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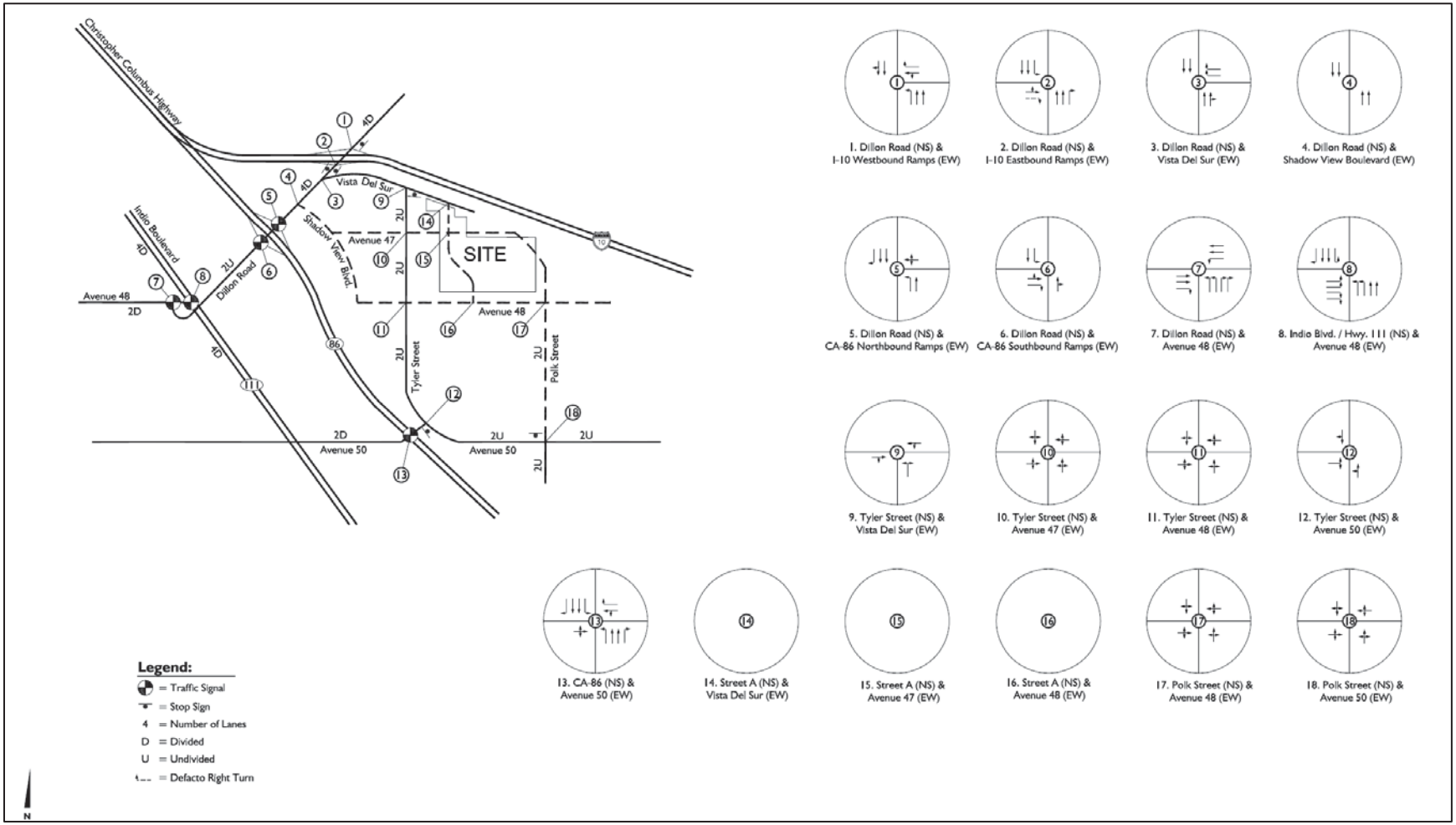
Figure 4.14.2-1
Existing Number of Through Lanes and Intersection Controls



Source for all Transportation/Traffic Figures is the *TIS* (**Appendix O**)

Figure 4.14.2-2
Existing Peak Hour Intersection Volumes and Average Daily Traffic

