Project-related parking occurs on-site or in pre-designated off-site parking areas.

MM TFR-2 would require that prior to construction, the Applicant shall submit for review and approval a Construction Traffic Control Plan (TCP) to the City as part of the approval process.

Additionally, construction of the Project would include off-site improvements for Year 2045 to support operations through Horizon year 2045. These off-site improvements include a combination of fee payments to established programs, construction of specific improvements, payment of a fair-share contribution toward future improvements, or a combination of these approaches. Refer to Section 4.14.7 below for more information.

Therefore, with implementation of **MMs TRF-1** and **TRF-2**, and adherence with applicable state, regional, and local plans and policies, construction-related impacts associated with the Project's proposed roadways, pedestrian, and bicycle facilities would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system.

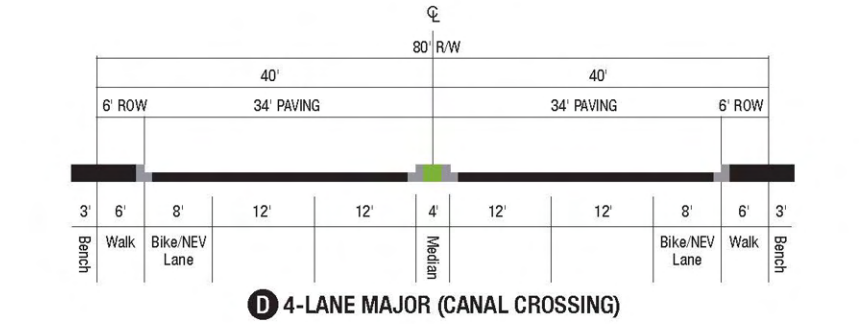
During Project operations, right-of-way (ROW) widths would be tailored to accommodate expected traffic demand generated by the different development components, but also include room to accommodate pedestrian and bicycle facilities. The Project would be designed to encourage pedestrian activity throughout the Project site, between different planning areas. The inclusion of canopy trees along roadways and trails within the Project area will allow for maximum shade and encourage pedestrian travel along those routes.

Concerning public transit, the Project, coupled with the approved La Entrada Specific Plan area, would provide an extension of the Sunline Transit Agency's service further east of the City. Potential bus lines along Avenue 50 and Vista Del Norte would serve to increase connectivity between the Project site, the La Entrada Specific Plan site, and the City.

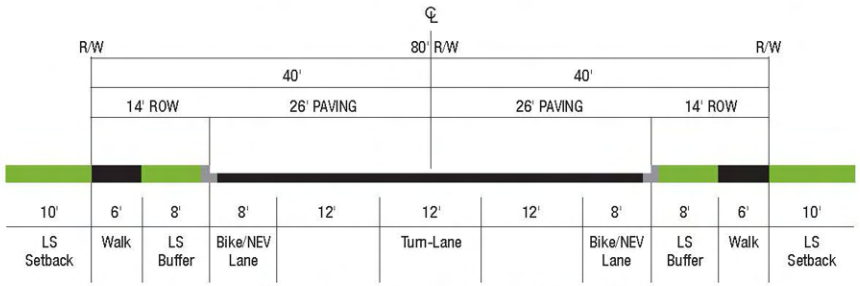
As noted in the construction discussion above, bicycle lanes will be included within the Project's 2-lane collector streets, 4-lane major streets, and 6-lane arterial streetscapes. These roadway types form the majority of roadways found within the Project area. The delineation of bicycle lanes would encourage alternative forms of travel and promote pedestrian and bicyclist safety. Additionally, the 6-lane arterial and 4-lane major streets would allow for pedestrian, bicycle, and neighborhood electric vehicles (e.g., golf carts) to traverse via a landscape-separated buffer. The Project's proposed bicycle lanes would provide connectivity to the future extension identified in the CVAG's CV LINK (see Figure 2. CV Link Overview Map at footnoted link.)[8] See **Exhibit 4.14-1: Typical Street Sections**.

[8] CVAG. (2016). *CV LINK, Conceptual Master Plan Volume 1*. Available at: https://coachellavalleylink.com/wp-content/uploads/CV_Link_MP_Vol_1_v47.pdf (accessed July 2023).

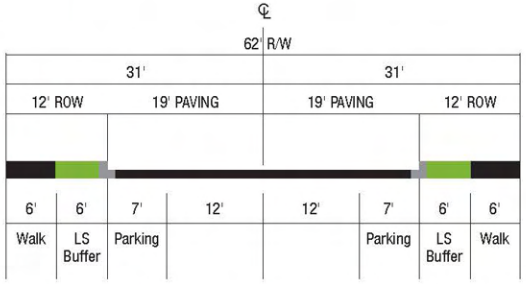
Based on the above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; therefore, a less than significant impact would occur.



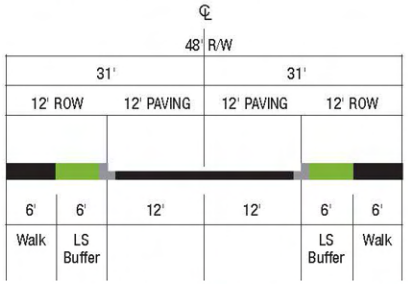
D 4-LANE MAJOR (CANAL CROSSING)



E 2-LANE COLLECTOR (SECONDARY)



LOCAL STREET: W/ON-STREET PARKING (RESIDENTIAL)



LOCAL STREET: NO ON-STREET PARKING (RESIDENTIAL)

EXHIBIT 4.14-1: Typical Street Sections (Continuing)

KPC Coachella Specific Plan Project

City of Coachella

Kimley»Horn

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OFF-SITE IMPROVEMENTS

Similarly, all construction and operational activity associated with the off-site improvement areas would be subject to compliance with all applicable programs, plans, ordinance or policies addressing the circulation system. In addition, utility infrastructure and roadway improvements would be sited with appropriate pre-design field surveys and analyses to facilitate final siting/design ensure consistency with applicable plans, policies, standards, and ordinances related to the circulation system. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Additionally, the TIA conducted for the Project analyzed the Project's impact on key study locations to evaluate the traffic associated with existing, future, and Project traffic. Recommended improvements are provided in **Section 4.14.7** and are listed as (**TRANS-1** through **TRANS-21)**. Therefore, impacts associated with the off-site improvement areas would be less than significant with mitigation incorporated. Refer to **Section 3.0: Project Description** of this EIR and **Section 4.14.7** below for recommended off-site improvements.

Mitigation Measures

Refer to additional recommended improvements **TRANS-1** through **TRANS-21** in **Section 4.14.7**.

MM TRF-1 Prior to commencing grading, the Applicant shall develop and implement a Parking and Staging Plan for all phases of construction to require that all Project-related parking occurs on-site or in pre-designated off-site parking areas. The Staging Area shall maintain through park access for motor vehicles, bicycles, and pedestrians. At least 60 days prior to start of site mobilization, the Applicant shall submit the Plan to each affected jurisdiction for review and approval.

MM TRF-2 Prior to construction grading, the Applicant shall submit for review and approval a Construction Traffic Control Plan (TCP) to the Cities of Coachella and Indio, County of Riverside, and Caltrans jurisdictions in the area as required as part of the encroachment permit or related approval process. The TCP shall address, at minimum, the following issues:

a) Controlling construction traffic flow by use of a flag person at construction site entrances on public roads;

b) Signage, lighting, and traffic control device placement if required;

c) Need, if any, for construction work hours and arrival/departure times outside of peak traffic periods;

d) Maintaining access for emergency vehicles;

e) Advanced notice to local agencies, transit providers, school districts, and emergency service providers regarding the anticipated schedule, location, and duration of any temporarily reduced through lanes, including clear plans for temporary detours and alternate routes, if applicable;

f) Main through access in each direction on any public road;

g) Maintain access to adjacent properties during the construction;

h) Specify construction related haul routes for any material import/export;

i) Timing of heavy equipment and building materials deliveries; and

j) Identify specific contractor training and related safety procedures for construction vehicles exiting and entering work areas from public roads.

Impact 4.14-2: Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Level of Significance: Less Than Significant with Mitigation Incorporated

OPERATIONS

As discussed in **Section 4.14.2**, Regulatory Setting above, comprehensive updates to CEQA and the State CEQA Guidelines require projects to use VMT to determine project impacts. The VMT impact analysis for the Project is presented below.

Project VMT

As noted in **Section 4.14.3**, a VMT analysis (**Appendix J1**) was conducted for the Project by LLG in December 2022. The VMT Analysis determined the following average VMT per Capita, VMT per employee and Regional Boundary VMT values by utilizing RIVCOM for the County of Riverside and the Project.

Residential Land Uses

Residential VMT was analyzed using RIVCOM Socio-Economic Data (SED) and the Project's proposed 9,538 Dwelling Units (DU) and population factors of 3.45 and 2.84 in 2018 and 2045, respectively, as shown in **Table 4.14-4: Residential Factors and Population**.

Table 4.14-4: Residential Factors and Population

Residential Factors and Population	
Land Use	Residential
Size	9,538 DU
Population Factor (Baseline)	3.45 Population/DU
Population (Baseline)	**32,913**
Population Factor (Cumulative)	2.84 Population/DU
Population (Cumulative)	**27,127**
Source: LLG. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis*. Page 8 – Table 3. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J1.**	

Baseline plus Project-Generated VMT – As shown in **Table 4.14-5: Baseline plus Project-Generated VMT per Capita** below, the Project average baseline Project-generated VMT per Capita is 16.74 percent less than the County's baseline VMT per Capita.

Table 4.14-5: Baseline plus Project-Generated VMT per Capita

Baseline plus Project-Generated VMT per Capita	
Baseline County of Riverside VMT/Capita (Threshold)	14.88
Project Baseline Residential VMT	407,839
Project Baseline Population	32,913
Baseline Project-Generated VMT/Capita	12.39
Compared to the County of Riverside Threshold	**16.74% Lower**
Source: LLG. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis*. Page 8 – Table 4. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J1.**	

Cumulative plus Project-Generated VMT- As shown in **Table 4.14-6**, **Cumulative plus Project-Generated VMT**, the Project average cumulative Project-generated VMT per Capita is 8.54 percent less than the County's cumulative VMT per Capita threshold.

Table 4.14-6: Cumulative plus Project-Generated VMT per Capita

Cumulative plus Project-Generated VMT per Capita	
Cumulative County of Riverside VMT/Capita (threshold)	15.89
Project Cumulative Residential VMT	394,246
Project Cumulative Population	27,127
Cumulative Project-Generated VMT/Capita	14.53
Compared to the County of Riverside Threshold	**8.54% Lower**
Source: LLG. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis*. Page 8 – Table 5. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J1.**	

Based on the info presented in **Tables 4.14-4** through **4.14-6** above, the Project's residential land uses would not exceed the County's baseline or cumulative VMT per Capita threshold and therefore, would not have a significant VMT impact for either the baseline or cumulative conditions for the residential land uses.

Office Land Uses

The VMT Analysis concluded that the Project is anticipated to have 5,948 employees by utilizing the County's GP Appendix E-2: Socioeconomic Build-out Assumptions and Methodology as shown in **Table 4.14-7: Employee Factors and Employees.**

Table 4.14-7: Employee Factors and Employees

Employee Factors and Employees	
Land Use	Office
Agriculture	0.05 Employee/Acre
Commercial Retail	500 SF/Employee
Commercial Office	300 SF/Employee
Open Space – Mineral Resources	0.03 Employee/Acre
Open Space - Recreation	0.15 Employee/Acre
Notes:	

Employee Factors and Employees
The VMT Analysis applies the methodology most appropriate for evaluating vehicle miles traveled regardless of location within the County, i.e., the *County of Riverside Transportation Analysis Guidelines for Level of Service, Vehicle Miles Traveled* (dated December 2020). See **Section 4.12: Population and Housing**, for the Project's projected employee and population counts based on City-specific employee and population generation rates.
Source: LLG. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis*. Page 9 – Table 6. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J1.**

Baseline plus Project-Generated VMT – As shown in **Table 4.14-8: Baseline plus Project-Generated VMT per Employee** below, the Project average baseline Project-generated VMT per Employee would need to be reduced by 5.41 percent to meet the County's baseline VMT per Employee threshold. Refer to **MMs TRF-3** and **TRF-4** below for more information.

Table 4.14-8: Baseline plus Project-Generated VMT per Employee

Baseline plus Project-Generated VMT per Employee	
Baseline County of Riverside VMT/Employee (Threshold)	18.30
Project Baseline Work VMT	115,056
Project Baseline Employees	5,948
Baseline Project-Generated VMT/Employee	19.34
Compared to the County of Riverside Threshold	**5.41% Reduction Needed**
Source: LLG. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis*. Page 9 – Table 7. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J1.**	

Cumulative plus Project-Generated VMT- As shown in **Table 4.14-9**: **Cumulative plus Project-Generated VMT per Employee**, the Project average cumulative Project-generated VMT per Employee would need to be reduced by 3.69 percent to meet the County's cumulative VMT per Employee threshold. Refer to **MMs TRF-3** and **TRF-4** below for more information.

Table 4.14-9: Cumulative plus Project-Generated VMT per Employee

Cumulative plus Project-Generated VMT per Employee	
Cumulative County of Riverside VMT/Employee (threshold)	17.31
Project Cumulative Work VMT	106,927
Project Cumulative Employee	5,948
Cumulative Project-Generated VMT/Employee	17.98
Compared to the County of Riverside Threshold	**3.69% Reduction Needed**
Source: LLG. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis*. Page 10 – Table 8. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J1.**	

Based on the info presented in **Tables 4.14-7** through **4.14-9** above, the Project's office land uses would exceed the County's baseline and cumulative VMT per Employee threshold and therefore would have a significant VMT impact for both the baseline and cumulative conditions for the office land uses, thus requiring mitigation. Refer to **MMs TRF-3** and **TRF-4** below for more information.

Retail Land Uses

Retail VMT was similarly projected using RIVCOM SED algorithms.

Baseline plus Project-Generated VMT – As shown in **Table 4.14-10, Baseline Plus Project's Effect on VMT** below, the baseline Plus Project link-level boundary County-wide VMT would need to be reduced by 0.87 percent to meet the baseline no Project link-level boundary County-wide VMT threshold. Refer to **MMs TRF-3** and **TRF-4** below for more information.

Table 4.14-10: Baseline Plus Project's Effect on VMT

Baseline Project's Effect on VMT	
Baseline No Project link-level boundary County-wide VMT (Threshold)	60,874,265
Baseline Plus Project link-level boundary County-wide VMT	61,408,606
Compared to the County of Riverside Threshold	**0.87% Reduction Needed**
Source: LLG. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis*. Page 10 – Table 9. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J1.**	

Cumulative Plus Project-Generated VMT- As shown in **Table 4.14-11**, **Cumulative Plus Project's Effect on VMT** below, the baseline Plus Project link-level boundary County-wide VMT would need to be reduced by 0.87 percent to meet the baseline no Project link-level boundary County-wide VMT threshold. Refer to **MMs TRF-3** and **TRF-4** below for more information.

Table 4.14-11: Cumulative Plus Project's Effect on VMT

Cumulative Project's Effect on VMT	
Cumulative No Project link-level boundary County-wide VMT (Threshold)	84,233,703
Cumulative Plus Project link-level boundary County-wide VMT	84,079,221
Compared to the County of Riverside Threshold	**0.18% Lower**
Source: LLG. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis*. Page 10 – Table 10. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J1.**	

Based on the info presented in **Tables 4.14-10** and **4.14-11** above, the Project's retail land uses would increase the baseline link-level boundary County VMT under the plus Project condition compared to the no Project condition and thus would have a significant VMT impact for the baseline conditions for the retail land uses and requires mitigation.

The VMT Analysis concluded that the Project's retail land uses would decrease the cumulative link-level boundary County VMT under the plus Project condition compared to the cumulative no Project condition. Therefore, the Project would not have a significant cumulative VMT impact regarding retail land uses. In addition, a significant majority of the retail development would be local-serving retail and restaurant uses with building sizes less than 50,000 SF, which would screen out under County and OPR Guidelines but in order to be conservative, the Project would implement **MMs TRF-3** and **TRF-4** to reduce the significant baseline retail VMT and office land use impacts to less than significant.

The Project Applicant would implement a TDM program that includes a combination of strategies to reduce VMT. These strategies include **MM TRF-3,** which would require the implementation of a marketing strategy to promote the Project site employer's Commute Trip Reduction (CTR) to promote and educate employees about their travel choices to the employment location such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. Another applicable TDM is **MM TRF-4**,

which would require the implementation of a ridesharing program and establishment of a permanent transportation management association with funding requirements for employees in order to reduce the number of trips, VMT, and GHG emissions. As concluded in the VMT Analysis and **Table 4.14-12**, implementation of **MMs TRF-3** and **TRF-4** are expected to reduce the project's [employee commute] VMT by up to 7.84%. The VMT reduction associated with **MMs TRF-3** and **TRF-4** was quantified based on the reduction formulas established in the CAPCOA GHG Reduction Handbook (calculation worksheets are provided in **Appendix J1**). Therefore, impacts would be less than significant.

Table 4.14-12: Baseline Plus Project's Effect Summarization

Baseline Plus Project's Effect Summarization	
Baseline Project's Effect on VMT – Reduction Needed	0.87%
MM TRF-3 Maximum VMT Reduction	4.0%
MM TRF-4 Maximum VMT Reduction	4.0%
MM TRF-3 and -4 Total Reduction (1 – [(1 – 4%) ∗ (1 – 4%)])	7.84%
Difference Between Reduction Needed and Total Reduction Provided	6.97%

OFF-SITE IMPROVEMENTS

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The off-site improvements proposed as part of the Project are not traffic-generating improvements, but are infrastructure improvements limited to water, sewer, dry utilities, and an off-site extension of Vista Del Norte to the west of the Project site. Additionally, the off-site improvements are conceptual in nature, and subject to modification during final design and permitting. Therefore, impacts associated with the off-site improvements would be less than significant.

Mitigation Measures

MM TRF-3 The applicant will implement a marketing strategy to promote the project site employer's Commute Trip Reduction (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 and GHG emissions. Since 100% of employees will be eligible for the program, the Project can get a maximum VMT reduction of up to 4.00%.

MM TRF-4 The applicant will implement a ridesharing program and establish a permanent transportation management association with funding requirements for employees. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT and GHG emissions. Since 100% of employees will be eligible for the program, the Project can get a maximum VMT reduction of up to 4.00%. Based on the above, after the Project implements the combination mitigation measures of T-7 and T-8, the VMT reduction is 7.84%.

Impact 4.14-3: ***Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

Level of Significance: Less Than Significant with Mitigation Incorporated

CONSTRUCTION

Construction of the Project would involve the use of large heavy-duty equipment such as rollers, graders, and dump trucks. Per **MM TRF-1** and **MM TFR-2,** all staging, and construction areas would have appropriate signage and standard safety protocols as implemented by the Applicant through standard construction practices. To further reduce potential Project site improvements, the circulation improvements identified in Impact Threshold 4.14-1 above, the Project would implement **MM TRF-2**, requires the contractor to use construction traffic flagmen, signage, and other measures subject to local agency review and approval, to ensure safe construction practices. Furthermore, all the Project's circulation plan and off-site improvements would be designed in compliance with applicable Coachella GP policies and Coachella MC design requirements to ensure that potential hazards are minimized. Therefore, impacts would be less than significant. Refer to Impact Threshold 4.14-1 and **Section 3.0**: **Project Description** for further information regarding the Project's proposed circulation improvements.

OPERATIONS

Land development proposed for the Project area would avoid naturally occurring hazards to the extent feasible while providing circulatory improvements that would aid the accessibility of service vehicles. Separation of pedestrians from vehicular and bicycle traffic would be accomplished through several elements, such as the installation of sidewalks and incorporation of pedestrian walking paths within landscape buffers. The curvilinear design of the proposed internal roadway system evokes an organic development layout which encourages smoother, slower driving.

These circulation improvements would ensure that the Project is compliant with Coachella GP Policies including but not limited to, Coachella GP Mobility Element Policy 1.1, which requires that the planning, design and construction of projects consider the needs of all modes of travel to create safe, livable and inviting environments for pedestrians, bicyclists, motorists and public transit users of all ages and abilities; and Coachella GP Policy 3.1, which supports the need for a pedestrian network to improve health outcomes by creating a safe and convenient circulation system for pedestrians that focuses on crosswalks, improves the connections between neighborhoods and commercial areas, provides places to sit or gather, pedestrian-scaled street lighting, buffers from moving vehicle traffic, and includes amenities that attract people of all ages and abilities. Furthermore, each circulation improvement plan would undergo plan checks by City staff to ensure that all future roadways are designed to be safe and minimize roadway hazards pursuant to Coachella MC Section 16.32.070, Grade, curves, and sight distances. Since the Project's circulation would not create hazards due to a geometric design feature or incompatible use during operations, a less than significant impact would occur.

OFF-SITE IMPROVEMENTS

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. As noted in Threshold 4.14-2, the off-site improvements (limited to infrastructure improvements) are needed to serve the Project. Therefore, construction and operations of the off-site improvements would not introduce geometric design features or incompatible uses and impacts would less than significant.

Mitigation Measures

Refer to **MMs TRF 1** and **2** in Impact Threshold 4.14-1 above.

Impact 4.14-4: Would the project result in inadequate emergency access?

Level of Significance: Less than Significant with Mitigation Incorporated

CONSTRUCTION

As previously stated, the Project proposes a circulation plan that would provide regional and internal access to the Project site. Construction may result in temporary lane closures and detours for affected roadway segments, which may slow access of emergency vehicles. Project construction would occur within six phases with each phase including necessary circulation improvements and access, as illustrated in **Exhibit 3-12: Phasing Plan** located in **Section 3.0: Project Description**. The I-10/Avenue 50 Interchange is proposed to be built as a new interchange, thereby providing direct freeway access to the Project site. This interchange is not part of the Specific Plan, and the Project is conditioned such that construction would not occur until the interchange is built. Thus, the Project would be limited by a condition of approval that would prohibit the construction of the Project until the I-10/Avenue 50 interchange and Vista Del Norte extension are constructed since two access points to a site is the minimum requirement by the City.

The Project applicant in partnership with the City and CVAG are seeking to fund the construction of the I-10/Avenue 50 interchange via grant opportunities, concurrent with the preparation of this Draft EIR. Since Phase I development is contingent on the development of the I-10/Avenue 50 Interchange, and the City/Project Applicant cannot assure funding for the proposed interchange or control the timing/ implementation of the proposed interchange, Standard Condition of Approval (COA) TRANS-1 would ensure that Project construction would not commence until completion of the I-10/Avenue 50 Interchange.

As each phase of the Project is constructed, **MM TRF-2** would be implemented to reduce potential impacts to less than significant levels, by requiring such measures as adequate signage, emergency service provider notification, and traffic control during construction. These site-specific construction activities would be required as part of the Project's circulation plan and would be finalized on a project-by-project basis by the City to ensure that the Project maintains efficient emergency access internally, during construction of each phase. The Project's construction activities would be required to implement measures to facilitate the passage of persons and vehicles through/around any required temporary road restrictions and ensure the safety of passage in accordance with Section 503 of the California Fire Code

(Title 24, California Code of Regulations, Part 9), which would be ensured through the City's permitting process. These measures would also be implemented through a construction traffic management plan placed on each project development phase.

Additionally, the Project would pay DIF fees pursuant to Coachella GP Policies 6.1 and 6.3 to fund the improvement of external intersections and roadways listed in the Project's TIA and in the Coachella GP Program EIR that would result in intersection and roadway deficiencies due to the Project in conjunction with cumulative development within the City. To help further reduce impacts, the Project would implement **MM TRF-5** that would require the Project Applicant to prepare a Master Natural Disaster Preparedness Plan for the entire Project area and specific-area Natural Disaster Preparedness plans (consistent with the Master Natural Disaster Preparedness Plan) for all Villages and each construction phase to help with emergency/evacuation activities during a natural disaster. **MM TRF-6** requires that the I-10/Avenue 50 interchange and Vista Del Norte extension be operational prior to the commencement of construction.

Overall, implementation of **MM TRF-2** and **MM TRF-6** and COA TRANS-1 and payment of DIFs, the City/ Project applicant would provide adequate emergency access during construction and operational activity. Therefore, impacts would be mitigated to a less than significant level.

OPERATIONS

The Project would include new and modified roadways with two points of access as noted above and in **Section 3.0**, **Project Description**. Direct access to the Project site would be provided from Vista Del Norte and the proposed Avenue 50/I-10 interchange access point, which are adjacent to the Project site. The Project is required to design and construct internal access roads of sufficient size to accommodate emergency vehicles and provide fire suppression facilities (e.g., hydrants, fire sprinklers and fire-resistant construction materials) in conformance with the City Municipal Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9).

The Project would also pay DIF fees that would improve emergency response circulation throughout the City, pursuant to Coachella MC Section 4.45.060. DIFs could be used as a fire facility fee to ensure that residents of the City have adequate fire protection facilities including buildings, land, equipment, and vehicles based on the facility standard of one fire station for every 3,000 dwelling units. Payment of DIFs could be used in support for police facilities to ensure that residents and workers of the City have adequate police protection facilities including buildings, land, equipment, and vehicles. Lastly, the Project would be required to pay a fair share fee pursuant to Coachella GP Policies 6.1 and 6.3. This would help improve the circulation of emergency vehicles throughout the City. Therefore, a less than significant impact is anticipated in regard to emergency access impacts during Project operations.

OFF-SITE IMPROVEMENTS

The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site improvements would not significantly impact emergency access. The off-site impact areas are spread out

and smaller in scale, and would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design. They would not interfere with egress and ingress of emergency vehicles on the Project site, and impacts would be less than significant.

Standard Condition of Approval

COA TRANS-1 Project construction will not commence until completion of the I-10/Avenue 50 Interchange and the extension of Vista Del Norte is completed in order to provide two points of access to the Project site.

Mitigation Measures

Refer to **MM TRF-2** in Impact Threshold 4.14-1 above.

MM TRF-5 Prior to issuance of any building, or grading permit, the Project Applicant will prepare a Master Natural Disaster Preparedness Plan for the entire Project area and subsequent neighborhood-specific Natural Disaster Preparedness Plans, for each Village and proposed Phases of construction. The Natural Disaster Preparedness Plans, at minimum, would include but is not limited to the following elements:

- Means of reporting fires, earthquakes, and other public safety emergencies.
- Evacuation procedures and emergency escape route assignments.
- Procedures for employees or emergency personnel who remain to operate critical operations before they evacuate.
- Accounting for all employees and residents after an emergency evacuation has been completed.
- Rescue and medical duties for on-site employees and residents.
- Names or job titles of persons who can be contacted.
- A description of the alarm system to be used to notify employees (including disabled employees) to evacuate and/or take other actions. The alarms used for different actions should be distinctive and might include horn blasts, sirens, or even public address systems.
- The site of an alternative communications center to be used in the event of an emergency event.
- The site of an alternative communications center to be used in the event of a fire or explosion.

The Natural Disaster Preparedness Plans would be implemented by the Project Applicant/Site-specific Contractor during the Project's construction and implemented by the City of Coachella and site-specific employer, and HOA during the Project's operational phase.

MM TRF-6 Project construction will not commence until completion of the I-10/Avenue 50 Interchange and the extension of Vista Del Norte is completed in order to provide two points of access to the Project site.

4.14.5 CUMULATIVE IMPACTS

CONSTRUCTION

Construction activities associated with the Project, in conjunction with nearby cumulative projects, would result in both temporary and long-term traffic impacts to local roadway system. However, the Project is not anticipated to conflict with transportation plans or policies and is consistent with all relevant state, regional, and local goals and policies, as listed in **Section 4.14.2: Regulatory Setting**, above. As part of the City's discretionary review and approval process, all cumulative development projects are required to reduce construction traffic impacts on the local circulation system and implement mitigation measures pursuant to CEQA provisions. Consequently, future development on the cumulative development sites would not result in significant environmental transportation-related impacts, nor would future development on the cumulative development sites conflict with or obstruct a state or local plan or regulation related to transportation with implementation of **MMs TRF-1** through **TRF-4**. Therefore, the Project would not cause a cumulatively considerable transportation impact, and no mitigation measures are required during the Project's construction phase.

Operations

As discussed previously in Impact 4.14-2, the Project is not anticipated to result in VMT that would exceed the County's adopted thresholds of significance with implementation of **MMs TRF-3** and **MM TRF-4**. Furthermore, the Project would be required to pay its fair share contributions and DIFs to ensure that intersections will function at LOS E or better during operations. This would consequently improve emergency services within the Project site and the City. Consistent with the Project, all cumulative development projects would be required to reduce VMT-related impacts and implement TDMs, PDFs, or mitigation measures pursuant to CEQA guidelines. Therefore, the Project would not result in a cumulatively considerable contribution during the operations phase.

4.14.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant and unavoidable impact concerning transportation would occur.

4.14.7 SUPPLEMENTAL LOS INFORMATION

The TIA was conducted for the Project in accordance with the City of Coachella, City of Indio, and the RCTC CMP traffic study requirements. However, the following supplemental traffic analysis is provided for informational and transparency purposes only, as additional delay – to an intersection or roadway segment – is no longer considered a significant impact under CEQA. Nevertheless, pursuant to City direction, the recommendation improvements will be considered as mitigation measures to ensure that LOS is reduced at each applicable intersection/roadway.

STUDY AREA

Fifty-three existing key study intersections and two future key study intersections were evaluated for the TIA's External Network analysis. Five future key study intersections were evaluated for the Internal Network analysis.

A list of the intersections that make up the Study Area, including the existing AM and PM peak hour LOS are listed in **Table 4.14-13, External and Internal Study Intersections** below.

Existing Conditions Traffic Volumes

Existing AM and PM peak hour traffic volumes at the 53 key existing study intersections evaluated in the report were collected in August 2022. These key existing study intersections were designated for evaluation based on the appropriate City criteria and knowledge of the area circulation system. Traffic count data is included in **Appendix J2** of this EIR. Below.

Table 4.14-13: External and Internal Study Intersections

Study Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
1. Monroe Street at I-10 Westbound Ramps	Signal	7.5	A	6.6	A
2. Monroe Street at I-10 Eastbound Ramps	Signal	25.8	C	26.5	C
3. Monroe Street at Highway 111	Signal	27.3	C	31.1	C
4. Monroe Street at Avenue 48	Signal	35.7	D	32.1	C
5. Jackson Street at I-10 Westbound Ramps	Signal	5.8	A	4.6	A
6. Jackson Street at I-10 Eastbound Ramps	Signal	19.3	B	19.0	B
7. Jackson Street at Highway 111	Signal	27.3	C	27.2	C
8. Jackson Street at Avenue 48	Signal	32.2	C	29.4	C
9. Jackson Street at Avenue 50	All-Way Stop	**38.9**	**E**	20.1	C
10. Jackson Street at Avenue 52	All-Way Stop	19.6	C	17.9	C
11. Golf Center Parkway at Avenue 44	Signal	18.6	B	15.8	B
12. Golf Center Parkway at Indio Springs Drive	Signal	21.7	C	20.3	C
13. Golf Center Parkway at I-10 Westbound Ramps	Signal	20.5	C	14.0	B
14. Golf Center Parkway at I-10 Eastbound Ramps	Signal	19.8	B	21.0	C
15. Golf Center Parkway at Avenue 45	Signal	17.8	B	19.1	B
16. Golf Center Parkway/Lorraine Street at Highway 111	Signal	43.8	D	**181.2**	**F**
17. Calhoun Street at Avenue 48	Signal	20.2	C	19.6	B
18. Calhoun Street at Avenue 50	Signal	30.8	C	30.5	C
19. Calhoun Street at Avenue 52	All-Way Stop	20.0	C	14.2	B
20. Van Buren Street at Avenue 48	Signal	25.3	C	22.1	C
21. Van Buren Street at Avenue 50	Signal	28.9	C	27.0	C
22. Van Buren Street at Avenue 52	Signal	30.8	C	31.5	C
23. Dillon Road at Avenue 48	Signal	19.6	B	22.3	B
24. Highway 111 at Avenue 48	Signal	13.6	B	14.2	B
25. Dillon Road at Cabazon Avenue/Avenue 48	Signal	11.3	B	16.0	B
26. Grapefruit Boulevard at Avenue 49	Signal	11.3	B	10.3	B
27. Dillon Road at Harrison Place	Signal	14.8	B	16.3	B
28. Dillon Road at SR-86 NB Ramps	Signal	22.9	C	20.1	C
29. Dillon Road at SR-86 SB Ramps	Signal	16.3	B	20.3	C
30. Cesar Chavez Street at Park Lane/Grapefruit Boulevard	Signal	19.4	B	19.9	B
31. Cesar Chavez Street at Avenue 50	Signal	28.2	C	28.9	C
32. Cesar Chavez Street at Avenue 52	Signal	39.5	D	47.3	D
33. Leoco Lane at Avenue 50	Signal	11.7	B	11.0	B
34. Grapefruit Boulevard at Leoco Lane	One-Way Stop	13.6	B	16.3	C
35. Terra Lago Parkway at Avenue 44	One-Way Stop	9.0	A	8.9	A
36. Dillon Road at Vista Del Norte	Two-Way Stop	23.7	C	24.0	C

Study Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
37. Dillon Road at I-10 Westbound Ramps	One-Way Stop	17.5	C	17.3	C
38. Dillon Road at I-10 Eastbound Ramps	One-Way Stop	14.8	B	13.7	B
39. Dillon Road at Vista Del Sur	One-Way Stop	9.8	A	9.7	A
40. Magnolia Street/Tyler Street at Avenue 50	Three-Way Stop	14.3	B	29.3	D
41. Sunset Drive at Avenue 52	Signal	13.0	B	15.2	B
42. Grapefruit Boulevard at Sunset Drive	Signal	10.2	B	12.2	B
43. Dillon Road at Fargo Canyon Road	One-Way Stop	11.6	B	10.1	B
44. Dillon Road at Avenue 44	One-Way Stop	12.7	B	11.1	B
45. Tyler Street at Vista Del Norte	One-Way Stop	0.0	A	0.0	A
46. Tyler Street at 50th Avenue	One-Way Stop	8.9	A	8.6	A
47. Tyler Street at SR-86	Signal	25.6	C	17.4	B
48. Tyler Street at Avenue 52/Industrial Way	Signal	17.2	B	24.0	C
49. Polk Street at 50th Avenue	Two-Way Stop	8.9	A	9.0	A
50. Polk Street at Avenue 52	One-Way Stop	8.8	A	8.6	A
51. SR-86 at Avenue 52	Signal	22.8	C	18.9	B
52. Filmore Street at Avenue 50	Two-Way Stop	8.7	A	8.6	A
53. Filmore Street at Avenue 52	Two-Way Stop	8.9	A	8.7	A
54. Avenue 50 at I-10 Westbound Ramps [*Future Intersection*]	-	-	-	-	-
55. Avenue 50 at I-10 Eastbound Ramps [*Future Intersection*]	-	-	-	-	-
Source: Linscott Law and Greenspan, Engineers. 2023. *Traffic Impact Analysis Report KPC Coachella Specific Plan*. Page 18 – Table 3-1. Irvine, CA: Linscott, Law, and Greenspan, Engineers.					
Notes: LOS = Level of Service Maximum Acceptable LOS = D Deficient operation shown in bold; Delay shown in seconds; SB = Southbound; NB = Northbound; SR – State Route					

Table 4.14-14: Existing intersection LOS Results, summarizes the existing peak hour service level calculations for key study intersections based on existing traffic volumes and current street geometry.