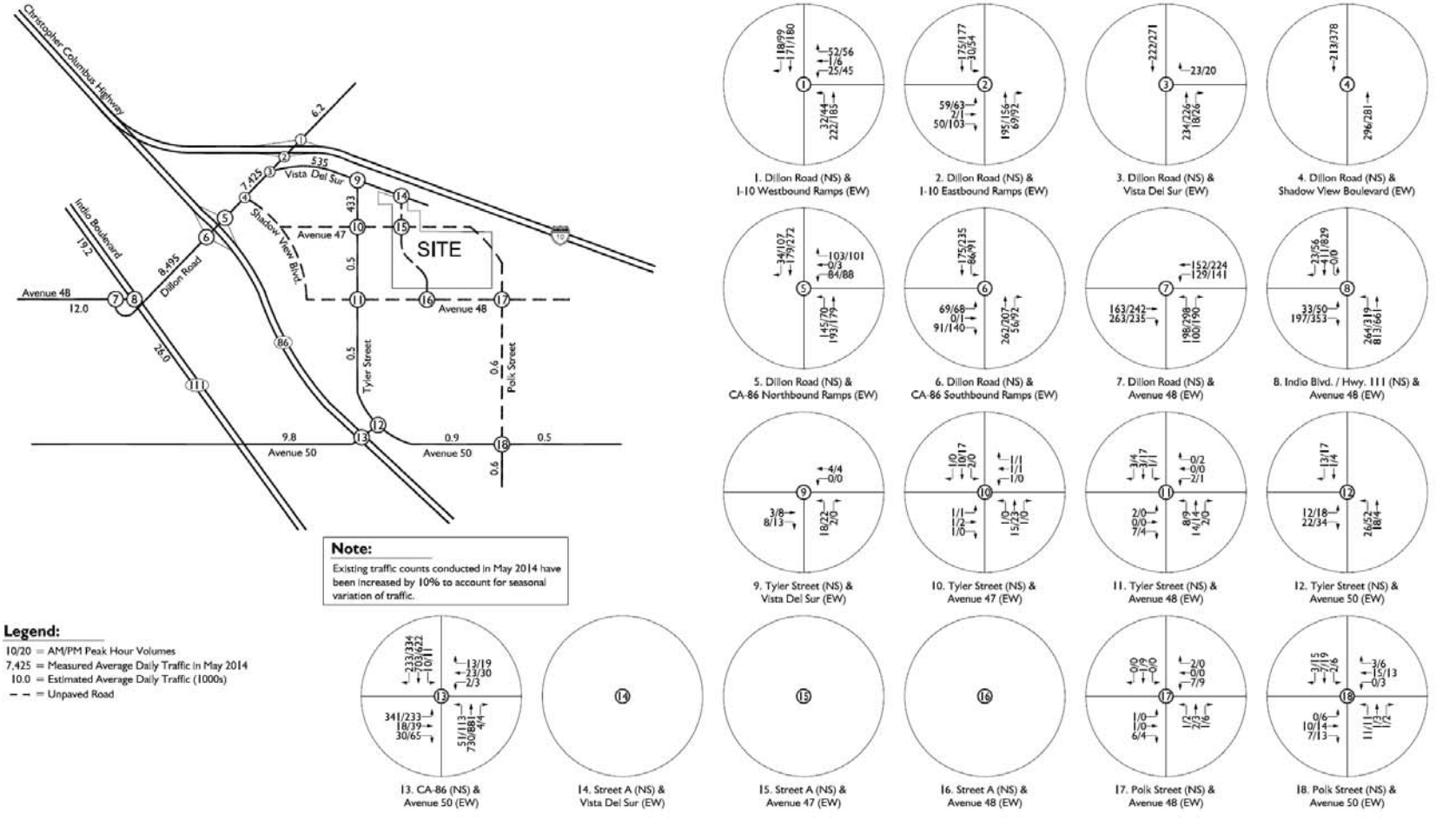


Figure 4.14.4-1
Planning Area 1 Outbound Trip Distribution

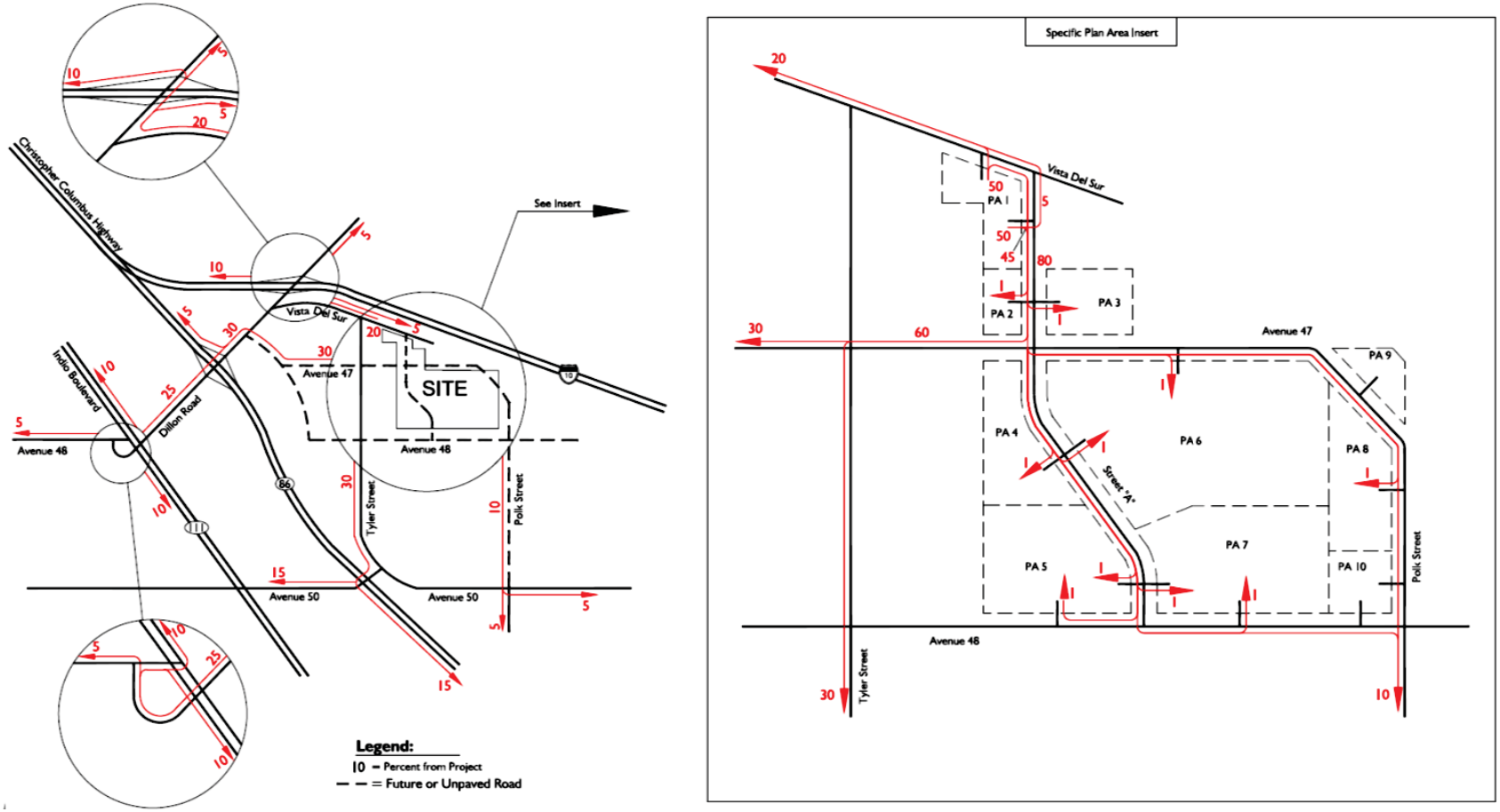


Figure 4.14.4-2
Planning Area 1 Inbound Trip Distribution

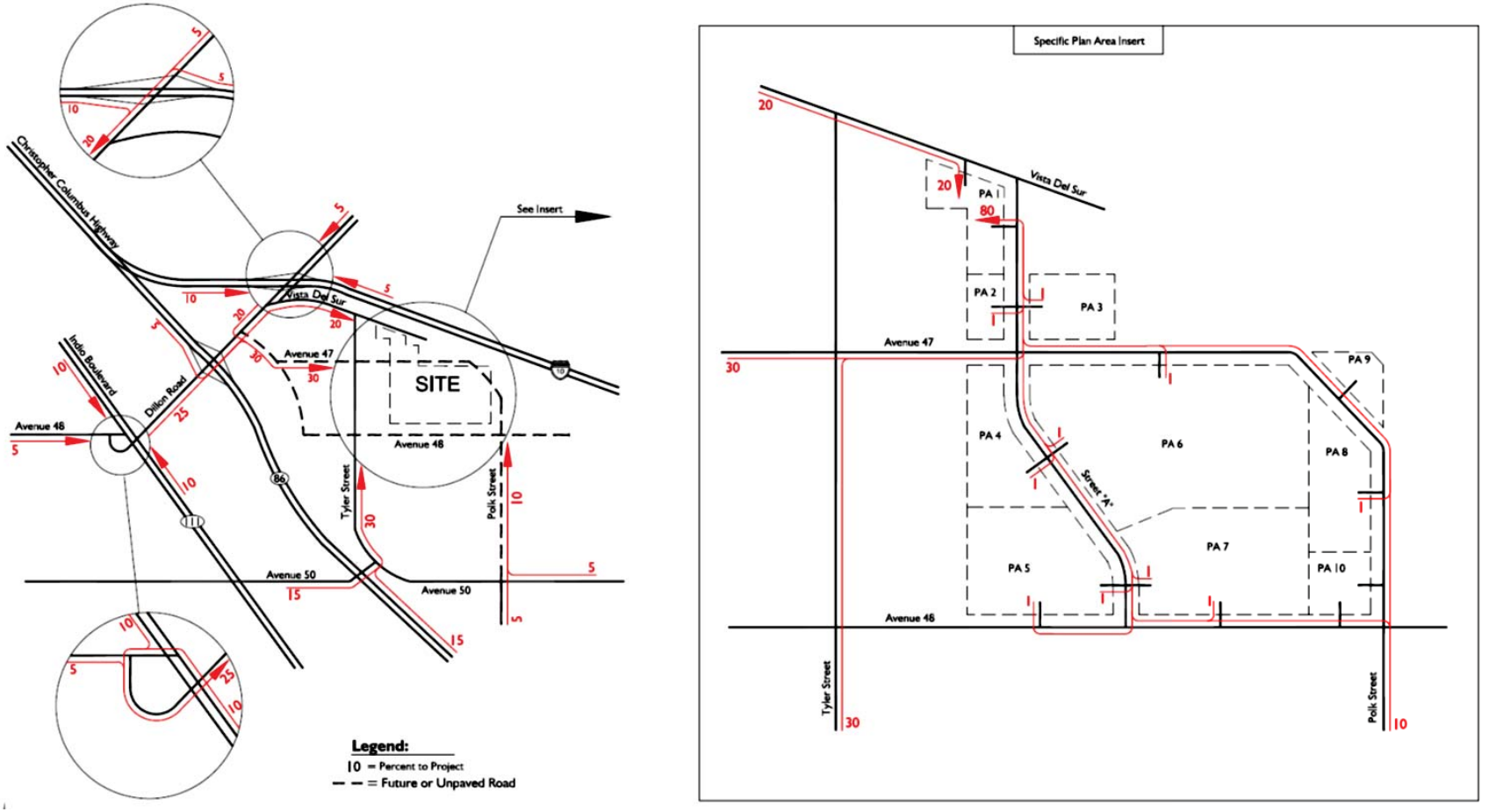


Figure 4.14.4-3
Planning Area 2 Inbound Trip Distribution

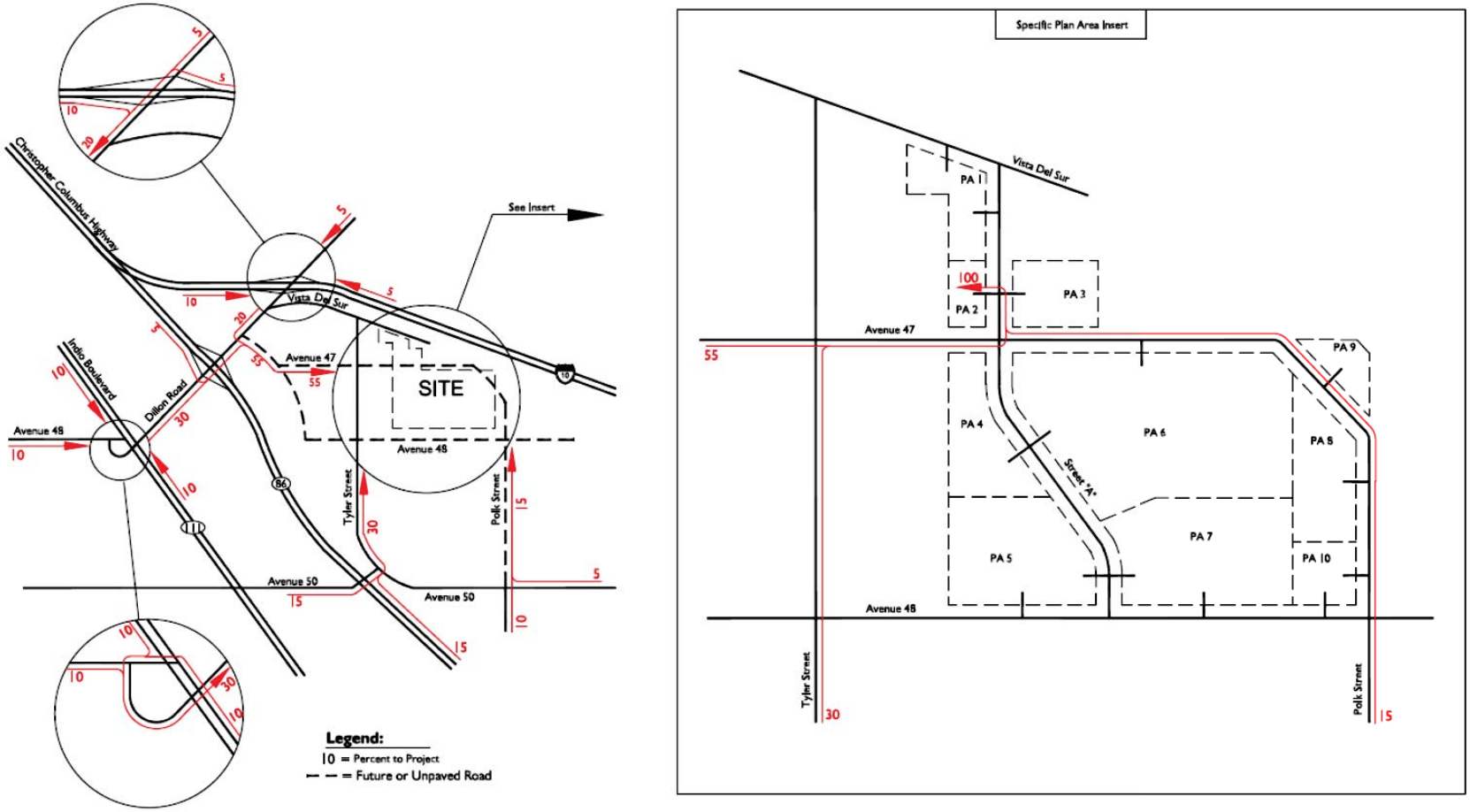
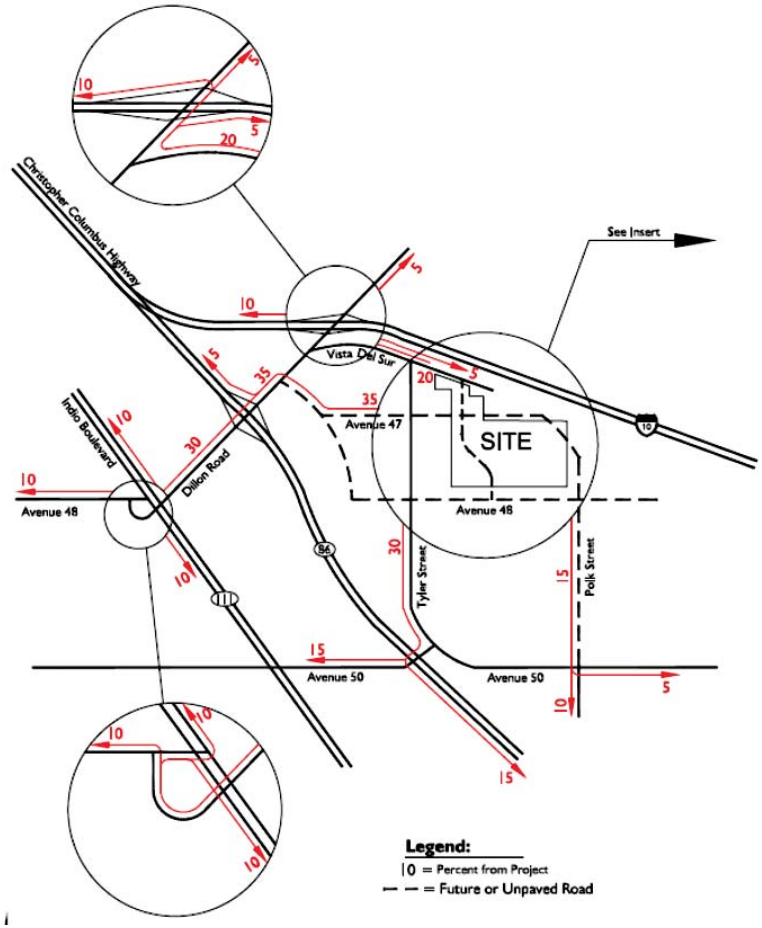