Table 4.14-14: Existing Intersection LOS Results

Study Intersection	AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS
9. Jackson Street at Avenue 50	38.9	E	--	-
16. Gold Center Parkway/Lorraine Street at Highway 111	--	--	181.2	F

As concluded in Table 4.14-14, Intersections 9 and 16 currently operate at an unacceptable level of service, LOS E or worse during the AM and/or PM peak hour. The remaining key study intersections currently operate at an acceptable level of service during the AM and PM peak hours.

Trip Generation Forecast

Traffic projections for the Project were modeled using RIVCOM. Appropriate SED data was allocated to the RIVCOM Traffic Analysis Zones (TAZs) based on the project description. **Table 4.14-15: Project Trip Generation Forecast – Buildout KPC Coachella Specific Plan** summarizes the ITE trip generation rates used to calculate the number of trips forecast to be generated by the Project.

Table 4.14-15: Project Trip Generation Forecast – Buildout KPC Coachella Specific Plan

Project Description	Daily 2-way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
KPC Coachella Specific Plan Total Gross Trip Generation	98,485	4,047	4,917	8,964	4,309	3,818	8,127
Total Internal Trip Ends	40,394	1,801	1,813	3,614	1,695	1,693	3,389
Total External Trip Ends	58,091	2,246	3,105	5,350	2,614	2,125	4,738

Linscott Law and Greenspan, Engineers. 2023. *Traffic Impact Analysis Report KPC Coachella Specific Plan*. Page 26 – Table 5-1. Irvine, CA: Linscott, Law, and Greenspan, Engineers.

As shown in **Table 4.14-15** above, the Project is forecasted to generate approximately 98,485 gross daily trips, with 8,964 gross trips (4,047 inbound, 4,917 outbound) produced in the AM peak hour and 8,127 gross trips (4,309 inbound, 3,818 outbound) produced in the PM peak hour on a "typical" weekday. Further, the Project is forecasted to generate approximately 58,091 daily net external trips, with 5,350 net external trips (2,246 inbound, 3,105 outbound) produced in the AM peak hour and 4,738 net external trips (2,614 inbound, 2,125 outbound) produced in the PM peak hour on a "typical" weekday.

External Network Year 2045 Traffic Impact Analysis

The relative impact of the added Project traffic volumes generated by the Project during the AM and PM peak hours was evaluated based on analysis of future operating conditions at the key study intersections in the External Network, with and without the proposed Project for the Year 2045 traffic conditions. The capacity analysis procedures further discussed in the TIA were utilized to investigate the future delay relationships and volume-to-capacity ratios and service level characteristics at each study intersection. The Project's potential impacts at each key intersection was evaluated using the traffic impact criteria further discussed in the TIA. Refer to Table 7-1 of the TIA for more information.

Without Project Conditions

The 55 study intersections were analyzed for the External Network Year 2045 Without Project traffic conditions. **Table 4.14-16: Without Project 2045 Peak Hour LOS** summarizes the AM and PM peak hour LOS results at the key study intersections for the Year 2045 without Project traffic conditions that are forecast to operate at unacceptable levels of service.

Table 4.14-16: Without Project 2045 Peak Hour LOS

Study Intersection	AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS
9. Jackson Street at Avenue 50	143.1	F	81.9	F
10. Jackson Street at Avenue 52	102.9	F	103.9	F
16. Golf Center Parkway/Lorraine Street at Highway 111	314.9	F	484.2	F
19. Calhoun Street at Avenue 52	277.8	F	129.8	F
22. Van Buren Street at Avenue 52	99.7	F	-	-
32. Cesar Chavez Street at Avenue 52	118.0	-	107.7	F
34. Grapefruit Boulevard at Leoco Lane	-	-	44.7	E
36. Dillon Road at Vista Del Norte	375.5	F	183.9	F
37. Dillon Road at I-10 Westbound Ramps	781.9	F	322.4	F
38. Dillon Road at I-10 Eastbound Ramps	497.7	F	439.4	F

Study Intersection	AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS
40. Magnolia Street/Tyler Street at Avenue 50	465.2	F	455.0	F
46. Tyler Street at 50th Avenue	2,838.5	F	241.5	F
47. Tyler Street at SR-86	335.0	F	273.3	F
49. Polk Street at 50th Avenue	274.5	F	-	-
50. Polk Street at Avenue 52	159.1	F	98.0	F
51. SR-86 at Avenue 52	318.7	F	221.8	F
52. Filmore Street at Avenue 50	1,192.7	F	95.8	F
53. Filmore Street at Avenue 52	3,590.1	F	2,439.3	F

Source: LLG Engineers. 2023. *Traffic Impact Analysis Report KPC Coachella Specific Plan*. Page 30. Irvine, CA: Linscott, Law, and Greenspan, Engineers.

As shown in **Table 4.14-16**, 18 key study intersections are forecast to operate at unacceptable LOS during the AM and/or PM peak hours under External Network Year 2045 Without Project traffic conditions. The remaining 37 key study intersections would operate at acceptable LOS better during the AM and PM peak hours.

With Project Conditions

The 55 study intersections were analyzed for the External Network Year 2045 With Project traffic conditions. **Table 4.14-17: With Project 2045 Peak Hour LOS** summarizes the AM and PM peak hour LOS results at the key study intersections for the Year 2045 with Project traffic conditions that are forecast to operate at unacceptable levels of service.

Table 4.14-17: With Project 2045 Peak Hour LOS

Study Intersection	AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS
9. Jackson Street at Avenue 50	133.5	F	73.7	F
10. Jackson Street at Avenue 52	107.6	F	97.5	F
13. Golf Center Parkway at I-10 Westbound Ramps	77.9	E	-	-
14. Golf Center Parkway at I-10 Eastbound Ramps	-	-	63.3	E
16. Golf Center Parkway/Lorraine Street at Highway 111	324.9	F	474.6	F
19. Calhoun Street at Avenue 52	273.7	F	125.0	F
22. Van Buren Street at Avenue 52	96.5	F	-	-
32. Cesar Chavez Street at Avenue 52	129.7	F	120.6	F
34. Grapefruit Boulevard at Leoco Lane	-	-	42.7	E
36. Dillon Road at Vista Del Norte	4,970.1	F	3,369.5	F
37. Dillon Road at I-10 Westbound Ramps	2,204.8	F	1,163.8	F
38. Dillon Road at I-10 Eastbound Ramps	1,035.3	F	1,026.3	F
40. Magnolia Street/Tyler Street at Avenue 50	530.8	F	479.2	F
46. Tyler Street at 50th Avenue	2,171.6	F	353.2	F
47. Tyler Street at SR-86	354.6	F	292.0	F
49. Polk Street at 50th Avenue	10,000	F	10,000	F
50. Polk Street at Avenue 52	987.9	F	1,845.8	F
51. SR-86 at Avenue 52	436.2	F	340.4	F
52. Filmore Street at Avenue 50	10,000	F	10,000	F
53. Filmore Street at Avenue 52	6,050.9	F	4,788.0	F

Source: LLG Engineers. 2023. Traffic Impact Analysis Report KPC Coachella Specific Plan. page 31. Irvine, CA: Linscott, Law, and Greenspan, Engineers.

As shown in **Table 4.14-17**, 20 of the key study intersections are forecast to operate at unacceptable LOS with the addition of Project traffic. The remaining 35 key study intersections would operate at acceptable LOS during the AM and PM peak hours under the External Network Year 2045 With Project traffic conditions.

Internal Network Year 2045 Analysis

The relative impact of the Project traffic volumes generated by the Project during the AM and PM peak hours was evaluated based on analysis of future operating conditions at the key study intersections in the Internal Network with the proposed Project traffic conditions. **Table 4.14-18, Internal Network Project Intersection Peak Hour LOS** summarizes the AM and PM peak hour LOS and Delay results at the key study intersections of the Internal Network Project traffic conditions.

Table 4.14-18: Internal Network Project Intersection Peak Hour LOS

Key Intersection	Maximum Acceptable LOS	Time Period	Project Traffic Conditions		
			Control Type	Delay (s/v)	LOS
1. Internal Intersection 1	D	AM PM	Roundabout	13.4 9.3	B A
2. Internal Intersection 2	D	AM PM	8Ø Traffic Signal	37.9 44.9	D D
3. Internal Intersection 3	D	AM PM	Roundabout	9.1 6.5	A A
4. Internal Intersection 4	D	AM PM	Roundabout	9.5 7.0	A A
5. Internal Intersection 5	D	AM PM	Roundabout	3.9 3.8	A A

Note:
s/v = seconds per vehicle, Ø = Phase
- LOS = Level of Service, please refer to *Tables 1-1* and *1-2* for the LOS definitions.
- **Bold LOS values** indicate adverse service levels based on the LOS standards outlined in this report.

Source: LLG Engineers. 2023. *Traffic Impact Analysis Report KPC Coachella Specific Plan*. Page 41 – Table 8-1. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to **Appendix J2**

Planned and Recommended Improvements

For those intersections where projected traffic volumes are expected to result in unacceptable operating conditions, the TIA contained recommended traffic improvements that would change the intersection and/or roadway segment geometry to increase capacity. These capacity improvements involve traffic signals, roadway widening, and/or re-striping to reconfigure (add lanes) roadways to specific approaches of a key intersection.

External Network Planned Improvements

The following planned improvements (separate from this Project) listed below have been included in the background of Year 2045 Without Project and Year 2045 With Project traffic conditions:

- 1. Monroe Street at I-10 Westbound Ramps: Reconstruct the south leg to provide with a second exclusive northbound left-turn lane, a second northbound through lane, and a second southbound departure lane. Reconstruct the north leg to provide a second southbound through lane. Reconstruct the east leg to provide an exclusive westbound left-turn lane, a shared westbound left-turn/through/right-turn lane, and an exclusive westbound right-turn lane.

Reconstruct the west leg to provide a second westbound departure lane. Stripe a crosswalk on the east leg. Modify the existing traffic signal. This intersection is under the City of Indio and Caltrans jurisdiction.

- 2. Monroe Street at I-10 Eastbound Ramps: Reconstruct the south leg to provide the northbound approach with a second northbound through lane, an exclusive northbound right-turn lane, and a second southbound departure lane. Reconstruct the north leg to provide a second exclusive southbound left-turn lane, a second southbound through lane, and a second northbound departure lane. Reconstruct the west leg to provide an exclusive eastbound left-turn lane, a shared eastbound left-turn/through/right-turn lane, and an exclusive eastbound right-turn lane. Reconstruct the east leg to provide a second eastbound departure lane. Stripe a crosswalk on the east leg. Modify the existing traffic signal. This intersection is under the City of Indio and Caltrans jurisdiction.
- 54. Avenue 50 at I-10 Westbound Ramps: Construct a signalized ramp interchange and design for two-phase operation. Provide the south leg with three northbound through lanes, a free northbound right-turn lane onto a loop on-ramp, and three southbound departure lanes. Provide the north leg with two southbound through lanes, a shared southbound through/right-turn lane, and three northbound departure lanes. Provide east leg with an exclusive westbound left-turn lane and exclusive westbound right-turn lane. Provide west leg on-ramp with two westbound departure lanes to I-10 freeway. Stripe crosswalks across north, west, and east legs. This planned intersection would occur under the City of Coachella's and Caltrans' jurisdiction.
- 55. Avenue 50 at I-10 Eastbound Ramps: Construct a signalized ramp interchange and design for three-phase operation. Provide the south leg with two northbound through lanes, one shared northbound through/right-turn lane, and three southbound departure lanes. Provide the north leg with one exclusive southbound left-turn lane, three southbound through lanes, and three northbound departure lanes. Provide west leg with an exclusive eastbound left-turn lane, a shared eastbound left-turn/right-turn lane, and an exclusive eastbound right-turn lane. Provide east leg on-ramp with two eastbound departure lanes to I-10 freeway. Stripe crosswalks across south, west, and east legs. This planned intersection would occur under the City of Coachella's and Caltrans' jurisdiction.

In addition, Avenue 50 will be extended northeastward from its current terminus just east of Fillmore Street to the planned Avenue 50/I-10 interchange. This planned improvement to the existing roadway network will be constructed in conjunction with other planned or proposed projects.

External Network Year 2045 with Project Additional Recommended Improvements

The following improvements listed below have been identified to offset the effect of Year 2045 traffic and Project traffic and improve Levels of Service to an acceptable range and/or to pre-Project conditions for Year 2045 With Project traffic conditions. The jurisdiction within which each improvement is located would be the lead agency in any required improvement implementation.

TRANS-1 For any off-site improvements noted below, if not constructed or fully funded by others, the Project Applicant shall pay a fair share fee. For City of Coachella

improvements, this fair share payment shall be at time of building permit issuance. For improvements in other jurisdictions, the Project Applicant or City of Coachella shall enter into an MOU with the affected jurisdiction(s) regarding fair share payment timing. The Project Applicant's fair share payment to a jurisdiction other than City of Coachella shall only be made if there is an established mechanism for receiving the funds and ensuring the funds are directly allocated toward the identified improvement in a timely manner.

TRANS-2 **Intersection 9. Jackson Street at Avenue 50 (City of Indio):**

- Install a traffic signal and design for eight-phase operation with protective left-turn phasing for all approaches.
- Stripe crosswalks across all four legs.

TRANS-3 **Intersection 10. Jackson Street at Avenue 52 (City of Indio):**

- Install a traffic signal and design for five-phase operation with protective left-turn phasing for Avenue 52.
- Stripe crosswalks across all four legs.

TRANS-4 **Intersection 13. Golf Center Parkway at I-10 Westbound Ramps (City of Indio/ Caltrans):**

- Widen and/or restripe the east leg to provide an exclusive westbound left-turn lane.
- Modify the existing traffic signal.

TRANS-5 **Intersection 14. Golf Center Parkway at I-10 Eastbound Ramps (City of Indio/ Caltrans):**

- Widen and/or restripe the south leg to provide an exclusive northbound right-turn lane.
- Modify the existing traffic signal.

TRANS-6 **Intersection 16. Golf Center Parkway/Lorraine Street at Highway 111 (City of Indio):**

- Widen and/or restripe the west leg to provide for a second exclusive eastbound left-turn lane.
- Widen and restripe the north leg to provide an exclusive southbound left-turn lane and a second northbound departure lane.
- Convert existing five-phase operation traffic signal to six-phase operation with protective left-turn phasing for eastbound and westbound traffic on Highway 111 and split-phasing on Golf Center/Lorraine Street.

TRANS-7 **Intersection 19. Calhoun Street at Avenue 52 (Riverside County):**

- Install a traffic signal and design for two-phase operation.
- Stripe crosswalks across all four legs.

TRANS-8 **Intersection 22. Van Buren Street at Avenue 52 (City of Coachella):**

- Widen and restripe the east leg to provide a westbound through lane.

- Widen and restripe the west leg to provide a second westbound departure lane.
- Modify existing traffic signal.

TRANS-9 **Intersection 32. Cesar Chavez Street at Avenue 52 (City of Coachella):**

- Widen and restripe the west leg to provide an exclusive eastbound left-turn lane.
- Widen and restripe the east leg to provide an exclusive westbound left-turn lane.
- Convert existing six-phase operation traffic signal to eight-phase operation with protective left-turn phasing for all approaches.

TRANS-10 **Intersection 34. Grapefruit Boulevard at Leoco Lane (City of Coachella):**

- Widen and/or restripe the north leg to provide an exclusive southbound right-turn lane.

TRANS-11 **Intersection 36. Dillon Road at Vista Del Norte (City of Coachella):**

- Widen and restripe the east leg to provide two exclusive westbound left-turn lanes.
- Install a traffic signal and design for eight-phase operation.
- Stripe crosswalks on all four legs.

TRANS-12 **Intersection 37. Dillon Road at I-10 Westbound Ramps (City of Coachella/Caltrans):**

- Install a traffic signal and design for three-phase operation.
- Stripe crosswalks across west and east legs.

TRANS-13 **Intersection 38. Dillon Road at I-10 Eastbound Ramps (City of Coachella/Caltrans):**

- Install a traffic signal and design for three-phase operation.
- Stripe crosswalks across west and east legs.

TRANS-14 **Intersection 40. Magnolia Street/Tyler Street at Avenue 50 (City of Coachella):**

- Widen and restripe the east leg to provide an exclusive eastbound left-turn lane.
- Install a traffic signal and design for three-phase operation with protected/permissive left-turn phasing for westbound Avenue 50.
- Stripe crosswalks across all four legs.

TRANS-15 **Intersection 46. Tyler Street at 50th Avenue (City of Coachella):**

- Widen and restripe the south leg to provide a second exclusive northbound right-turn lane and a third southbound departure lane.
- Widen and restripe the west leg to provide an exclusive eastbound right-turn lane.
- Widen and restripe the east leg to provide two exclusive westbound left-turn lanes and a second eastbound departure lane.

- Install a traffic signal and design for three-phase operation with split phasing for all approaches.
- Stripe crosswalks across south and east legs.

TRANS-16 **Intersection 47. Tyler Street at SR-86 (City of Coachella/Caltrans):**

- Widen and restripe the south leg to provide two exclusive northbound left-turn lanes, a northbound through lane, and a second southbound departure lane.
- Widen and restripe the north leg to provide an exclusive southbound left-turn lane, a second southbound through lane, a second exclusive southbound right-turn lane, and a second northbound departure lane.
- Widen and restripe the west leg to provide a second exclusive eastbound left-turn lane and a third westbound departure lane.
- Widen and restripe the east leg to provide a third westbound through lane.
- Modify the existing traffic signal and provide southbound and eastbound right-turn overlap phasing.

TRANS-17 **Intersection 49. Polk Street at 50th Avenue (City of Coachella):**

- Widen and restripe the east leg to provide an exclusive westbound left-turn lane.
- Install a traffic signal and design for three-phase operation with protected/permissive left-turn phasing for westbound 50th Avenue.
- Stripe crosswalks across all four legs.

TRANS-18 **Intersection 50. Polk Street at Avenue 52 (City of Coachella):**

- Widen and restripe the north leg to provide an exclusive southbound right-turn lane.
- Widen and restripe the west leg to provide an exclusive eastbound left-turn lane and a second westbound departure lane.
- Widen and restripe the east leg to provide a westbound through lane.
- Install a traffic signal and design for three-phase operation.
- Stripe crosswalks across the north and west legs.

TRANS-19 **Intersection 51. SR-86 at Avenue 52 (City of Coachella/Caltrans):**

- Widen and restripe the south leg to provide a third northbound through lane and a third southbound departure lane.
- Widen and restripe the north leg to provide a third southbound through lane and a third northbound departure lane.
- Widen and restripe the west leg to provide an exclusive eastbound left-turn lane, an eastbound through lane, and a second westbound departure lane.
- Widen and restripe to provide an exclusive westbound left-turn lane, a westbound through lane, an exclusive westbound right-turn lane, and a second eastbound departure lane.

- Modify the existing traffic signal to provide westbound right-turn overlap phasing.

TRANS-20 **Intersection 52. Fillmore Street at Avenue 50 (City of Coachella):**

- Widen and restripe the south leg to provide an exclusive northbound left-turn lane.
- Widen and restripe the west leg to provide a shared eastbound through/right-turn lane and a second westbound departure lane.
- Widen and restripe the east leg to provide an exclusive westbound left-turn lane, a westbound through lane, and a second eastbound departure lane.
- Install a traffic signal and design for five-phase operation with protected/permissive left-turn phasing for westbound Avenue 50.
- Stripe crosswalks across all four legs.

TRANS-21 **Intersection 53. Fillmore Street at Avenue 52 (City of Coachella):**

- Install a traffic signal and design for two-phase operation.
- Stripe crosswalks across all four legs.

Project Fair Share Analysis

The transportation impacts associated with the development of the proposed Project were determined based on the future conditions analysis with the Project. The key study locations forecast to operate at adverse levels of service are discussed below. As such, the Project's "fair share" of the recommended improvements has been calculated for the key study locations that are forecast to operate at adverse levels of service.

It should be noted that a mechanism by which the Project, per each development phase, would pay its fair share is recommended to be developed in coordination with the City and affected jurisdictions and shall be included in the Project Specific Conditions of Approval. Each Focused Traffic Study prepared in conjunction with the various phases of development of the Project shall calculate the dollar figure specific to the recommended improvements utilizing the fair share percentages calculated as part of their respective Focused Traffic Study.

External Network Year 2045 with Project Fair Share

Table 4.14-19: External Network Year 2045 with Project Traffic Conditions Intersection Fair Share Contribution presents the AM and PM peak hours Project fair share percentages at the key study intersections that are forecast to operate at adverse levels of service under Year 2045 With Project traffic conditions. As presented in **Table 4.14-19**, the first column (1) presents the existing traffic volume at the intersection. The second column (2) presents the Year 2045 Without Project traffic volume. The third column (3) presents the Year 2045 With Project traffic volume. The fourth column (4) represents the Project fair share based on the following formula:

- Project Fair Share (4) = [Column (3) – Column (2)] / [Column (3) – Column (1)] * 100

The AM and PM peak hours Project fair share percentages at the key study intersections that are forecast to operate at adverse levels of service under Year 2045 with Project traffic conditions range from -7.13% to +50.35% as shown in **Table 4.14-19**. It should be noted that the negative fair share values between the 2045 Without and 2045 With Project Traffic Conditions reflects the regional shift in traffic volume with the construction of the Project and the Avenue 50 interchange.

Table 4.14-19: External Network Year 2045 with Project Traffic Conditions Intersection Fair Share Contribution

Key Intersection	Jurisdiction	Impacted Time Period	Existing Volume (1)	Year 2045 Without Project Volume (2)	Year 2045 With Project Volume (3)	Project Fair Share Responsibility (4)
9. Jackson Street at Avenue 50	Indio	AM PM	1,830 1,613	2,703 2,364	2,649 2,314	-6.59% [9] -7.13%[9]
10. Jackson Street at Avenue 52	Indio	AM PM	1,390 1,145	2,277 1,969	2,291 1,973	**1.55%** 0.48%
13. Golf Center Parkway at I-10 Westbound Ramps	Indio/ Caltrans	AM PM	1,841 --	3,024 --	3,271 --	**17.27%**[8]
14. Golf Center Parkway at I-10 Eastbound Ramps	Indio/ Caltrans	AM PM	-- 1,732	-- 2,972	-- 3,184	-- **14.60%**
16. Golf Center Parkway/ Lorraine Street at Highway 111	Indio	AM PM	1,416 1,533	2,134 2,339	2,329 2,444	**21.36%** 11.78%[8]
19. Calhoun Street at Avenue 52	Riverside County	AM PM	1,121 906	2,056 1,731	2,074 1,731	**1.89%** 0.00%
22. Van Buren Street at Avenue 52	Coachella	AM PM	1,337 --	2,891 --	2,911 --	**1.27%** --
32. Cesar Chavez Boulevard at Avenue 52	Coachella	AM PM	2,009 2,120	3,832 3,817	3,939 3,953	5.54% **7.42%**
34. Leoco Lane at Avenue 50	Coachella	AM PM	-- 1,161	-- 1,903	-- 1,888	-- -2.06%[9]
36. Dillon Road at Vista Del Norte	Coachella	AM PM	978 845	2,381 2,103	2,699 2,406	18.48% **19.41%**
37. Dillon Road at I-10 Westbound Ramps	Coachella/ Caltrans	AM PM	1,061 984	2,668 2,322	2,963 2,727	15.51% **23.24%**
38. Dillon Road at I-10 Eastbound Ramos	Coachella/ Caltrans	AM PM	948 1,055	2,220 2,374	2,653 2,862	25.40% **27.01%**
40. Magnolia Street/Tyler Street at Avenue 50	Coachella	AM PM	962 1,031	1,979 2,054	2,107 2,090	**11.18%** 3.40%
46. Tyler Street at 50th Avenue	Coachella	AM PM	67 77	2,407 2,188	2,626 2,360	**8.56%** 7.53%
47. Tyler Street at SR-86 SB Ramps	Coachella/ Caltrans	AM PM	2,875 2,663	6,294 5,859	6,293 5,856	-0.03%[10] -0.09%[10]
49. Polk Street at 50th Avenue	Coachella	AM PM	61 57	1,413 1,183	2,388 2,024	41.90% **44.80%**
50. Polk Street at Avenue 52	Coachella	AM PM	124 96	1,589 1,413	2,204 2,024	29.57% **31.69%**

[9] The negative fair share value between the 2045 Without and 2045 With Project Traffic Conditions reflects the regional shift in traffic volume with the construction of the Project and the Avenue 50 interchange.

[10] The negative fair share value between the 2045 Without and 2045 With Project Traffic Conditions reflects the regional shift in traffic volume with the construction of the Project and the Avenue 50 interchange.

Key Intersection	Jurisdiction	Impacted Time Period	Existing Volume (1)	Year 2045 Without Project Volume (2)	Year 2045 With Project Volume (3)	Project Fair Share Responsibility (4)
51. SR-86 at Avenue 52	Coachella/ Caltrans	AM PM	2,455 2,284	4,801 4,370	5,232 4,846	15.52% **18.58%**
52. Fillmore Street at Avenue 50	Coachella	AM PM	26 18	1,535 1,300	2,882 2,600	47.16% **50.35%**
53. Fillmore Street at Avenue 52	Coachella	AM PM	90 80	1,712 1,653	1,909 1,866	10.83% **11.93%**

Notes:
▪ Net Project Percent Increase (4) = [Column (3) – Column (2)] / [Column (3) – Column (1)]
▪ Bold Project Fair Share Responsibility is based on worse case
Source: LLG Engineers. 2023. *Traffic Impact Analysis Report KPC Coachella Specific Plan*. Page 50 – Table 11-1. Irvine, CA: Linscott, Law, and Greenspan, Engineers. Refer to Appendix J2.

4.14.8 REFERENCES

City of Coachella. (2015). *City of Coachella General Plan – Land and Community Character Element.* https://www.coachella.org/home/showpublisheddocument/8407/637818910797370000.

City of Coachella. (2015). *City of Coachella General Plan – Mobility Element.* https://www.coachella.org/home/showpublisheddocument/8415/637818911636900000.

Linscott Law and Greenspan, Engineers. (2022). *KPC Coachella Specific Plan Vehicle Miles Traveled Analysis*. Irvine, CA: Linscott, Law, and Greenspan, Engineers.

Linscott Law and Greenspan, Engineers. (2023). *Traffic Impact Analysis Report KPC Coachella Specific Plan*. Irvine, CA: Linscott, Law, and Greenspan, Engineers.

4.15 TRIBAL CULTURAL RESOURCES

This section provides an assessment of potential impacts related to tribal cultural resources that could result from implementation of the proposed Project. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria. The evaluation of the Project and potential impacts to tribal cultural resources is largely based on government-to-government consultation conducted by the City of Coachella with support from the following sources:

- Cultural Resources Assessment (CRA), BCR Consulting LLC, January 2023 (attached as **Appendix D**).
- Archaeological Testing Report (ATR), BCR Consulting LLC, August 2023 (attached as **Appendix D**).

Section 4.15.4, Project Impacts and Mitigation below, discusses the potential impacts that would occur to tribal cultural resources. Tribal consultation and subsequent assessment of tribal cultural resources was conducted in compliance with California Public Resources Code (PRC) Sections 21018.3.1, 21018.3.2, 21080.3.1, 21084.2, and 21084.3.

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo their own independent CEQA analyses, including but not limited to an analysis of any impacts to cultural resources. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors, such as disturbance level of area soils.

4.15.1 ENVIRONMENTAL SETTING

The following is summarized from the Environmental Setting in **Section 4.4, Cultural Resources**. Refer to Section 4.4 for further detail related to the Natural Setting of the Project site. The Project site is located in the Coachella Valley, north of the Salton Sea in the City of Coachella. It is bounded by vacant land to the north and east, Interstate 10 (I-10) to the south, and the Coachella Canal to the west. It contains vacant and undeveloped land, and a portion of the Coachella Canal at its west end that is approximately 2,700 feet in length.

ETHNOGRAPHIC AND ARCHAEOLOGICAL CONTEXTS

Please refer to **Section 4.4, Cultural Resources**, which provides the ethnography of Native American tribes within the Project's Area, as well as the history of the Project site. This information is summarized below.

Ethnography

Cahuilla. The Cahuilla belong to the Cupan group of the Takic subfamily of languages. Like other Native American groups in southern California, they practiced semi-nomadic hunter-gatherer subsistence strategies and commonly exploited seasonably available plant and animal resources. Spanish missionaries were the first outsiders to encounter these groups during the late 18th century. The Cahuilla are generally divided into three groups: Desert Cahuilla, Mountain Cahuilla, and Western (or Pass) Cahuilla. The term Western Cahuilla is preferred over Pass Cahuilla because this group is not confined to the San Gorgonio Pass area. The distinctions are believed to be primarily geographic, although linguistic and cultural differences may have existed to varying degrees. Cahuilla territory lies within the geographic center of southern California and the Cocopa-Maricopa Trail, a major prehistoric trade route, ran through it. The first written accounts of the Cahuilla are attributed to mission fathers; later documentation was by Strong (1929), Bright (1998), and others (BCR 2023).

History

The modern City of Coachella was established within the desert of the Coachella Valley. Prior to European settlement, the area was home to the Cahuilla Native Americans. The Cahuilla migrated between the valley floor and the surrounding mountains as dictated by various stands of Ancient Lake Cahuilla. After the lake dried up around 1500, many Cahuilla settled in the valley and were historically known as the Desert Cahuilla. The first European to pass through the area is thought to be a Spaniard called Father Francisco Garces. Having become familiar with the area, Garces acted as a guide to Juan Bautista de Anza, who had been commissioned to lead a group across the desert from a Spanish outpost in Arizona to set up quarters at the Mission San Gabriel in 1771 near what today is Pasadena. Garces was followed by Alta California Governor Pedro Fages, who briefly explored the region in 1772. Searching for San Diego Presidio deserters, Fages had traveled through Riverside to San Bernardino, crossed over the mountains into the Mojave Desert, and then journeyed westward to the San Joaquin Valley. Later Spanish expeditions end eventually settlements (including Mission outposts) occurred in the 1820s. In the early years of non-Native settlement, the valley area was referred to as "Cuchuil" by the Spanish and Mexicans, derived from a rendering of a Cahuilla word with a spelling variant being "Coahuila." The Desert Cahuilla people remaining in the Coachella Valley lived at Mission outposts and, following secularization of mission lands and Mexican independence from Spain, on rancherias where they learned technical agriculture. After the United States acquired Californian territories from Mexico in 1848, several reservations were established for the Cahuilla that remained in the valley. These included Agua Caliente, Cabazon, and Torres Martinez Reservations established in 1876, and the Augustine Reservation established in 1891 (BCR 2023).

In 1876, the Southern Pacific Railroad completed its line from Los Angeles to Indian Wells (present-day Indio), under General Superintendent A.N. Towne. Jason L. Rector was the first American to take up permanent residence in the valley, in present-day Coachella. Born and raised in Iowa, Rector came to San Diego in 1884. He was actively engaged in real estate and cattle businesses and bought livestock throughout southern California. He soon accepted a position with the Southern Pacific Railroad Company

and arranged contracts with the A.N. Towne Estate to export wood from the Coachella Valley. At the time, the valley was covered in a heavy growth of mesquite and greasewood. Rector chose a site along the Southern Pacific rail siding to establish a mesquite wood terminal named Woodspur, from which lumber was hauled off to market in Los Angeles. Rector ultimately relinquished his lumber exporting venture in favor of surveying the valley to plan a townsite. He built an adobe home there. After digging a test well to check the groundwater source for irrigation potential, Jason Rector and his brother Lon excavated a well four miles east of Indio in 1900. The well tapped into pure water, at a depth of 550 feet below the desert surface. With a reliable fresh water supply secured, jobs in the railroad and lumber industries induced a settlement in Woodspur, and a small community was established. Rector dubbed the community Woodspur shortly after his well was completed. In 1901, the burgeoning town voted to change the name of Woodspur to "Conchilla," a Spanish word denoting the small shells found throughout the valley floor. When the name was decided upon and sent to printers to create advertisements for the town, the printers published the name as "Coachella," confusing the "n" and "i" for an "a" and "e," respectively. Rector and other townsite planners decided to keep the new name rather than delay development any further. The surrounding valley adopted the name as well (BCR 2023).

New settlers flocked to the townsite and began establishing homesteads. The Southern Pacific Indio Station accommodated most passengers, and the Coachella siding remained a loading station where goods and resources were imported and exported. In its nascent years, Coachella featured a general store, a drugstore, a bank, and a pool hall among its growing number of homesteads. In 1902, Rector established the Coachella Valley Produce Association, a venture that would encourage farming settlements in the area and through which the town shipped crops from the valley by train. In 1904, Rector also built, owned, and operated the first pre-cooling plant under the title of the Coachella Valley Refrigerating Company. The A. N. Towne Estate, organized under the Coachella Land and Water Company, platted the town and sold its interests to Rector. By 1905, Rector had overseen the development of a water delivery system with over two miles of pipes and the planting of a plethora of ornamental trees, making settlement in Coachella an alluring venture. Despite seasonal flooding from the surrounding mountains, people continued to settle farms and ranches in Coachella and congregated in the town center for holidays and parades. By the time Jason Rector died in 1919, he had Coachella grow into a thriving community. Private artesian wells supplied local farmers and ranchers until 1918, when the Coachella Valley Water District was formed and developed a broader distribution system for irrigation and agriculture, managed groundwater supply, and provided drinking water. Abundant water meant that crops could be planted and harvested all year; such crops that would remain viable for decades included onions, corn, melons, grapes, citrus, and dates. Front Street served as the communal center for the town of Coachella, where the Southern Pacific station and an increasing number of businesses and stores were located. The local Hayward Lumber Company provided increasing numbers of settlers with the wood to build their residences and other structures. Growing popularity and affordability of automobiles in the 1920s accompanied a locally robust economy, and service stations and garages proliferated. Family-owned businesses remained the common enterprises of Coachella through the 1930s. Social organizations, such as the Coachella Ladies Aid Society, formed and facilitated charitable projects for the community. By this time the arid desert setting of Coachella had been transformed into a mature agricultural landscape, due to year-round farming made possible by the climate and plentiful water. Construction of the Coachella

Branch of the All-American Canal in the late 1940s diverted water from the Colorado River to Coachella Valley communities and bolstered the growing region's ability to cultivate year-round crops. Decades of study, planning, and negotiating between the Coachella Valley County Water District, the Bureau of Reclamation, and various local groups resulted in construction of the system. Prior to construction of the canal, farmers irrigated a total of 14,030 acres of crops. The newly completed Coachella Canal distribution system allowed cultivation of over 50,000 acres. The system remains intact and operates as originally intended. In December of 1946, Coachella's residents overwhelmingly voted to incorporate the 2.5-square-mile town as a city. A City Hall was dedicated in 1949, which housed a courthouse, post office, police department, and administrative offices. (BCR 2023).

Recent decades have brought residential development which has modernized the Coachella Valley landscape. By the 1970s, the Southern Pacific siding at Coachella was no longer in use and demolished, leaving the farming and ranching enterprises without a nearby railroad connection to their markets. Persistence of agriculture and an influx of Hispanic laborers to work the fields resulted in Coachella becoming a locus of political activism for fieldworkers' rights and better working conditions through the 1960s and 1970s. Cesar Chavez was among the most prominent organizers of rallies and marches for the movement, even signing his first labor contract in Coachella. By the late 1980s and early 1990s, vineyards and other large swaths of agricultural properties began to be supplanted by commercial properties and residential subdivisions. In the 1990s, the region became internationally famous for the Coachella Valley Music and Arts Festival (colloquially known as "Coachella Fest," or simply "Coachella") which annually attracts crowds that exceed 100,000. Today, the original 2.5-square-mile town has expanded into a 29-square-mile city with a diverse populace of over 45,000 residents. While agriculture persists, it is described as a largely young, rural, and family-oriented desert community (BCR 2023).

EXISTING TRIBAL CULTURAL RESOURCES

Methods Used to Identify Known Cultural Resources

Records Search

An archaeological records search was conducted at the Eastern Information Center (EIC) on April 15, 2019, prior to fieldwork. This included a review of all recorded cultural resources and survey/excavation reports generated from projects located within one mile of the Project site. In addition, a review was conducted of the CRHR, National Register of Historic Places (NRHP), and documents and inventories from the California Office of Historic Preservation (OHP), including the lists of California Historical Landmarks, California Points of Historical Interest, and the Inventory of Historic Structures.

Additional Research. BCR Consulting performed additional research using records provided by the Bureau of Reclamation, records of the General Land Office maintained by the Bureau of Land Management (BLM) and using various internet resources.

Field Survey

Intensive-level cultural resources field surveys of the Project site were conducted from April 17, 2019, to May 31, 2019, January 9, 2020, to January 16, 2020, and July 28, 2022. The surveys were conducted by

walking transects that followed the contours of the landforms present, such as the ridgetops and washes, excluding excessively steep slopes. Fifteen-meter transect intervals were maintained where possible. Additional fieldwork was conducted on April 19, 2023, to conduct subsurface archaeological testing. Digital photographs were taken at various points within the Project site. These included overviews as well as detail photographs of all cultural resources.

Native American Consultation

A letter was sent to the Native American Heritage Commission (NAHC) to identify whether any Sacred Lands File (SLF) were on record for the Project site and general vicinity. The results were received from the NAHC on April 18, 2019, indicated the SLF search yielded negative results. The NAHC also provided a contact list for tribal groups or individuals who may have knowledge of cultural resources within the area.

In accordance with AB 52 and SB 18, outreach letters were sent to the 11 Native American tribes on December 12, 2022, requesting any information they may have regarding the presence of potential or known tribal cultural resources within the Project site. One Tribe, the Agua Caliente Band of Cahuilla Indians, responded to the notice on January 18, 2023, and provided preliminary information regarding concerns with the Project's potential to impact tribal cultural resources. The City held a meeting with the Tribe on January 30, 2023, during which time the Tribe requested GIS shapefiles used within the Cultural Resources Assessment (CRA). These files were provided to the Tribe on February 7, 2023. Since that time, several attempts were made to consult with the Tribe, including an invitation to participate in the evaluation process for cultural resources identified within the Project site. However, no further response was received from the Tribe and, therefore, consultation is considered closed.

Cultural Resources Results

Records Search

Data from the EIC revealed that 40 cultural resource studies have taken place and 34 cultural resources have been recorded within a one-mile radius of the Project site. Of the 40 previous studies, five overlap with portions of the Project site, resulting in the identification of six cultural resource within its boundaries. See **Section 4.4: Cultural Resources**.

Field Survey

During the field survey, BCR Consulting personnel identified 48 total cultural resources, including five historic-period archaeological sites, one historic-period transmission alignment, one historic-period canal, 21 prehistoric archaeological sites, and 20 isolated artifacts (13 historic-period and seven prehistoric). This total number includes the six cultural resources previously recorded and identified within the records search. A complete description of each resource is provided under Field Survey in the CRA in **Appendix D.**

Evaluations

Of the 48 cultural resources identified within the Project site, only 28 are of Native American origin. Further, only 21 of these resources required evaluations of eligibility for listing in the CRHR and NRHP as isolated finds are not considered "historical resources" under CEQA or "historic properties" under the NHPA. Of the remaining 19 prehistoric resources, BCR Consulting personnel recommended 17 ineligible

for listing, as they are not associated with important people or events in history, do not embody any distinctive architectural characteristics nor represent the work of a master, and do not have the potential yield important prehistoric or historic information. However, BCR noted that two prehistoric archaeological sites, P-33-15151 and KIM1905-PS-9, required additional archaeological testing be conducted to thoroughly analyze potential eligibility of each resource. For a complete description and preliminary eligibility evaluation of each resource, see the CRA in Appendix D.

Archaeological testing for P-33-15151 and KIM1905-PS-9 was conducted by BCR Consulting personnel on April 19, 2023. KIM1905-PS-9 exhibited no intact or significant buried archaeological component and therefore is not recommended eligible for CRHR/NRHP listing. Significant buried archaeological materials were identified during test excavations at P-33-15151, though excavation and analysis exhausted the site's data potential and, therefore, the site is not recommended eligible for CRHR/NRHP listing. As such, no prehistoric cultural resources identified within the Project site are considered eligible for listing in the CRHR/NRHP.

4.15.2 REGULATORY SETTING

FEDERAL

Archaeological Resources Protection Act

The intent of the Archaeological Resources Protection Act of 1979 (ARPA) is to ensure preservation and protection of archaeological resources on public and Native American lands. ARPA places primary emphasis on a Federal permitting process in order to control the disturbance and investigation of archaeological sites on these lands. In addition, ARPA's protective provisions are enforced by civil penalties for violation of the Act.

Under this regulation, the term "archaeological resources" includes but is not limited to:

> *…pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. Nonfossilized and fossilized paleontological specimens, or any portion or piece thereof, shall not be considered archaeological resources, under the regulations under this paragraph, unless found in an archaeological context. No item shall be treated as an archaeological resource under regulations under this paragraph unless such item is at least 100 years of age.*

ARPA mandates consultation procedures before initiation of archaeological research on Native American lands or involving Native American archaeological resources. Section 4(c) requires Native American tribes be notified of possible harm to, or destruction of, sites having religious or cultural significance to that group. The Federal land manager must notify affected tribes before issuing the permit for archaeological work. Section (g)(2) specifies that permits to excavate or remove archaeological resources from Indian lands require consent of the Native American or Native American Tribe owning or having jurisdiction over such lands. The permit, it is also stipulated, must include such terms and conditions as may be requested by the affected Native Americans.

Concerning the custody of archaeological resources, ARPA stipulates that any exchange or ultimate disposition of archaeological resources excavated or removed from Native American lands must be subject to the consent of the Native American or Native American Tribe that owns or has jurisdiction over such lands.

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains, associated funerary objects, and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

National Register Bulletin 38

The National Park Service (NPS) has prepared guidelines to assist in the documentation of traditional cultural properties (TCPs) by public entities. While it is federal guidance, it serves as the best and most recognized guidance for identifying TCPs. National Register Bulletin 38 is intended to be an aid in determining whether properties have traditional cultural significance and if they are eligible for inclusion in the NRHP. It is also intended to assist federal agencies, State Historic Preservation Offices (SHPO), Certified Local Governments, tribes, and other historic preservation practitioners who need to evaluate such properties when considering their eligibility for the NRHP as part of the review process prescribed by the Advisory Council on Historic Preservation (ACHP).

National Historic Preservation Act Section 106

Archaeological resources are protected through the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [USC] 300101 et seq.), and its implementing regulations, Protection of Historic Properties (36 CFR Part 800); the Archaeological and Historic Preservation Act of 1974; and the Archaeological Resources Protection Act of 1979. The NHPA authorized the expansion and maintenance of the NRHP, established the position of SHPO, provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes in preserving their cultural heritage, and created the ACHP. Prior to implementing an "undertaking" (e.g., issuing a federal permit), Section 106 of the NHPA requires federal agencies to consider the effects of the undertaking on historic properties and to afford the ACHP and the SHPO a reasonable opportunity to comment on any undertaking that would adversely affect properties eligible for listing in the NRHP. As indicated in Section 101(d)(6)(A) of the NHPA, properties of traditional religious and cultural importance to a tribe are eligible for inclusion in the NRHP. Under the NHPA, a resource is considered significant if it meets the NRHP listing criteria at 36 CFR 60.4.

STATE

California Environmental Quality Act

The California Environmental Quality Act (CEQA) applies to all discretionary projects undertaken or subject to approval by the state's public agencies (California Code of Regulations [CCR] 14(3), Section 15002(i)). Under CEQA, "A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (CCR tit. 14(3), Section 15064.5(b)). State CEQA Guidelines Section 15064.5(a) defines a "historical resource" as a resource that meets one or more of the following criteria:

- Listed in, or eligible for listing in, the CRHR
- Listed in a local register of historical resources (as defined at Cal. Public Res. Code [PRC] Section 5020.1(k))
- Identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Cal. PRC
- Determined to be a historical resource by a project's lead agency (CCR tit. 14(3), Section 15064.5(a))

A historical resource consists of "Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California…Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources" (CCR tit. 14(3), Section 15064.5(a)(3)).

The significance of a historical resource is impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for the CRHR. If an impact on a historical or archaeological resource is significant, CEQA requires feasible measures to minimize the impact (State CEQA Guidelines Section 15126.4 (a)(1)). Mitigation of significant impacts must lessen or eliminate the physical impact that the project will have on the resource.

Section 5024.1 of the Cal. PRC established the CRHR. Generally, a resource is considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (CCR tit. 14(3), Section 15064.5(a)(3)). The eligibility criteria for the CRHR are similar to those of the NRHP, and a resource that meets one or more of the eligibility criteria of the NRHP will be eligible for the CRHR.

The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding and affords certain protections under CEQA. Criteria for Designation:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.

2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). Fifty years is normally considered sufficient time for a potential historical resource, and in order that the evaluation remain valid for a minimum of five years after the date of this report, all resources older than 45 years (i.e., resources from the "historic-period") will be evaluated for CRHR listing eligibility, or CEQA significance. The CRHR also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

Finally, CEQA requires that significant effects on unique archaeological resources be considered and addressed. CEQA defines a unique archaeological resource as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA Guidelines Section 15064.5 Appendix G includes significance criteria relative to archaeological and historical resources. These have been utilized as thresholds of significance here, and a project would have a significant environmental impact if it would:

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 10564.5;

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 10564.5;

c) Disturb any human remains, including those interred outside of formal cemeteries.

California Public Records Act

Sections 6254(r) and 6254.10 of the California Public Records Act (Government Code Section 6250 et seq.) were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to

"Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects… maintained by, …, the Native American Heritage Commission….". Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports maintained by, or in the possession of, the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the [NAHC], another state agency, or a local agency, including the records that the agency obtains through a consultation process between a California Native American tribe and a state or local agency."

California Health and Safety Code §7050.5

California Health and Safety Code Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the Coroner must notify the NAHC within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

California Native American Graves Protection and Repatriation Act

Enacted in 2001, the California Native American Graves Protection and Repatriation Act (California Repatriation Act), requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate Native American Tribe(s).

California Public Resources Code Section 5097.98

Public Resources Code (PRC) Section 5097.98 stipulates that whenever the NAHC receives notification concerning discovery of Native American human remains from a county coroner pursuant to California Health and Safety Code Section 7050.5, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the landowner's permission, or his or her authorized representative, inspect the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with the appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 48 hours of being granted access to the site. The recommendation may include the scientific removal and non-destructive analysis of human remains and items associated with Native American burials. The NAHC would designate the MLD for any future human remains found on the project site.

Senate Bill 18

Senate Bill (SB) 18 (California Government Code Section 65352.3) requires local governments to consult with Native American tribes prior to making certain planning decisions and to provide notice to Tribes at certain key points in the planning process. These consultation and notice requirements apply to the adoption and amendment of general plans and specific plans. The consultation process requires (1) that local governments send the NAHC information on a proposed project and request contact information for local Native American Tribes; (2) that local governments then send information on the project to the tribes that the NAHC has identified and notify them of the opportunity to consult; (3) that the tribes have 90 days to respond on whether they want to consult or not, and (4) that consultation begins, if requested, by a tribe and there is no statutory limit on the duration of the consultation. If issues arise and consensus on mitigation cannot be reached, SB 18 allows a finding to be made that the suggested mitigation is infeasible.

Assembly Bill (AB) 52

On July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (PRC Section 21084.2). It further states that the lead agency shall avoid damaging effects to a tribal cultural resource, when feasible. (PRC Section 21084.3). PRC Section 21074 (a)(1) and (2) defines tribal cultural resources as "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and meets either of the following criteria:

a) Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or

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

AB 52 also established a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project" if requested. (PRC Section 21080.3.1(b)). Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency. The Notice of Preparation for this Project was issued on November 14, 2022; therefore, AB 52 applies to this Project.

LOCAL

City of Coachella General Plan

The Project site is located in the City of Coachella and would be required to comply with the regulations set forth in the CGP. CGP elements, goals, and policies relevant to the Project are as follows:

Sustainability and Natural Environment Element

This Element[1] establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces.

Goal 10	**Passive Open Space. Preserved open space areas that represent significant aesthetic, cultural, environmental, economic and recreational resources for the community.**
Policy 10.3	Archaeological resource preservation: Preserve important archaeological and paleontological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.
Policy 10.4	Mitigation and preservation of cultural resources: Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources.
Policy 10.5	Grading: Require that proposed projects that involve a significant amount of grading shall have an archaeological and paleontological survey conducted before construction.
Goal 12	**Cultural Resources and Sites. Preserved and protected cultural resources that provide the community with significant cultural, scientific, or educational value.**
Policy 12.1	Disturbance of human remains. In areas where there is a high chance that human remains may be present (areas along the Whitewater Rivers/CVSC, on Tribal lands, on areas with previously undisturbed soil, in the washes and canyons found in the eastern areas of the Planning Area, and areas of historic settlement), require proposed projects to conduct survey to establish occurrence of human remains, if any. If human remains are discovered on proposed project sites, the project must implement mitigation measures to prevent impacts to human remains in order to receive permit approval.
Policy 12.2	Tribal coordination: Require notification of California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.
Policy 12.3	Protected sites: Require sites with significant cultural resources to be protected.
Policy 12.6	Discovery of human remains: Require that any human remains discovered during implementation of public and private projects within the City be treated with respect

[1] City of Coachella. 2015. City of Coachella General Plan – Sustainability and Natural Environment. https://www.coachella.org/home/showpublisheddocument/8419/637819141150600000. (accessed July 2022).

and dignity and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.

Policy 12.8 Disturbance of human remains. In areas where there is a high chance that human remains may be present (areas along the Whitewater Rivers/CVSC, on Tribal lands, on areas with previously undisturbed soil, in the washes and canyons found in the eastern areas of the Planning Area, and areas of historic settlement), require proposed projects to conduct survey to establish occurrence of human remains, if any. If human remains are discovered on proposed project sites, the project must implement mitigation measures to prevent impacts to human remains in order to receive permit approval.

4.15.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning tribal cultural resources. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

METHODOLOGY AND ASSUMPTIONS

The Project and associated Project Design Features (PDFs) are evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning tribal cultural resources. This analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

Approach to Analysis

This analysis of impacts on tribal cultural resources examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects based on application of the significance criteria/thresholds outlined above. For each criterion, the analyses are generally divided into two main categories: (1) temporary impacts; and (2) permanent impacts. Each criterion is discussed in the context of Project components that share similar characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The baseline conditions and impact analyses are based on: field observations made by BCR personnel on April 17, 2019 to May 31, 2019, January 9, 2020 to January 16, 2020, July 28, 2022, and on April 19, 2023; review of SLF results from the NAHC; review of records search results from the EIC; review of project maps and drawings; analysis of aerial and ground-level photographs; review of various data available in confidential repositories and public records, and consultation with Native American tribes. The determination that the Project would or would not result in "substantial" adverse effects on tribal cultural resources considers the existing site's cultural value to Tribes and the severity of the Project implementation on resources that may be considered tribal cultural resources.

PROJECT DESIGN FEATURES

- The KPC Coachella Specific Plan has been designed to preserve portions of the Specific Plan site as permanent open space, thereby reducing the potential for disturbance of previously unidentified paleontological and archaeological resources in those areas.

4.15.4 PROJECT IMPACTS AND MITIGATION

Impact 4.15-1: ***Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

- ***Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k) or***
- ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code (PRC) § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?***

Level of Significance: Less Than Significant with Mitigation Incorporated

As previously stated, the NAHC was contacted to identify if there are any SLF results within or adjacent to the Project site. The NAHC responded on April 18, 2019, stating that the SLF search yielded negative results. The NAHC also provided a list of Native American Tribes that should be contacted to elicit information regarding known or potential tribal cultural resource within the Project site.

In accordance with AB 52 and SB 18, outreach letters were sent to 11 Native American Tribes on December 12, 2022. To date, one response has been received from Lucy Padilla, Operations Manager for the Agua Caliente Band of Cahuilla Indians (ACBCI), on January 18, 2023. The Tribe requested formal government-to-government consultation with the City of Coachella, cultural resources documentation generated for the Project (i.e., records search and associated site records, cultural resources assessment, etc.), the presence of an archaeologist that meets the Secretary of Interior standards and an approved Agua Caliente Native American Cultural Resource Monitor during any ground-disturbing activities (including archaeological testing and surveys), and a meeting with the City, Project developer, and Project archaeologist. The City held a meeting with the Tribe on January 30, 2023, during which time the Tribe requested GIS shapefiles used within the CRA. These files were provided to the Tribe on February 7, 2023. Since that time, several attempts were made to consult with the Tribe, including an invitation to participate in the evaluation process for cultural resources identified within the Project site. However, no further response was received from the Tribe and, therefore, consultation is considered closed.

Though no tribal cultural resources were identified within the Project site, archaeological monitoring is recommended during all earthmoving activities within the vicinity of P-33-15151 and KIM1905-PS-9 to ensure significant impacts will not occur to unknown buried resources associated with these sites, as outlined in **CUL MM-3**. Further, construction monitoring for all ground-disturbing activity within the Project site by an Agua Caliente Native American Cultural Resource Monitor would be conducted to ensure significant impacts will not occur to unknown buried resources that may be tribal cultural resources, as outlined in **TCR MM-1**. The process to address the discovery of potential unknown cultural resources, which may be tribal cultural resources, during ground-disturbing activities would be followed per **MM CUL-2**. Further, in the event that Native American human remains are encountered during Project implementation, the process outlined in **MM CUL-4** would be followed. As such, impacts to tribal cultural resources during construction would be less than significant with mitigation incorporated. **MM CUL-2** through **MM CUL-4** are located within **Section 4.4: Cultural Resources**.

Off-Site Impacts

See Impact 4.15-1 above. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. Off-site circulation and utility improvements would involve grading and construction equipment. Note that off-site improvements areas are conceptual and would be sited in a sensitive manner, with appropriate pre-design field surveys and analyses to facilitate final siting/design to avoid sensitive resources including tribal cultural resources. **MM CUL-2** through **MM CUL-4** and **MM TCR-1** would be implemented to address inadvertent discoveries of tribal cultural resources.

Mitigation Measures

MM TCR-1 **Tribal Monitoring.** Prior to the commencement of any ground-disturbing activity within the Project site, the Project applicant shall retain a Native American Monitor (Tribal Monitor) approved by the Agua Caliente Band of Cahuilla Indians (Consulting Tribe). A copy of the executed contract will be submitted to the City of Coachella Planning and Building Departments prior to the issuance of any permit necessary to commence a ground-disturbing activity.

The Tribal Monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground-disturbing activities are defined as activities that may include, but are not limited to, pavement removal, potholing or augering, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the Project site. The Tribal Monitor would be empowered to temporarily halt or redirect construction work within 100 feet of any find until the find can be assessed and evaluated by the Project Archaeologist in consultation with the Consulting Tribe, as required in **MM CUL-2**.

The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. Monitoring will end when all ground-disturbing activities within the Project site are completed, or when the Consulting Tribe indicates that all upcoming ground-disturbing activities within the Project site have little to no potential for impacting tribal cultural resources.

4.15.5 CUMULATIVE IMPACTS

As discussed above, the potential exists for undiscovered and known tribal cultural resources to be adversely impacted during Project construction. With implementation of **MM CUL-2, MM CUL-3,** and **MM TCR-1**, the Project would not cause a substantial adverse change in the significance of tribal cultural resources. Cumulative projects could involve actions that damage known or as-yet undiscovered tribal cultural resources specific to those development sites. However, as with the Project, all cumulative development would undergo environmental and design review on a project-by-project basis pursuant to CEQA to evaluate potential impacts to tribal cultural resources. This would include cultural resources assessments and tribal consultation identify tribal cultural resources that are present or could be present within a development site. Additionally, cumulative development would be subject to compliance with the established federal, state, and local regulatory framework concerning the protection of tribal cultural resources on a project-by-project basis. Where significant or potentially significant impacts are identified, implementation of all feasible site-specific mitigation would be required to avoid or reduce impacts. The Project's cumulative impacts to tribal cultural resources would be less than significant given compliance with the established regulatory framework and site-specific mitigation would be required.

As concluded above, previously undiscovered human remains could be encountered during Project construction activities; however, a less than significant impact would occur in this regard following compliance with the established state regulatory framework, as outlined in **MM CUL-4**. Cumulative development could impact previously undiscovered human remains during construction. However, all cumulative development would undergo environmental review on a project-by-project basis to evaluate

the site-specific archaeological sensitivity. Additionally, cumulative development would be subject to compliance with the established state regulatory framework concerning the discovery of human remains on a project-by-project basis. The Project's cumulative impacts concerning the potential to disturb human remains would be less than significant given compliance with the established regulatory framework would be required.

4.15.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts have been identified.

4.15.7 REFERENCES

BCR Consulting LLC. 2023. *Cultural Resources Assessment*.

BCR Consulting LLC. 2023. *Archaeological Testing Report.*

City of Coachella. 2015. *General Plan Update*. https://www.coachella.org/Home/ShowDocument?id=3221.

City of Coachella. 2020. *Coachella Municipal Code*. https://library.municode.com/ca/coachella/codes/code_of_ordinances.

4.16 UTILITIES AND SERVICE SYSTEMS

This section evaluates the potential impacts of the KPC Coachella Specific Plan Project (Project) on utilities and service systems by identifying anticipated demand and evaluating its relationship to existing and planned utilities services facilities and availability. For abbreviation purposes, the general term "utilities and service systems" in this Draft Environmental Impact Report (EIR) includes the following: water, sewer, stormwater, electricity, natural gas, and solid waste. Further, this section evaluates the existing public utilities and service systems that would be used by the Project and the associated environmental impacts from Project implementation. Information herein is derived from the City of Coachella General Plan (CGP), the Coachella Valley 2020 Regional Urban Water Management Plan (RUWMP), the City of Coachella 2015 Sewer System Master Plan, and following technical reports:

- Q_3 Consulting. 2024. KPC Coachella Specific Plan Drainage Master Plan. (**Appendix H1**).
- Charles Marr Consulting. 2023. KPC Coachella Water Supply Assessment Report. (**Appendix K1**).
- Charles Marr Consulting. 2023. KPC Coachella Sewer System Study. (**Appendix K2**).
- Charles Marr Consulting. 2023. KPC Coachella Domestic Water System. (**Appendix K3**).

The Project proposes five villages that encompass future development of residential, commercial, public educational, employment, and recreational uses, including associated on- and off-site infrastructure improvements. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. The Project is analyzed at a programmatic level. As such, future development projects proposed under the KPC Coachella Specific Plan would be required to undergo its own independent California Environmental Quality Act (CEQA) analysis, including but not limited to an analysis of any impacts on utilities and service systems. Each project-specific analysis would provide more detail based on each project's specific location and other site-specific factors.

4.16.1 ENVIRONMENTAL SETTING

The 2,808-acre Project site is located immediately north of Interstate 10 (I-10), east Dillion Road at the east end of Vista Del Norte, and northeast of the All-American Canal in the City of Coachella (City). The Project site is on the eastern flank of Coachella Valley north of the Salton Sea. The Project site consists of 57 vacant parcels on an undisturbed, open, hilly, and undeveloped desert area with minimal vegetation, except for small native trees, shrubs, and annual grassland. Broad natural drainage corridors traverse the Project site diagonally. The Project site is surrounded by undeveloped desert area to the north and east; I-10, undeveloped desert area, and agricultural land to the south; and the Coachella Canal, undeveloped desert area, the Coachella Valley Transfer Station and Compost Facility, and residential development to the west.

WATER[1]

Water Supply Assessment

A Water Supply Assessment (WSA) Report was prepared for the Project to evaluate whether Coachella Water Authority's (CWA's) total projected water supplies will meet the Project water demand. The WSA analyzes and evaluates CWA's past and projected water supplies, water rights, and the current Coachella Valley 2020 RUWMP, which includes CWA 2020 Urban Water Management Plan (UWMP); 2012 Coachella Valley Water Management Plan (CVWMP) Update as developed by the Coachella Valley Regional Water Management Group; the 2011 Subsequent Programmatic Environmental Impact Report for the CVWMP Update; 2021 California Department of Water Resources (DWR) State Water Project Water Delivery Capability Report; the 2016 CVWMP Update Status Report for the CVWMP Update; the 2014 Coachella Valley Integrated Regional Water Management (IRWM) Plan; the Sustainable Groundwater Management Act Alternative Groundwater Sustainability Plan Bridge Document for the Indio Subbasin; 2022 Alternative Plan Update; 2022-23 Coachella Valley Water District (CVWD) Engineer's Report on Water Supply and Replenishment Assessment; the Bureau of Reclamation Draft Review of the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead; and CWA 2017 Water Master Plan.

Coachella Water Authority and Coachella Valley Water District

Water services for the Project would be provided by CWA. As a public water supplier in the Coachella Valley, CWA and the City maintain a close and cooperative relationship with CVWD. CVWD was formed in 1918 to protect and conserve local water sources. CVWD's services include collecting water and purchasing imported water for direct use and groundwater basin replenishment. Additionally, CVWD delivers irrigation and domestic water, collects and recycles wastewater, provides regional stormwater protection, replenishes the groundwater basin, and promotes water conservation.

Within its service area CWA provides water utilities to a population of approximately 44,000 people. The service area for the CWA encompasses approximately 30 square miles, making up the Eastern Coachella Valley. The City's SOI will allow that service area to expand as needed up to approximately 53 square miles, though full expansion is not expected until sometime after the year 2050. The water-related services provided by the City include domestic water delivery, wastewater collection and reclamation, and local drainage control. CWA's current water supply source is groundwater from the Indio Subbasin produced from CWA owned and operated wells.

CWA's existing water system consists of different pressure zones, groundwater wells, storage reservoirs, booster pumping stations, and distribution facilities, as described below. The current water system is divided into two pressure zones, the Low Zone, providing water to a majority of the City, and the 150 Zone, which supplies primarily commercial and light industrial users along the I-10 freeway corridor.

[1] Coachella Valley Water District. 2021. *2020 Coachella Valley Regional Urban Water Management Plan*. Page 5-1. http://www.cvwd.org/DocumentCenter/View/5482/Coachella-Valley-RUWMP.

Local groundwater pumped from CWA-owned wells is the principal water supply source for CWA and the City. There are currently six wells within the City's distribution system. As of 2021, the total pumping capacity of the active wells is approximately 11,400 gallons per minute (gpm) or 16.5 million gallons per day (MGD). The City also manages multiple reservoirs for water retention. There are three storage reservoirs within the City, the 1.5-million-gallon (MG) Dillion Road Reservoir, the 3.6 MG Mecca Reservoir, and the 5.4 MG Well 18 Reservoir. CWA has a total reservoir storage capacity of approximately 10.5 MG; of which, approximately 1.5 MG lies within the 150 Zone. Additionally, two booster stations are also operated by CWA; the Mecca Reservoir booster pump station (Well 12 Booster) and the Well 18 Reservoir booster pump station (Well 18 Booster). The Well 12 Booster supplies the Low Zone and takes suction from the Mecca Reservoir, and the Well 18 Booster supplies both the 150 Zone and Low Zone and takes suction from the Well 18 Reservoir. CWA currently receives 100 percent of its water supply from groundwater, and does not currently participate in water recycling, water desalination, water exchanges or transfers, or purchase imported water supplies. In addition, the groundwater quality is high and currently only receives chlorine disinfection.

The Coachella Valley 2020 RUWMP, which includes CWA 2020 UWMP as Chapter 5 (CWA 2020 UWMP), was prepared in accordance with requirements of Water Code Sections 10610 through 10656 of the Urban Water Management Planning Act. The 2020 RUWMP provides past and existing water supplies well as projected supplies for consecutive five-year periods between 2025 and 2045. **Table 4.16-1: Actual and Projected Water Supply (AFY)**, below shows these volumes from each of the land uses. Additionally, CWA also provides anticipated water supplies for a normal year, single dry year, multiple dry years which are shown in **Table 4.16-2: Normal Year Supply and Demand Comparison**, **Table 4.16-3: Single Dry Year Supply and Demand Comparison**, and **Table 4.16-4: Multiple Dry Years Supply and Demand Comparison**.

CWA's water supplies for 2020 and projected water supplies through 2045 are shown **Table 4.16-1: Actual and Projected Water Demands (AFY)**.

Table 4.16-1: Actual and Projected Water Demands (AFY)

Land Use Type	Projected Water Use (AFY)[1]					
	2020 (Actual)	2025	2030	2035	2040	2045
Single Family	4,283	7,072	8,364	9,575	10,840	11,785
Multi-Family	693	1,005	1,189	1,422	1,799	2,342
Commercial/Inst.	779	1,181	1,370	1,558	1,674	1,790
Industrial	-					
Landscape	1,087	935	1,096	1,257	1,449	1,641
Other	62	22	26	31	36	41
Losses	312	654	774	888	1,021	1,147
Total:	**7,216**	**10,869**	**12,819**	**14,731**	**16,819**	**18,746**

Source: Coachella Valley Water District. 2021. *2020 Coachella Valley Regional Urban Water Management Plan*. Table 5-6 and Table 5-7. http://www.cvwd.org/DocumentCenter/View/5482/Coachella-Valley-RUWMP.
[1] AFY = acre-feet per year

Table 4.16-2: Normal Year Supply and Demand Comparison

	2020	2025	2030	2035	2040	2045
Supply Totals (AFY)	7,216	10,869	12,819	14,731	16,819	18,746
Demand Totals (AFY)	7,216	10,869	12,819	14,731	16,819	18,746
Difference	0	0	0	0	0	0
Difference as % of Supply	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Difference as % of Demand	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Source: Coachella Valley Water District. 2021. *2020 Coachella Valley Regional Urban Water Management Plan*. Table 5-6 and Table 5-19. http://www.cvwd.org/DocumentCenter/View/5482/Coachella-Valley-RUWMP.

Table 4.16-3: Single Dry Year Supply and Demand Comparison

	2020	2025	2030	2035	2040	2045
Supply Totals (AFY)	7,216	10,869	12,819	14,731	16,819	18,746
Demand Totals (AFY)	7,216	10,869	12,819	14,731	16,819	18,746
Difference	0	0	0	0	0	0
Difference as % of Supply	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Difference as % of Demand	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Source: Coachella Valley Water District. 2021. *2020 Coachella Valley Regional Urban Water Management Plan*. Table 5-6 and Table 5-20. http://www.cvwd.org/DocumentCenter/View/5482/Coachella-Valley-RUWMP.

Table 4.16-4: Multiple Dry Years Supply and Demand Comparison

		2020	2025	2030	2035	2040	2045
Multiple-Dry Year, First Year Supply	**Supply totals (AFY)**	7,216	10,869	12,819	14,731	16,819	18,746
	Demand totals (AFY)	7,216	10,869	12,819	14,731	16,819	18,746
	Difference	0	0	0	0	0	0
	Difference as % of Supply	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Difference as % of Demand	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Multiple-Dry Year, Second Year Supply	**Supply totals (AFY)**	7,216	10,869	12,819	14,731	16,819	18,746
	Demand totals (AFY)	7,216	10,869	12,819	14,731	16,819	18,746
	Difference	0	0	0	0	0	0
	Difference as % of Supply	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Difference as % of Demand	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Multiple-Dry Year, Third Year Supply	**Supply totals (AFY)**	7,216	10,869	12,819	14,731	16,819	18,746
	Demand totals (AFY)	7,216	10,869	12,819	14,731	16,819	18,746
	Difference	0	0	0	0	0	0
	Difference as % of Supply	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Difference as % of Demand	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Multiple-Dry Year, Fourth Year Supply	**Supply totals (AFY)**	7,216	10,869	12,819	14,731	16,819	18,746
	Demand totals (AFY)	7,216	10,869	12,819	14,731	16,819	18,746
	Difference	0	0	0	0	0	0
	Difference as % of Supply	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Difference as % of Demand	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Multiple-Dry Year, Fifth Year Supply	**Supply totals (AFY)**	7,216	10,869	12,819	14,731	14,296	15,934
	Demand totals (AFY)	7,216	10,869	12,819	14,731	14,296	15,934
	Difference	0	0	0	0	0	0
	Difference as % of Supply	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Difference as % of Demand	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Source: Coachella Valley Water District. 2021. *2020 Coachella Valley Regional Urban Water Management Plan*. Table 5-6 and Table 5-21. http://www.cvwd.org/DocumentCenter/View/5482/Coachella-Valley-RUWMP.

Imported Water, Surface Water, and Stormwater

Currently, CWA does not use purchased or imported water. Additionally, CWA does not use self-supplied surface water as part of its water supply and it does not use, or plan to use, local stormwater runoff as part of its water supply. CWA participates financially through the State Water Project tax and the payment of Replenishment Assessment Charges (RACs) according to groundwater use to ensure that the East Whitewater River Subbasin is replenished. This is described further in **Section 4.16.2: Regulatory Setting.** CVWD has two sources of imported water available: Colorado River water delivered via the Coachella Canal and SWP water exchanged for Colorado River water delivered through the Colorado River Aqueduct.[2] These imported water sources are used to recharge the groundwater basin and as an alternative to meet non-potable demands from irrigation of agriculture, golf, and urban uses that would have otherwise been met by pumping groundwater. The source of replenishment water for Thomas E. Levy is Colorado River water via the Coachella Canal and does not include SWP water. CWA receives benefits from the Thomas E. Levy GRF; therefore, CWA pays RACs to ensure the eastern portion (East Whitewater River Subbasin) of the Indio Subbasin receives enough water from the Colorado River to replenish water needed to service CWA customers.[3]

Wastewater and Recycled Water

The City manages the Coachella Sanitary District (CSD), which operates a 4.5 MGD design capacity wastewater treatment facility – the Avenue 54 Wastewater Treatment Plant (WWTP).[4] Currently, CSD discharges treated wastewater to the Coachella Valley Storm Channel. The plant is a secondary level treatment facility and has an average discharge of approximately 2.7 MGD as of 2021. The water discharged from the facility is sent to drying beds in which they are dewatered and sent to landfills to be used as cover material.

The City and CWA do not currently contain a recycled water system, nor do they use recycled water within their service area. In March 2018, CWA, CSD, Mission Springs Water District (MSWD), Indio Water Authority, and Valley Sanitary District collectively conducted a Recycled Water Feasibility Study which informed the water agencies of the potential benefits of recycled water use within their service areas. Relative to the City, the Recycled Water Feasibility Study found that the provision of recycled water via a recycled water system is currently infeasible, as the City and CWA lacks the customer base to make economic sense. The City and CWA are open to further exploration in the future.

Wastewater System

The City's collection system includes about 90 miles of sanitary sewers ranging in size from 4-inches to 54-inches in diameter. About 35.6 miles, 39 percent of the total length, were modeled with diameters ranging in size from 6-inches to 54-inches, which are the backbone of the sewer network.[5] Based on the City's current 2015 Sewer System Master Plan, the City anticipates development of the general planning

[2] City of Coachella. 2024. *Water Supply Assessment for the Proposed Coachella Airport Business Park Project.* Page 20.
[3] Ibid.
[4] Riverside Local Agency Formation Commission. 2019. *Countywide Water and Wastewater Municipal Service Review*. https://lafco.org/wp-content/uploads/documents/msr-2018-2022/Coachella%20Valley%20Region%20(5-23).pdf.
[5] City of Coachella. 2015. *City of Coachella 2015 Sewer System Master Plan.* https://www.coachella.org/home/showpublisheddocument/5678/636087784506170000.

subareas east of the Coachella Canal to be served by the East-side Trunk Sewer (ESTS). This includes the Project site. The City's Sewer System Master Plan provides for direct flows from the Project to the Avenue 48 24-inch sewer reach. Although this would effectively divert Project flows downstream of the smaller reaches of the ESTS, it would require alignment of the proposed off-site system through unplanned area owned by others.