Figure 4.14.4-4
Planning Area 3 Outbound Trip Distribution



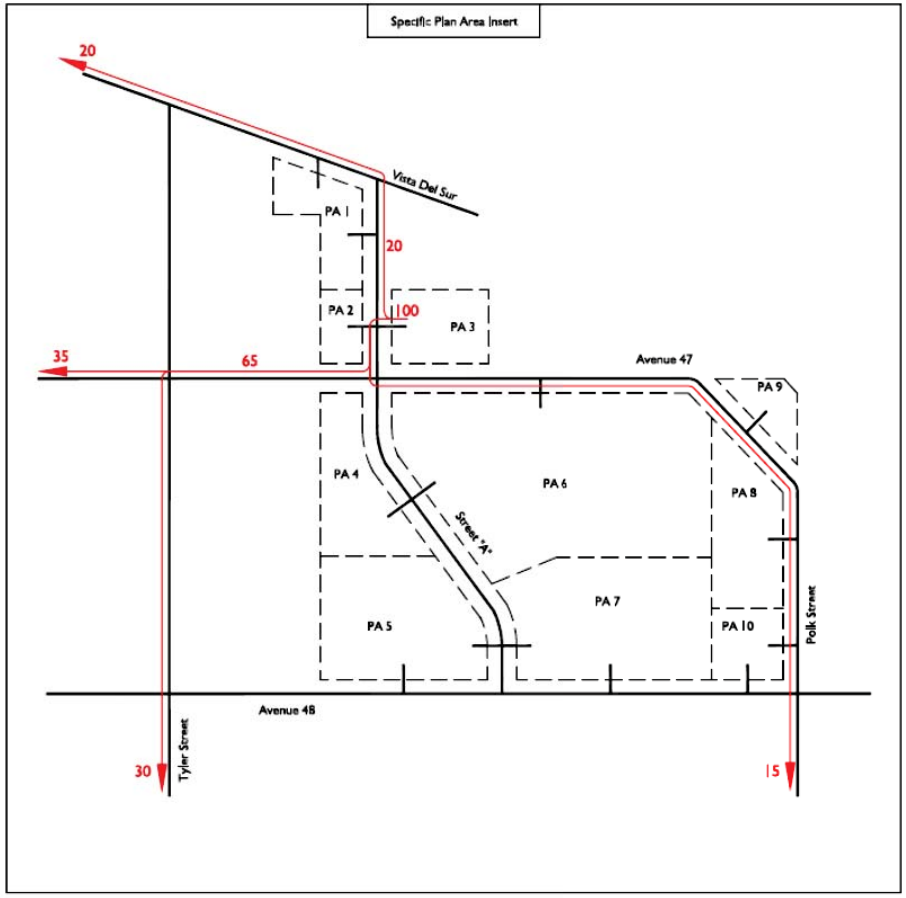


Figure 4.14.4-5
Planning Area 2 Outbound Trip Distribution

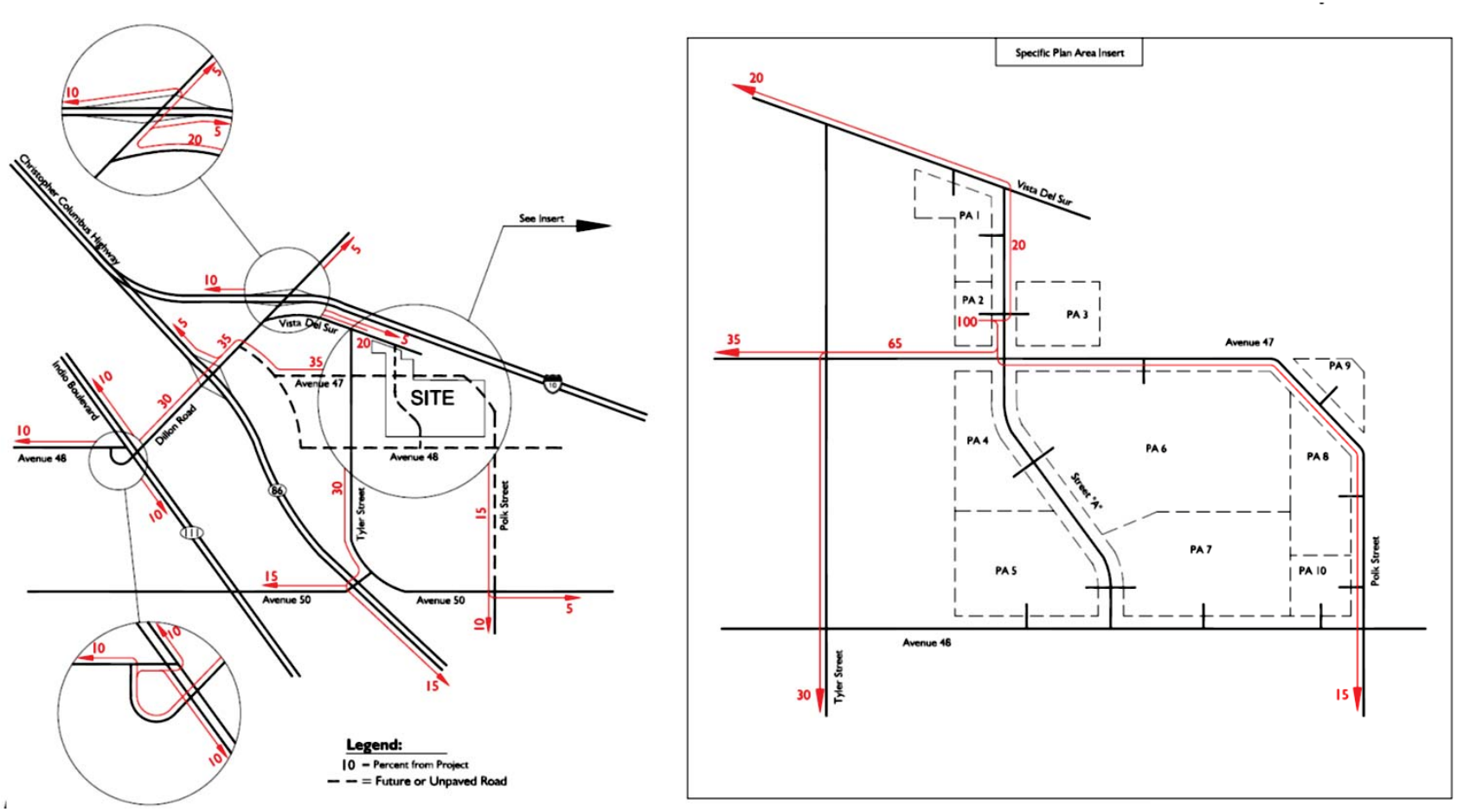


Figure 4.14.4-6
Planning Area 3 Inbound Trip Distribution

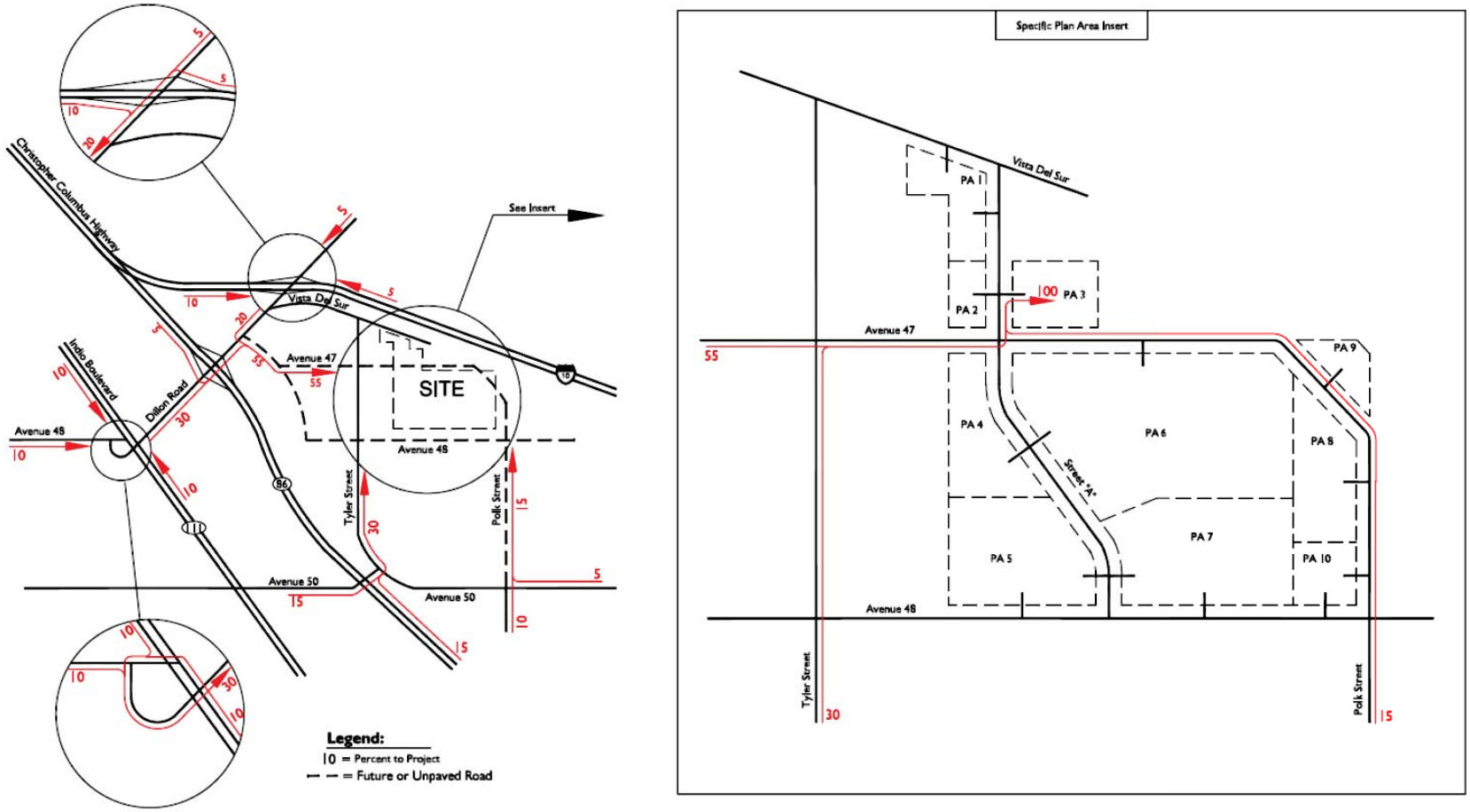


Figure 4.14.4-7
Planning Area 4 Outbound Trip Distribution

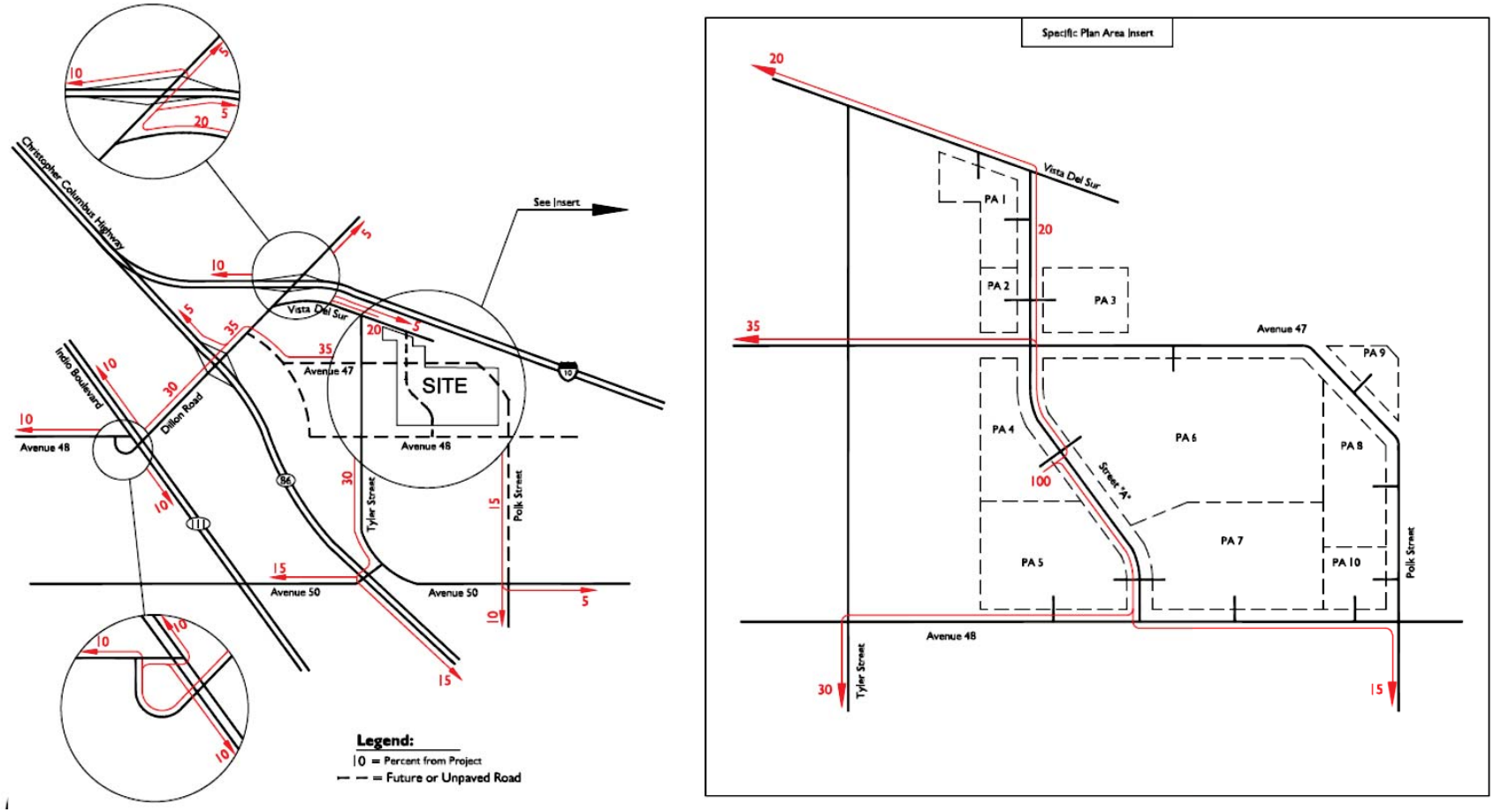
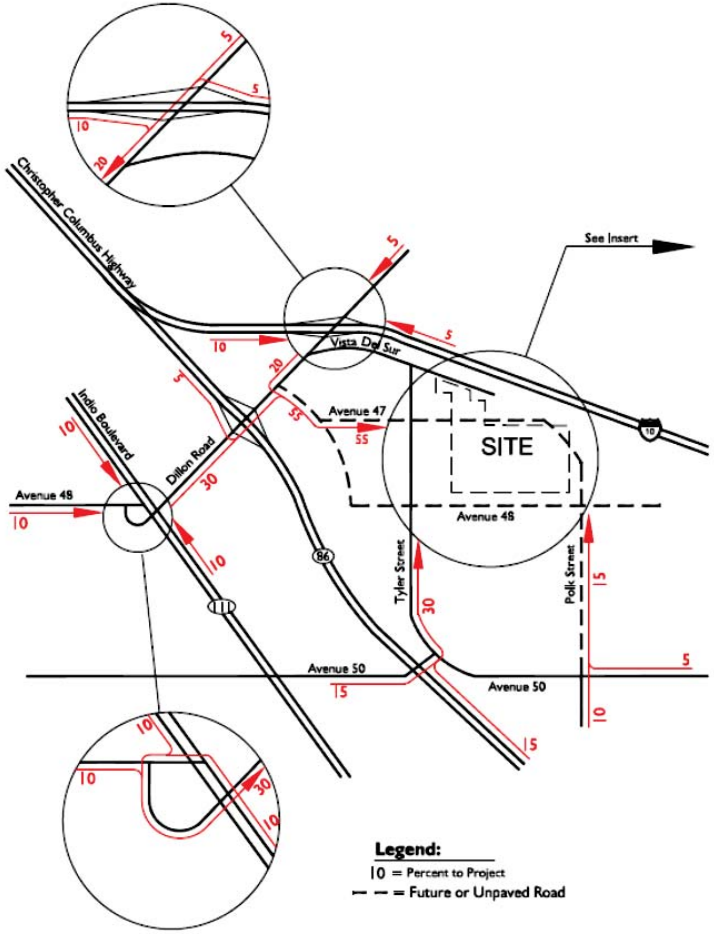