Solid Waste

There are two operational solid waste facilities, operations, and/or disposal sites located 1.3 miles northwest of the Project site: the Coachella Valley Compost and the Coachella Valley Transfer Station. In addition, the Riverside County Department of Waste Resources Desert Center landfill facility in the City of Desert Center is approximately 40 miles east of the Project site. Burrtec Waste and Recycling Services provides waste pickup and disposal services in the vicinity of the Project site.

Solid waste is taken to the Coachella Valley Transfer Station, located on Landfill Road in the unincorporated area of the County. Although the County is the permitted owner of the facility, Burrtec Waste Industries is the practical owner and operator of the Coachella Valley Transfer Station.[6]

The Coachella Valley Transfer Station is a 14.5-acre (ac) facility that accepts various waste types including agricultural, construction/demolition, green materials, industrial, inert, metals, mixed municipal, and tires. The facility sorts this waste and then transfers it for disposal. At present, the facility has a maximum permitted throughput of 1,100 tons of waste per day (tpd) and a maximum permit capacity of 12,685.[7] The diversion rate (percentage of waste materials diverted from landfill disposal or incineration to be recycled, composted, or reused) for this facility is approximately three to five percent. Solid Waste services for the City are contracted through Burrtec Waste Services.

The City's Public Works Department has contracted all of the City's solid waste services to Burrtec Waste Industries. The City's Municipal Code (Coachella MC) Section 8.44 states that the City and its chosen contractor, Burrtec Waste Management Industries, are solely responsible for the collection and disposal of refuse, garbage, rubbish, waste material, salvage, construction material, rubble, horse and poultry manure, and toxic hazardous waste. The City and Burrtec will be required to comply with all relevant waste management policies at the federal, state, and local levels.[8]

Burrtec provides solid waste services to residential and commercial customers, as well as construction and demolition projects. Burrtec operates multiple transfer stations in Southern California to receive and sort collected waste for more efficient disposal. These transfer stations include the Aqua Mansa Materials Recycling Facility (MRF) in the City of Riverside and the Coachella Valley Transfer Station in unincorporated Riverside County.

[6] City of Coachella. 2014. *General Plan 2035 Draft Environmental Impact Report*. Page 4.14-5. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.14_-_utilities.pdf.
[7] Ibid.
[8] City of Coachella. 2022. *City of Coachella Municipal Code – Section 8.44.*

Stormwater and Drainage

Within CVWD's boundaries there are 16 stormwater protection channels. The entire system includes approximately 135 miles of channels built along the natural alignment of dry creeks that naturally flow from the surrounding mountains into the Whitewater River.[9] Along with the channels, a number of dikes and levees have been designed and built to collect rapidly flowing flood water as it pours from the adjacent mountains onto the valley floor. These are mostly located in Coachella Valley's Cove Communities. The backbone of the stormwater protection system is a 50-mile storm channel that runs from the Whitewater area north of Palm Springs to the Salton Sea. The western half of the channel runs along the natural alignment of the Whitewater River that cuts diagonally across the valley to Point Happy in La Quinta (near Highway 111 and Washington Street). Because the riverbed flattens out naturally in the eastern valley, downstream from Point Happy a man-made storm channel funnels flood waters to the Salton Sea. The entire length of this flood protection facility is known as the Whitewater River / Coachella Valley Stormwater Channel. The channel was built to withstand a standard project flood, or approximately a flow of 80,000 cubic feet per second. A standard project flood is greater than a 100-year flood.

Natural Gas

The Project would be served by Southern California Gas Company (SoCalGas). SoCalGas operates a standard gas distribution facility to the west of the Project site. There is an existing 8-inch, high pressure distribution main and a 4-inch standard pressure distribution main at the intersection of Tyler and Vista Del Norte which is approximately 3000-feet to the west of the Project site. There is a high-pressure distribution line crossing Vista del Norte, west of the Project site and a transmission line crossing through the northern portion of the Project site to the eastern portion of the Project site in an area designated as electrical/gas easement (Southern California Edison [SCE] Transmission Easements); refer to **Exhibit 3-6: Land Use Plan**.[10]

Electricity

The Project would be served by Imperial Irrigation District - Energy Division (IID). IID is the third largest public power provider in California. IID provides electric service to more than 140,000 customers in Imperial County and parts of Riverside County and the City of Coachella. There are currently three high-voltage transmission lines (consisting of 500kva, 220kva, 69kva circuits) traversing the northern and eastern portions of the Project site on SCE transmission easements. These facilities provide power from both Davis Dam and Hoover Dam on the Colorado River in California/Nevada/Arizona. The SCE transmission facilities distribute power to various transmission Substation sites in southern California and include Orange County/San Diego County/Riverside County/San Bernardino County. The transmission easements have capacity for up to one more Tower Line along with a number of underground transmission System conduit routes, if needed.

[9] Coachella Valley Water District. ND. *Stormwater Protection and Flood Control.* http://www.cvwd.org/165/Stormwater-Protection-Flood-Control.

[10] Southern California Gas Company. 2022. *Gas Transmission Pipeline Interactive Map-Riverside*. https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=aaebac8286ea4e4b8e425e47771b8138.

Telecommunications

The City has granted franchises to multiple cable television, telephone, and internet service providers. Cable for the City is provided by Time Warner Cable, Frontier Fios, and Direct TV. Telephone services are provided by AT&T, Frontier, and T-Mobile. Internet services in the City are provided by Time Warner: Spectrum, Frontier, and Windstream.[11]

4.16.2 REGULATORY SETTING

FEDERAL

Safe Drinking Water Act

The Federal Safe Drinking Water Act (42 U.S.C Section 300f et seq., [SDWA]) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The 1986 and 1996 amendments to the law set forth requirements to protect drinking water and its sources: rivers, lakes, reservoirs, springs, and groundwater wells (not including private wells serving fewer than 25 persons). These amendments greatly enhanced the law by recognizing source water protection, operator training, funding for water system improvements, and public information as important components of safe drinking water. SDWA authorizes the U.S. Environmental Protection Agency (U.S. EPA) to set national standards for drinking water supplied by public water systems to protect against both naturally occurring and human-made contaminants. These National Primary Drinking Water Regulations set enforceable maximum contaminant levels for particular contaminants in drinking water or required ways to treat water to remove contaminants; and includes requirements for water systems to test for contaminants in the water to make sure standards are achieved. Direct oversight of water systems is conducted by State drinking water programs. States can apply to the U.S. EPA for “primacy” authority to implement the SDWA within their jurisdictions. The California Department of Public Health (CDPH) has the primary responsibility for implementing the SDWA and related California drinking water laws and regulations (Title 22, California Code of Regulations [CCR], Division 4, Chapter 15, Domestic Water Quality and Monitoring Regulations).

STATE

Urban Water Management Planning Act

The California Urban Water Management Planning Act, as amended (California Water Code [CWC] Section 10610 et seq.), mandates that every urban water supplier that either provides over 3,000 acre-feet of water annually, or serves more than 3,000 urban connections, to assess the reliability of its water sources over a 20-year planning horizon, and report its progress on 20 percent reduction in per-capita urban water consumption by the year 2020, as required in the Water Conservation Bill of 2009 Senate Bill (SB) X7-7. The Act is intended to provide assistance to water agencies in carrying out their long-term resource planning responsibilities to ensure adequate water supplies to meet existing and future demands for water through preparation of Urban Water Management Plans (UWMPs). The UWMPs must be prepared every five years and submitted to the California Department of Water Resources (DWR) for

[11] City of Coachella. 2019. *Utility Companies.* https://www.coachella.org/residents/utility-companies.

review. An UWMP must 1) describe the service area of the supplier, including current and projected population, climate, and other demographic factors affecting the supplier's water management planning; 2) quantify past and current water use over five-year increments, and projected water use, identifying the uses among various water use sectors, including single-family residential, multifamily, commercial, industrial, institutional and governmental, landscape, sales to other agencies, seawater intrusion barriers, groundwater recharge, conjunctive use, or any combination thereof, and agricultural; and 3) describe the reliability of the water supply and its vulnerability to seasonal and climatic shortage, and provide data, to the extent practicable, for average, single dry, and multiple dry water years.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) is the State agency focused on providing and ensuring clean sustainable water for all state residents. This State agency works alongside other federal programs like the Clean Water Act to regulate water sources and uses. The SWRCB regulates water consumption for irrigation and drinking, as well as water discharges from construction, municipal uses, stormwater, and other sources.

Water Conservation Act of 2009 (CWC Sections 10608–10608.64)

The Water Conservation Act of 2009 (often referred to as "SBx7-7" or the "20 by 2020 law") established the goal of achieving a 20 percent reduction in statewide urban per capita water use by December 31, 2020, and the interim goal of achieving a 15 percent reduction by 2015. In an effort to achieve those goals, SBx7-7 requires urban retail water suppliers to develop technical information (e.g., baseline daily per capita water use, water use targets, and interim water use targets) and to report that information in their UWMPs. As further discussed below, two of the primary calculations required by SBx7-7 are Base Daily Per Capita Water Use (average gallons per capita per day [gpcd] used in prior years), and Compliance Water Use Targets (gpcd targets for 2015 and 2020). The Base Daily Per Capita Water Use calculation is based on gross water use by an agency in each year and can be based on a 10-year average ending no earlier than 2004 and no later than 2010, or on a 15-year average if 10 percent of the agency's 2008 municipal demand was met by recycled water. Using this Base Daily Per Capita Water Use figure, an urban retail water supplier must then determine its urban water use target for 2020 and its interim water use target for 2015, both in terms of "gpcd." Section 10608.20(b) of SBx7-7 establishes four alternative methods for calculating the Compliance Water Use Targets. Generally, the alternative methods are: (1) 80 percent of Base Daily Per Capita Water Use; (2) adherence to certain water use performance standards; (3) 95 percent of the applicable State hydrologic region target as set forth in the State's draft 20 by 2020 Water Conservation Plan; or (4) the provisional target method and procedures developed by DWR pursuant to SBx7-7.1. Importantly, per capita reductions under SBx7-7 can be accomplished through any combination of increased water conservation, improved water use efficiency, and increased use of recycled water to offset potable demands. Potable demand offsets can occur through direct reuse of recycled water, such as for irrigation, or indirect potable reuse through groundwater recharge and reservoir augmentation. SBx7-7 provides additional flexibility by allowing compliance on an individual agency basis or through collaboration with other agencies in a region.

Senate Bill 1420

SB 1420, enacted on September 19, 2014, updated state law (CWC, Part 2.6, Chapter 3 et seq.) to require urban water suppliers to file their water management plans with the DWR electronically, streamlining the filing process. These plans help the state ensure water suppliers are planning to meet their community's current and future water needs. In addition, SB 1420 also requires that water suppliers report and account for water loss in their distribution systems, furthering water conservation efforts pursuant to SBX7-7.

Assembly Bill 2067

Assembly Bill (AB) 2067, enacted on September 19, 2014, further amended state law (CWC, Parts 2.55 and 2.6, et seq.) to require that an urban retail water supplier and an urban wholesale water supplier provide narratives describing the supplier's water demand management measures. The bill requires, for urban retail water suppliers, the narrative to address the nature and extent of each water demand management measure implemented over the past five years and to describe the water demand management measures that the supplier plans to implement to achieve its water use reduction targets pursuant to SBX7-7. The bill required each urban water supplier to submit its 2015 plan to the DWR by July 1, 2016. The City and its Coachella Water Authority has been implementing demand management measures as described in the 2020 RUWMP.[12] These include: water survey programs; metering with commodity rates; large landscape conservation programs and incentives program; public information program; school education program; conservation pricing program; water conservation program coordination and staffing support; and rebate programs (such as landscape conversion, ultra-low-toilet replacement and high-efficiency washing machine rebate programs).

Senate Bill 610

Enacted on October 9, 2001, SB 610 resulted in additions and amendments to CWC Sections 10910-10915 and Public Resources Code (PRC) Section 21151.9. SB 610 provides that when a city or county determines that a "project" as defined in CWC Section 10912 is subject to review under CEQA, the city or county must identify the water supply agency that would provide retail water service to the project and request that water supplier to prepare a WSA to support the proposed development.

Senate Bill 221

SB 221, enacted October 9, 2001, amends state law (Business and Professions Code Section 11010 and California Government Code Sections 65867.5, 66455.3, and 66473.7) to require the legislative body of a city, county, or local agency to include as a condition in any Tentative Tract Map or development agreement that includes a subdivision (as defined) a requirement that a sufficient water supply is or will be available to serve the subdivision. The availability of a sufficient water supply must be based on a written verification from the public water system that will provide water service to the proposed project. As with the standard provided by SB 610, a "sufficient water supply" under SB 221 is the total water supplies available to the water provider during normal, single dry, and multiple dry years over a 20-year projection that will meet the projected demand of the proposed subdivision in addition to existing and

[12] Coachella Valley Water District. 2021. *2020 Coachella Valley Regional Urban Water Management Plan*. Page 3-6. http://www.cvwd.org/DocumentCenter/View/5482/Coachella-Valley-RUWMP.

planned future uses, including agricultural and industrial uses. The water provider's verification must be based on substantial evidence such as water supply contracts, capital outlay programs, and regulatory permits and approvals regarding the water provider's right to and capability of delivering the project supply. In accordance with SB 221, the approval of any development agreement or Tentative Tract Map for the project that includes a subdivision must be conditioned on obtaining a written verification from the Coachella Water Authority.

California Water Conservation in Landscaping Act

In September 2008, the Water Conservation in Landscaping Act was amended in accordance with AB 1881. Among other things, AB 1881 required the DWR to update the Model Water Efficient Landscape Ordinance (Model Ordinance) in accordance with specified standards to reflect the recommendations of the Landscape Task Force. In addition, AB 1881 required local agencies, no later than January 1, 2010, to adopt the updated Model Ordinance or a local landscape ordinance that is at least as effective as the updated Model Ordinance in conserving water for specified landscape applications. If a local agency fails to adopt the Model Ordinance or its own local landscape ordinance, the Model Ordinance becomes applicable within that jurisdiction as a default measure.

The Office of Administrative Law (OAL) approved the DWRs' updated Model Ordinance on September 10, 2009. The landscape ordinances and policies that have been adopted by the City of Coachella and CVWD are discussed in further detail below.

Water Reuse (CWC Sections 13550 through 13557). These sections of the CWC provide that recycled water should be used for non-potable uses such as cemeteries, golf courses, parks, highway landscaped areas, and industrial and irrigation uses if suitable recycled water is available for such uses according to certain statutory standards.

Water Recycling in Landscaping Act (California Government Code Sections 65601 through 65607). Similar to the CWC provisions above, the Water Recycling in Landscaping Act provides that if a recycled water producer determines that within 10 years it will provide recycled water within the boundaries of a local agency that meets all of the conditions described in CWC Section 13550, the recycled water producer must notify the local agency, and identify the area that is eligible to receive the recycled water and the necessary infrastructure that the recycled water producer or retail water supplier will provide to support the delivery of recycled water.

California Administrative Code. Title 24 of the California Administrative Code includes the California Building Standards, which in turn include the California Plumbing Code (Part 5), which promotes water and water-related energy conservation. Section 25352 of the California Administrative Code addresses pipe insulation requirements that reduce the amount of energy needed to heat water and maintain water temperature before it reaches equipment and fixtures. Title 20 CCR 1601(b) addresses public utilities and energy and includes appliance and efficiency standards that promote water conservation. In addition, a number of State laws require water-efficient plumbing fixtures in structures.

2022 California Green Building Standards Code (CALGreen Code). The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The 2022 California Green Building Standards Code became effective January 1, 2023.

Executive Order B-29-15. On April 1, 2015, Governor Brown issued Executive Order B-29-15 calling for a 25 percent reduction in consumer water use in response to the historically dry conditions throughout California. The Executive Order also included mandatory actions aimed at reducing water demands, with a particular focus on outdoor water use. In addition to requiring urban water use reductions, the Executive Order called for the following:

- remove and replace turf with drought tolerant landscape options,
- support rebate program for water efficient devices,
- restrict water use on commercial, industrial, and institutional properties in order to achieve 25 percent reduction in potable water use,
- prohibit irrigation of ornamental turf on street medians with potable water supplies,
- prohibit irrigation of new construction with potable water unless drip or micro spray systems are used, and
- direct water supplies to develop rate structures and pricing mechanisms to maximize water conservation consistent with statewide restrictions.

In May 2015, pursuant to the Governor's Executive Order, the SWRCB adopted emergency regulations designed to achieve an overall 25 percent reduction in potable urban water use across the state. The regulations were in response to the four-year drought and marked the first time in the State's history for such action. Under the regulations, the State's urban water suppliers (i.e., those serving more than 3,000 customers or delivering more than 3,000 AF of water per year but not including suppliers functioning solely in a wholesale capacity) were required to achieve assigned water-saving targets that collectively would result in a 25 percent reduction in potable urban water production across the state. The original and extended regulations were effective through May 2016. In response to the State's drought mandate, the CWA has successfully achieved a 27 percent water savings for the month of October 2015 compared to the same month in 2013.[13]

On May 9, 2016, Governor Brown issued Executive Order B-37-16 calling on the State Board to adjust emergency water conservation regulations through the end of January 2017 in recognition of differing

[13] City of Coachella. 2015. *City of Coachella Water Authority Exceeds Water Conservation Goals*. https://www.coachella.org/Home/Components/News/News/157/109?arch=1&utm_source=chatgpt.com.

water supply conditions across the state. On May 18, 2016, the State Board adopted a new emergency conservation regulation to allow urban water providers to calculate an alternative water conservation standard based on a "stress test" approach that assumes three additional dry years. These standards require local water agencies to ensure a three-year supply, assuming three more dry years like the ones the state experienced from 2012 to 2015. Water agencies that would face shortages under three additional dry years are required to meet a conservation standard equal to the amount of shortage. As directed by Governor Brown in Executive Order B-37-16, the Board will separately take action to make some of the requirements of the regulation permanent. The emergency regulations do not impede the City's ability to grow and approve new developments. Rather, it guides water use in a conservative direction while eliminating gross water waste, as shown in the City's water use activity restrictions.

On April 7, 2017, Governor Brown ended the drought emergency in most of California through Executive Order B-40-17, while maintaining water reporting requirements and prohibitions against wasteful practices such as watering during or right after rainfall. The Order also rescinded two emergency proclamations from January and April 2014 and four drought-related Executive Orders issued in 2014 and 2015. Executive Order B-40-17 builds on actions taken in Executive Order B-37-16, which remains in effect, to continue making water conservation a way of life in California. The Board will separately take action to make reporting and wasteful water practices permanent.

"Make Water Conservation a California Way of Life." The City reports its monthly water use and progress in meeting the mandated water use reduction to the State through its online monthly monitoring report system. Additionally, the City and CWA will continue to work with the Department of Water Resources and the State Board to develop a long-term framework to "Make Water Conservation a California Way of Life." This framework will help to improve the resiliency of California supplies in times of drought.

Making Conservation a California Way of Life is a new way of managing urban water use. The regulation establishes unique efficiency goals for each Urban Retail Water Supplier in California and provides those suppliers flexibility to implement locally appropriate solutions. As part of the state's all-of-the-above strategy to expand storage, develop new water supplies, and promote more efficient water use, this regulation seeks to cultivate long-term practices that help communities adapt to California's ongoing water challenges. The regulation will lessen the need for the emergency water use reduction targets that were important in recent droughts.

As part of the regulation, urban retail water suppliers – not individual households or businesses – will be held to "urban water use objectives." An urban water use objective is the sum of standard-based budgets for a subset of water uses, such as residential outdoor use.

California Integrated Water Management Act of 1989

The California Integrated Waste Management Act of 1989 (more commonly referred to as AB 939), required all California cities and counties to implement programs to reduce, recycle, and compost at least 50 percent of wastes by 2000 (PRC Section 41780). The State determines compliance with this mandate to divert 50 percent of generated waste (which includes both disposed and diverted waste) through a complex formula. This formula requires cities and counties to conduct empirical studies to establish a base

year waste generation rate against which future diversion is measured. The actual determination of the diversion rate in subsequent years is arrived at through deduction, not direct measurement; instead of counting the amount of material recycled and composted, the city or county tracks the amount of material disposed at landfills and then subtracts the disposed amount from the base year amount. Thus, the difference is assumed to be diverted.

Senate Bill 1374

SB 1374 requires that the annual report submitted to CalRecycle (formerly known as the California Integrated Waste Management Board) include a summary of the progress made in the diversion of construction and demolition waste materials. In addition, SB 1374 required CalRecycle to adopt a model ordinance suitable for adoption by any local agency to require 50–75 percent diversion of construction and demolition waste materials from landfills by March 1, 2004. Local jurisdictions are not required to adopt their own construction and demolition ordinances, nor are they required to adopt CalRecycle's model by default. However, adoption of such an ordinance may be considered by CalRecycle when determining whether to impose a fine on a jurisdiction that has failed to implement its Source Reduction and Recycling Element (SRRE).

Assembly Bill 75

AB 75, passed in 1999, took effect on January 1, 2000. This bill added new provisions to the PRC, mandating that State agencies develop and implement an Integrated Waste Management Plan (IWMP); it also mandated that community service districts providing solid waste services report disposal and diversion information to the city, county, or regional agency in which the community service district is located.

California Public Utilities Commission

Article XII of the California Constitution established the California Public Utilities Commission (CPUC) and gives the CPUC broad authority. California law specifically directs that the Commission is responsible for approving construction of utility facilities, including transmission lines. California law also directs how the Commission is to review and approve construction of utility facilities. Public Utilities Code Section 1001 states (among other things) that no electric utility shall begin the construction of a line "without having first obtained from the commission a certificate that the present or future public convenience and necessity require or will require such construction…"

Projects between 50 kV and 200kV require a Permit to Construct from the CPUC, which consists primarily of an environmental review pursuant to CEQA. The Commission process generally does not analyze the need for or economics of these projects. Projects over 200kV require a Certificate of Public Convenience and Necessity from the Commission. The Commission's Certificate of Public Convenience and Necessity process analyzes the need for the project and the economics of the project as well as the environmental impacts of the project.

California Code of Regulations

CCR Title 24, Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. New standards were adopted by the Commission in 2008 as mandated by AB 970 to reduce California's electricity demand. The new standards went into effect on August 1, 2009.

Senate Bill 1305

SB 1305, the Power Source Disclosure requires retail suppliers of electricity to disclose to consumers "accurate, reliable, and simple to understand information on the sources of energy that are being used ..." (Public Utilities Code Section 398.1 (b)).

LOCAL

2020 Regional Urban Water Management Plan

The City has completed its 2020 UWMP through the Coachella Valley RUWMP. The 2020 RUWMP was completed on behalf of six water providers that serve customers in the Coachella Valley, including the CVWD and CWA, and adopted on June 22nd, 2021. The California Water Code allows agencies to join together to prepare a RUWMP in lieu of an individual UWMP, provided that the RUWMP contains all the same elements as an individual UWMP. This updated RUWMP will allow the six agencies to work together on planning efforts related to water resources and their efficient use in the Coachella Valley. In addition to the RUWMP, each agency prepared a Water Shortage Contingency Plan to describe agency-specific response to water shortage.

Coachella Valley Water District Replenishment Assessment Charge[14]

The RAC partially funds Coachella Valley Water District's groundwater replenishment program. The City contributes financially to groundwater replenishment through the RAC and the State Water Project tax. There are three separate RACs based on geography, because the costs and benefits of the replenishment programs also vary by geography. The Project is located within the RAC for the East Whitewater River Subbasin Area of Benefit. The RAC covers an important portion of the costs of replenishing the aquifer, including the cost of importing water for that purpose. The region's groundwater replenishment program is a key element of the Indio Subbasin Water Management Plan Update developed to reduce the overdraft of the East Whitewater River Subbasin and provide a dependable long-term supply of high-quality water for water users within this Area of Benefit. RAC payers are those entities that use a well or multiple wells that collectively pump more than 25 acre-feet of water from the aquifer in any year. This is the equivalent of 8,146,275 gallons of water in any year. The East Whitewater River Subbasin Area of Benefit RAC, effective July 1, 2021, is $72.27 for each acre-foot of water pumped in that subbasin by large water uses (those pumping more than 25-acre-feet of groundwater in any year). The RAC reflects a 9.5 percent

[14] Coachella Valley Water District. ND. *East Whitewater Subbasin Area of Benefit.* https://www.cvwd.org/201/East-Whitewater-River-Subbasin-Area-of-B.

increase from the RAC in the previous fiscal year. CWA pays RACs according to groundwater use to ensure that the East Whitewater River Subbasin is replenished.

Integrated Regional Water Management Plan

The IRWM Plan is a long-term planning program presented by the CVRWMG with the goal of addressing water management issues. The IRWM Plan is intended to:

- Define the Coachella Valley IRWM Region and water systems,
- Identify regional water management goals and objectives,
- Establish objectives and measurable targets for the Region,
- Identify stakeholder involvement and agency coordination processes,
- Identify and evaluate resource management strategies,
- Assess the integration of projects based on objectives,
- Establish a project evaluation and prioritization process based on regional priorities, and
- Establish a framework for implementation of projects.

The regional planning strategies presented in the IRWM Plan supports CWA's 2020 UWMP and involves regional agencies in a beneficial collaborative effort.

City of Coachella General Plan

The Project site is located in the City of Coachella and would be required to comply with the regulations set forth in the CGP. CGP elements, goals, and policies relevant to the Project are as follows:

Sustainability and Natural Environment Element

This Element[15] establishes the City's long-term goals and policies for managing and protecting its natural resources and open spaces.

Goal 1	**Climate Change. A resilient community that is prepared for the health and safety impacts of and minimizes the risks of climate change.**
Policy 1.12	**Reduced water supplies.** When reviewing development proposals, consider the possibility of constrained future water supplies and require enhanced water conservation measures.
Policy 1.13	**Designing for warming temperatures.** When reviewing development proposals, encourage applicants and designers to consider warming temperatures in the design of cooling systems.
Goal 3	**Water Resources. Protected and readily available water resources for community and environmental use.**

[15] City of Coachella. 2015. *City of Coachella General Plan – Sustainability and Natural Environment*. https://www.coachella.org/home/showpublisheddocument/8419/637819141150600000.

Policy 3.1 **Conservation performance targets – new construction.** Require new construction to exceed the state's Green Building Code for water conservation by an additional 10 percent.

Policy 3.2 **Water conservation technologies.** Advocate and promote indoor and outdoor water conservation and reuse practices including water recycling, grey water re-use and rainwater harvesting.

Policy 3.4 **Low impact development.** Require the use of low-impact development strategies to minimize urban run-off, increase site infiltration, manage stormwater and recharge groundwater supplies.

Infrastructure and Public Services Element

The Infrastructure and Public Services Element of the City's General Plan establishes the City's long-term goals and policies for establishing and managing its infrastructure systems and public services. The following goals and polices are applicable to the Project:

Goal 1 **Citywide Utilities. A healthy community with well-maintained, efficient, high-quality public infrastructure facilities and services throughout the city.**

Policy 1.4 **Development phasing.** Ensure that new public facilities and services are phased in, in conjunction with the approved urban development it's intended to serve.

Policy 1.5 **New development infrastructure costs.** Require new developments to provide adequate facilities or pay its fair share of the cost for facilities needed to provide services to accommodate growth without adversely impacting current service levels.

Goal 2 **Water Supply Facilities. Water supply facilities that meet future growth within the city and assure a high-quality and reliable supply of water to current and future residents.**

Policy 2.5 **Water supply for new development**. Ensure water supply capacity and infrastructure capacity is in place before granting building permits for new development.

Policy 2.6 **Expanding water supply.** If water supply is not adequate to supply new development, require new water supplies be secured before granting building permits for new development.

Policy 2.8 **Fair-share costs.** Establish connection fees to ensure all development has adequate infrastructure for the provision of water and require real property be dedicated when new water facilities are required to serve a development.

Policy 2.13 **Water-efficient landscaping.** Require the use of water-efficient landscaping in all new development.

Goal 3 **Wastewater Systems. Adequate and reliable sewer and wastewater facilities that collect, treat and safely dispose of wastewater.**

Policy 3.4 **Wastewater treatment capacity for new development.** Ensure that wastewater treatment and conveyance capacity is in place before to granting building permits for new development.

Policy 3.5	**Fair-share costs.** Require new development fund fair-share costs associated with the provision of wastewater service through the collection of development impact fees and connection fees to ensure all development has adequate infrastructure for a wastewater collection and treatment system.
Policy 3.6	**Expanding water supply.** If water supply is not adequate to supply new development, require new water supplies be secured before granting building permits for new development.
Policy 3.9	**Sewer system connections**. Require connection to the sewer system of all new development at densities of one unit per acre or greater. New development at rural densities or in areas with extremely difficult and/or expensive sewer construction, for example the Mecca Hills, may be accommodated by private septic systems provided there are no negative health and safety impacts and subject to review and approval by the City Council, the Coachella Sanitary District, the Riverside County Environmental Health Department, the Coachella Valley Water District, and the Regional Water Quality Control Board.
Goal 4	**Stormwater Capacity. Sufficient stormwater drainage facilities and services that are environmentally sensitive, accommodate growth and protect residents and property.**
Policy 4.2	**New stormwater facilities.** Ensure all new drainage facilities are adequately sized and constructed to accommodate stormwater runoff in urbanized areas.
Policy 4.4	**Fair-share costs.** Require new development fund fair-share costs associated with the provision of stormwater drainage to ensure all development has adequate stormwater drainage protection.
Policy 4.5	**New development.** Require the preparation of drainage studies that evaluate adherence to City stormwater design requirements and incorporate measures to prevent on- or off-site flooding with all new development applications.
Policy 4.9	**Property dedication**. Require the dedication of real property and improvements of that property when new stormwater drainage facilities are required to serve a development.
Goal 5	**Solid Waste Management. An integrated solid waste management system that recycles resources locally and minimizes contributions to the county landfill.**
Policy 5.13	**Construction and demolition debris**. Require recycling and reuse of construction wastes, including recycling materials generated by the demolition and remodeling of buildings, with a minimum diversion of 75% by weight.
Policy 5.15	**On-site collection and storage of recyclables.** Require new public and private buildings to be designed with on-site storage facilities for recycled materials.
Goal 6	**Telecommunications and Utilities. Coachella residents, the business community and educational institutions are provided easy access to quality internet services, modern telecommunication services, and reliable energy throughout the city.**

Policy 6.6 **Smart communities.** Establish requirements for the installation of state-of-the-art internal telecommunications technologies in new large-scale planned communities, office and commercial developments (e.g., wiring of all new housing and businesses).

Policy 6.8 **Utility line undergrounding.** Require undergrounding of all new publicly owned utility lines, encourage undergrounding of all privately owned utility lines in new developments and work with electricity and telecommunications providers to underground existing overhead lines.

Policy 6.10 **Transmission corridors.** Encourage the shared use of major transmission corridors and other appropriate measures as a means of preserving the aesthetic resources of the City and to lessen the visual impact of such development. The City shall work with the appropriate agencies in developing these corridors for recreational use.

City of Coachella Municipal Code

Title 8

The Coachella MC Chapter 8.44 – Solid Waste Collection explains in detail the City's regulations regarding waste management. This includes the guidelines for service and requirements for both the collectors of waste and the owners of the waste-generating properties. This section also details the unlawful acts associated with trash collection, such as prohibited containers and disturbing waste.[16]

Additionally, the Project would be subject Coachella MC Section 8.4.220 – Model water efficient landscaping ordinance requirements (MWELO), which requires compliance with MWELO standards for efficient landscape design, installation, management, maintenance, and stormwater management. These standards include choose climate-adapted plants, improving soil conditions, using, and maintaining high efficiency irrigation equipment and managing the irrigation schedule to fit the plants water needs as they are influence by local climate.

Title 13

Chapter 13.03 – Water Service System of the Coachella MC requires all extensions of water mains into the City subdivisions to be installed according to the design and requirements of the City Water Department. These installations require a written agreement between the subdivider and the City.[17]

Chapter 13.16 – Water Quality Control of the Coachella MC details the City's provisions and regulations regarding stormwater and runoff management. The section has been designed to comply with the Federal Clean Water Act, California Water Code (CWD), and Porter-Cologne Water Quality Control Act. The section also ensures that all new developments and redevelopments comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit.[18]

[16] City of Coachella. 2022. *City of Coachella Municipal Code – Section 8.44.*
[17] City of Coachella. 2022. *City of Coachella Municipal Code – Section 13.03.*
[18] City of Coachella. 2022. *City of Coachella Municipal Code – Section 13.16.*

Title 15

Chapter 15.54.040(B) - New Construction. All covered projects must do the following:

a. Meet the diversion requirement of at least fifty (50) percent of all construction waste.

b. Submit a construction and demolition waste plan (on the required forms).

c. Submit a performance security along with the application required for a construction permit. City-owned projects will not be required to pay the performance security.[19]

Title 16

The Coachella MC Chapter 16.28 – Improvements and Grading provides the City's policy regarding the place of utility facilities within new developments. Moving forward, the City requires utility distribution lines, including, but not limited to electric, communication, natural gas, and cable television lines, to be placed underground. Waivers to this policy will be approved at the commission or director's discretion.[20]

4.16.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning utilities and service systems. The questions presented in the Checklist have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

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

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

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

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

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

METHODOLOGY AND ASSUMPTIONS

The proposed Project and associated Project Design Features (PDFs) are evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of

[19] City of Coachella. 2022. *City of Coachella Municipal Code – Section 15.54.040.*
[20] City of Coachella. 2022. *City of Coachella General Plan – Section 16.28.*

significance concerning aesthetics. In addition to PDFs, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

Approach to Analysis

This analysis of impacts on utility resources examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects based on application of the significance criteria/thresholds outlined above. For each criterion, the analyses are generally divided into two main categories: (1) temporary impacts; and (2) permanent impacts. Each criterion is discussed in the context of Project components that share similar characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The baseline conditions and impact analyses are based on technical assessments provided by Charles Marr Consulting (Charles Marr) and Kimley-Horn and Associates, Inc.; review of Project maps and drawings; analysis of aerial and ground-level photographs; and review of various data available in public records, including local planning documents. The determination that the Project would or would not result in in "substantial" adverse effects on utilities or service systems is based on the capacity of those systems and their ability to efficiently accommodate the Project's development into their infrastructure or whether new facilities would be required that could result in significant environmental impacts, as well as the Project's compliance with all relevant regulations and policies. An example of a substantial adverse effect would be if utility systems needed to expand, or new facilities needed to be built to accommodate the Project.

PROJECT DESIGN FEATURES

- Existing drainage, water, and wastewater utility infrastructure exists in the surrounding areas that will be utilized to provide utility services to the Project.
- New stormwater collection and conveyance system are designed to treat and convey development-related runoff, provide 100-year flood protection to flood-prone areas, increase groundwater recharge (where practical) through on-site retention basins, and improve water quality on-site and downstream through on-site water quality basins.
- The Project shall be designed in accordance with the applicable California Green Building Standards (CALGreen) Code (24 CCR, Part 11). The Building Official, or designee shall ensure compliance prior to the issuance of each building permit. These requirements include designing buildings to be water efficient. Water-efficient fixtures would be installed in accordance with Section 5.303 of the California Green Building Standards Code Part 11.
- Proposed primary water supply connection to connect the Project site to existing water facilities operated by the City and CWA, located adjacent to Polk Street and Vista Del Norte (Avenue 46).

- Four new water wells are required to increase the City's water supply and production capacity for service to the Project. Booster pumps, transmission and distribution piping, and reservoirs are also planned within the Project site.
- Sewer lines are proposed to connect the Project site to existing off-site sewer infrastructure (the ESTS) at the Vista Del Norte sewer east of Dillon Road in Avenue 46.
- Additional off-site improvements are also planned to further facilitate the Project's utility service needs. These include a powerline, an off-site well supply system and wells, and a natural gas regulator station, as depicted by **Exhibit 3-11: Off-Site Improvements**. Additionally, it is anticipated that IID will need to relocate or rearrange portions of IID's existing transmission/ distribution lines, depending on IID circuit load projections and anticipated line capacity growth.

4.16.4 PROJECT IMPACTS AND MITIGATION

Impact 4.16-1: ***Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Level of Significance: Less Than Significant With Mitigation Incorporated

CONSTRUCTION AND OPERATIONS

The Project would be developed on undeveloped and vacant land with no prior improvements. Therefore, the Project would require the creation or expansion of water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunication facilities. Water and wastewater services for the Project would be provided by the City through its Water Authority and Sanitation District would rely on both their existing facilities as well as newly proposed infrastructure.

Utilities necessary for the Project site to operate and the associated service providers are as follows:

- Electricity – Imperial Irrigation District
- Water – CWA
- Sewer – CSD
- Cable/Internet/Telephone – Frontier Communications, Charter Communications, Spectrum
- Gas – SoCalGas Company

Existing utilities would be extended and upgraded as needed during construction of the Project to serve the anticipated demands and to accommodate operation of the Project. All new, on-site facilities would be within the boundaries of the Project site and are evaluated within this Draft EIR. Off-site facilities are sited within disturbed or developed areas, or within existing roads, as depicted by **Exhibit 3-11: Off-Site Improvements**. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure. Services provided by each utility is discussed in additional detail below.

Water

Potable water to the Project site would be provided by CWA. Impacts of required water facilities to convey water to and throughout the Project site are addressed throughout this EIR in the respective EIR section(s). The Project would require new water facilities including on-site facilities (i.e., booster pumps, transmission and distribution piping, and reservoirs) and new off-site well infrastructure (i.e., four new water wells and a new water supply system). Specifically, approximately 6.4-miles of below ground well supply infrastructure is proposed to connect four conceptual well locations to the Project site via Vista Del Norte, as depicted by **Exhibit 3-11: Off-Site Improvements**. Disturbed areas would be limited to existing roadway rights-of-way (ROWs) for Avenue 50, Avenue 48, Tyler Street, and Vista Del Norte. Planned groundwater production sites are proposed at Tyler Street and Avenue 48; Avenue 48 and Polk Street; Avenue 50 and Polk Street; and Avenue 50 and Fillmore Street. The majority of Project water facilities would be installed below ground and within existing or future road rights-of-way and, as such, the only physical impacts would be associated with temporary impacts during construction (refer to **Section 4.11: Noise** for a discussion of significant short-term noise impacts during construction).

As mentioned in **Section 4.9: Hydrology and Water Quality**, off-site construction or improvements are conceptual in nature and would undergo their own, individual environmental review and analyses. On-site construction activities would adhere to the SWPPP and proper BMP utilization according to City of Coachella Ordinance 13.16.341 and **MM HYD-1**. Off-site improvements would adhere to **MM HYD-3**, which requires compliance with Coachella MC Sections 13.16.340(A), 13.16.340(B), and 13.16.341. Aesthetic impacts related to above-ground facilities are addressed in **Section 4.1: Aesthetics**. Potential biological impacts related to proposed off-site facilities are addressed in **Section 4.3: Biological Resources**. Based on **Section 4.3: Biological Resources**, pre-construction surveys for the desert tortoise and burrowing owl may be required prior to any ground disturbance activities related to new water facilities, pursuant to **MMs BIO-1** and **BIO-2**. Similarly, **MM BIO-3** would be implemented that requires that pre-construction presence/absence surveys are conducted for nesting birds. All Project water facilities would be constructed and operated in accordance with applicable guidelines and regulations in the Clean Water Act and City and would also be subject to applicable EIR mitigation measures in each topical area addressed in this EIR. In consideration of existing requirements and EIR mitigation measures, no significant impacts are anticipated with respect to Project water facilities, with the exception of potentially significant temporary construction-related noise impacts addressed in **Section 4.11: Noise**. Therefore, in consideration of existing requirements, impacts would be less than significant.

Wastewater

The Project would utilize CSD's existing wastewater infrastructure and require new on-site sewer facilities including lift stations and sewer lines in the form of 8, 10, 12, 15, 16, 18, and 24-inch sewer pipes. Both gravity and force main sewer types would be utilized in order to convey wastewater efficiently and effectively throughout the Project site. A Sewer Study was conducted for the Project by Charles Marr Consulting in October 2023; provided as **Appendix K2: Sewer Study**. The Sewer Study includes analysis of the ESTS and its capacity to serve the Project wholly through Vista del Norte and also analyzes the reduced impacts to the ESTS by sewering later Project phases through La Entrada. According to the Sewer Study

conducted for the Project site, the projected wastewater flows from the Project were estimated using the City's Planning and Design Criteria as outlined in the 2015 Sewer System Master Plan.

According to the Sewer System Study (**Appendix K2**) conducted for the Project, the proposed connection of the Project to the City's sewer system is located at the east end of the Vista Del Norte sewer east of Dillon Road in Avenue 46. The off-site collection system consists of 12, 15, and 24-inch gravity sewers recently completed to convey municipal wastewater from new development north of I-10 and east of the Coachella Canal to the Polk Street Sewer Pump Station. The current status of the off-site collection system proposed to serve the Project, the ESTS, follows Vista Del Norte, Dillon Road, Highway 86, Avenue 48, Tyler Street, Avenue 50 and Polk Street. The Polk Street Pump Station pumps the collected wastewater through a 24-inch force main system to the City's 42-inch trunk sewer and the Avenue 54 WWTP.

The Project would connect to and be served by CSD Avenue 54 WWTP. Currently, CSD operates a newly expanded 4.5 MGD secondary treatment facility and has a 2.7 MGD daily discharge rate. According to the Sewer Study, the Project would generate approximately 1,438 GPM, or 2.07 MGD, as shown in **Table 4.16-5: KPC Coachella Sewer Flow Summary**. Therefore, the Project would exceed the existing treatment capacity. Consequently, the Avenue 54 WWTP would require additional capacity expansion to treat future development flows, including flows generated by the Project. Treatment plants typically start preparing for expansion when the average flows get near 80 percent of capacity (WDR Requirements Section 6.A.2.e).

Table 4.16-5: KPC Coachella Sewer Flow Summary

Village	Area	Average (Gallons per Minute)		Peak [1]
A	2&3	308 GPM	0.444 MGD	616 GPM
B	1&5	462 GPM	0.665 MGD	924 GPM
C	4	181 GPM	0.261 MGD	362 GPM
D	6	319 GPM	0.459 MGD	638 GPM
E	7	168 GPM	0.242 MGD	336 GPM
Total		**1,438 GPM**	**2.071 MGD**	**2,876 GPM**

Source: Charles Marr Consulting. 2023. KPC Coachella Sewer System Study. (**Appendix K2**). Table 3.
[1] Each Village has multiple land uses; therefore, no single land use peaking is appropriate. Based on flow monitoring performed for the 2015 Sewer Master Plan, the highest recorded peak of the meters used for diurnal loading was from Meter 3, which showed a PF of 2.0, thus 2.0 is considered a conservative estimate for Village peaking.

In consideration of the projected wastewater flows from the Project, the Sewer Study identifies two options for sewer service to the Project, primary off-site sewer service through the ESTS or optional off-site sewer service through La Entrada, discussed below.

On-Site System

The basis of sewer system planning for the Project is to take advantage of existing topography and minimize pumping. The following describes the on-site collection system required for efficient sewer service to all Project Villages within three defined sewersheds. The Project is divided into three sewersheds – Sewershed 1 includes the highest elevations at the east side of the Project with drainage flow direction to the west and south, with its boundary separating it from Sewershed 2 by the natural drainage area defined in the land use plan as DR-8 and DR-9. In like manner, the upper reaches of

Sewershed 2 starts at the next highest elevations at the north side of the Project and flows to the west and south, with its boundary separating it from Sewershed 1 by DR-1. The primary consideration for the proposed Project sewer system layout is to minimize pumping and natural drainage crossings. Refer to **Exhibit 4.16-1: Conceptual Sewer Plan** for a detailed diagram of the sewershed areas and planned sewer facilities.

Off-Site System

The new on-site facilities would then connect to CWA's existing facilities. The proposed connection for the Project to the City's sewer system is located at the east end of the Vista Del Norte sewer east of Dillon Road in Avenue 46; as depicted by **Exhibit 3-11: Off-Site Improvements**. As mentioned above, the Sewer Study identifies two options for sewer service to the Project, primary off-site sewer service through the ESTS or optional off-site sewer service through La Entrada, discussed below.

The primary off-site collection system consists of 12, 15, and 24-inch gravity sewers recently completed to convey municipal wastewater from new development north of I-10 and east of the Coachella Canal to the Polk Street Sewer Pump Station. The primary off-site collection system proposed to serve the Project (Option 1), referred to in the Sewer System Study as ESTS, follows Vista Del Norte, Dillon Road, Highway 86, Avenue 48, Tyler Street, Avenue 50 and Polk Street. The Polk Street Pump Station pumps the collected wastewater through a 24-inch force main system to the City's 42-inch trunk sewer and Avenue 54 WWTP. The Project plan for the upgrading of the ESTS Reaches 3 and 4 (Dillon Road and "Spur") is recommended for development following the hotel/entertainment center, as the second phase of the Project may also be complete prior to the construction of sewer facilities to the south. In the event that the Project must develop 100 percent of its off-site sewer capacity needs, all reaches of the ESTS will require upsizing at estimated off-site sewer improvements cost to the Project. The Sewer System Study confirms the findings of the City's analysis in its 2015 Sewer Master Plan that the majority of the 24-inch trunk sewer reaches in Tyler Street, Avenue 50 and Polk Street would require upsizing due to the anticipated Project service location at the intersection of Avenue 48 and Tyler Street.[21] Additionally, the Project estimated on-site, and off-site sewer construction costs are summarized in **Appendix K2**.

Secondary (Option 2) off-site sewer collection is a concept alignment through the future La Entrada Specific Plan development that could be used by the Project when it is constructed. Under this option, the Project sewer system would connect with the planned La Entrada alignment. Option 2 would convey Project flows within future Caltrans rights-of-way at either Avenue 50 or Avenue 52. Flows to Avenue 50 would only impact the most downstream reach of the ESTS in Polk Street. The Polk Street sewer is the existing 24-inch sewer between Avenue 50 and the Polk Street Pump Station.

Conclusion

The proposed on-site wastewater facilities are contained within the Project site and therefore associated impacts are addressed within this Draft EIR. Regarding off-site facilities, the potential upsizing of the ESTS under Option 1 and the potential development of a new off-site sewer collection system under Option 2 could result in environmental impacts. Proposed sewer pipes would be below ground, within existing or planned roadway rights-of-way, and as such are addressed in respective EIR section(s). As with off-site water lines, off-site sewer line construction adjacent to sensitive receptors may result in temporary

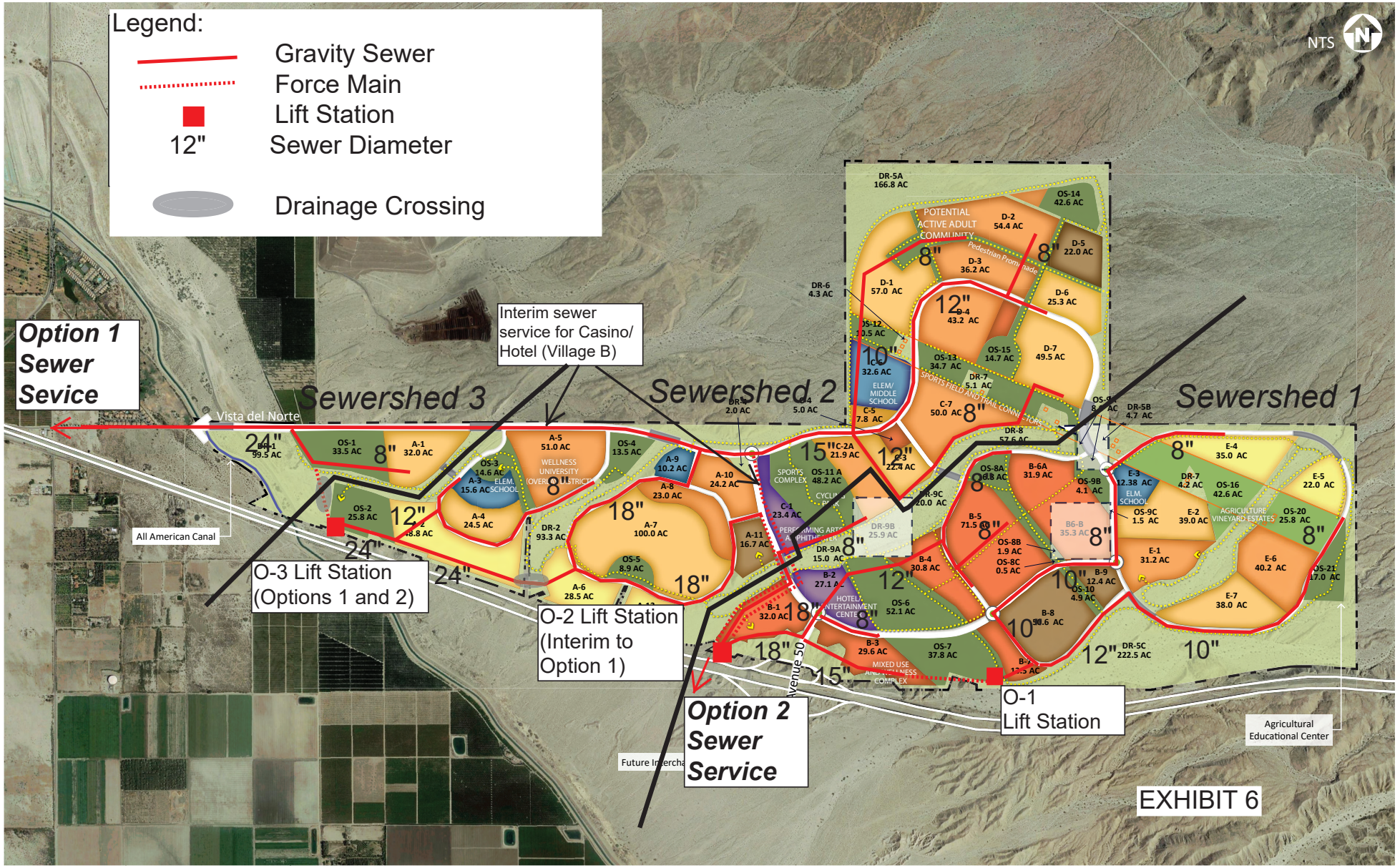
[21] Charles Marr Consulting. 2023. *KPC Coachella Sewer System Study. P*age 22.

significant noise impacts, as addressed in **Section 4.11: Noise**. All Project wastewater facilities would be constructed and operated in accordance with applicable guidelines and regulations of the CWA and City and would also follow applicable EIR mitigation measures in each topical area addressed in the EIR. Additionally, as development progresses in the region, it would be more feasible for the Project to utilize future collection systems that may become available to Project development, not only due to construction cost but also due to the potential reduction in future, on-site pumping needs. In consideration of existing requirements and EIR mitigation measures, no significant impacts are anticipated with respect to Project on-site wastewater facilities and the off-site sewer pipe network, except for potentially significant temporary construction-related noise impacts addressed in **Section 4.11: Noise**.

The Project would contribute its fair share of WWTP expansion costs through connection and service fees. The WWTP expansion would be required to undergo its own independent environmental review and CEQA analysis. CWA, as a Lead Agency under CEQA, will be responsible for CEQA compliance and any other permits or approvals needed for WWTP expansion. However, at this time, it is anticipated that the WWTP expansion would occur within the footprint of the existing facility, and associated WWTP discharges would not result in significant impacts given required regulatory compliance with Clean Water Act and other regulations. Therefore, the Project would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects.

Stormwater and Drainage

The Project would require new on-site drainage infrastructure including on-site drainage channels and retention basins. The Project is planned to develop 20 proposed drainage basins. The basins would provide flood control and water quality benefits. The on-site drainage system is designed to capture, convey, and mitigate stormwater runoff from within the site development. Refer to **Section 4.9: Hydrology and Water Quality** regarding existing conditions and Project impacts with respect to stormwater and drainage facilities. Furthermore, Project stormwater and drainage facilities would be constructed and operated in accordance with applicable guidelines and regulations of the CVWD, CWA, and City. All construction activities would adhere to the SWPPP and proper BMP utilization according to City of Coachella Ordinance 13.16.341 and **MM HYD-1**. Additionally, the Project would adhere to **MM HYD-2** and **HYD-3,** which requires approval of a Water Quality Management Plan and identification of appropriate Best Management Practices. Therefore, the Project would not require or result in the relocation or construction of new or expanded stormwater and drainage facilities, the construction or relocation of which could cause significant environmental effects. Therefore, in consideration of existing requirements, impacts would be less than significant.



Source: Charles Marr Consulting, July 2023

EXHIBIT 4.16-1: Con eptual Se er Plan
KPC Coachella Specific Plan Project
City of Coachella

Kimley»Horn

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Electricity

The Project would require new electricity facilities including on-site extensions of electricity infrastructure and an off-site powerline extension. There are currently 500 kilovolt-amps (kva)/220 kva/66 kva SCE Transmission towers/pole lines transitioning through the Project site on SCE Transmission Easements. The Project would connect to the existing SCE lines, which would enable services to the Project site. Electricity facilities, such as powerlines and other similar system components, would be required for the Project. An approximately 0.9-mile off-site powerline extension is proposed to connect an existing 230 kilovolt (kV) SCE Transmission line, located along Coachella Canal Road, to the proposed Avenue 50 Interchange with I-10; refer to **Exhibit 3-11: Off-Site Improvements**.

IID provides electric service to the Project site. To support Project implementation, IID would need two new distribution circuits within the Project site for the expansions of IID's electric system. Based on anticipated development in the northern region of Coachella, it is not anticipated that a Substation will be required. However, if the schedule for the Project pre-dates the anticipated developments on the south side of I-10, IID may require that a new electric substation be constructed within the Project site. It is anticipated that IID's transmission/distribution lines will primarily be constructed on overhead poles to the edge of the Project with circuitry within the Project being installed underground.

In addition to the installation of IID's new facilities to serve the Project, it is anticipated that IID will need to relocate or rearrange portions of IID's existing transmission/distribution lines, depending on IID circuit load projections and anticipated line capacity growth. IID will also need to relocate or rearrange some of IID's existing overhead 12.5kV lines and integrate those existing facilities with the new on-site electric distribution facilities. Potential relocation of existing IID electrical facilities between 50 kV and 200 kV would require a Permit to Construct from the CPUC, which consists primarily of an environmental review pursuant to CEQA. IID has an existing 92kV sub transmission system that may be subject to CPUC regulation should the need for relocation arise.

All required improvements and extensions to existing electrical would occur within the existing roadway rights-of-way adjacent to the Project site. Furthermore, this new infrastructure would be completely undergrounded, pursuant to Coachella MC Chapter 16.28 – Improvements and Grading and would be installed within the proposed development areas. An analysis of Project energy use is provided in **Section 4.5: Energy**.

As mentioned above, off-site construction or improvements are conceptual in nature and would undergo their own individual environmental review and analyses. On-site construction activities would adhere to the SWPPP and proper BMP utilization according to City of Coachella Ordinance 13.16.341 and **MM HYD-1**. Off-site impacts would adhere to **MM HYD-3**, which requires compliance with Coachella MC Sections 13.16.340(A), 13.16.340(B), and 13.16.341. Aesthetic impacts related to above-ground facilities are addressed in **Section 4.1: Aesthetics**. Potential biological impacts related to proposed off-site facilities are addressed in **Section 4.3: Biological Resources**. Based on **Section 4.3: Biological Resources**, pre-construction surveys for the desert tortoise burrowing owl and may be required prior to any ground disturbance activities related to new water facilities, pursuant to **MMs BIO-1** and **BIO-2**. Similarly, **MM BIO-3** would be implemented that requires that pre-construction presence/absence surveys are

conducted for nesting birds. Therefore, the Project would not require or result in the relocation or construction of new or expanded electricity facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts would be less than significant.

Natural Gas

The Project would require new natural gas facilities including on-site extensions of natural gas infrastructure and an off-site natural gas regulator station. The SoCalGas Company provides gas services to the Project. Similar to electrical services, natural gas lines already exist in the area to enable service to surrounding uses. There is a high-pressure distribution line crossing Vista del Norte, west of the Project site and a transmission line crossing through the Project site.[22] Natural gas services for the Project would be provided through the use of underground pipes to distribute gas within the Project site, within proposed development areas such as planned roadways. Construction of the Project's on-site natural gas facilities would not create an increased impact on the environment beyond what is addressed for the overall Project, in respective EIR sections.

There is an existing 8-inch, high pressure distribution main and a 4-inch standard pressure distribution main at the intersection of Tyler and Vista Del Norte, which is approximately 3,000-feet to the west of the Project site. This location will be the "Point of Connection" for the Project. Depending on the Natural Gas Loads for the site, the 4-inch standard pressure line will be the source for the site; however, if the loads for the site exceed the capacity of the 4-inch gas main, SoCalGas will install a regulator station connected to the 8-inch high-pressure distribution line and will run a new standard-pressure main to the Project. There are three existing transmission gas mains transitioning easterly and westerly through the northerly half of the Project. The transmission gas mains transmit natural gas from Texas to the West Coast. At this time, it is the intent of the Project to "Protect-in-Place" the existing transmission gas mains.

A 0.26-acre natural gas regulator station is proposed to be located at the site of an abandoned gas station along Vista Del Norte; refer to **Exhibit 3-11: Off-Site Improvements**. All required improvements and extensions to existing natural gas would occur within the existing roadway rights-of-way adjacent to the Project site.

As mentioned above, off-site construction or improvements are conceptual in nature and would undergo their own individual environmental review and analyses. As these impacts will be included in the larger common plan of off-site development for the Project, on-site construction activities would adhere to the SWPPP and proper BMP utilization according to City of Coachella Ordinance 13.16.341 and **MM HYD-1**. Offsite impacts would adhere to **MM HYD-3**, which requires compliance with Coachella MC Sections 13.16.340(A), 13.16.340(B), and 13.16.341. Aesthetic impacts related to above-ground facilities are addressed in **Section 4.1: Aesthetics**. Potential biological impacts related to proposed off-site facilities are addressed in **Section 4.3: Biological Resources**. Based on **Section 4.3: Biological Resources**, pre-construction surveys for the desert tortoise and burrowing owl may be required prior to any ground disturbance activities related to new water facilities, pursuant to **MMs BIO-1** and **BIO-2**. Similarly,

[22] Southern California Gas Company. 2022. *Gas Transmission Pipeline Interactive Map-Riverside*. https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=aaebac8286ea4e4b8e425e47771b8138.

MM BIO-3 would be implemented that requires that pre-construction presence/absence surveys are conducted for nesting birds. Therefore, the Project would not require or result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts would be less than significant.

Telecommunication

The Project would require new on-site telecommunication facilities. Much like the electric power facilities discussed earlier, telecommunication facilities will need to be connected throughout the Project site. Because this area is mostly undeveloped at present, there are no existing telecommunications facilities within the Project site. All required improvements and extensions to existing telecommunications utilities would occur within the existing roadway rights-of-way adjacent to the Project site. The new facilities required for the Project would be constructed within the development area and would be placed underground as per Coachella MC Chapter 16.28 – Improvements and Grading. Therefore, construction of the Project's telecommunication, cable and internet facilities would not create an increased impact on the environment beyond what is addressed for the overall Project, in respective EIR sections. No off-site telecommunications facilities are anticipated at this time. Therefore, the Project would not require or result in the relocation or construction of new or expanded telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts would be less than significant.

Off-Site Impacts

Project-related off-site infrastructure is addressed in the respective facility discussion above (water, wastewater, electricity, natural gas, and telecommunications).

Mitigation Measures

Refer to **MMs BIO-1** through **BIO-3** in **Section 4.3: Biological Resources** and **MMs HYD-1** through **HYD-3** in **Section 4.9: Hydrology and Water Quality**.

Impact 4.16-2: ***Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

Level of Significance: Less Than Significant

CONSTRUCTION AND OPERATIONS

CWA will provide the Project's water supply. Therefore, the Project, like the rest of the City, will rely on CWA's groundwater resources obtained from the Indio Subbasin (East Whitewater River).

The Project proposes a variety of uses including residential, commercial, institutional, and open space. Residential development approximates 9,538 residential dwelling units (DU) of varying types within the Project site, including those within the mixed-use parcels. Additionally, the mixed-use parcels approximate 270 acres of commercial development (including an entertainment center); the institutional

parcels approximate 71 acres; the open space parcels account for approximately 1,170 acres; and the ROW/Street parcels account for 179 acres, respectively.

A WSA Report was prepared for the Project by Charles Marr Consulting in September 2023. The WSA analyzed and evaluated the existing and future demands on the water supply needed to be supplied from CVWD and CWA. The WSA shows that CWA's available water supplies would be sufficient to meet all of the water demands of the entire Project for the next approximately twenty-five years through 2045, including during single and multiple dry years. **Table 4.16-6: Project Water Demand**, below, outlines each land use's estimated water demands.

Table 4.16-6: Project Water Demand

Land Use Type	Gross Acres (AC)	Density (DU/AC)	Dwelling Units (DU)[2]	Consumption Factor [1]	Average Demand (Acre-Feet per Year)	Average Demand (Million Gallons Per Day)
Residential						
Very Low Density Residential	152.0	0.4 – 1.0	152	2.85 AF/Ac/Yr	433 AFY	0.39 MGD
Low Density Residential	362.0	2.0 – 8.0	1,811	2.85 AF/Ac/Yr	1,032 AFY	0.92 MGD
Medium Density Residential	410.0	7.0 – 25.0	4,102	2.85 AF/Ac/Yr	1,169 AFY	1.04 MGD
MDR (NAP)	-	-	-	-	-	-
High Density Residential	102.0	15.0 – 40.0	2,542	2.69 AF/Ac/Yr	274 AFY	0.24 MGD
Residential Subtotal	***1,026.0***	**-**	***8,605***	**-**	***2,908 AFY***	***2.60 MGD***
Commercial						
Mixed-Use – Residential [2]	176.0	-	727	2.69 AF/Ac/Yr	473 AFY	0.42 MGD
Mixed-Use – Commercial [2]	44.0	-	-	1.78 AF/Ac/Yr	78 AFY	0.07 MGD
Mixed-Use (NAP)	-	-	-	-	-	-
Entertainment, Performing Arts [3]	27.0	-	-	1.78 AF/Ac/Yr	48 AFY	0.04 MGD
Entertainment Venue [5]	23.0	-	-	6.00 AF/Ac/Yr	138 AFY	0.12 MGD
Commercial Subtotal	***270.0***	**-**	**-**	**-**	***738 AFY***	***0.66 MGD***
Open Space						
Park, Greenways, Amenity Centers	379.0	-	-	1.8 AF/Ac/Yr	682 AFY	0.61 MGD
PGAC (NAP)	-	-	-	-	-	-
New Agricultural Production	68.0	-	-	1.8 AF/Ac/Yr	122 AFY	0.11 MGD
Drainage and Other Open Space	723.0	-	-	-	-	-
DRNG and other OS (NAP)	-	-	-	-	-	-
Open Space Subtotal	***1,170.0***	**-**	**-**	**-**	***805 AFY***	***0.72 MGD***
Institutional						
Elementary School	38.0	-	-	1.32 AF/Ac/Yr	50 AFY	0.04 MGD
Middle School	33.0	-	-	1.32 AF/Ac/Yr	44 AFY	0.04 MGD
Institutional Subtotal	***71.0***	**-**	**-**	**-**	***94 AFY***	***0.08 MGD***
ROW/Streets						
ROW/Streets	179.0	-	-	-	-	-

Land Use Type	Gross Acres (AC)	Density (DU/AC)	Dwelling Units (DU)[2]	Consumption Factor [1]	Average Demand (Acre-Feet per Year)	Average Demand (Million Gallons Per Day)
Interchange	-	-	-	-	-	-
TOTAL	***2,716 [4]***		***9,538***	***-***	***4,544 AFY***	***4.06 MGD***

Source: Charles Marr Consulting. 2023. KPC Coachella Water Supply Assessment Report. (**Appendix K1**). Table 2-2.

Notes:
[1] Pursuant to Coachella Water Master Plan
[2] Assumed to "Mixed Use" acreage split equals 80% residential, and 20% commercial.
[3] Includes 375 hotel rooms
[4] Excludes NAP areas
[5] Includes potential for up to 10 acres of water feature surface area subject to City of Coachella pan evaporation rate (taken as 10 ft/year). Normal water usage for "entertainment venue" is 1.78 ft/year. Ten of the proposed 23 acres calculates to an average consumption factor of approximately 6.0 AF/ac/yr (ft/year).

Based on the information provided in CVWD's 2020 RUWMP and CWA's 2020 UWMP, there is sufficient supply capabilities to meet the expected demands of its member agencies from 2020 through 2045 under normal, historic single-dry, and historic multiple-dry year conditions. Additionally, the City and CVWD have committed sufficient resources to further implement the primary elements of the City's CWA 2020 UWMP and Coachella Valley 2020 RUWMP, including source substitution, water conservation, and purchases of additional water supplies for recharge of the Indio Subbasin. The proposed development projects listed in the CWA 2020 UWMP do not specifically callout the Project nor previous project names associated with the Project site. According to the CWA 2020 UWMP, the population projection accounts for a population growth of approximately 70,000 persons from year 2020 to 2045, or approximately 19,718 additional DUs.[23] The Project's total proposed DU count is 9,538. Therefore, the total DUs calculated for the Project, using population growth accounted for in the 2020 UWMP, are estimated to be within the projected overall growth identification for the 20-year planning horizon. Thus, the total projected water demands in the 2020 UWMP for the City include the capacity to serve the Project.

Table 4.16-1: Actual and Projected Water Demands (AFY), above, shows past and existing water supplies as well as projected supplies for consecutive five-year periods between 2025 and 2045. In all cases through year 2045, even during single and multiple dry year conditions, water supplies available to CWA would be sufficient to meet all present and future water supply requirements of the Project for the next twenty-five years. Based on land use information provided by the developer and the City, the actual average water demand for the Project is estimated to be 4,544 acre-feet per year (AFY), which is well within the limits of the estimated demand considered in the 2020 UWMP. Furthermore, the Project's yearly total water demand of approximately 4,544 AFY would only make up about 0.02 percent of the approximately 25-million-acre feet of available water within the Indio Subbasin.

Furthermore, the Project would incorporate various water conservation elements adopted by the City and/or CVWD in accordance with SBx7-7. These include conservation elements for indoor and outdoor uses throughout the Project. The Project would implement water efficiency strategies including reduced potable water demand through landscaping, non-potable reclaimed, well or canal water for irrigation purposes (when available), and high efficiency plumbing fixtures and appliances; efficient irrigation

[23] Using the SCAG persons per household factor of 3.55, 70,000 persons amounts to about 19,718 households (70,000 persons / 3.55 persons per household = 19,718.3 households).

controls; reduced irrigated turf in parks; implementing a minimum of 75 percent of all front yard landscaping utilizing desert-scape or xeriscape materials; implementing an integrated stormwater collection and conveyance system designed to treat and convey development-related runoff; and supporting the development of reclaimed water supplies in the City. These efforts may further reduce the ultimate water demands of the Project.

Based on the information, analysis, and conclusions documented in the WSA, substantial evidence exists to support a determination that the total projected water supplies available to the City during normal, single dry, and multiple dry water years during a 20-year projection are sufficient to meet the projected water demand associated with the Project, in addition to the City's existing and planned future uses, including agricultural and manufacturing uses. This conclusion is based on, among other things, the volume of water available in the regional aquifer; the City's current and planned local water management programs and projects; and CVWD's current and planned local and regional management programs and water supply projects to supplement and sustain regional groundwater supplies.

The Indio Subbasin has a capacity of approximately 28.8 million acre-feet and currently contains about 25 million acre-feet, simulating the benefits of a very large conjunctive use reservoir. As described above, it is capable of meeting the water demands of the Coachella Valley for extended periods during normal, single-dry and multiple-dry year conditions. Because the City's utilization of groundwater supplies is in a manner that is consistent with the implementation of the CVWMP Update, there will not be significant environmental impacts on the groundwater basin and, instead, there would be a beneficial effect on groundwater resources.[24] Water demand for the Project has a total estimate of approximately 4.06 MGD. This converts to approximately 4,544 AFY of water. As mentioned, the Project's yearly total water demand of approximately 4,544 AFY would only make up about 0.02 percent of the approximately 25-million-acre feet of available water within the Indio Subbasin (also referred to as the East Whitewater River). Based on the Project water usage rate, the Project would represent a nominal percentage of CWA's present and future water supplies for both single- and multiple-dry-year scenarios, is within the projections of water demand increases for the City and basin, and would not generate a significant impact to water levels. Therefore, the Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, impacts would be less than significant.

Offsite Impacts

Refer to the analysis above. Additional groundwater production wells would be required during the initial phase of Project implementation to increase the City's production capacity for service to the Project, which is unrelated to the water supply availability and, according to the WSA, is adequate. Planned groundwater production sites are proposed at Tyler Street and Avenue 48; Avenue 48 and Polk Street; Avenue 50 and Polk Street; and Avenue 50 and Fillmore Street. The proposed well locations are depicted by **Exhibit 3-11: Off-Site Improvements**. As discussed above, the Indio Subbasin has sufficient water

[24] Charles Marr Consulting. 2023. *KPC Coachella Water Supply Assessment.*

supplies available to serve the Project and the Project's water demands would not result in a significant impact related to water supply.

Mitigation Measures

No mitigation is necessary.

Impact 4.16-3: Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Level of Significance: Less Than Significant

CONSTRUCTION AND OPERATIONS

The City's General Plan EIR determined that the City's wastewater distribution and treatment system, with implementation of City policies requiring the provision of a wastewater collection and treatment system that supports existing and planned development within the City of Coachella, would be adequate to serve the City. **Table 4.16-4** outlines the Project's projected wastewater flows. As mentioned above, the Project would generate approximately 1,438 GPM, or 2.07 MGD. This represents 44.4 percent of the 4.5 MGD current treatment capacity. Upon buildout, the La Entrada Specific Plan project is anticipated to necessitate the expansion of the Avenue 54 WWTP.[25] Therefore, the Avenue 54 WWTP would require additional capacity expansion to treat future development flows, in combination with existing flows, including future flows generated by the Project and the nearby La Entrada Specific Plan project. CGP Policy 3.4 requires that wastewater treatment and conveyance capacity be in place before to granting building permits for new development. Therefore, the capacities of the Avenue 54 WWTP would be monitored as Project development progresses to optimize the expansion and operation of the sewer system for serving the region and determination of off-site sewer collection system, based on the options provided, would take place prior to attainment of building permits. WWTPs typically start preparing for expansion when the average flows get near 80 percent of capacity. To this end, the City projects to begin a facilities expansion plan for the Avenue 54 WWTP within calendar year 2024 or 2025 and will most likely plan to add 1.5 MGD as soon as feasible.[26]

Pursuant to CGP Policy 3.5, the Project would be subject to the payment of all applicable Development Impact Fees related to sewer infrastructure. Therefore, although the buildout of the Project may result in a conclusion that there is not currently adequate capacity (in conjunction with other, cumulative project demand), consistent with CGP Policy 3.5, building permits would not be issued for the Project unless there is adequate treatment capacity at the Avenue 54 WWTP. The Project would be conditioned to comply with CGP Policy 3.5 and ensure adequate capacity exists at the time of permit issuance, which would ensure that no deficiency with wastewater treatment capacity would occur. Therefore, although impacts have the potential to be significant, existing policy would ensure that the project does not result in a

[25] City of Coachella. 2013. *La Entrada Specific Plan Draft Environmental Impact Report.* Page 4.14-28. https://laentradacommunity.com/.
[26] Personal communication via email with Cástulo Estrada, Utilities Director at City of Coachella, on November 13, 2023.

wastewater capacity deficiency. Therefore, impacts are anticipated to be less than significant, and no mitigation is required.