Figure 4.14.4-8
Planning Area 4 Inbound Trip Distribution



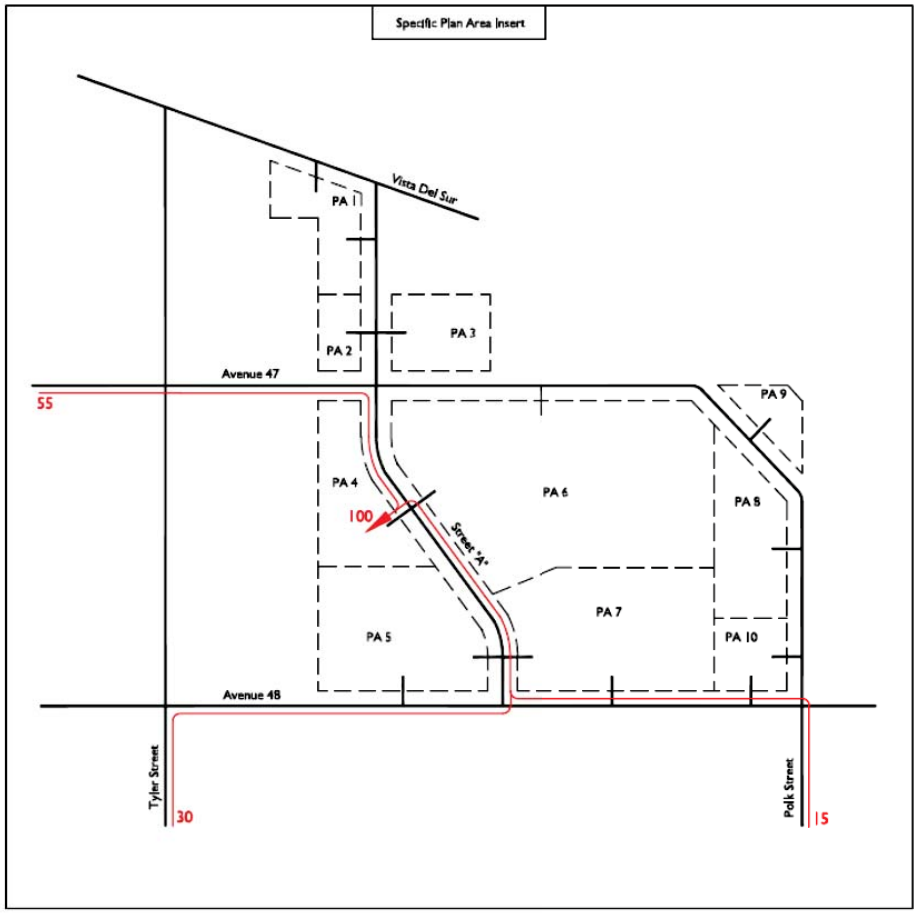


Figure 4.14.4-9
Planning Area 5 Outbound Trip Distribution

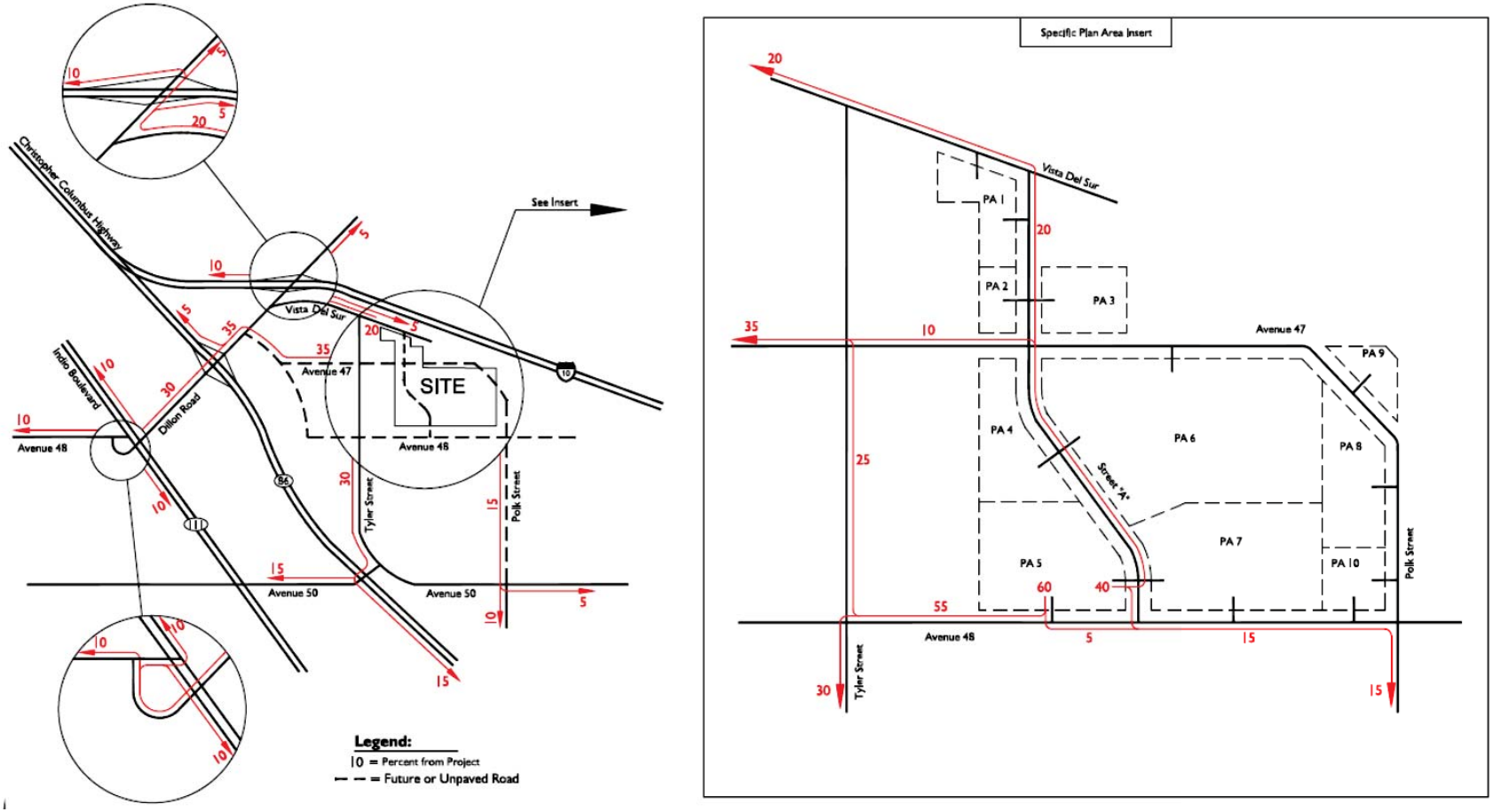


Figure 4.14.4-10
Planning Area 5 Inbound Trip Distribution

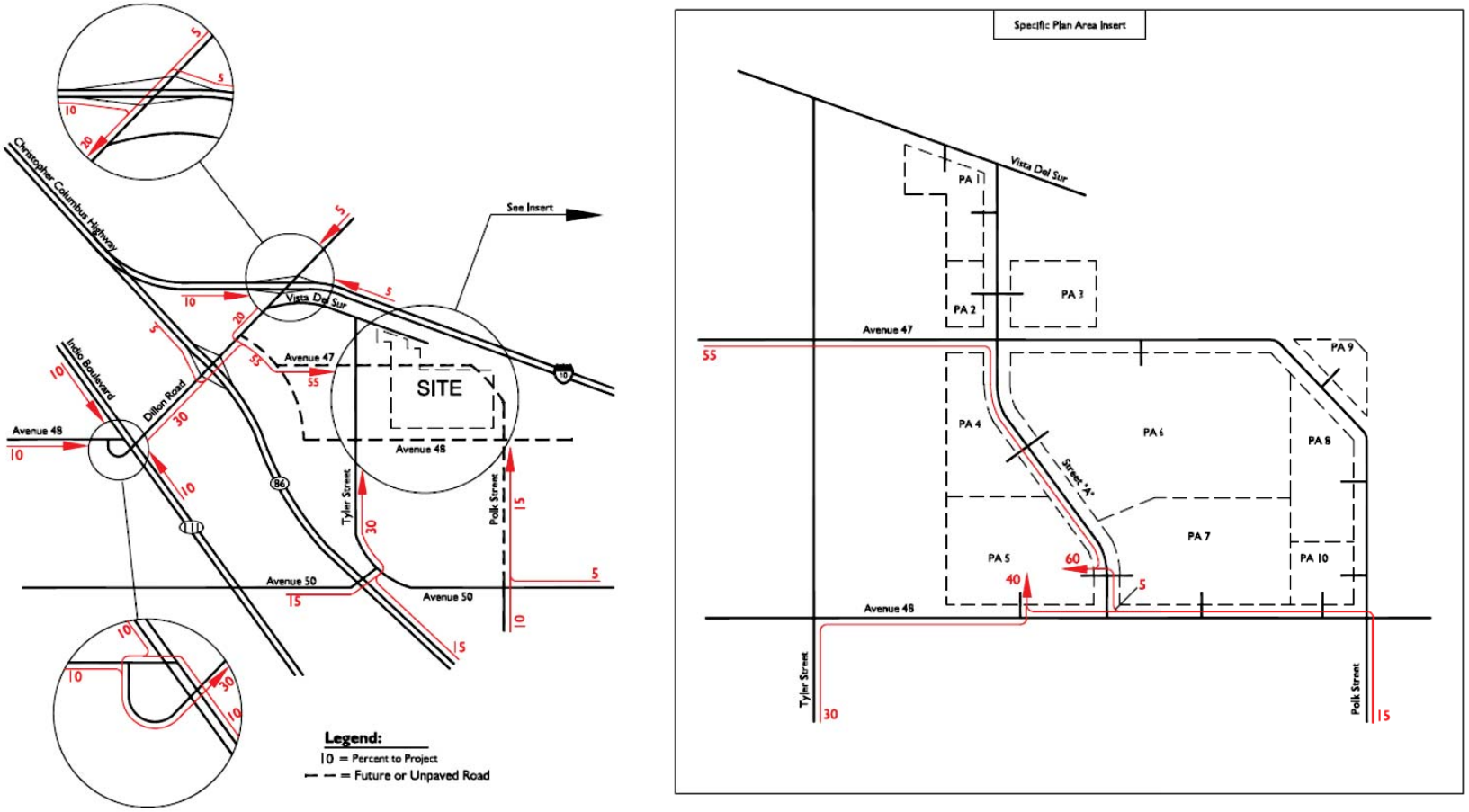


Figure 4.14.4-11
Planning Area 6 Outbound Trip Distribution