Off-Site Impacts

Refer to analysis above.

Mitigation Measures

No mitigation is necessary.

Impact 4.16-4: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Level of Significance: Less Than Significant

CONSTRUCTION

Project construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating. Such activities would result in the generation of solid waste. Construction would occur intermittently over a period of 20 years and varies depending on the nature or phase of construction. Generally, solid waste generation from construction would be temporary in nature. The solid waste generated by construction when compared to operational waste generation would be negligible, since all construction activities would be subject to compliance with Coachella MC regulations. Specifically, future building permit applications with the Project site would be required to be accompanied by a construction and demolition waste plan (Coachella MC Section 15.54.070). Additionally, the Project would comply with Coachella MC requirements for diversion of recyclable and reusable construction materials (Coachella MC Section 15.54.040). Ultimately, the Project is analyzed at a programmatic level. As such, specific projects proposed under the KPC Coachella Specific Plan would be required to undergo its own independent CEQA analysis, including but not limited to an analysis of any potential impacts on solid waste generation. Therefore, compliance with applicable local and state regulations would ensure that the Project construction would result in a less than significant impact to solid waste generation.

OPERATIONS

Solid waste generated by the Project and its subsequent developments will be collected and handled in compliance with any applicable regulation including those in Chapter 8.44 – Solid Waste Collection of the Coachella MC.

Coachella's 2035 General Plan EIR provides average waste generation rates for different land uses. **Table 4.16-7: Solid Waste Generation Rates**, below, outlines the Project's estimated annual waste generation rate.

Table 4.16-7: Solid Waste Generation Rates

Land Use	Generation Rate	Project Usage Context	Total Waste Generation (tons)
Residential	0.41 tons/unit/year	9,538 units	3,910.58
Commercial[1]	0.0024 tons/sf/yr	2,040,518 sf	4,897.24
Institutional[2]	0.0108 tons/sf/yr	1,782,813 sf	19,254
		Total Annual Waste Generation	**28,061.8**

Source: City of Coachella. 2014. *General Plan 2035 Draft Environmental Impact Report, Table 4.14-2: Generation Rate for Future Solid Waste*. Page 4.14-6. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.14_-_utilities.pdf.
Notes:
[1] Includes 2/3 of Mixed-Use area, Hotel, and Casino.
[2] For the purposes of this analysis, institutional uses shall use waste generation rates for public uses.

The Project would be served by Burrtec Waste Services for its waste disposal. Burrtec operates the Coachella Valley Transfer Station, the nearest transfer station to the Project. The Coachella Valley Transfer Station is located approximately 1,500 feet north of the Plan area at its nearest point. The Coachella Valley Transfer Station is a 14.5-acre facility that accepts various waste types including agricultural, construction/ demolition, green materials, industrial, inert, metals, mixed municipal, and tires. The facility sorts this waste and then transfers it for disposal. The facility was processing an average of 1,100 tons of waste per day (tpd), which is also the maximum permitted throughput for this facility.[27] The diversion rate (percentage of waste materials diverted from landfill disposal or incineration to be recycled, composted, or reused) for this facility is approximately three to five percent.[28] The Project's estimated annual waste generation of approximately 28,061.8 tons per year, or 76.88 tons per day, constitutes only 7.0 percent of the processing capacity of the transfer station.

The Project would reduce solid waste generation by utilizing renewable, recycled, locally sourced, and sustainable materials as well as materials with little to no volatile organic compounds (VOCs). In addition, the Project would incorporate separation of solid wastes to achieve a goal of 75 percent diversion of construction solid wastes to landfills. Therefore, with implementation of PDFs and compliance with local regulations, the Project would minimize undiverted solid waste and therefore minimize impacts to the transfer stations operations.

Once solid waste has been sorted at the Coachella Valley Transfer Station, it is typically disposed of at one of the three landfills that serve the City: (1) Badlands Sanitary Landfill, (2) the Lamb Canyon Sanitary Landfill, or (3) Salton City Landfill. According to **Table 4.16-7**, residential development is estimated to produce 3,910.58 tons of waste per year, or an estimated 10.7 tons of waste per day; commercial development is estimated to produce 4,897.24 tons of waste per year, or an estimated 13.4 tons of waste per day; and Institutional (Education) development is estimated to produce 19,254 tons of waste per year, or an estimated 52.8 tons of waste per day. This totals approximately 76.9 tons of waste per day, which is approximately 1.6 percent of the Badlands Sanitary Landfill maximum daily throughput, 1.5 percent of Lamb Canyon Sanitary Landfill's maximum daily throughput, and 1.3 percent of Salton City Landfill's

[27] CalRecycle. 2025. *SWIS Facility Detail: Coachella Valley Transfer Station (33-AA-0248)*. https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/2426.
[28] *Riverside County Nondisposal Facility Element*. 2015. https://rcwaste.org/sites/g/files/aldnop376/files/2023-11/2023%20Update%20Non%20Disposal%20Facility%20Element%20NDFE.PDF.

maximum daily throughput. Further details regarding the three landfills are presented below in **Table 4.16-8: Landfill Information**.

Table 4.16-8: Landfill Information

Landfill	Location	Max. Permitted Throughput (tons per day)	Remaining Capacity (cubic yards)	Max. Permit Capacity (cubic yards)	Cease Operation Date
Badlands Sanitary Landfill	Moreno Valley	5,000	7,800,000	82,300,000	1/1/2059
Lamb Canyon Sanitary Landfill	Beaumont	5,000	19,242,950	39,681,513	4/1/2032
Salton City Landfill	Salton City	6,000	1,264,170	65,100,000	12/31/2038
Source: CalRecycle. 2019. *SWIS Facility/Site Search*. https://www2.calrecycle.ca.gov/SolidWaste/Site/Search .					

Project implementation would increase solid waste disposal demands over existing conditions. Badlands Sanitary Landfill, located in Moreno Valley, has a maximum permitted throughput is 5,000 tons per day. The facility's remaining capacity is approximately 7.8 million cubic yards and maximum capacity is approximately 82 million cubic yards. Lamb Canyon Sanitary Landfill, located in Beaumont, has a maximum permitted throughput is 5,000 tons per day. The facility's remaining capacity is approximately 19 million cubic yards and maximum capacity is approximately 39 million cubic yards. Salton City Landfill, located in Salton City, has a maximum permitted throughput is 6,000 tons per day. The facility's remaining capacity is approximately 1.2 million cubic yards and maximum capacity is approximately 65 million cubic yards. The Project would be served by a landfill with sufficient remaining permitted capacity to accommodate the Project's solid waste disposal needs. Therefore, the Project's solid waste disposal needs could be accommodated at one or a combination of the disposal facilities discussed above. Operational activities would be subject to compliance with all applicable federal, state, and local statutes and regulations for solid waste, including those identified under CALGreen and AB 939. The Project would result in less than significant impacts concerning solid waste, and no mitigation is required.

Off-Site Impacts

Refer to the analysis above.

Mitigation Measures

No mitigation is necessary.

Impact 4.16-5: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Level of Significance: Less Than Significant

CONSTRUCTION AND OPERATIONS

Section 15.54.010 of the Coachella MC states:

> *Under California law, as embodied in the California Waste Management Act (California Public Resources Code Section 40000 et seq.), Coachella is required to prepare, adopt, and implement source reduction and recycling elements to reach reduction goals, and is required to make substantial reductions in the volume of waste materials going to landfill,*

under the threat of penalties of ten thousand dollars ($10,000.00) per day; that waste from demolition and construction of commercial and residential buildings represents a large portion of the volume presently coming from Coachella, and that a percentage of that waste is particularly suitable for recycling; that Coachella's commitment to the reduction of waste and to compliance with state law requires the establishment of programs for recycling and salvaging construction and demolition materials; that the city council recognizes that requiring demolition and construction waste to be recycled and reused may in some respects add modestly to the cost of demolition and construction and in other respects may make possible some cost recovery and cost reduction; and that it is necessary in order to protect the public health, safety, and welfare that the following regulations be adopted.

(Ord. 930 Section 2 [part], 2005)

Furthermore, Section 15.54.040(c): Diversion Requirements states:

Every applicant shall submit a properly completed "Recycling and Waste Reduction Form" as prescribed by the city's compliance official, to the building and safety department, as a portion of the building or demolition permit process. The form shall contain an accurate estimate of the tonnage or other specified units of construction and/or demolition waste to be generated from construction and demolition on the site. Approval of the form as complete and accurate shall be a condition precedent to issuance of any building or demolition permit.

(Ord. 930 Section 2 [part], 2005)

Lastly, Section 5.408.1: Construction Waste Management of the CALGreen Code states:

Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.408.1.2 or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.

Coachella MC Section 8.44.210: Compliance with CALGreen recycling requirements codifies compliance with CALGreen recycling requirement as amended July 1, 2019, and effective January 1, 2020.

The Project would be constructed in compliance with Section 5.408.1 of the CALGreen Code and Section 8.44.210 of the Coachella MC, the more stringent of the code sections at 65 percent diversion, and a less than significant impact would occur.

Mitigation Measures

No mitigation is necessary.

4.16.5 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts have been identified.

4.16.6 CUMULATIVE IMPACTS

For purposes of public utilities and service systems, cumulative impacts are considered for projects located within Coachella. As discussed above, all impacts from the Project to utilities and service systems would be less than significant in consideration of compliance with existing laws, ordinances, regulations, and standards. In addition, the Project site would recycle and implement measures on-site to reduce the waste stream to landfill(s). The Project applicant would pay the applicable development impact and service fees. Impacts related to stormwater drainage facilities are addressed in **Section 4.9: Hydrology and Water Quality**. Although temporary significant impacts during construction could occur, these impacts would only occur during development of the sites, would be typical of construction, would be localized, would occur at different times, and would be required to implement site-specific erosion control plans. Therefore, impacts are not anticipated to be cumulatively considerable. Other past, present, and reasonably foreseeable projects would be anticipated to implement similar measures or implement mitigation to fully mitigate their contribution to cumulative impacts. There are no significant cumulative impacts anticipated relative to electricity, potable water, telecommunications, solid waste, and natural gas.

Wastewater

The geographic area for the cumulative analysis for wastewater treatment is defined as the City and the CSD service territory. The service territory would include the approved La Entrada Specific Plan project, located to the south of the Project across I-10. The La Entrada Specific Plan EIR addresses impacts to wastewater facility adequacy and determined that the La Entrada project would necessitate expansion of the existing WWTP. As presented in **Impact 4.16-3**, the Project would require additional capacity expansion to the Avenue 54 WWTP to treat future development flows, in combination with existing flows, including future flows generated by the Project and the nearby La Entrada Specific Plan project. The Project applicant would pay the applicable development impact and service fees related to sewer infrastructure. All projects within the City, including the Project and the nearby La Entrada Specific Plan project, would comply with CGP Policy 3.4 which requires that wastewater treatment and conveyance capacity be in place before to granting building permits for new development. Therefore, the capacities of the Avenue 54 WWTP would be monitored as Project development progresses to optimize the expansion and operation of the sewer system for serving the region and determination of off-site sewer collection system, based on the options provided, would take place prior to attainment of building permits. Therefore, the Project would result in a determination by the wastewater treatment provider that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

The City's General Plan EIR addresses cumulative impacts of City buildout. The City's General Plan EIR determined that the City's wastewater distribution and treatment system, with implementation of City policies requiring the provision of a wastewater collection and treatment system that supports existing and planned development within the City of Coachella, would be adequate to serve the City. The City's General Plan EIR analyzed the Project site for an existing General Plan land use designation, Resort District, which allows for residential, lodging, recreational, and support retail and commercial services. Theme parks, sports venues and specialized entertainment uses are also allowed within this designation. The

Project has been designed to be generally compliant with any applicable land use related regulation with the CGP. However, the Project would require a Zone Change, and General Plan Map and Text Amendment in order to facilitate the Specific Plan. Therefore, the Project is not analyzed by the General Plan EIR. However, as discussed in **Section 6.0: Alternatives to the Proposed Project**, impacts under the existing Resort District land use designation would be greater compared to those potentially resulting from the proposed Project. Therefore, the City's wastewater distribution and treatment system would be adequate to serve the City with implementation of the proposed Project.

As mentioned above, the Project would necessitate that the CSD manage the expansion of the existing WWTP and the overall wastewater system to meet increased wastewater demands from the Project and already entitled projects including the La Entrada Specific Plan project. Therefore, the proposed Project would not result in significant cumulative impacts to wastewater treatment or wastewater treatment facilities. Therefore, the Project's contribution toward potential future utility and service system impacts in the City is not cumulatively considerable.

4.16.7 REFERENCES

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5.0 OTHER CEQA CONSIDERATIONS

This section of the Draft Environmental Impact Report (Draft EIR) discusses additional CEQA impact considerations required for inclusion in an EIR pursuant to CEQA, including Significant and Unavoidable Impacts, Growth-inducing Impacts, and Mandatory Findings of Significance.

5.1 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the CEQA Guidelines states that an irreversible impact may result from use of nonrenewable resources during all phases of a project. Implementation of the Specific Plan would require the long-term commitment of natural resources and land. Implementation of the KPC Coachella Specific Plan would result in the commitment of land resources with different uses. Its direct effect would include changes to infrastructure to support the proposed land uses, including streetscape improvements, parks, and roadway improvements. Construction and long-term operation of future development in the Specific Plan would require the commitment and reduction of available nonrenewable and slowly renewable resources, including petroleum fuels and natural gas (for vehicle use, construction, lighting, heating, and cooling of structures) and lumber, sand/gravel, steel, copper, lead, and other metals (for use in building construction, piping, and roadway infrastructure). Other resources that are slow to renew and/or recover from environmental stressors would also be impacted by Specific Plan implementation; examples include air quality, through the combustion of fossil fuels and production of greenhouse gases and water supply, through the increased potable water demands for drinking, cooking, cleaning, landscaping, and general maintenance needs. Project impacts are addressed in detail in **Sections 4.1** through **4.16** of this Draft EIR.

Resources that would be permanently and continually consumed by the proposed development would include water, electricity, natural gas, and fossil fuels. However, new construction in California is required to conform to energy conservation standards specified in Title 24 of the California Code of Regulations (CCR), as amended in 2022 (effective date: January 1, 2023). These standards establish “energy budgets” for different types of residential and non-residential in which all new building must comply. To conform to CCR Title 24, efficient energy use would be designed into all new buildings developed within the Project area. In addition, all new development would be required to comply with all applicable building codes, development standards, and design requirements related to sustainability and energy conservation contained in the City’s Municipal Code and required pursuant to current and future State legislation, executive orders, and regulatory guidance. City policy, State standards, and mitigation measures contained in the General Plan EIR and in this Draft EIR would help ensure that all natural resources are conserved or recycled to the maximum extent feasible. Energy consumption is discussed in greater detail within **Section 4.5: Energy** and **Section 4.16: Utilities and Service Systems**.

Project implementation is expected to occur over a period of 20 years in six phases, starting in 2025. The Project would be phased based on market demand and available infrastructure improvements needed to support development. Phases may occur concurrently so long as the associated infrastructure is provided.

Phasing allows the Project to match home sales to market demand and absorption and to generate the financing necessary for infrastructure improvements, such as roads, parks, schools, and sewer and water

facilities, to be installed and available to residents commensurate with the need for these services. Phasing of the development also permits for the planned and orderly construction of off-site improvements that are required to mitigate the project's impacts on public services serving adjacent communities.

Moreover, long-term increase in the demand for electrical and natural gas resources would occur. Use of these fossil fuel-derived energy sources would be necessary for transport of workers and materials during construction and provision of electricity and natural gas for the new homes, businesses, and infrastructure during the life of the Project. Although the consumption of fossil fuel, sand, gravel, wood, and construction materials associated with the proposed Project would constitute the depletion of resources, the amount of resources consumed would not be of an extraordinary nature in a regional context.

Nonetheless, the proposed Project would be justified, because it would use those resources to increase housing opportunities affordable to a range of potential residents, provide employment opportunities, increase recreational opportunities, and contribute to the economic and social well-being of the community. Therefore, the development of the Project site pursuant to the KPC Coachella Specific Plan would not involve a wasteful or unjustifiable use of energy or other resources and the use of energy in the Project area would occur in an efficient manner consistent with the goals, policies, and objectives of the City of Coachella General Plan.

5.2 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this Project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this Draft EIR.

1. Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?

The Project when implemented would directly induce population growth in the City through the development of a maximum of 9,538 residential dwelling units, as well as a maximum of 305 acres of commercial development which includes a maximum of 844 multiple-family dwelling units. In addition, 395 acres of parks, greenways, and amenity centers; 68 acres of agricultural production; and 754 acres of drainage and other open space are included in the KPC Coachella Specific Plan. The KPC Coachella Specific Plan would also include 179 acres of right-of-way/streets. Utilizing an average of 4.25[1] persons per household, the Project would result in a population increase of approximately 40,536 persons in the City. Generally, new businesses also tend to directly translate into population growth. The Project would introduce community commercial businesses that will require employees. Therefore, as discussed in **Section 4.12: Population and Housing**, although the Project would directly and indirectly induce economic and population growth, this growth is consistent with local and regional planning documents such as the City General Plan, the City's Draft Housing Element Update policies, and the SCAG Connect SoCal Plan and is therefore not considered a significant impact in itself. The environmental impacts of construction and operation of the Project are addressed throughout the Draft EIR.

As discussed in **Section 4.12: Population and Housing**, the City's housing stock is forecasted to be approximately 33,469 dwelling units, the City's population is forecast to approximately 135,000 persons, and provide approximately 32,000 jobs in 2035 with buildout of the General Plan and the Project. The City's housing stock is forecasted to be approximately 35,600 dwelling units, the City's population is forecast to approximately 153,080 persons, and provide approximately 23,200 jobs in 2050 with buildout of SCAG projections and the Project.[2] As shown in **Table 4.12-2**, SCAG projects the City population to increase to 153,080 persons by 2050. Similarly, SCAG projects City employment to increase to 23,200 jobs by 2050 and the County employment to increase to 1,185,000 jobs by 2050. As discussed previously, the Project would potentially increase employment in the City by 4,314 employees and its population by 41,030 people. The Project includes development of a variety of uses including residential and commercial. Commercial uses are typically developed to provide a sound and diversified economic base and ample employment opportunities for the citizens of Coachella. The Project together with other commercial and residential developments within the City would serve an existing demand for employment, while also meeting the cumulative demand of employment that would result from the City's projected future population. These increases for population, housing, and employment are accounted for within the forecasted total projected growth for 2050. Implementation of the Project would not result in a cumulatively significant population or housing impact and the Project land uses would not significantly induce growth in areas where growth was not previously anticipated.

[1] State of California Department of Finance. 2022. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2022 with 2020 Census Benchmark. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2021/(accessed December 2022).

[2] SCAG. (2024). *SCAG RTP/SCS: Connect SoCal Plan – Demographics and Growth Forecast*. https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf. (accessed July 2025).

While the Project would directly and indirectly lead to increased population, housing, and employment, this growth is planned and consistent with and according to the City General Plan, the City's Draft Housing Element Update policies, and the SCAG Connect SoCal Plan. Therefore, this is not considered a significant growth-inducing impact.

2. Would this project result in the need to expand one or more public services to maintain desired levels of service?

The Project includes the extension and construction of infrastructure to support the Project. This Draft EIR analyzes potential environmental impacts related to the proposed infrastructure including off-site sewer and drainage facilities, as well as off-site road improvements; refer to **Section 4.16: Utilities and Service Systems**. The off-site improvements consist of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure; refer to **Exhibit 3-11: Off-Site Improvements**. As discussed in **Section 4.16**, the off-site sewer and drainage facilities are intended to serve the Project and are not anticipated to represent removal of an obstacle to other future development and as such is not considered a significant growth-inducing impact. Regional circulation would be provided by the new Avenue 50 Interchange with I-10, and the extension of Avenue 50 into the Project site. Avenue 50 within the Project is planned as a six-lane major arterial roadway with 14-foot wide median and off-street bike/neighborhood electric vehicle lanes. Additional vehicle site access will be provided by an extension of Vista del Norte from the west, which connects to Dillon Road, across the Coachella Canal into the Project. The extension of Vista del Norte is planned as a four-lane major roadway. Refer to **Exhibit 3-8: Circulation Plan**. Refer to **Section 4.14: Transportation**, for transportation-related impacts. The Project site does not contain existing internal roadways at this time. External access to the Project site would be created via the extension of Vista del Norte and the construction of an I-10 interchange. The extended Via Del Norte would connect with the Project site as a four-lane divided road which would form the main internal road. Additional four-lane roadways within the Project site would consist of 1st Street, 2nd Street, 3rd Street, G Street, and D Loop, and F Loop. The Project site would also be developed with lower capacity 2-lane center turn lane roads. Roadways planned for this style include A Loop, B Loop, and E Loop. Finally, C Loop, which connects to the Avenue 50 and the proposed I-10 interchange, would be developed as a 6-lane divided roadway to accommodate increased traffic from the freeway and surrounding region. Roadway improvements within the Project site would create a circulation system in a previously undeveloped portion of the City and further provide adequate emergency response circulation to all areas of the Project site. These roadway improvements would be consistent with the Coachella General Plan Circulation Element and is not considered a significant growth-inducing impact.

Additionally, as discussed in **Section 4.16: Public Services**, the Project would result in increased demand for library square footage and materials that would exceed existing library facilities. There are no current plans to expand existing City library facilities nor does the Project propose new public library facilities. Therefore, the Project would result in the need to expand one or more public services to maintain desired levels of service.

As discussed in Draft EIR **Sections 4.13** and **Section 4.16**, the Project is currently vacant and would require the typical range of public services and utilities, the majority of which would be located on-site.

Section 4.14: Transportation, describes various off-site road improvements for which the Project would either construct or fund a fair share of, including the Vista del Norte extension described above (and throughout the Draft EIR). This is addressed in **Section 4.14** and throughout the Draft EIR. As discussed above, the Project requires extensions for sewer service and drainage; see **Section 4.16**. In addition, the Project would result in the need for new or expanded libraries services to maintain desired levels of service; see **Section 4.13**. Other than these impacts from off-site improvements and on library facilities, the Project is not anticipated to require new or expanded off-site facilities that would result in significant environmental impacts.

3. Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

During project construction, a number of design, engineering, and construction-related jobs would be created. However, construction related jobs would not result in a significant population increase because they would be filled by workers in the region and the construction phase would cease upon buildout of the Project. Note that it cannot be said with certainty that the design, engineering, and construction-related jobs would be held by the same personnel for the entirety of Project construction. It is more likely that personnel would change as Project construction phases progress. Therefore, these jobs are considered temporary. As discussed in **Section 4.12: Population and Housing**, the Project would result in the creation of approximately 4,314 new long-term jobs (**Table 4.12-8: Project Land Use, Population, and Employment Projections**). The majority of new jobs that would be created by implementation of the Specific Plan would be positions that do not require a specialized workforce, and this type of workforce exists in the City and surrounding areas. Thus, it is anticipated that new jobs would primarily be filled by people within Coachella and the surrounding communities and would not induce an unanticipated influx of new labor into the region. Although the Project would result in new permanent employment opportunities and stimulate economic activity, it would meet future employment demands anticipated in SCAG's regional growth projections.

As the number of employees in the Specific Plan area grows, these employees would seek shopping, entertainment, auto maintenance, and other economic opportunities in the surrounding area. This would facilitate economic goods and services and could, therefore, encourage the creation of new businesses and/or the expansion of existing businesses to address these economic needs. However, the increase in opportunities for employees would not create substantial growth inducement because growth could be accommodated within regional and local projections, and jobs would be filled by the local workforce.

Overall, the Project would not encourage or facilitate economic effects that could significantly affect the environment. Therefore, this is not considered a significant growth-inducing impact.

4. Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

The Project includes the adoption of the KPC Coachella Specific Plan. In addition to the KPC Coachella Specific Plan adoption, other related Project entitlements include an Environmental Review, Development Agreement, Tentative Tract Map, Zone Change, and General Plan Map and Text Amendment. The Project

also includes the construction or improvement of various off-site infrastructure, generally consisting of water supply infrastructure and wells, natural gas facilities, powerlines, and sanitary sewer infrastructure. Additionally, primary access to the Project site would be provided by a proposed interchange on I-10 at Avenue 50. This interchange would serve not only this project, but also the La Entrada Specific Plan project to the south of the Project, across I-10. Secondary access to the site would be provided from the west via Vista Del Norte, which will be extended and expanded from the current two-lane configuration to handle the additional anticipated capacity. This Project entails the construction of a maximum of 9,538 residential dwelling units, as well as a maximum of 305 acres of commercial development which includes a maximum of 844 multiple-family dwelling units. In addition, 395 acres of parks, greenways, and amenity centers; 68 acres of agricultural production; and 754 acres of drainage and other open space are included in the KPC Coachella Specific Plan. The KPC Coachella Specific Plan would also include 179 acres of right-of-way/streets. The Project also proposes a Wellness University Overlay District in Planning Area A-5 intended to allow for medically related educational facilities to be developed in this area should the market provide the opportunity for it. In total, the KPC Coachella Specific Plan consists of approximately 2,807 acres. Development and full buildout of the Project is expected to occur in six phases over a period of 20 years, starting in 2025 with anticipated Project completion by 2045. However, note that actual phasing sequence and starting/completion years may vary depending on market conditions. Pressures to develop other land in the surrounding area would derive from regional economic conditions and market demands for housing, commercial, and mixed land uses that are not directly or indirectly influenced by zoning actions on a particular property. Therefore, approval of the Project would not involve a precedent-setting action that could be applied to the surrounding properties and thereby encourage or facilitate growth that would not otherwise occur.

5.3 MANDATORY FINDINGS OF SIGNIFICANCE

CEQA requires preparation of an EIR when certain specified impacts may result from construction or implementation of a project. An EIR has been prepared for the Project, which fully addresses all of the Mandatory Findings of Significance, as described below.

DEGRADATION OF THE ENVIRONMENT

Section 15065(a)(1)-(4) of the CEQA Guidelines requires a finding of significance if a project "has the potential to substantially degrade the quality of the environment." In practice, this is the same standard as a significant effect on the environment, which is defined in Section 15382 of the CEQA Guidelines as "a substantial or potentially adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

This Draft EIR in its entirety addresses and discloses all known potential environmental effects associated with the development of the Project both on- and off-site including direct, indirect, and cumulative impacts in the following resource areas:

- Aesthetics
- Air Quality
- Hydrology and Water Quality
- Land Use and Planning

- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

A summary of all potential environmental impacts, level of significance and mitigation measures is provided in **Section 1.0: Executive Summary**.

IMPACTS ON HABITAT OR SPECIES

Section 15065(a)(1) of the CEQA Guidelines states that "A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: (1) substantially degrade the quality of the environment; (2) substantially reduce the habitat of a fish or wildlife species; (3) cause a fish or wildlife population to drop below self-sustaining levels; (4) threaten to eliminate a plant or animal community; (4) substantially reduce the number or restrict the range of an endangered, rare or threatened species; (5) or eliminate important examples of the major periods of California history or prehistory." Without mitigation, the Project would have significant impacts to biological resources, however, these impacts are mitigated to less than significant levels. **Section 4.3: Biological Resources**, of this Draft EIR fully addresses any impacts that might relate to the reduction of fish or wildlife habitat or populations and the reduction or restriction of the range of special status species as a result of Project implementation. Note that the Project includes over 700 acres of natural open space.

SHORT-TERM VS. LONG-TERM GOALS

Section 15065(a)(2) of the CEQA Guidelines states that "A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: the project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals." The Project designates over 700 acres of natural open space, preserving important natural resources. **Section 5.1: Significant and Irreversible Environmental Changes**, of this document addresses the short-term and irretrievable commitment of natural resources to ensure that the consumption is justified on a long-term basis. In addition, **Section 1.0: Executive Summary**, identifies all significant and unavoidable impacts that could occur that would result in a long-term impact on the environment. Lastly, **Section 5.2: Growth-Inducing Impacts of the Proposed Project**, identifies any long-term environmental impacts associated with economic and population growth that are associated with the Project.

CUMULATIVELY CONSIDERABLE IMPACTS

Section 15065(a)(3) of the CEQA Guidelines states that "A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: the project has potential environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." This Draft EIR provides a cumulative impact analysis only for those thresholds that result in a less than significant impact, a potentially significant impact unless mitigated, or a significant and unavoidable impact. Cumulative impacts are addressed for each of the environmental topics listed above and are provided in **Sections 4.1** through **4.16** of this Draft EIR.

SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS

As required by Section 15065(a)(4) of the CEQA Guidelines, "A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly." Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This standard relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could directly or indirectly affect human beings would be possible in all of the CEQA issue areas previously listed, those that could directly affect human beings include aesthetics, air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, land use and planning, public services and utilities, transportation/traffic, water resources, wildfire hazards, and climate change, all of which are addressed in the appropriate sections of this Draft EIR; refer to Table of Contents for specific section numbers. The following topic areas were determined to be significant and unavoidable with respect to adverse effects on human beings:

Visual Character

Despite strategic Project Design Features, the Project site is located in a non-urbanized area and will substantially degrade the existing visual character or quality of public views of the site and its surroundings. No mitigation measures were identified to reduce these impacts to less than significant. Each planning area within the KPC Coachella Specific Plan area would be required to comply with the development guidelines set forth within the Specific Plan, the goals and policies within the Coachella General Plan, and the sections within the Coachella Municipal Code. Each planning area shall be evaluated to showcase conformance with these regulatory standards to ensure minimal impacts will occur to the visual character or quality of the site and its surroundings. See **Section 4.1: Aesthetics**, for additional discussion.

Project-Related Emissions

Project implementation would result in air pollutant emissions that exceed South Coast Air Quality Management District's (SCAQMD) construction and operational emission thresholds. Although mitigation would reduce emissions by the greatest feasible amount, Project emissions levels would remain significant and would contribute to the nonattainment designations in the Salton Sea Air Basin. Therefore, the Project would be inconsistent with the Air Quality Management Plan (AQMP), resulting in a significant and unavoidable impact despite the implementation of mitigation.

With mitigation, construction emissions would exceed the SCAQMD threshold for NO_X. Emissions generated by operation of the Project will exceed established SCAQMD thresholds for ROG (VOC), CO and NO_X as well as PM_{10} where the majority of ROG emissions are from area and mobile sources and the majority of NO_X, CO, and PM_{10}, emissions are from mobile sources.

Despite implementation of mitigation measures, the overlapping operational and construction emissions from each phase would result in emissions that exceed the thresholds for ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$. Therefore, mitigated impacts related to phased construction and operations would remain significant and unavoidable. See **Section 4.2: Air Quality** for additional discussion.

Cumulative Emissions

The Project would result in short-term and long-term air quality impacts because mitigated emissions would exceed the SCAQMD thresholds for NO_X during construction and ROG, NO_X, CO, and PM_{10} during operations. These pollutants are precursors for ozone for which SCAQMD is currently an extreme nonattainment area. Therefore, both construction and operational impacts would be cumulatively considerable. See **Section 4.2: Air Quality** for additional discussion.

Seismic Risk

The Project site is located within an Alquist-Priolo Earthquake Fault Hazard Zone and contains several potentially active faults. As discussed in **Section 4.6: Geology and Soils**, the Project's direct or indirect adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Zoning Map, would remain despite implementation of **MM GEO-1** and compliance with all applicable federal, state, and local regulations and development standards. See **Section 4.6** for additional information.

Greenhouse Gas Emissions

The Project is consistent with City of Coachella CAP, Regional Transportation Plan/Sustainable Communities Strategy, and CARB Scoping Plan and does not conflict with the applicable plans and policies that are discussed above. However, the Project is a mixed-use Specific Plan and due to the nature and size of the Project, it produces a tremendous number of vehicular trips. The Project incorporates all feasible mitigation measures that could be implemented and there are no additional measures available that would further reduce emissions because the vast majority of the Project's GHG emissions are from mobile and energy sources which are regulated by the State and the Project has no control over them. However,

as noted in **Section 4.7: Greenhouse Gas Emissions**, the Project would generate 167,366.65 $MTCO_2e$ during the first year of Project Buildout and as a result, the Project is assumed to result in a significant and unavoidable impact even with mitigation incorporated.

Library Services

The Project would result in increased demand for library square footage and materials that would exceed existing library facilities. Due to the increased demand for City library resources, the Project's potential to result in substantial adverse physical impacts associated with the provision of new or physically altered to library facilities would be significant and unavoidable until additional library resources are provided. Additionally, the Project's impact on library services would be cumulatively considerable. See **Section 4.13: Public Services** for additional information.

6.0 ALTERNATIVES TO THE PROPOSED PROJECT

6.1 INTRODUCTION

Sections 15126.6(a) and (b) of the State CEQA Guidelines (14 California Code of Regulations [CCR]) provide guidance on the scope of alternatives to a proposed project that must be evaluated. The CEQA Guidelines state:

a. *Alternatives to the Proposed Project. An EIR shall 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 but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not 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, which are infeasible or speculative. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the 'rule of reason'.*

b. *Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.*

In selecting alternatives to the Specific Plan, the City of Coachella (City), as Lead Agency, is to consider alternatives that could feasibly attain most of the basic objectives of the KPC Coachella Specific Plan Project (Project) and avoid or substantially lessen one or more of the significant effects.

Section 15126.6(f) of the CEQA Guidelines (14 CCR) states:

> *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. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR needs to examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.*
>
> *Among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.*

Therefore, factors that may be considered when addressing the feasibility of alternatives include but are not limited to site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether proponents can reasonably acquire, control, or otherwise have access to the alternative site. Although these factors do not present a strict limit on the scope of reasonable alternatives to be considered, they help establish context in which "the rule of reason" is measured against when determining an appropriate range of alternatives sufficient to establish and foster meaningful public participation and informed decision-making.

6.2 RANGE OF ALTERNATIVES

The lead agency is responsible for selecting this range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. This section describes four alternatives to the Project. These alternatives include the No Project/No Build Alternative, No Project/Existing Zoning and General Plan Alternative, and Reduced Density Alternative. The three alternatives are discussed in more detail below. A fourth alternative, the Alternative Site Alternative, was considered but rejected; see Section 6.6 below.

Among the factors that may be taken into account when addressing the feasibility of alternatives, as described in Section 15126.6(f)(1) of the CEQA Guidelines, are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the Project proponent could reasonably acquire, control, or otherwise have access to an alternative site.

As discussed above, one of the main purposes of the range of alternatives is to discuss different projects that are capable of avoiding or substantially lessening significant effects, especially effects that are found to be significant and unavoidable. In the case of the Project, as discussed throughout **Section 4.0: Environmental Impacts Analysis**, there are unavoidable significant impacts associated with aesthetics, air quality, noise, public services, and utilities and service systems.

The CEQA Guidelines do not require an EIR to consider every plausible alternative to a project, but rather must examine in detail only the ones which the lead agency determines could feasibly attain most of the basic project objectives. An EIR also does not need to consider alternatives whose effects cannot be reasonably ascertained and whose implementation is remote and speculative. Feasibility factors include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether project proponents can reasonably acquire, control, or otherwise have access to an alternative site. If the lead agency determines no alternative projects or locations are feasible, it must disclose the reasons for this conclusion in the EIR (CEQA Guidelines Section 15126.6). The alternatives that were selected for additional consideration were chosen in accordance with the above-listed CEQA Guidelines, represent a reasonable range of alternatives and will encourage discussion in a manner to foster meaningful public participation and informed decision making.

6.3 PROJECT OBJECTIVES

Section 15124(b) of the CEQA Guidelines indicates that an EIR should include "a statement of objectives sought by the proposed Project." The Specific Plan was prepared to achieve the following Project objectives, which are also described in **Section 3.3** of this Draft EIR:

Objective 1: Enhance circulation in the Project area by providing a new connection via the extension of Vista Del Norte into the Project site, dedicating ROW necessary for the proposed Avenue 50/I-10 interchange improvements and contributing the Project's fair share to planned Circulation Element improvements in the cities of Coachella and Indio and to other jurisdictions in the area as required.

Objective 2: Enhance infrastructure to serve the Project by construction and upsizing on- and off-site water and sewer infrastructure.

Objective 3: Provide a variety of housing opportunities (single-family residential and multi-family residential as part of the mixed-use component) to serve the existing and future housing needs in the City of Coachella, consistent with the goals and policies established in the Coachella General Plan Land Use, Housing, Community Health and Wellness, and Safety Elements.

Objective 4: Provide affordable housing stock within the City of Coachella.

Objective 5: Provide new employment opportunities in the area.

Objective 6: Plan for new educational opportunities, including new schools and higher education.

Objective 7: Provide a variety of open space opportunities, including planned and programmed neighborhood parks, passive recreation corridors, and a trail system that increases connectivity both within and outside of the Project area.

Objective 8: Provide an opportunity for commercial development to serve existing and planned development in the vicinity of the Project area to reduce vehicle trips.

6.4 SIGNIFICANT AND UNAVOIDABLE PROJECT IMPACTS

Impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project; see CEQA Guidelines Section 15126.6. As concluded in **Section 4.1** through **Section 4.16** of this EIR, the Project would result in significant and unavoidable aesthetic, air quality, public services, noise, transportation, and utility impacts.

Aesthetics

The proposed Project would involve mass grading, landform alteration, and the development of approximately 9,538 residential dwelling units; a maximum of approximately 305 acres of mixed-use development which includes a maximum of approximately 844 multiple-family dwelling units; approximately 395 acres of parks, greenways, and amenity centers; approximately 68 acres of agricultural

production; approximately 754 acres of drainage and other open space, and approximately 179 acres of right-of-way (ROW)/streets. The proposed Project would result in a significant amount of new development on undisturbed areas of the City. Although there are existing urbanized areas abutting the proposed Project, a majority of the area abutting the proposed Project site is undeveloped and undisturbed land. The development intensities proposed by the Project would result in significant and unavoidable impacts.

Air Quality

Despite implementation of mitigation measures, the Project's construction emissions would remain above SCAQMD thresholds for NO_X. Additionally, the Project's operational emissions would remain above SCAQMD thresholds for ROG, NO_X, CO, and PM_{10}. Although the Project's long-term influence would be consistent with the 2022 AQMP and SCAG's goals and policies, the Projects exceedance of construction NO_X and operation ROG, NO_X, CO, and PM_{10} thresholds would potentially result in both short-term and long-term impacts on the region's ability to meet state and federal air quality standards.

Geology and Soils

Despite the implementation of MM GEO-1, the Project would potentially be impacted by substantial adverse effects due to fault rupture of unknown earthquake faults.

Greenhouse Gas Emissions

Despite the implementation of plans, programs, and policies, and mitigation measures, the Project would result in a significant and unavoidable GHG emissions impact. The Project is consistent with City of Coachella CAP, Regional Transportation Plan/Sustainable Communities Strategy, and CARB Scoping Plan and does not conflict with the applicable plans and policies. However, the Project is a mixed-use Specific Plan and due to the nature and size of the Project, it produces a tremendous number of vehicular trips. The Project incorporates all feasible mitigation measures that could be implemented and there are no additional measures available that would further reduce emissions because the vast majority of the Project's GHG emissions are from mobile and energy sources which are regulated by the State and the Project has no control over them.

Public Services

The Project would result in significant unavoidable adverse impacts related to the need for new library facilities because there are no feasible mitigation measures to reduce impacts associated with the increased demand on library facilities to a less than significant impact.

Noise

Because the Clearly Compatible standard would be exceeded, cumulative operational noise impacts from related projects, in conjunction with Project-specific noise impacts, would be cumulatively considerable along Avenue 50 from Tyler Street to Polk Street and Avenue 52 from Tyler Street to State Route 86 (SR-86).

6.5 CRITERIA FOR SELECTING ALTERNATIVES

Per Section 15126.6(b) of the CEQA Guidelines, the discussion of alternatives shall focus on alternatives to a project, or its location that are capable of avoiding or substantially lessening significant impacts of a project, even if the alternatives would impede to some degree the attainment of the project objectives or would be more costly. This alternatives analysis therefore focuses on project alternatives that could avoid or substantially lessen environmental impacts of the Project related to the environmental categories listed in Appendix G of the CEQA Guidelines.

Comments received during the NOP process included issues related to adequate biological resource assessment, proper Project review by the Coachella Valley Conservation Commission (CVCC), school siting, student population, tribal consultation, City overcrowding, and consistency with the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

While all of these considerations are addressed throughout this Draft Environmental Impact Report (EIR) and in the respective sections, they also were considered to develop the reasonable range of alternatives and to address the concerns. The alternatives listed below, specifically those that are evaluated, represent a reasonable range, and at least partially fulfill the Project objectives the County is seeking and/or alleviate some of the potential impacts that would occur upon implementation of the Project as proposed.

Ability to Achieve Specific Plan Project Objectives

For purposes of the alternative analysis, alternatives are assessed to determine the extent to which each could attain the objectives identified for the Project. The Project objectives express the types of actions that are necessary to promote the spirit and intent of the Project, as shown above. The ability of each alternative to attain the majority of objectives was one criterion for selection and evaluation in this Draft EIR.

Ability to Avoid Significant Impacts

Section 15126.6(b) of the State CEQA Guidelines (14 CCR) states that “Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly”.

Therefore, the alternatives evaluated in this Program EIR have been selected because they are anticipated to reduce and/or eliminate one or more significant impacts associated within the Specific Plan area. Potentially significant environmental impacts that would result from implementation of the Specific Plan are evaluated in Sections 4.1 through 4.16 of this Program EIR. With implementation of the respective Plans, Programs, and Policies; Project Design Features, and Mitigation Measures (MMs) identified for each topical issue, many of the potentially significant impacts resulting from implementation of the Specific

Plan would be reduced to a level considered less than significant. The Specific Plan impacts listed above would remain significant and unavoidable.

The discussion in this EIR focuses on three alternatives:

1. No Project/No Build Alternative
2. No Project/Existing Zoning and General Plan Alternative
3. Reduced Density (20 Percent Reduction) Alternative

Based on criteria described above, the three alternatives, including the No Project/Existing Zoning and General Plan Alternative, were analyzed and carried forward. These alternatives are described in **Section 6.8: Comparison of Project Alternatives**. The following subsection (**Section 6.6: Alternatives Considered but Rejected**), describes the Alternatives that were considered, but rejected, and provides reasoning for not carrying this Alternative forward for evaluation in this EIR.

6.6 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines Section 15126.6(c) states that an EIR should identify any alternatives that were considered by the lead agency but rejected because the alternative would be infeasible, fail to meet most of the basic project objectives, or unable to avoid significant environmental impacts. Further, an EIR may consider an alternative location for the proposed project but is only required to do so if significant project effects would be avoided or substantially lessened by moving the project to another site and if the project proponent can reasonably acquire, control, or otherwise have access to the alternative site.

Alternative Site Alternative

CEQA Guidelines Section 15126.6(f)(2)(A) notes the following concerning alternative project locations:

- The key question and first step in alternative location analysis is whether any of the significant effects of the Project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. The majority of the proposed Project's significant effects are related to the scale of the Project, not its location. For instance, an alternative location would also be redeveloped, changing the scale/make-up of the alternative site in a manner similar to the proposed Project.
- CEQA Guidelines Section 15126.6(f) requires consideration of an Alternative Site that the Project Applicant would be reasonably able to acquire, control, or gain access to develop. The CEQA Guidelines section also posits that the alternative location chosen should substantially reduce or avoid potential environmental impacts. In the case of the proposed Project, an alternative site is not considered applicable or feasible, as the Project Applicant does not control other undeveloped property not already planned for development of similar size within the City or in the immediate area. Additionally, the City lacks developable sites that are approximately commensurate in size to the Project. Further, an alternative site in a comparable location would not be likely to substantially reduce any potential impact created by Project implementation. For

the above reasons, the Alternative Site Alternative was rejected from further consideration and is not discussed further.

Mojave Desert Tortoise Conservation Area Alternative

Based on public comments received during the NOP scoping period, an alternative was considered which would involve the reduction of specific development areas throughout the Project site which would intersect or fall within Desert Tortoise Conservation Area lands. This would be done to preemptively avoid the areas with higher densities of tortoises and higher quality habitat, and ensure these areas are consistent to conservation lands that would remain in a natural state north, northeast, and east of the Project area. These undeveloped areas within the Project area would be designated as natural open space areas. This alternative, however, would be necessitated by the presence of designated Desert Tortoise Conservation Areas within the Project site, or the identified presence of desert tortoise within the Project site. The Project site is adjacent to, but not within or intersecting with currently designated Desert Tortoise Conservation Areas. Additionally, desert tortoise were not encountered during field visits. Additionally, the biological resources assessment conducted for the Project identified suitable habitat for the tortoise within the area which is already managed by the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). Impacts to desert tortoise would therefore be addressed through coordination with the CVMSHCP. Bolstering this, mitigation is proposed in the EIR which requires the retention of a qualified biologist to conduct preconstruction surveys for the desert tortoise. If desert tortoise is found, the Project applicant shall notify the USFWS 45 days prior to the issuance of any grading permit to allow the USFWS to salvage adult tortoises. If the USFWS is not able to salvage desert tortoise, the Project applicant will salvage desert tortoise per current USFWS desert tortoise clearance survey protocol. Construction on the Project site would not occur until the tortoises are salvaged (see **MM BIO-1**).

However, due to the lack of current determination of Project lands within Desert Tortoise Conservation Areas (See **Appendix C**) and the lack of identified locations harboring desert tortoise, the Project is unable to analyze this alternative with any certainty. Actions to reduce or modify the Project boundary based on potential occurrence of desert tortoise would be speculative and would otherwise not be feasibly accomplished based on limited knowledge of desert tortoise location within the Project site. , Therefore, in accordance with CEQA Guidelines Section 15126.6(c), this alternative has been removed from further consideration due to its infeasibility. However, this EIR includes MMs which are aimed at ensuring adequate coordination with state and local agencies, including the Coachella Valley Conservation Commission.

6.7 ALTERNATIVES TO THE PROPOSED PROJECT

As noted previously, the CEQA Guidelines (Section 15126.6(e)(2)) require that the alternatives discussion analyze the “No Project Alternative.” Pursuant to CEQA, the No Project/Existing Zoning and General Plan Alternative refers to the analysis of existing conditions (i.e., implementation of current plans and consistency with available infrastructure and community services) and what would reasonably be expected to occur in the foreseeable future if the Project is not approved. When the project is the revision of an existing land use plan, the no project alternative is the continuation of the existing plan into the future and the EIR’s discussion compared the projected impacts of the change that would result from

approval of the project with the impacts that would occur under the existing plan. CEQA Guidelines Section 15126.6(e)(3)(A).

The three analyzed alternatives present a reasonable range of alternatives to the Project. The analysis in this section focuses on significant and unavoidable impacts attributable to each Alternative and the ability of each Alternative to meet basic Project objectives.

ALTERNATIVE 1: NO PROJECT/NO BUILD ALTERNATIVE

Under the Alternative 1, no development would occur. The Project site would remain in its current undeveloped state.

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

Alternative 2 would allow decision-makers the ability to compare the impacts of approving the Project with impacts of not approving the Project by maintaining the existing zoning and general plan land use designations of the Project area, simulating development as established by the Project site's existing zoning standards.

ALTERNATIVE 3: REDUCED DENSITY (20 PERCENT REDUCTION) ALTERNATIVE

Alternative 3 focuses on redesigning the Project to reduce the overall density by 20 percent, and subsequently, reduce the Project's overall development capacity.

6.8 COMPARISON OF PROJECT ALTERNATIVES

Potential environmental impacts of three separate alternatives are compared below to impacts from the proposed Project. These alternatives were selected based upon their ability to avoid or substantially lessen the significant effects of the proposed Project, while still achieving the primary Project objectives (to develop the site in a manner generally consistent with the currently approved and amended Murrieta Hills Specific Plan); refer to **Table 6-1, Comparison of Alternatives**, for an impact matrix that compares the Alternatives to the proposed Project.

ALTERNATIVE 1: "NO PROJECT/NO BUILD" ALTERNATIVE

Description of Alternative

State CEQA Guidelines Section 15126.6, requires an evaluation of the "No Project" alternative for decision makers to compare the impacts of approving the Project with the impacts of not approving it. The No Project Alternative must include the assumption that conditions at the time of the NOP was published (i.e., baseline environmental conditions) would not be changed since the Project would not be implemented.

The "No Project/No Build" (Alternative 1) assumes that the proposed Project improvements would not be implemented, no Project Specific Plan would be established, and no development project would occur on the site. More specifically, under Alternative 1, there would not be a General Plan Amendment, land use

change, or zone change, nor any residential, commercial, parks, roads, institutional uses, and open space improvements.

The City's General Plan land use designation and zoning would remain the guiding document for the site. However, under Alternative 1, the Project site would remain in its existing, undeveloped state.

Impact Comparison to the Proposed Project

Aesthetics

The Project site is composed of undeveloped desert terrain, including rocky ridges and dry washes, which slope from the northeast to the southwest. Existing on-site vegetation consists of small, scattered shrubs, creosote, ocotillo, and small dispersed trees. Under Alternative 1 the Project site would remain in its existing conditions at the time of the circulation of the NOP. As such, no development would occur, including placement of structures which could increase light and glare in the proximity of the Project area, and otherwise modify the existing visual character of the Project area. Therefore, impacts associated with visual changes to the existing environment, or the addition of new visual components would be avoided.

Air Quality

Despite the application of mitigation, the Project would have significant and unavoidable impact associated with construction and operations emissions exceeding SCAQMD's significance threshold for NOx, ROG, CO, PM_{10}, and $PM_{2.5}$. All other potentially significant impacts would be reduced to less than significant with the incorporation of Mitigation Measures (**MM AQ-1** through **MM AQ-8**). Under Alternative 1, no development or land improvements would occur on the Project site and, subsequently, no impacts to air quality would occur. For this reason, air quality impacts would be reduced under Alternative 1 when compared to the proposed Project.

Biological Resources

The Project would result in less than significant impacts with mitigation measures incorporated to biological resources associated with the loss of protected trees, mature trees, riparian habitat, federally protected wetlands, nesting birds, movement of native residents or wildlife, and candidate, sensitive, or special status species. Because no demolition or construction would occur under Alternative 1, no changes to biological resources would occur. No nesting birds would be disturbed, and all existing trees and habitat would remain in place and no impacts would occur. For this reason, impacts to biological resources would be less under Alternative 1 when compared to the proposed Project.

Cultural Resources

Under Alternative 1 impacts to cultural resources, including historical, archaeological, or human remains would be less than under the proposed Project as this alternative would not involve any ground disturbing activities. As such, under Alternative 1, no impacts to cultural resources would occur. For this reason, impacts to cultural resources would be less under Alternative 1 when compared to the proposed Project.

Energy

Under Alternative 1 energy consumption during construction and operation would total zero kWh of electricity, zero gallons of gasoline, and zero gallons of diesel. For this reason, Alternative 1 would have no impact on the site compared to the proposed Project. Therefore, this Alternative would have no impact when compared to the proposed Project.

Geology and Soils

Impacts related to geology and soils were anticipated to have a significant and unavoidable impact despite the implementation of mitigation measures under the proposed Project. Under Alternative 1, no development would occur and therefore no new impact would occur in relation to expanded hazard due to modification of geological features or exposure to geologic hazards. This is due to the lack of new or additional land modifications or human-occupied structures. Impacts related to geology, soils, and seismicity would be reduced compared to those potentially resulting from the proposed Project.

Greenhouse Gas Emissions

The proposed Project would generate greenhouse gas emissions directly from Project construction and long-term energy and mobile sources. Because the proposed Project primarily involves residential and commercial development, the majority of emissions would occur from energy and mobile sources. Mitigation measures were proposed which would reduce mobile source emissions; however, impacts from the proposed Project were found to be significant and unavoidable. In contrast, Alternative 1 would eliminate all forecasted greenhouse gas emissions from the site as no development would occur. Impacts would be reduced compared to those potentially resulting from the proposed Project.

Hazards and Hazardous Materials

Under Alternative 1, the Project site would avoid exposing persons or structures to any potential impacts from hazardous materials on the public or environment as no development or change in site usage would occur. Impacts would be reduced compared to those potentially resulting from the proposed Project.

Hydrology and Waste Quality

Under Alternative 1, no impacts would occur to groundwater supplies, groundwater recharge, or the alteration of existing drainage patterns due to the lack of development or proposed land modification. Additionally, exposure of structures or persons to runoff, flooding, tsunami, seiche would not occur under Alternative 1. Therefore, no impacts would occur during this alternative. Impacts would be reduced compared to those potentially resulting from the proposed Project.

Land Use and Planning

Implementation of the proposed Project would require the approval of a Zone Change (ZC) and General Plan Amendment (GPA). Under Alternative 1 “No Project/No Build”, the Project site would remain within the current City general plan land use designation and zoning. However, since the site would remain undeveloped, the alternative would conflict with the goals of the Coachella GP. As such, impacts related

to conflict with existing neighborhoods or planning policies would occur. Impacts would be greater compared to those potentially resulting from the proposed Project.

Noise

Project construction would occur in six phases. Ground-borne noise and other types of construction-related noise impacts would typically occur during excavation activities of the grading phase. The Project has the potential to create the highest levels of ground-borne noise and other types of construction-related noise impacts during the excavation activities of the grading phase. The Project was found to not generate significant impacts once mitigation was applied. However, cumulative significant and unavoidable noise impacts would occur due to growth along surrounding roadways in conjunction with the Project. Under Alternative 1 however, short-term construction noise and vibration levels and long-term noise levels would be eliminated because the site would remain vacant, and no construction activities would occur. Impacts would be reduced compared to the Project.

Population and Housing

Under the Alternative 1, the land would remain undeveloped. This would conflict with the overall vision of the Project site as the area would no longer experience growth at the rate predicted or planned in the Coachella GP. Impacts would therefore be greater than the Project.

Public Services

Under Alternative 1, no impact would occur to public services as demand would remain the same. No structures would be removed or developed which would necessitate additional fire, police, school, park, or library facilities. Impacts would be reduced compared to the Project.

Transportation

The proposed Project is anticipated to have a less than significant impact with mitigation measures incorporated. Alternative 1 would eliminate all daily, morning, and evening daily trips. Additionally, the lack of construction would remove the necessity for emergency vehicle access. Impacts would be reduced compared to the Project.

Tribal Cultural Resources

Tribal cultural resources are sensitive and have the potential to be impacted regardless of the level of soil disturbance. Consultation was initiated with Native American Heritage Commission (NAHC) in April 2019 to determine whether any sacred sites were listed in the Sacred Lands File (SLF) for the Project study area and general vicinity. The SLF search resulted in a negative result, indicating no sacred sites. Under Alternative 1, the site would remain undisturbed, and any tribal cultural resources present would be preserved in place. Impacts would be reduced compared to the Project.

Utilities and Service Systems

The proposed Project impacts to utilities and service systems were found to be less than significant with mitigation incorporated. Alternative 1 would have no impact on utilities and service systems as there

would be no need for water or wastewater services to occur or be provided if the site remains in its current state.

Ability to Meet Project Objectives

The No Project/No Build Alternative would not meet any of the Project objectives identified above such as enhancing circulation in the Project area, enhancing infrastructure within the Project area, the provision of affordable housing, expansion of educational facilities, creation of open space areas, expansion of commercial land uses, and the expansion of educational facilities as the site would remain in its current condition and would not undergo any development.

Alternative 1 Summary

All topics anticipated to cause a less than significant impact, less than significant with mitigations, or a significant and unavoidable impact would be eliminated under Alternative 1. However, the implementation of Alternative 1 is not under consideration, as it fails to meet the Project objectives; does not address future housing needs and RHNA allocation as identified in the City's Housing Element Update; and is inconsistent with local land use plans as identified in the City's General Plan. In addition, a No Project/No-Build alternative would not preclude the Project site from being developed in the future. The City is precluded from downzoning existing residentially zoned land without identifying replacement housing and upzoning other sites, pursuant to SB 330.

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

Description of Alternative and Setting

Per the City's General Plan Land Use Map (2023) and Official Zoning Map (2023), the Project site is designated as Resort District. Alternative 2 assumes that the Project would not be developed. Instead, Alternative 2 would develop the site in accordance with the Existing zoning of the Project parcels, which is Open Space and Resort District. The Project site would then be developed to the development standards allowed for Open Space and Resort District zoning. Additionally, this alternative would not employ Project-specific mitigation measures associated with Project implementation but would continue to adhere to local, state, and federal regulations as applicable. **Table 6-1: Existing Zoning Standards Development Comparison** summarizes the development potential of Alternative 2 in comparison to the Project.

Table 6-1: Existing Zoning Standards Development Comparison

Use	% Area	Area (acres)	Density (du/ac)	Dwelling Units	FAR	Square Footage
Resort District	95%	2,668	8.0	21,344	0.1	11,621,808
Open Space	5%	139	–	–	–	–
Total	**–**	**–**	**–**	**21,344**	**–**	**11,621,808**
Project Total	–	–	–	*9,538*	–	*2,040,518*
Net Change	**–**	**–**	**–**	**+11,806**	**–**	**+9,581,290**

Impact Comparison to the Proposed Project

Aesthetics

A potential significant and unavoidable aesthetic impact was identified in regard to the modification or degradation of the existing visual character of the site from its current undeveloped, rural state. Under Alternative 2, the Project site would be developed to the scale and density allowed under the existing Resort District and Open Space zoning. Based on the scale allowed by the existing zoning and land use designation of the site, development would be allowed at a greater scale than proposed by the Project. This would similarly modify the Project site in a manner that would dramatically modify the existing landscape and setting. Therefore, impacts would be similar to the proposed Project.

Air Quality

Despite the application of mitigation, the Project would have significant and unavoidable impact associated with construction and operations emissions exceeding SCAQMD's significance threshold for NOx, ROG, CO, PM_{10}, and $PM_{2.5}$. All other potentially significant impacts would be reduced to less than significant with the incorporation of Mitigation Measures (**MM AQ-1** through **MM AQ-8**). Under Alternative 2, the Project would be able to be developed with a greater intensity of both commercial and residential uses. In comparison to the maximum estimated buildout under the proposed Project, buildout under the City's General Plan land use designation and zoning would allow for approximately 11,806 additional residential units, and approximately 9,581,290 sq ft of additional commercial uses as opposed to the proposed Project. Alternative 2 would therefore involve similar or greater construction activities and land disturbance as compared to the proposed Project. It is anticipated that these improvements would also lead to the emission of NOx, ROG, CO, PM_{10}, and $PM_{2.5}$ in excess of SCAQMD's thresholds. However, under Alternative 2, the implementation of the Project's mitigation measures would not be included. As such, impacts would remain significant and unavoidable at a greater intensity.

Biological Resources

Under Alternative 2, development could occur on the Project site. However, future development would not be proposed under the Project or include any mitigation measures proposed for the Project. As such, mitigation measures **MM BIO-1** through **MM BIO-4**, which were identified to reduce biological impacts to less than significant levels would not be implemented. Without the implementation of the Project's mitigation measures, impacts to special status species, sensitive communities and environments, and established local conservation plans may be significant. As such, impacts would be worse than the proposed Project.

Cultural Resources

Impacts to cultural resources including historical, archaeological, including the disturbance of human remains would be less than significant after mitigation under the proposed Project. Alternative 2 would develop essentially the same footprint but would have a greater development density and capacity. It is anticipated that Alternative 2 would generate greater land disturbance. As such the potential for effecting archeological or historical resources would be similarly greater. Additionally, this alternative would not utilize mitigation measures proposed for the Project, such as **MM CUL-1** which requires the presence of a

cultural monitor during all construction period ground moving activities. Therefore, impacts would not be reduced per the Project and would be greater under Alternative 2.

Energy

The Project would result in less than significant impacts due to wasteful use of energy resources and conflicts with established renewable energy or energy efficiency plans. The Project was estimated to demand approximately 0.5 percent and 0.4 percent of the County's electricity and natural gas generation, respectively. Under this Alternative, residential uses would increase by approximately 124 percent, and commercial uses would increase by approximately 470 percent. Assuming a combined increase of 594 percent, Alternative 2 would increase to approximately 3.0 percent and 2.4 percent of the County's electrical and natural gas generation, respectively. Therefore, energy impacts associated with this alternative would be greater than the Project.

Geology and Soils

The Project site is expected to experience strong ground shaking during the life span of the proposed development due to its proximity to the Alquist-Priolo Earthquake Fault Zone. Additionally, most of the site is within risk of experiencing landslides and erosion. Project approvals included mitigation measures including the requirement for the creation of a specific final geotechnical study for each specific planning area. The Project's impacts were found to be significant and unavoidable despite the implementation of mitigation measures. Similarly, impacts associated with Alternative 2 would remain significant. Therefore, impacts associated with this alternative would be similar to the proposed Project.

Greenhouse Gas Emissions

Alternative 2 would have more residential and commercial uses than the proposed Project. Both Alternative 2 and the proposed Project would result in direct emissions of GHGs from construction activities. The approximate quantity of daily GHG emissions generated by construction equipment, energy use, and mobile sources would be associated with development at a scale that is multiple times greater than the proposed Project. Under either scenario, the generation of these GHG emissions would not cease at Project completion. Additionally, the mitigation measures proposed for the Project would not be applied under Alternative 2, removing actions which would reduce potential greenhouse gas emissions. Therefore, impacts associated with this alternative would be greater than the Project.

Hazards and Hazardous Materials

Both Alternative 2 and the proposed Project would be developed within the same footprint. Hazardous materials used in the implementation of Alternative 2 scenario would be greater because of the larger disturbance intensity associated with Alternative 2. Additionally, operational risks of Alternative 2 relating to hazards would be greater to those of the proposed Project, because of the larger number of residential units and commercial square footage. However, overall, in both cases homes and commercial uses would require the similar types of limited standard maintenance hazardous materials, including, vehicle fuel, oils, and solvents for long-term operation purposes. Due to the increased intensity of the development allowed under Alternative 2, and the lack of mitigation measures as proposed for the Project, impacts

would likely remain significant. Therefore, impacts associated with this alternative would be greater than the Project.

Hydrology and Waste Quality

The development footprint for Alternative 2 would dramatically increase development compared to the proposed Project. Although, under both development scenarios, the amount of impervious surface would increase, Alternative 2 has the potential to disturb a greater amount of land. Construction and operational best management practices (BMPs) would be implemented under both alternatives to detain and treat surface runoff and reduce water quality impacts to a less than significant level with mitigation. However, impacts would be greater under this alternative due to the larger impervious footprint.

Land Use and Planning

Under Alternative 2, the Project site would be developed with uses consistent with the current Coachella GP designation and zoning. The Project would include the approval of a ZC and GPA. Like the proposed Project, it is not anticipated that Alternative 2 would physically divide an established community or cause a conflict with any land use plan, policy, or regulation. Alternative 2 is anticipated to have similar or less land use impacts than the proposed Project because no update to the City's General Plan land use designation or zoning would be necessary. Impacts would be less when compared to the Project due to consistency with General Plan land use designation and zoning.

Noise

Ground-borne noise and other types of construction-related noise impacts would typically occur during excavation activities of the grading phase. This phase of construction has the potential to create the highest levels of noise. Based on the Project's noise analysis, it is anticipated that the proposed Project would create less than significant direct groundborne vibration and noise levels. However, cumulative noise impacts would be significant and unavoidable through the exceeding of the Clearly Compatible standard in conjunction with growth along surrounding roadways. This alternative would generate greater trips, increasing mobile source noise impacts. This would create additional project-centric noise levels, and contribute a greater amount of noise to cumulative noise levels. Impacts would therefore remain significant and unavoidable from construction related impacts with no Project proposed mitigation applied. Alternative 2 impacts would be greater compared to the Project.

Population and Housing

Alternative 2 would allow for an additional 11,806 residential units and 9,581,290 square feet of commercial uses compared to the Project. While this would allow for population growth at a greater amount than that of the Project, this growth would be consistent with allowed densities established in the Coachella GP and Zoning Code without the need for a GPA or ZC. Additionally, the lack of structures on the Project site would not necessitate the demolition of housing elsewhere. Impacts would be reduced compared to the Project.

Public Services

The demand for public services under Alternative 2 would be greater from that of the proposed Project based on the potentially larger development that could be implemented compared to the proposed Project. Typically, residential developments have a large need in public services including police, fire, parks, schools, and other services. With the greater number of residential units and commercial areas proposed, the greater need of public services arises. Although the demand for public services could be mitigated through the payment of planning and development service fees to support future services, the proposed Project is anticipated to provide the necessary schools, parks, and recreational areas for the population would generate. It is unknown and it would be speculative to suggest that Alternative 2 would also provide enough schools and necessary public services to minimize impacts on libraries and schools. It is anticipated that Alternative 2 would have a greater impact on public services and recreational facilities.

Transportation

Alternative 2 could generate a larger volume of daily vehicular trips than the proposed Project due to the number of residential units and commercial uses which would be allowed by the Coachella GP density. Mitigation measures were proposed to reduce potential traffic and VMT impacts which may be associated with the Project. However, these mitigation measures would not be applied in Alternative 2. This issue would persist in this alternative since the Project site is currently vacant and does not include existing emergency vehicle accessways throughout the footprint. Impacts would be greater than the Project.

Tribal Cultural Resources

The Project site was not found to contain any resources which would appear on a SLF search by the NAHC. Additionally, a pedestrian survey of the Project site found no potentially tribally sensitive resources. Nonetheless, mitigation measures were proposed in order to account for any future discoveries that may occur. This led to a less than significant impact in regard to tribal cultural resources. Alternative 1 has the potential to increase soil disturbance above that of the proposed Project due to the greater allowance for residential and commercial development. This increased ground disturbance subsequently increases the opportunity to encounter unknown buried resources. Unlike the Project, Alternative 2 would not employ mitigation proposed for the Project. Therefore, impacts would remain at higher levels.

Utilities and Service Systems

When compared to the proposed Project, the development associated with Alternative 2 would result in an increased demand on utilities. Infrastructure improvements could also increase compared to those needed for the proposed Project and would need to be evaluated on a project-specific basis. As with the proposed Project, it is anticipated that impacts would be less than significant with mitigation incorporated. However, impacts would be greater when compared to the Project.

Ability to Meet Project Objectives

The Alternative 2would meet most of the Project objectives identified above with the exception of providing new educational opportunities and enhancing utility infrastructure. Alternative 2 fails to include

plans for expanding infrastructure as proposed by the Project as well as scaling development to levels which can be managed by the region and create a closer balance between residential and commercial uses.

Alternative 2 Summary

As discussed above, Alternative 2 is estimated to have a greater impact compared to the proposed Project for all environmental topics except aesthetics, land use and planning, and population and housing. Overall impacts would increase compared to the proposed Project. Alternative 2 fails to meet two of the eight Project objectives. Alternative 2 would meet six objectives.

The feasibility of Alternative 2 is speculative because we cannot currently conclude the exact extent of public service impacts as public service demand (such as library usage) varies between households and cannot be accurately predicted. Additionally, Alternative 2 is anticipated to cause a greater impact to the above mentioned resources compared to the proposed Project and would therefore worsen environmental conditions. Therefore, this Alternative is not under consideration at this time.

ALTERNATIVE 3: "REDUCED DENSITY" (20 PERCENT REDUCTION) ALTERNATIVE

Description of Alternative

The purpose of the Alternative 3 is to reduce impacts from the proposed Project related to the number of units developed and the intensity of commercial development. Under this alternative, the total number of residential dwelling units would be reduced from 9,538 to 7,670, representing a reduction of 1,868 units, or approximately 20 percent. In addition, it is anticipated that commercial square footage would be reduced by 20 percent under this alternative from 2,040,518 square feet to 1,603,955 square feet, a reduction of 356,563 square feet. **Table 6-2: Alternative 3 Development Comparison** summarizes Alternative 3 development potential in comparison to the Project.

Table 6-2: Alternative 3 Development Comparison

Land Use	Gross Acres	Density (du/ac)	Units (du)	FAR	Square Footage (SF)
Proposed Project Estimates					
Very Low Density Residential	152	1.0	152	–	–
Low Density Residential	362	5.0	1,811	–	–
Medium Density Residential	410	10.0	4,100	–	–
Medium Density Residential (NAP)[1]	*9*	*10.0*	*87*	–	–
High Density Residential	102	25.0	2,542	–	–
Mixed-Use	220	25.0	727	0.25	1,607,813
Mixed-Use (NAP)[1]	*35*	*10.0*	*117*	*0.25*	*257,705*
Entertainment Center and Performing Arts Theater	*27*	–	–	–	*100,000*
Entertainment Venues	*23*	–	–	–	*75,000*
Hotel Rooms		–	–	–	*375 Keys*
Project Totals	**2,807**	–	**9,538**	–	**2,040,518**
Alternative 3 Estimates					
Very Low Density Residential	152	0.8	122	–	–
Low Density Residential	362	4.0	1,448	–	–
Medium Density Residential	410	8.0	3,280	–	–
Medium Density Residential (NAP)[1]	*9*	*10.0*	*87*	–	–

Land Use	Gross Acres	Density (du/ac)	Units (du)	FAR	Square Footage (SF)
High Density Residential	102	20	2,034	–	–
Mixed-Use	220	20	582	0.20	1,286,250
Mixed-Use (NAP)[1]	*35*	*10.0*	*117*	*0.25*	*257,705*
Entertainment Center and Performing Arts Theater	*27*	–	–	–	*80,000*
Entertainment Venues	*23*	–	–	–	*60,000*
Hotel Rooms		–	–	–	*300 Keys*
Alternative 3 Total	**2,807**	**–**	**7,670**		**1,683,955**
Net Change	**–**	**–**	**-1,868**	**–**	**-356,563**

Notes:
1. NAP Parcels would remain unchanged in this alternative.

Impact Comparison to the Proposed Project

Aesthetics

Development of fewer dwelling units under Alternative 3 would reduce the overall alteration of the Project site's visual setting. Short-term construction impacts would be similar to the proposed Project, as mass grading of the site would occur, resulting in temporary exposure of onsite soils and construction equipment and debris, and views to the site during construction would occur from surrounding public vantage points. Compared to the proposed Project, the reduced dwelling unit count and allowed commercial development of this alternative could reduce visual impacts on site character as overall development intensity would be reduced, thereby resulting in a smaller percentage of land that would support physical development. The reduction of development by approximately 20 percent would generate fewer new potential sources of light and glare as compared to the proposed Project, thereby reducing such potential impacts with regard to light pollution and spillover onto adjacent lands; however, in relation to the current conditions, this alternative still introduces a significant new light source. Therefore, impacts related to aesthetics, light, and glare would be equal under this alternative as compared to the proposed Project, since impacts would remain significant.