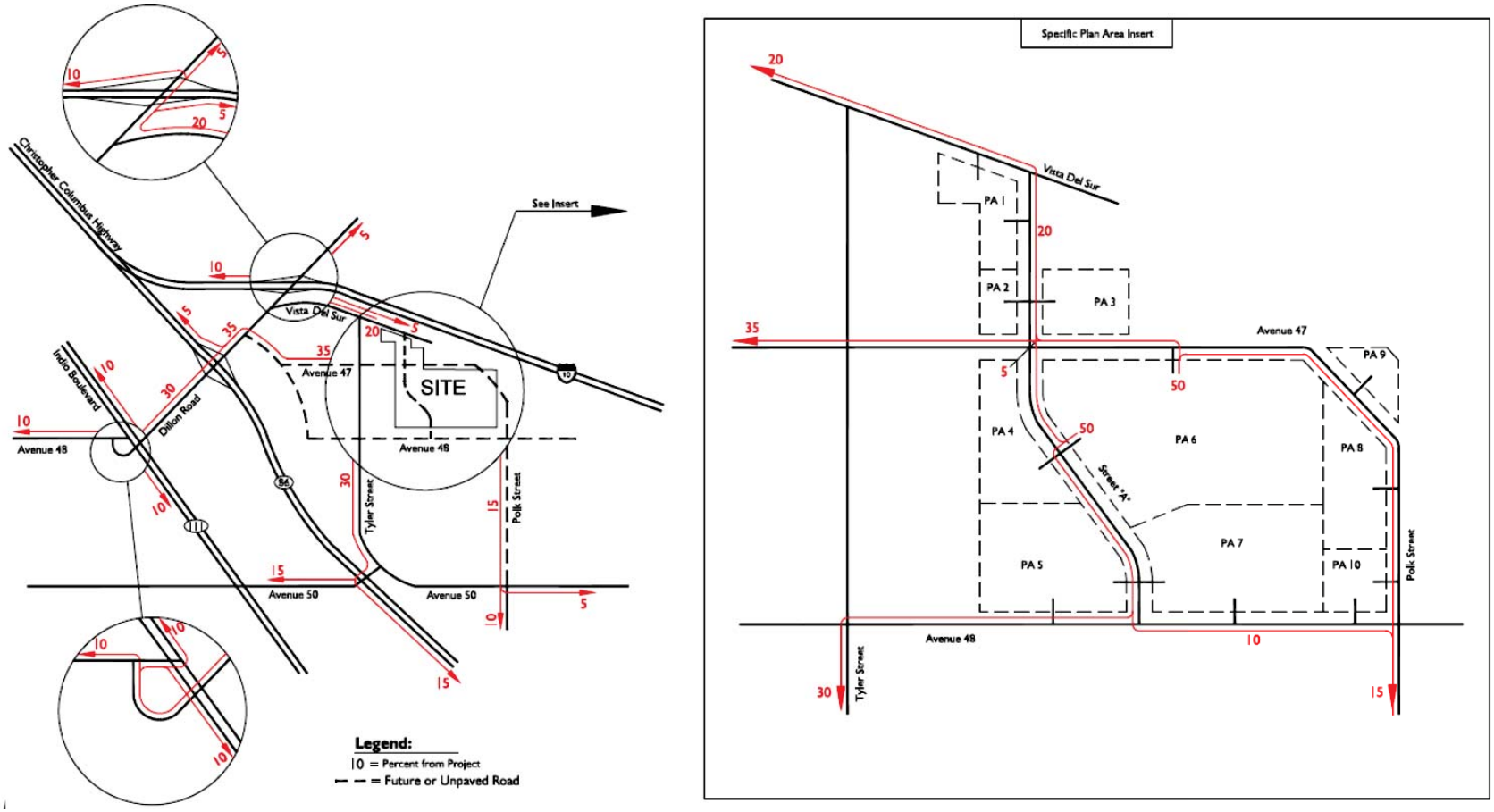


Figure 4.14.4-12
Planning Area 6 Inbound Trip Distribution

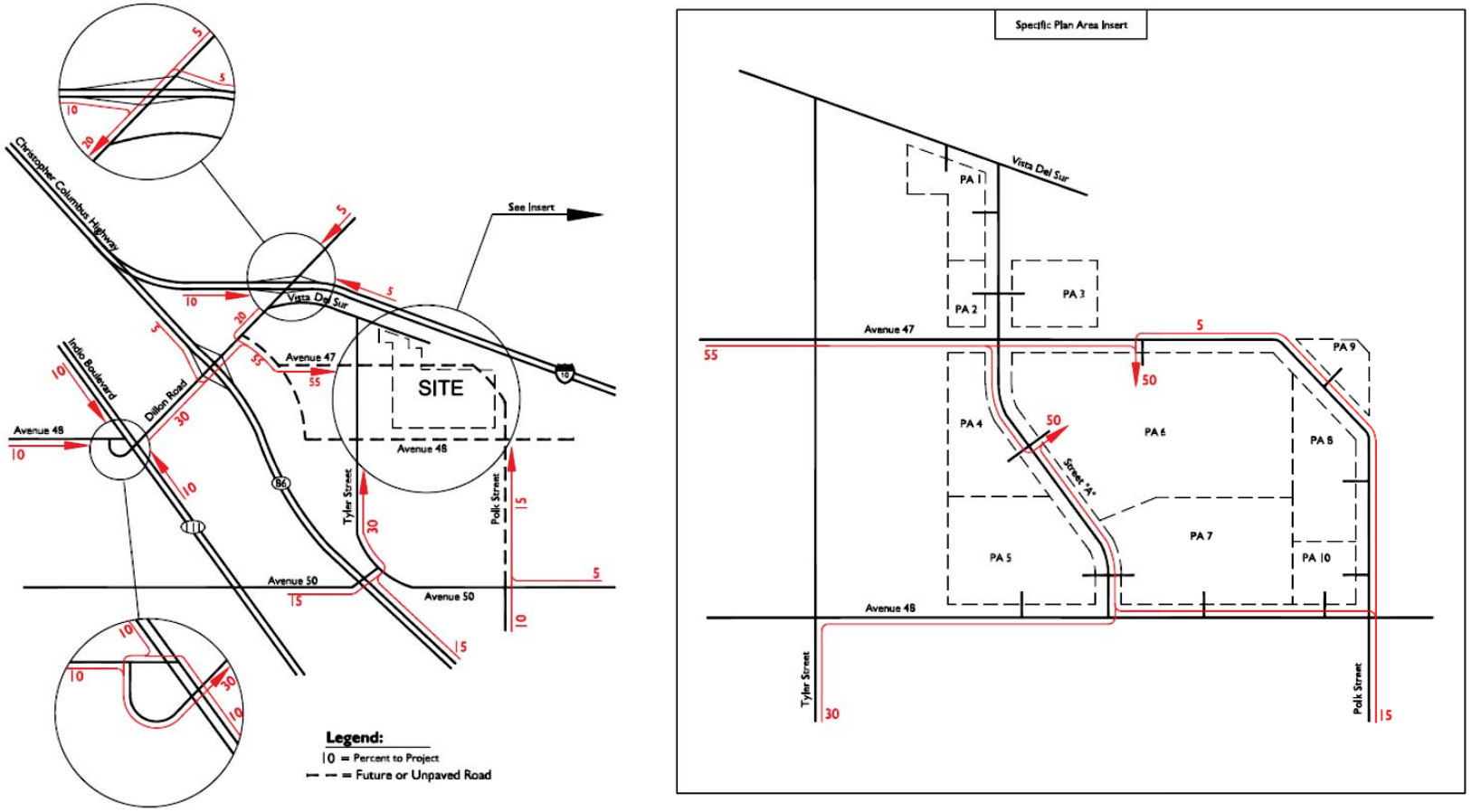


Figure 4.14.4-13
Planning Area 7 Outbound Trip Distribution

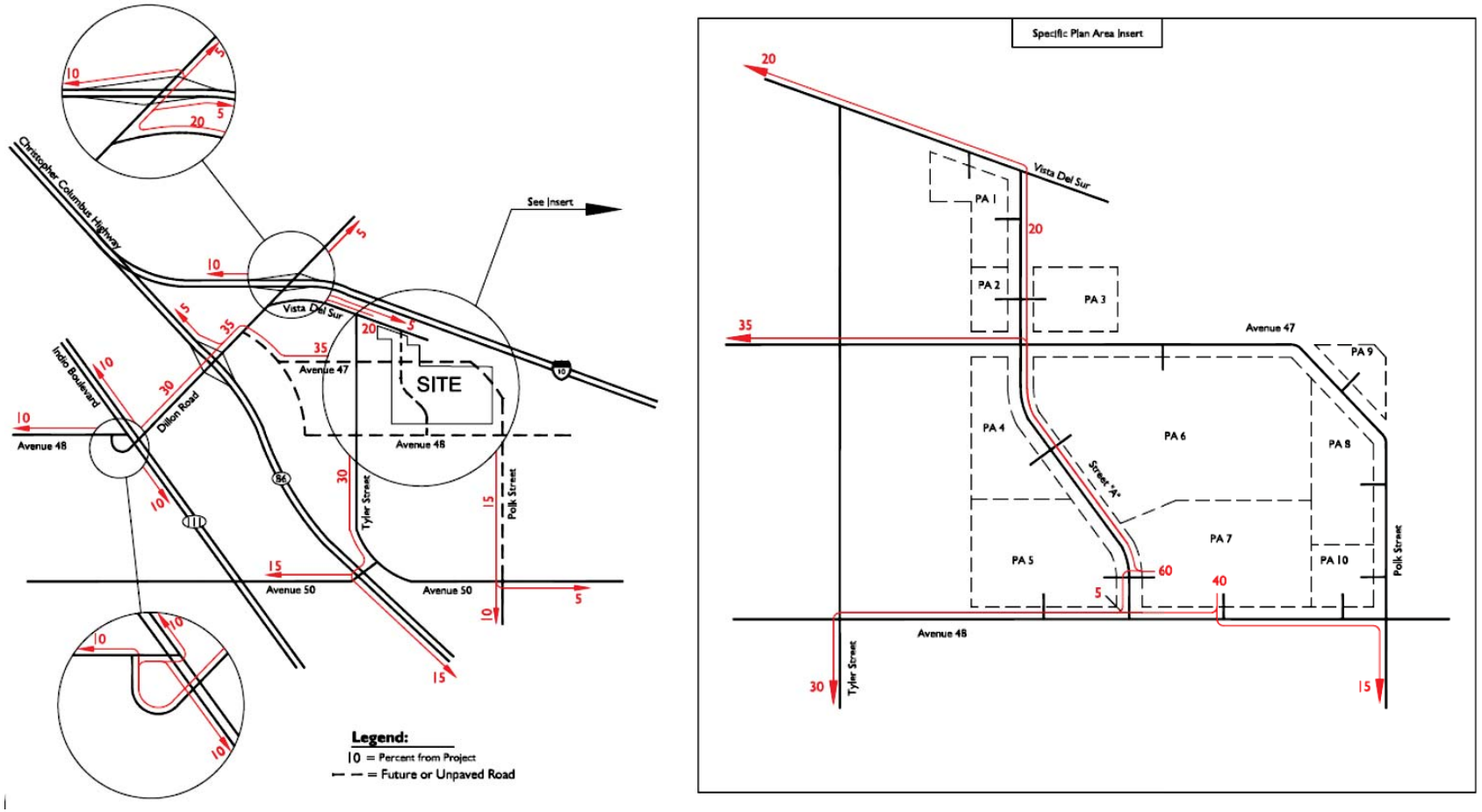


Figure 4.14.4-14
Planning Area 7 Inbound Trip Distribution

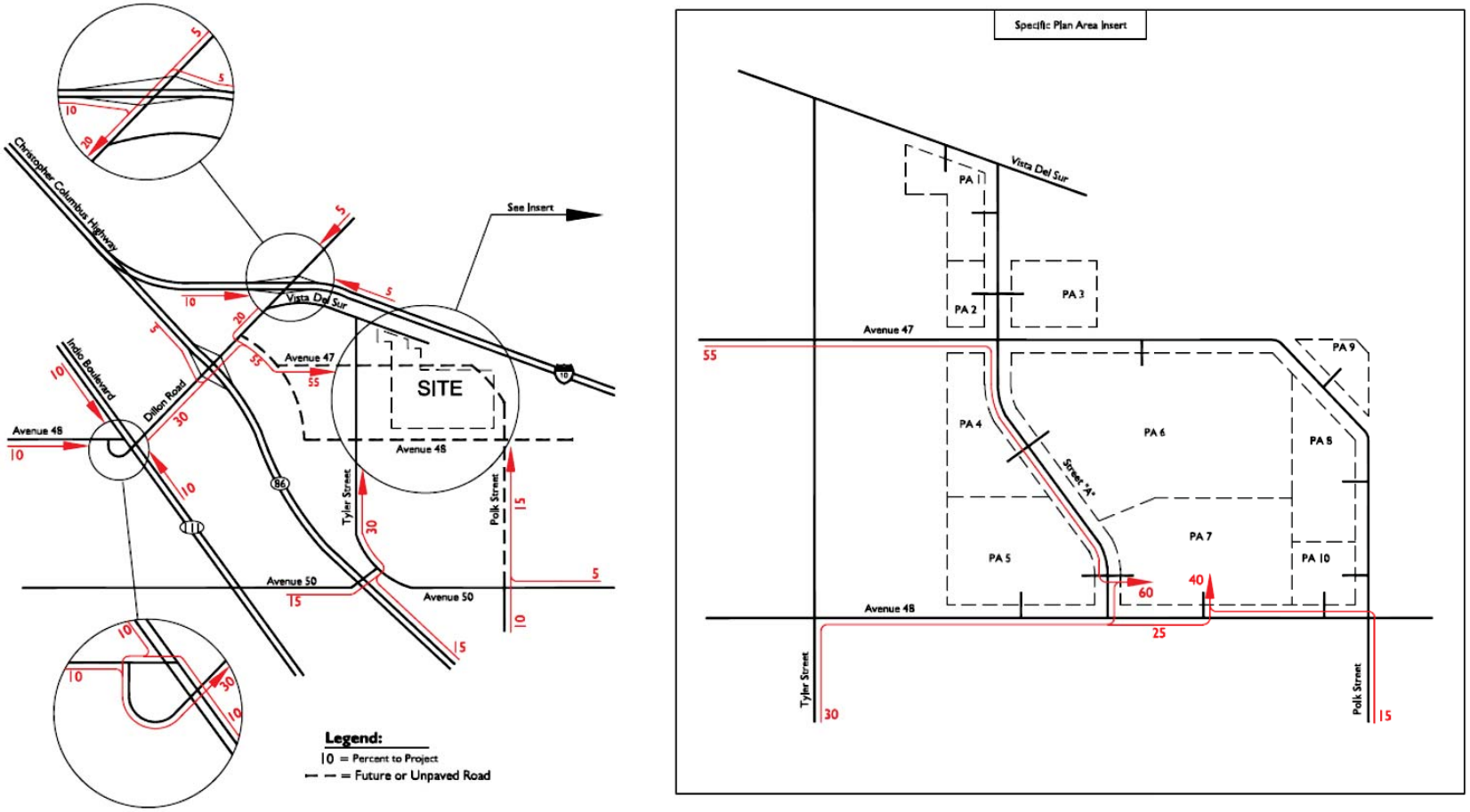
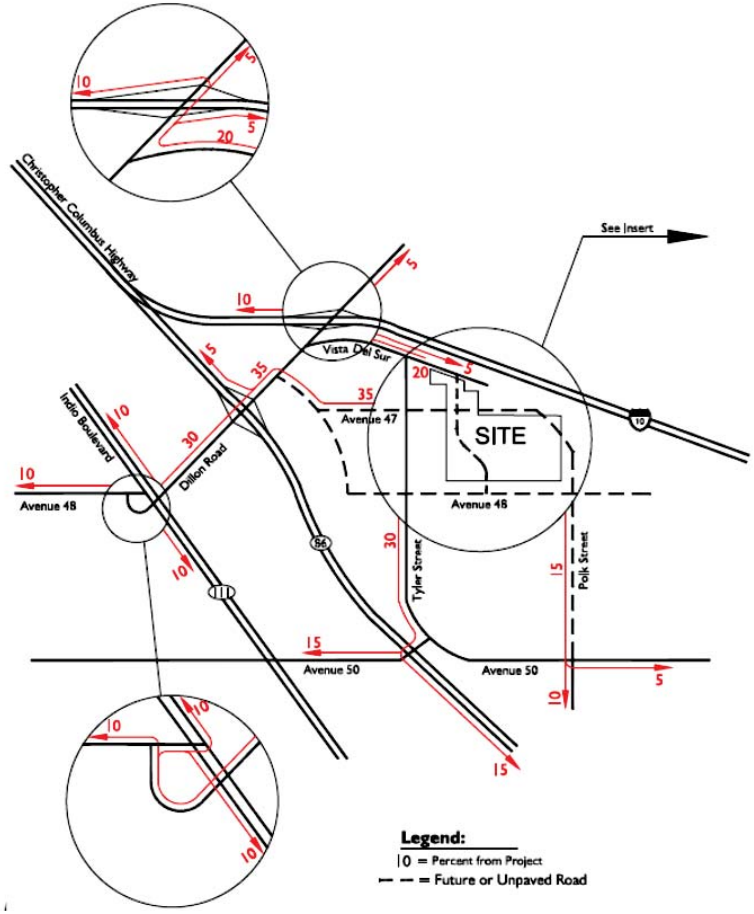