Air Quality

Alternative 3 would result in development of approximately 1,869 fewer dwelling units and 356,563 fewer square feet of commercial development, as compared to the Project, thereby reducing the overall number of resulting daily vehicle trips generated. As such, this alternative would result in reduced air emissions as compared to the proposed Project. Despite this, the Project would still likely exceed SCAQMD thresholds for NOx, ROG, CO, PM_{10}, and $PM_{2.5}$. While individual residential and commercial developments may not separately exceed the SCAQMD thresholds, it cannot be determined at this time, the exact design and schedule for development of each phase and planning area. Additionally, modeling conducted for the proposed Project is phase-specific and cannot be modified for the Project comprehensively. As such, the overall Project, as well as under this alternative, would remain in exceedance of the SCAQMD thresholds. Overall impacts, despite remaining significant and unavoidable, would be reduced compared to the proposed Project.

Biological Resources

The proposed Project would result in significant impacts with mitigation measures incorporated to biological resources associated with sensitive species, riparian habitat, federally protected wetlands, nesting birds, movement of native residents or wildlife, and local conservation plans. With implementation of mitigation measures (MM BIO-1 through MM BIO-4), the identified biological impacts would be reduced to less than significant levels. The reduction in density and intensity would still cause an impact on the site because although density and intensity would be reduced, development of the site consistent with the project's footprint is still assumed. Impacts would continue to be less than significant but would not be eliminated. Therefore, impacts would remain the same under this alternative.

Cultural Resources

Impacts to cultural resources including historical, archaeological, including the disturbance of human remains would be less than significant after mitigation under the proposed Project. Alternative 3 would develop essentially the same footprint but would have a reduced residential and commercial development density. It is anticipated that Alternative 3 could also mitigate impacts to less than significant by incorporating similar mitigation measures as those referenced in **Section 4.4: Cultural Resources** of this EIR. Therefore, impacts would be similar under Alternative 3 compared to the Project.

Energy

The Project would result in less than significant impacts due to wasteful use of energy resources and conflicts with established renewable energy or energy efficiency plans. The Project was estimated to demand approximately 0.5 percent and 0.4 percent of the County's electricity and natural gas generation. This alternative would result in development of approximately 1,869 fewer dwelling units and 356,563 fewer square feet of commercial development; and overall reduction of 20 percent. As such, energy demands associated with Alternative 2 would be subsequently reduced. Therefore, impacts associated with this alternative would be less than the Project.

Geology and Soils

Impacts related to geology and soils were anticipated to have a less than significant and significant and unavoidable impact with despite the implementation of mitigation measures under the proposed Project. Potential geologic impacts were found for both onsite and offsite areas of the Project. Additionally, geologic hazards were not centralized to individual lots or parcels. As such, **MM GEO-1** was widely applied to ensure the future assessment of each future development via a project-specific geotechnical investigation. Under Alternative 3, the site footprint would remain the same; however, development intensity would be reduced by approximately 20 percent. The modification to overall density and intensity would reduce the amount of people that would be exposed to potential adverse impacts resulting from natural geological events. Impacts related to geology, soils, and seismicity would be reduced compared to those potentially resulting from the proposed Project.

Greenhouse Gas Emissions

The proposed Project would generate greenhouse gas emission directly from project construction and long-term mobile sources. Because the proposed Project primarily involves residential development, most of emissions would occur from energy and mobile sources. Mitigation measures proposed within **Section 4.2: Air Quality** as well as those proposed in **Section 4.7: Greenhouse Gas Emissions** would reduce the amount of harmful air contaminants and greenhouse gases emitted as a result of the Project; however, impacts would be significant and unavoidable. A reduction of development density, as proposed in this alternative, would lead to an overall reduction of emissions associated with energy generation and mobile source emissions, further reducing impacts associated with Project emissions. However, even with the implementation of proposed mitigation impacts and a reduction in development intensity, impacts associated with Alternative 3 would remain significant and unavoidable.

Hazards and Hazardous Materials

With the Implementation of Mitigation Measures (**MM HAZ-1** and **MM HAZ-2**) the proposed Project would have a less than significant impacts on the public or the environment through the transport, use, disposal, potential upset of hazardous materials, or on sensitive receptors from construction and operational operations. Under Alternative 3, the potential exposure of persons or the environment would be lessened through the reduction of residential development potential. Overall, potential impacts would be reduced compared to the proposed Project.

Hydrology and Waste Quality

Development of the Project site under Alternative 3 would result in fewer residential dwelling units and decreased commercial development than the proposed Project. The reduction in units could reduce the number of impermeable surfaces, thereby reducing the amount of potential stormwater runoff from the developed portions of the Project site and allowing for greater infiltration. Alternative 3 would, however, still require grading and disturbance of the site, thereby resulting in a potential for erosion and siltation to occur as the result of exposed soils during construction. Impacts to hydrology and water quality would be reduced under Alternative 3. With mitigation measures and design changes to the layout of the site to minimize grading, impacts could be reduced compared to the Project.

Land Use and Planning

As part of the proposed Project, a change of land use and zoning would occur. Under Alternative 3, the Project site would undergo the same entitlements as that of the proposed Project. In either scenario, an established community would not be physically divided and no conflicts with any applicable land use plan or habitat conservation plan would occur. Though Alternative 3 would reduce the site's land use density and intensity, impacts would be of similar extent as those of the proposed Project.

Noise

Ground-borne noise and other types of construction-related noise impacts would typically occur during excavation activities of the grading phases. This phase of construction has the potential to create the highest levels of noise. Based on noise analysis, it is anticipated that the proposed Project would create

excessive temporary construction groundborne vibration or noise levels. However, with Mitigation Measures (**MM NOI-1** and **MM NOI-2**), impacts would be reduced to less than significant levels. Alternative 3 would reduce overall residential development by 20 percent, subsequently reducing the overall development duration. Alternative 3 would reduce short-term construction noise and vibration levels and long-term noise levels due to the reduction in overall Project size. Although, cumulative noise impacts would remain due to growth along surrounding roadways. Impacts would likely be less than those of the Project, although cumulative impacts would likely still result.

Population and Housing

The Project was found to create a less than significant impact to population and housing dynamics for the City. The growth included in the Project is within the projections included in the Coachella GP, the City's Draft Housing Element Update polices, and the SCAG Connect SoCal Plan. Alternative 3 would provide 20 percent fewer housing units, further reducing potential population growth associated with the Project. As such impacts would remain less than significant. Impacts would be equal to the Project.

Public Services

The proposed Project is anticipated to cause a less than significant impact on public services such as fire protection, police, and schools. However, a significant and unavoidable impact was found in regard to libraries in that new library facilities would be necessary. Development of these additional library facilities would potentially result in significant environmental impacts. The proposed Project would minimize some potential public services impacts through the payment of planning and development fees to support future services. Additionally, the proposed Project would provide parks, schools, and other recreational facilities necessary to meet community needs. However, library-related impacts remain significant and unavoidable. Although the reduction of overall residential density and commercial square footage would lessen demand on existing library facilities; it would not necessarily remove the need for the development of additional facilities. Therefore, impacts would remain significant. Impacts would be equal to the Project.

Transportation

The proposed Project is anticipated to generate vehicle trips and VMT at a rate which is less than significant with the implementation of mitigation measures. As such, the proposed Project is anticipated to have a less than significant impact with mitigation measures incorporated. Although Alternative 3 could reduce overall traffic, mitigation would be implemented as with the proposed Project and would remain consistent.

Tribal Cultural Resources

The Project site was not found to contain any resources which would appear on a SLF search by the NAHC. Additionally, a pedestrian survey of the Project site found no potentially tribally sensitive resources. Nonetheless, mitigation measures were proposed in order to account for any future discoveries that may occur. This led to a less than significant impact in regard to tribal cultural resources. Alternative 3 has the potential of reducing soil disturbance up to 20 percent. However, because archaeological resources may

still be identified onsite during ground moving activities, Alternative 3 would not significantly reduce impacts to tribal cultural resources. Impacts would be equal to the Project.

Utilities and Service Systems

The Project was determined to cause a less than significant impact with mitigation incorporated. All construction activities would adhere to the SWPPP and proper BMP utilization according to City of Coachella Ordinance 13.16.341 and MM HYD-1. Additionally, the Project would adhere to MM HYD-2 and HYD-3, which requires approval of a Water Quality Management Plan and identification of appropriate Best Management Practices. While the demand on utilities and services systems would be reduced 20 percent under Alternative 3, the alternative would still be required to adhere to the same requirements and mitigation. Impacts would be less than the Project.

Ability to Meet Project Objectives

Alternative 3 would generally meet the Project objectives. However, the Alternative 3 would not allow for the level of development of residential and commercial uses at the scale of the Project. Specifically, this Alternative with smaller buildout of residential uses would be further reduced from the projected population growth included in the Coachella GP. Additionally, the reduction of overall housing would potentially reduce the quantity of affordable housing available via the Project as well as the amount of housing variety. While the alternative would meet the Project objectives, it would not fully achieve the Project's goals to the intended degree.

Alternative 3 Summary

Alternative 3 is anticipated to generally cause a less than or equivalent level of impact. Areas such as energy, geology, greenhouse gas emissions, hazardous materials, and hydrology are anticipated to be reduced under Alternative 3 due to the direct relationship between the decrease in housing development. Topics requiring services, grading, and disturbance of natural resources would generally be equivalent to the proposed Project.

Overall, while Alternative 3 would generally meet most of the Project objectives, it would not provide the quantity and variety of housing and employment opportunities desired by the applicant and City, would hinder the City's ability to meet its RHNA goals, and would hinder the viability of implementing the new I-10 interchange, which is an essential circulation improvement for the Coachella Valley. In addition, although this alternative would generally reduce the Project's significant impacts due to the 20 percent density reduction, it would not eliminate all of the Project's unavoidable significant impacts. Based on the above, and considering that this alternative would not fulfill the Project's objectives to the greatest extent possible, this alternative is not under consideration at this time. Nonetheless, this alternative is considered the Environmentally Superior Alternative.

6.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines requires that an Environmentally Superior Alternative be identified; that is, an alternative that would result in the fewest or least significant environmental impacts. If the "No Project"

Alternative is the environmentally superior alternative, State CEQA Guidelines Section 15126.6(e)(2) requires that another alternative that could feasibly attain most of the basic Project's basic objectives be chosen as the environmentally superior alternative.

Alternative 1 "No Project / No Build" alternative is an environmentally superior alternative. However, in accordance with State CEQA Guidelines Section 15126.6(e)(2) a secondary alternative must be chosen if the No Project Alternative is environmentally superior.

Alternative 3: Reduced Density Alternative would be the Environmentally Superior Alternative. Alternative 3 would reduce the overall residential development density and commercial and capacity of the Project area by 20 percent. As shown in **Table 6-2: Alternative 3 Development Comparison**, Alternative 3 would result in the development of approximately 7,670 residential units; 1,868 units fewer than the Project's projected 9,538 total units; and 1,603,955 square feet of commercial uses 356,563 square feet fewer than the Project's 2,040,518 square feet of commercial. The reduction in overall development would likely reduce environmental impacts compared to the proposed Project. However, Alternative 3 would not avoid significant and unavoidable impacts related to aesthetics, air quality, public services, noise, transportation, or utilities and service systems. Also, by reducing the density of the Project by approximately 20 percent, the reduced density would not fulfill certain objectives to the same degree as the proposed Project. As previously stated, Alternative 3 would not meet the Project objectives to the extent of the proposed Project. A 20 percent reduction as described for Alternative 3 would also reduce the extent of affordable housing, community commercial, and agricultural uses which could be provided. **Table 6-3: Comparison of Alternatives and Environmental Considerations** summarizes each Alternatives impact level compared to the proposed Project and their ability to meet objectives.

Table 6-3: Comparison of Alternatives and Environmental Considerations

Topic	Project Impact Conclusion	Alternative 1 "No Project/No Build" Alternative	Alternative 2 "No Project/Existing Zoning and General Plan" Alternative	Alternative 3 "Reduced Density" Alternative
Aesthetics	Significant and Unavoidable	–	+	=
Air Quality	Significant and Unavoidable	–	+	+
Biological Resources	Less than Significant with Mitigation Incorporated	–	+	=
Cultural Resources	Less than Significant with Mitigation Incorporated	–	+	=
Energy	Less than Significant	–	+	–
Geology and Soils	Significant and Unavoidable	–	-	–
Greenhouse Gas Emissions	Significant and Unavoidable	–	+	=
Hazards and Hazardous Materials	Less than Significant with Mitigation Incorporated	–	+	–
Hydrology and Water Quality	Less than Significant with Mitigation Incorporated	–	+	–
Land Use and Planning	Less than Significant	+	–	=
Noise	Significant and Unavoidable	–	+	=
Population and Housing	Less than Significant	+	–	=
Public Services	Significant and Unavoidable	–	+	=
Transportation	Less than Significant with Mitigation Incorporated	–	+	=
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	–	+	=
Utilities and Service Systems	Less than Significant with Mitigation Incorporated	–	+	-
Attainment of Project Objectives	Meets all of the Project Objectives	Meets none of the Project Objectives	Meets some of the Project Objectives	Meets all of the Project Objectives, but not to the same degree as the Project

Notes:
A minus (-) sign means the Project Alternative has reduced impacts when compared to the Project/is environmentally superior.
A plus (+) sign means the Project Alternative has increased impacts when compared to the Project/is environmentally inferior.
An equal sign (=) means the Project Alternative has similar impacts when compared to the Project/is environmentally equivalent.

7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

7.1 INTRODUCTION

CEQA Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the Draft EIR. This section briefly describes effects found to have no impact or a less than significant impact based on the analysis conducted during the Draft EIR preparation process. Several issues indicated as having no impact or less than significant impact are nonetheless addressed in **Sections 4.1** through **4.16** of this Draft EIR as a matter of clarification or convenience for the reader.

7.2 AGRICULTURE AND FORESTRY RESOURCES

Impact 7.1-1: ***Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

Level of Significance: No Impact

The Project site is approximately 2,807 acres on an undisturbed, open, hilly, and undeveloped desert area with minimal vegetation, except for small native trees, shrubs, and annual grassland. Broad natural drainage corridors traverse the Project site diagonally. The Project site is surrounded by undeveloped desert area to the north and east; I-10, undeveloped desert area, and agricultural land to the south; and the Coachella Canal, undeveloped desert area, a landfill, and residential development to the west. The Project area lies in a relatively flat area at the base of the Little San Bernardino Mountains. On-site there are several northeast-southwest running ridges cut by adjacent flat alluvial drainage ways. The Project area is generally flatter towards the northeast portion of the site, with most slopes ranging between zero and ten percent. Steeper slopes are concentrated along the western and southern portions of the Project area.

The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as mapped on the Important Farmland Finder maintained by the California Department of Conservation.[1] Therefore, no impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur.

Mitigation Measures

No mitigation is necessary.

[1] Department of Conservation. 2016. California Important Farmland Finder Map. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed September 2022).

Impact 7.1-2: Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Level of Significance: No Impact

The California Land Conservation Act, also known as the 'Williamson Act,' of 1965, is a voluntary program that allows property owners to have their property assessed based on its agricultural production value rather than at the current market value. The property owner is thus relieved of having to pay higher property taxes, as long as the land remains in agricultural production.

Refer to Impact 7.1-1. Due to the Project site's natural hilly topography, farming is not viable. Additionally, no Williamson Act contracts exist for any of the parcels on the Project site.[2] No impact is anticipated to occur because the existing zoning assumes the Project is to be developed for potential resort district uses and does not require that any land be set aside for agricultural purposes. Because the Project would not impact agricultural uses or any Williamson Act contracts, no impact would occur.

Mitigation Measures

No mitigation is necessary.

Impact 7.1-3: Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Level of Significance: No Impact

The Project site contains small native trees, shrubs, and annual grasslands, and does not include forestland or timberland. Additionally, the Project site is not zoned as forestland. The Project would not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production. No impact would occur.

Mitigation Measures

No mitigation is necessary.

Impact 7.1-4: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

Level of Significance: No Impact

Refer to Impact 7.1-3. The Project would not result in the loss of forestland or the conversion of forestland to non-forest use. No parcels within or adjacent to the Project site are designated as forest land. No impact would occur.

Mitigation Measures

No mitigation is necessary.

[2] Department of Conservation. 2016. Riverside County Williamson Act FY 2015/2016, Sheet 1 of 3. Sacramento, CA.

Impact 7.1-5: Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Level of Significance: No Impact

Refer to Impact 7.1-1 through 7.1-4. The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as mapped on the Important Farmland Finder maintained by the California Department of Conservation. However, Project buildout includes approximately 68 acres of unique open space area designated for agricultural production. This may include vineyards for the production of table grapes, date palm groves for resale, or other agricultural products that are suitable for the region. The Project would not result in the conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use, and no impact would occur.

Mitigation Measures

No mitigation is necessary.

7.3 MINERAL RESOURCES

Impact 7.2-1: Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Level of Significance: No Impact

The Project site is categorized as a Mineral Resource Zone 3 (MRZ-3), known as having an undetermined significance for mineral deposits.[3] Additionally, the Department of Conservation does not identify the Project site as a mineral resources area.[4] No mineral resources have been identified in or around the Project site. No impact to mineral resources would occur.

Mitigation Measures

No mitigation is necessary.

Impact 7.2-2: Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Level of Significance: No Impact

[3] County of Riverside. 2015. *Environmental Impact Report, Section 4.14 – Mineral Resources, Figure 4.14.2 Mineral Resource Zones – Temescal Valley and San Bernardino Production Consumption Regions*. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2015-DEIR-521-DEIR-No.-521.pdf (accessed October 2025).

[4] Department of Conservation. 2015. Mineral Land Classification. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc (accessed September 2022).

See Impact 7.2-1. The Project's construction and operation would not be located on a locally important mineral resource recovery site and no such sites are delineated on a local general plan, specific plan, or other land use plan.[5] No impact would occur.

Mitigation Measures

No mitigation is necessary.

7.4 RECREATION

Impact 7.3-1: Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Level of Significance: Less than Significant

The Project may introduce up to 9,536 residential units along with commercial areas that would create a need for parks. The need for parks would be largely addressed through the Project's proposed open space, which would include 395 acres of parks, greenways, and amenity centers extending throughout the Project Villages. Additionally, apart from parks and amenity areas, the Project also provides approximately 754 acres of drainage areas that provide passive recreation and other open space, including walking trails and an additional 68 acres of space designated for agricultural production. A pedestrian and bicycle trail is also anticipated to traverse under the I-10 Freeway and safely connect the Project community with the newly approved La Entrada community to the south. With the development of the proposed 395 acres of parks, greenways, and amenity centers, and open space, it is anticipated that the Project would not significantly increase the use of other nearby off-site neighborhood parks, regional parks, or recreational facilities.

In addition to providing on-site park and recreational facilities, the Project would pay applicable park impact fees as established by the City, pursuant to Coachella MC Section 16.36.060 - Dedication of land and/or payment of fees for park and recreation purposes pursuant to the Quimby Act. The Coachella GP standard for parkland is three acres of parkland per 1,000 people. According to the Coachella GP, the City currently contains approximately 60.2 acres of park and 109 acres of parkland and open space. At the time of the Coachella GP EIR, the City was deficient in parkland by 61.91 acres and does not meet the current standard for parkland. Under the aforementioned standard for parkland, the City is currently substantially underserved, and future population projections would create a more significant need for parkland. As discussed in **Section 4.12: Population and Housing**, the anticipated increase in population as a result of the Project would be within the total projected growth forecasts for 2045, as accounted for in the Coachella GP EIR. The Project has the potential to result in a population increase of up to 40,536. To maintain the current standard for parkland within the Project site alone, the Project would additionally require approximately 122 acres of parkland.[6] Therefore, the Project proposes approximately 395 acres of parks, greenways, and amenity centers as well as 754 acres of publicly accessible natural open space.

[5] City of Coachella. 2013. General Plan Update 2035 Draft EIR, Figure 4.5-9, Mineral Resources. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.5_-_geology.pdf (accessed June 2022).

[6] ([3 acres*40,536 residents]/1000 residents=121.6 acres)

Parks would connect the surrounding neighborhoods to the natural open space within the community through a series of pedestrian and bicycle trails that run through the Project site. Pursuant to Chapter 4.45 of the Coachella MC, the applicant would be required to pay Development Impact Fees including Park and recreation facilities fees based on the number of dwelling units proposed, that would be used to provide necessary parkland and open space to meet the needs of new residential construction. As of 2022 Park Land Impact Fees were $3,056.94 for single family units and $2,567.83 for multi-family units.[7]

Upon Project implementation, the Project will contribute to the expansion of parks and recreational facilities for the City and would comply with the Quimby Act and City regulations through the dedication of parkland and/or payment of in-lieu fees for parks/recreation purposes, as determined by the City. Therefore, impacts to existing neighborhood and regional parks or other recreational facilities would be less than significant.

Mitigation Measures

No mitigation is necessary.

Impact 7.3-2: Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Level of Significance: Less than Significant

Refer to Impact 7.3-1. The Project proposes approximately 395 acres of parks, greenways, and amenity centers as well as 754 acres of publicly accessible natural open space. Parks would connect the surrounding neighborhoods to the natural open space within the community through a series of pedestrian and bicycle trails that run through the Project site. With Project implementation, recreational uses would be permitted within the open space land use designation including pedestrian or equestrian trails, interpretive areas and associated facilities, and public parking. Additionally, sporting and recreational camps would be permitted within the open space land use designation with a conditional use permit. Pursuant to the Coachella GP, new parks, open spaces and public facilities would be constructed concurrent with, or prior to, the development of each neighborhood. Therefore, while the population growth associated with the Project would result in an increased demand for parks in exceedance of the City's current available parkland, the Project would fully accommodate this increased demand. Therefore, subsequent to the development of the proposed parkland and open space, impacts to parks are anticipated to be less than significant.

Mitigation Measures

No mitigation is necessary.

[7] City of Coachella. 2022. *City of Coachella Development Impact Fees Annual Report 2022.* Retrieved January 2023, from https://www.coachella.org/home/showpublisheddocument/8998/638034403197970000.

7.5 WILDFIRE

Impact 7.4-1: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Level of Significance: No Impact

According to CAL FIRE's Fire and Resource Assessment Program, FHSZ Viewer,[8] the Project site is not located in or near a State Responsibility Area (SRA).[9] The Project site is located in a Local Responsibility Area (LRA) within an area designated as Moderate FHSZ.[10] In addition, the Project site does not contain lands classified as a very high fire hazard severity zone (VHFHSZ). Review of the City's GP further supports the finding that the Project site is not located in or near an SRA and the Project site is not within a VHFHSZ.[11] Additionally, when using Wildland Urban Interface (WUI) as a measure of proximity, the Project site is also not near a VHFHSZ. WUI is defined as any area for which a Community Wildfire Protection Plan is not in effect but is within half mile of the boundary of an "at risk community." An "at risk community" is defined as a community where conditions are conducive to a large-scale wildland fire disturbance event, thereby posing a significant threat to human fire or property.[12]

The City of Coachella's Safety Element includes policies and procedures to be administered in the event of a disaster. The City has adopted an Emergency Operations Plan (EOP) to identify evacuation routes, emergency facilities, and City personnel and equipment available to effectively deal with emergency situations. The EOP is designed as a reference and guidance document and is the foundation for response and recovery operations for the City and is meant to coordinate with the Riverside County Operational Area (OA) EOP and EOC to facilitate effective response to any emergency. The City manages disaster preparedness through interdepartmental and inter-jurisdictional coordination and collaboration to be prepared for, respond to, and recover from everyday and disaster emergencies through their EOP and coordination with the County. A full range of cost-effective services to the City as part of the regional and integrated fire protection system are provided via a cooperative agreement with the Riverside County Fire Department and CAL FIRE. Services provided include fire suppression, fire prevention and fire protection planning. The City is served by the Riverside County Fire Department and is responsible for the preparation of the community for disasters and the organization of recovery efforts. Because the Project site undisturbed and an undeveloped desert area, it is not identified in the City's Local Hazard Mitigation Plan as being an evacuation area.[13] However, it is important that existing roadways and emergency routes are maintained in support of emergency vehicles and that the Project provides adequate site access for emergency vehicles during both the construction and operational phases. The Project site would have

[8] CAL FIRE. 2024. Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247 (accessed August 2025).

[9] Office of the State Fire Marshal. 2024. *Fire Hazard Severity Zones in State Responsibility Area*. https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008 (accessed August 2025).

[10] Riverside County Fire. 2025. FHSZ Map. https://www.rvcfire.org/our-departments/fire-marshal/FHSZ-map (accessed August 2025).

[11] City of Coachella. 2013. City of Coachella General Plan, Fire Hazards. Page 03-32. https://www.coachella.org/home/showpublisheddocument/3221/635712771850800000 (accessed September 2022).

[12] United States Department of Agriculture, Forest Service. What is Wildland Urban Interface. https://research.fs.usda.gov/nrs/fire/wui (accessed October 2025).

[13] City of Coachella. 2014. General Plan, Safety Element, Potential Emergency Shelters and Evacuation Routes. https://www.coachella.org/home/showpublisheddocument/3217/635712766613900000 (accessed June 2022).

multiple points of ingress/egress per the Conceptual Land Use plan and vehicular circulation description as defined in the Specific Plan. Construction of the Project would be generally confined to the Project site and would not physically impair access to the site or the Project area. During both construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles as required by the City of Coachella and the Riverside County Fire Department.

The Project would not alter or impact any existing emergency access roads or evacuation routes as identified in the City's Local Hazard Mitigation Plan, but future development as described in the Specific Plan would improve the access through the Project site. Furthermore, the Project would be required to construct off-site improvements or pay development fees towards future improvements, as described in **Section 4.14: Transportation**, that would further improve emergency access to the site and adjacent properties. Furthermore, the City's and County Fire Department's review of all future permits for development would include review of access for emergency vehicles during construction and operation, in accordance with the California Fire Code. Compliance with the requirements for emergency lane width, vertical clearance, and distance would ensure that adequate emergency access is available for all new development and redevelopment projects. Future construction and operation of the Project is not expected to create risks of wildfire since the site is located in an area of the City that is not prone to wildfire risks nor is it adjacent to wildland area. The proposed construction, along with the removal of any brush, trees, and grasses would limit the potential for wildfire spreading by removal of source materials. Due to multiple points of ingress/egress, building designs compliant with state, regional, and local codes; and designation of the Project site in a Non-VHFHSZ zone; buildout of the Project would not interfere with emergency response and evacuation plans of the City. No impact would occur in this regard.

Mitigation Measures

No mitigation is necessary.

Impact 7.4-2: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Level of Significance: No Impact

Refer to Impact 7.4-1 above. The Project site is not located in or near an SRA and the Project site does not contain lands classified as VHFHSZs. The Project would not exacerbate wildfire risks or expose Project occupants to pollutant concentrations or the uncontrolled spread of a wildfire. The Project site is not located in areas that can accelerate the spread of wildfire and the majority of the site is undisturbed, open, hilly, and undeveloped desert area with minimal vegetation, except for small native trees, shrubs, and annual grassland, which would be removed upon Project development (see **Section 4.3: Biological Resources**). All new landscape plans, design standards, and development guidelines would be reviewed by the City and County Fire Department and landscaping would be installed and maintained as required. Additionally, all future Project development will be consistent with the California Building Code requiring new buildings to use ignition-resistant construction methods and materials as well as fire suppression

systems. These design elements are expected to reduce exposure of the Project site and structures to fire. No impact would occur in this regard.

Mitigation Measures

No mitigation is necessary.

Impact 7.4-3: ***If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

Level of Significance: No Impact

Refer to Impact 7.4-1 above. The Project site is not located in or near an SRA and does not contain lands classified as VHFHSZs. During both construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles as required by the City of Coachella and the Riverside County Fire Department. Because the Project is required to comply with all applicable City codes and is not located in a VHFHSZ, construction and operation of the Project would not increase the risk of fire, nor would it require the installation/maintenance of infrastructure that would exacerbate fire risk. The Project site would include installation of utilities and roads within the Project area and connect to existing off-site utilities and roads as necessary. Future development within the Project would not include and does not require any fuel breaks. In addition, emergency water sources are not required beyond water supply needed to comply with applicable building codes. No elements of the Project would exacerbate the risk of wildfire or generate environmental impacts. Therefore, no impact would occur.

Mitigation Measures

No mitigation is necessary.

Impact 7.4-4: ***If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

Level of Significance: No Impact

Refer to Impact 7.4-1 above. The Project site is not located in or near an SRA and does not contain lands classified as VHFHSZs. The Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Potential impacts regarding flooding, landslides, and drainage are further discussed in **Section 4.6: Geology and Soils** and **Section 4.9: Hydrology and Water Quality**. No impact would occur in this regard.

Mitigation Measures

No mitigation is necessary.

7.6 REFERENCES

California Department of Forestry and Fire Protection. 2024. Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247 (accessed August 2025).

City of Coachella. 2013. General Plan Update 2035 Draft EIR, Section 4.5, Mineral Resources. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.5_-_geology.pdf.

City of Coachella. 2013. General Plan Update 2035 Draft EIR, Section 4.15, Public Services. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.15_-_public_services.pdf.

City of Coachella. 2014. General Plan, Safety Element, Potential Emergency Shelters and Evacuation Routes. https://www.coachella.org/home/showpublisheddocument/3217/635712766613900000.

County of Riverside. 2015. Environmental Impact Report, Section 4.14 – Mineral Resources, Figure 4.14.2 Mineral Resource Zones – Temescal Valley and San Bernardino Production Consumption Regions. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2015-DEIR-521-DEIR-No.-521.pdf.

Department of Conservation. 2016. California Important Farmland Finder Map. https://maps.conservation.ca.gov/DLRP/CIFF/.

Department of Conservation. 2019. Mineral Land Classification. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc.

Office of the State Fire Marshal. 2024. Fire Hazard Severity Zones in State Responsibility Area. https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008 (accessed August 2025).

Riverside County Fire. 2025. FHSZ Map. https://www.rvcfire.org/our-departments/fire-marshal/FHSZ-map (accessed August 2025).

United States Department of Agriculture, Forest Service. What is Wildland Urban Interface? https://research.fs.usda.gov/nrs/fire/wui.

8.0 ORGANIZATIONS AND PERSONS CONSULTED

This section is consistent with the requirements set forth in Section 21153 of the PRC and Section 15129 of the CEQA Guidelines, which states: "The EIR shall identify all federal, state, or local agencies, other organizations, and private individuals consulted in preparing the draft EIR, and the persons, firm, or agency preparing the draft EIR, by contract or other authorization." Refer to **Section 2.3: Notice of Preparation/Early Consultation** for a summary of public notification and consultation.

The NOP and NOP comment letters are provided in **Appendix A: Notice of Preparation & Scoping Materials**. The City provided multiple opportunities for public input, both as part of the CEQA process and as part of Project scoping. In addition to required public notifications under CEQA, the City has engaged in consultation with the Agua Caliente Band of Cahuilla Indians, pursuant to AB 52 and SB 18, as discussed further in **Section 4.15: Tribal Cultural Resources** and provided in **Appendix D**.

8.1 EIR CONSULTATION

Lead Agency

City of Coachella

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Cástulo Estrada, *Utilities Director*
Ron Goldman, *Project Planner*

Applicant

KPC Development Company, LLC

9 KPC Parkway, Suite # 301
Corona, CA 92879

Contacts: Dr. Kali P. Chaudhuri
Stanley McNaughton

Notice of Preparation Commenters

As noted above, the City engaged in public and agency consultation through the NOP and public scoping process. The following entities provided comments on the NOP, which have been considered as part of this EIR preparation process.

- *California Department of Fish and Wildlife – Inland Deserts Region, Kim Freeburn*
- *Center for Biological Diversity, J.P. Rose*
- *Coachella Valley Conservation Commission, Peter Satin*

- *Coachella Valley Unified School District, David Baucom*
- *County of Riverside Department of Environmental Health, Michael Mistica, MBA, REHS*
- *County of Riverside Transportation Department, Kevin K. Tsang*
- *Desert Sands Unified School District, Patrick Cisneros*
- *Desert Tortoise Council, Edward L. LaRue, Jr., M.S.*
- *Imperial Irrigation District, Donald Vargas*
- *Leadership Council for Justice and Accountability, Perry Elerts*
- *Lozeau Drury and Supporters Alliance for Environmental Responsibility, Molly Greene*
- *Member of the Public, Adam Ahmed*
- *Member of the Public, Howard Goldberg*
- *Member of the Public, Optical Palm Desert*
- *Mission Springs Water District, Eric Weck, P.E.*
- *Native American Heritage Commission, Andrew Green*
- *Oswit Land Trust, Jane Garrison*
- *Riverside County Airport Land Use Commission, Jackie Vega*
- *Sierra Club – San Gorgonio Chapter, Joan Taylor*
- *South Coast Air Quality Management District, Sam Wang*
- *Southern California Association of Governments, Frank Wen, Ph.D.*

8.2 ENVIRONMENTAL DOCUMENT PREPARERS

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Ryan Chiene, *Deputy Technical Manager*
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Aldo Perez, *Environmental Analyst*
Sabrina Wallace, *Environmental Analyst*
Cameron Bauer, *Environmental Analyst*
John Nsofor, *Environmental Analyst*
Dane Boegner, *Environmental Analyst*
Amanda McCallum, *Document Production*

8.3 TECHNICAL STUDY PREPARATION

Air Quality, Greenhouse Gas, Energy, and Noise

Kimley-Horn and Associates, Inc.

- Air Quality Assessment
- Energy Assessment
- Greenhouse Gas Assessment
- Health Risk Assessment
- Acoustical Assessment

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Riverside, CA 92501

Contacts: Ace Malisos
Alex Pohlman

Biological Resources

Rocks Biological Consulting

- Biological Resources Assessment and Coachella Valley MSCHP Consistency Report
- Project Jurisdictional Delineation Report
- Off-site Improvements – Biological and Aquatic Resources Assessment Memo

4312 Rialto Street
San Diego, CA 92107

Contact: Jim Rocks

ELMT Consulting

Coachella Valley MSHCP Like Exchange
2201 N. Grand Avenue, #10098
Santa Ana, CA 92711

Contact: Travis McGill

Cultural Resources

BCR Consulting, LLC

- Cultural Resources Assessment
- Archaeological Testing Report

505 West 8th Street
Claremont, CA 91711

Contacts: David Brunzell, M.A., RPA
Dylan Williams, B.A.
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Petra Geosciences, Inc.

- Feasibility-Level Geotechnical Evaluation

40880 County Center Drive, Suite M
Temecula, CA 92591

Contact: Alan Pace

Kenney GeoScience

- Fault Investigation Report

Kenney GeoScience
Vista, CA 92083

Contact: Dr. Miles Kenney, PhD, PG

Hydrology and Water Quality

Q3 Consulting

- Conceptual Storm Water Quality Analysis
- Drainage Master Plan

27042 Towne Centre Drive, Suite 110
Foothill Ranch, CA 92610

Contact: John McCarthy

Transportation

Linscott, Law & Greenspan, Engineers

- Vehicle Miles Traveled (VMT) Analysis
- Traffic Impact Analysis Report

2 Executive Circle, Suite 250
Irvine, CA 92614

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Zawwar Saiyed, P.E.

Utilities and Service Systems

Charles Marr Consulting

- Sewer System Study
- Domestic Water System Study
- Water Supply Assessment

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