Figure 4.14.4-15
Planning Area 8 Outbound Trip Distribution



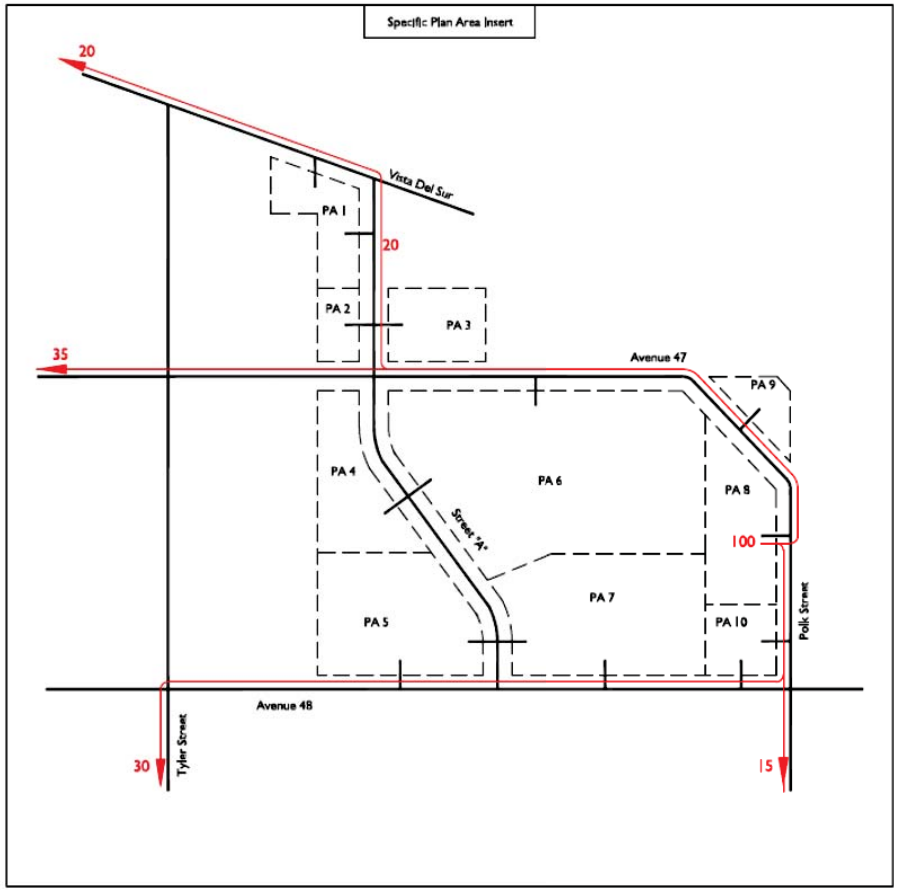


Figure 4.14.4-16
Planning Area 8 Inbound Trip Distribution

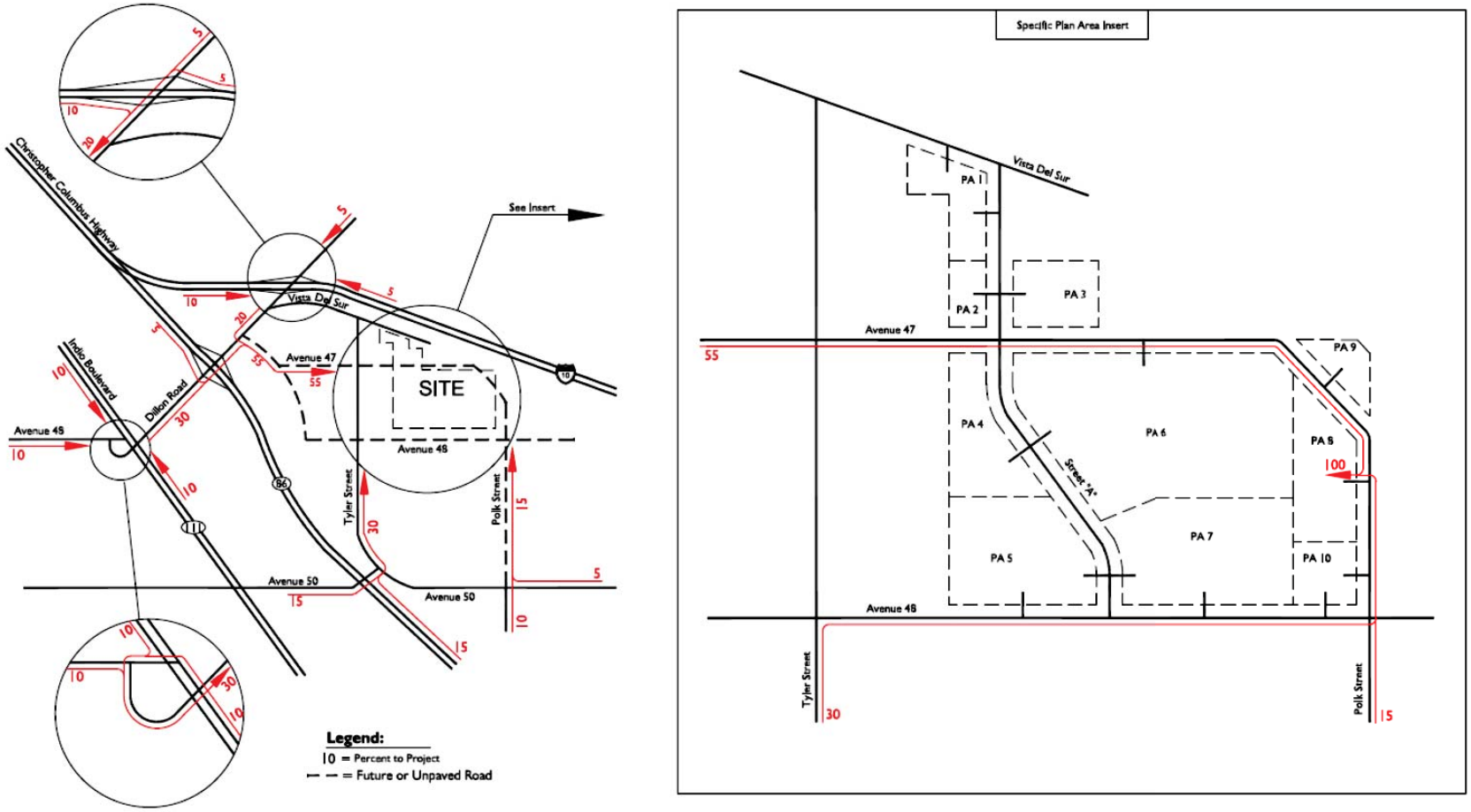
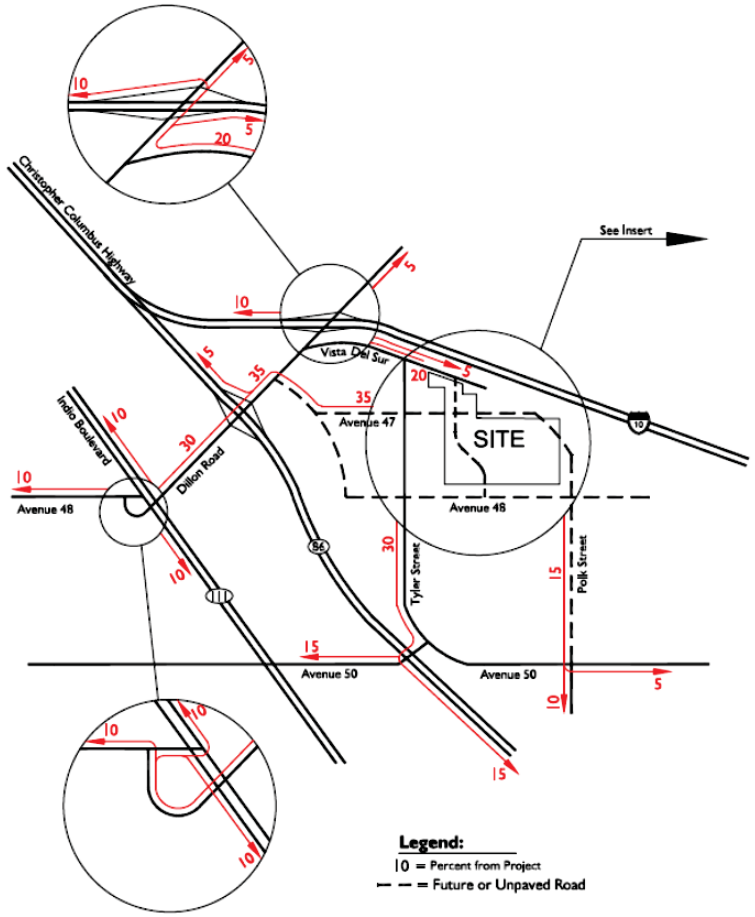


Figure 4.14.4-17
Planning Area 9 Outbound Trip Distribution



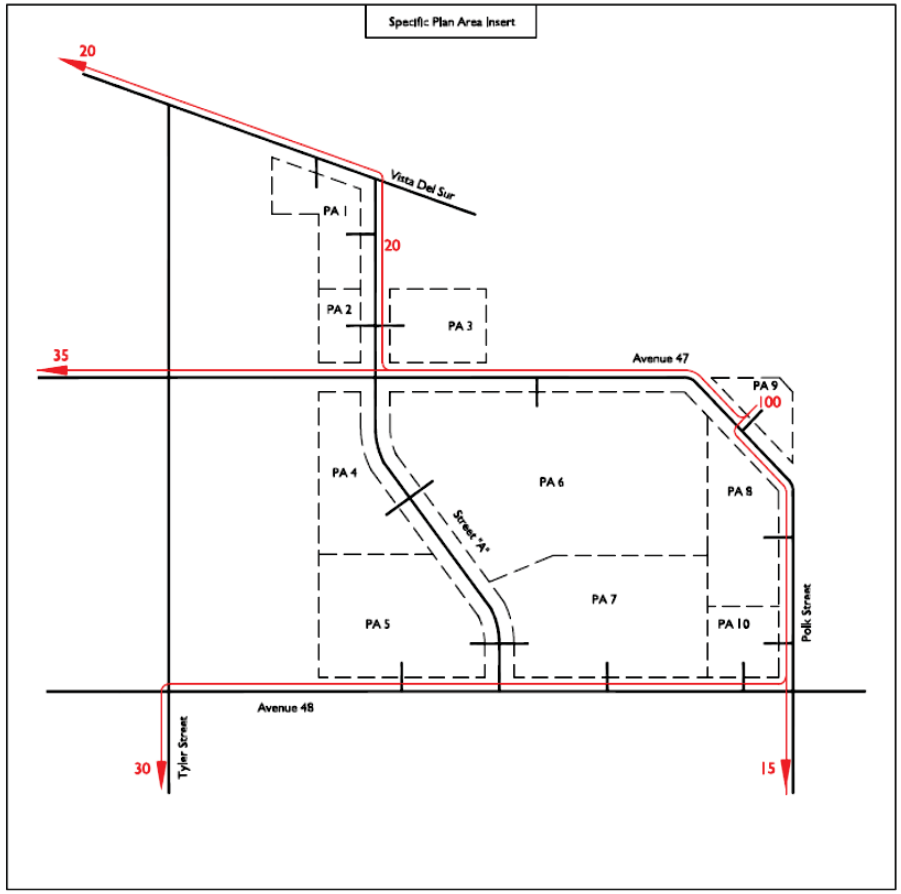


Figure 4.14.4-18
Planning Area 9 Inbound Trip Distribution

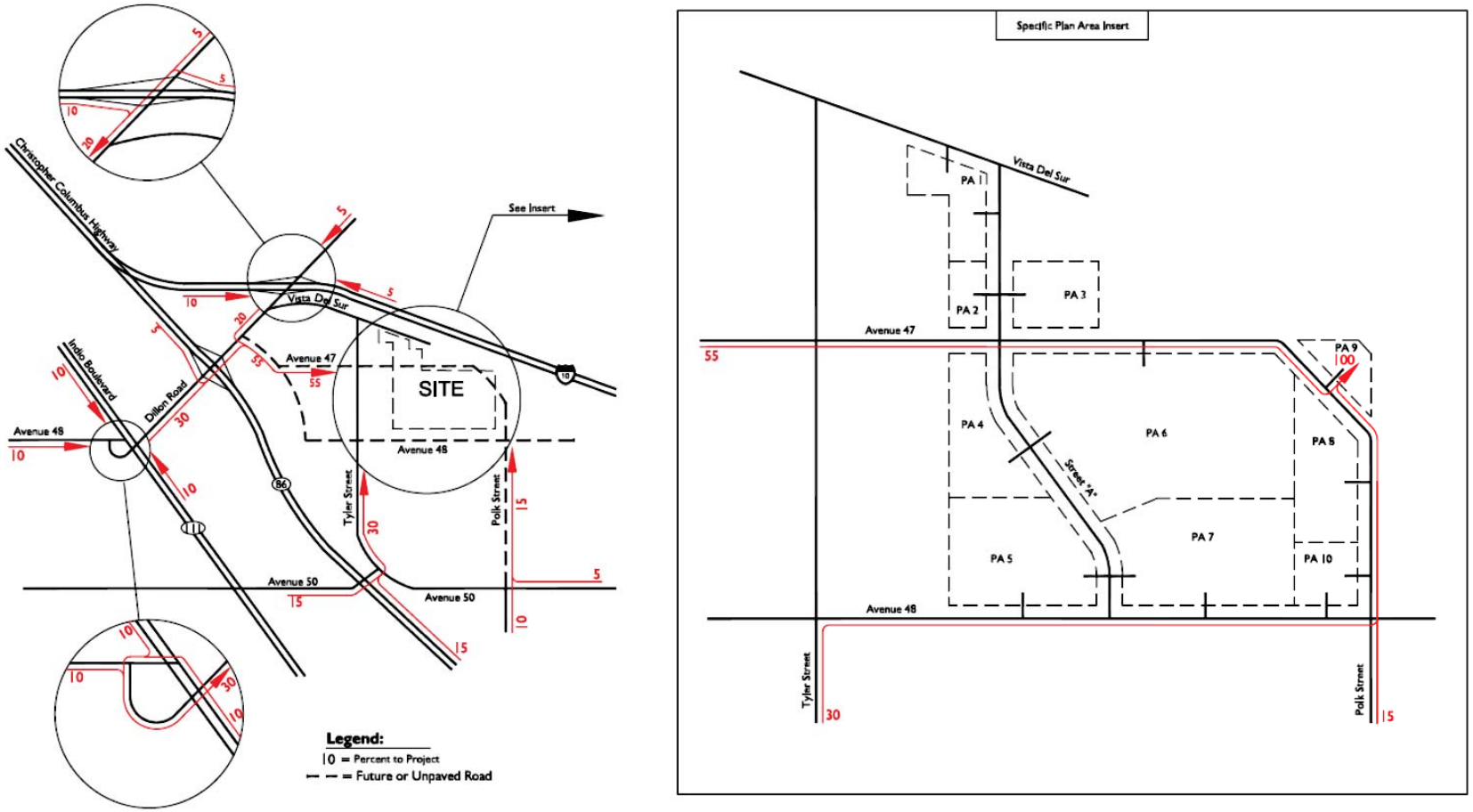


Figure 4.14.4-19
Planning Area 10 Outbound Trip Distribution

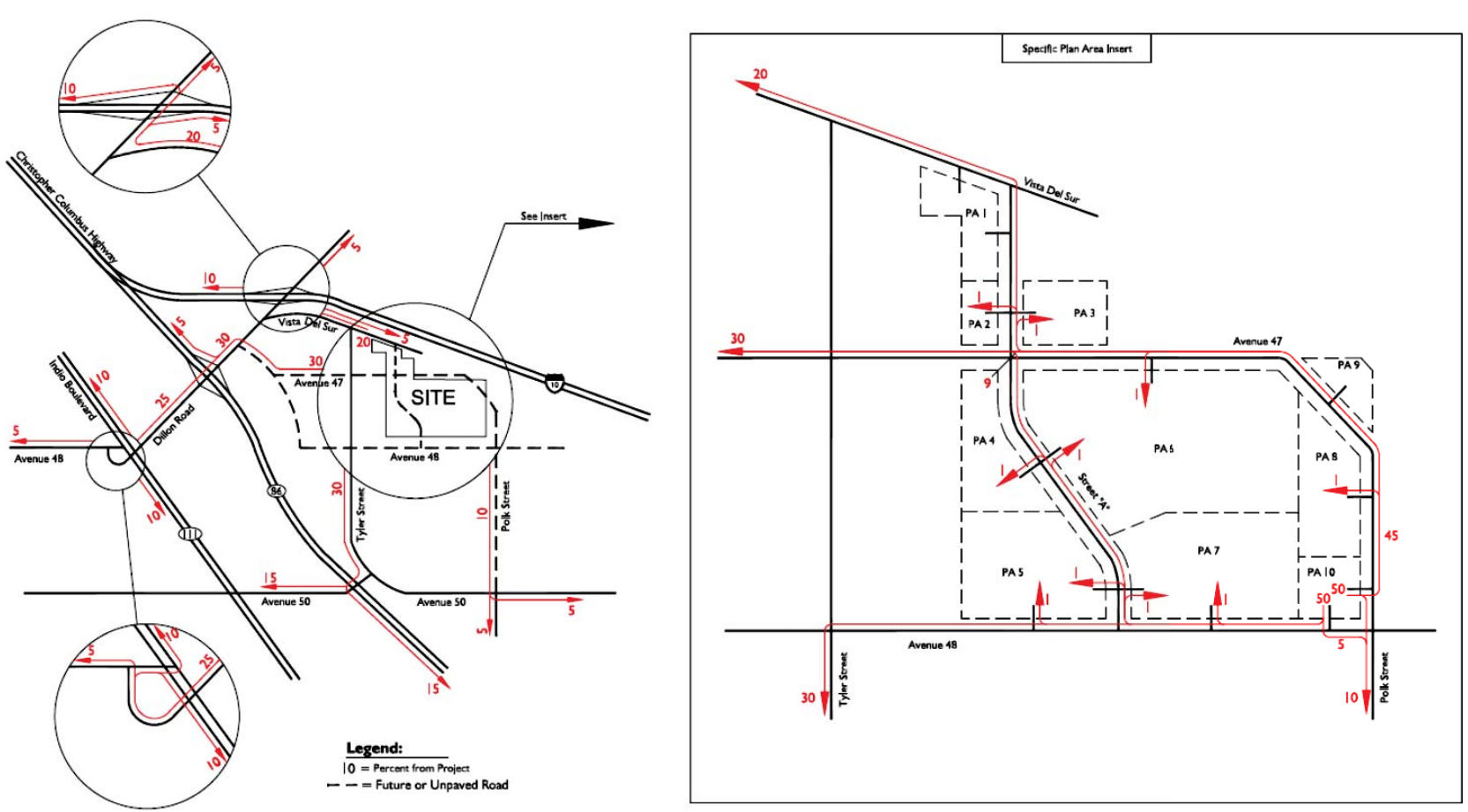


Figure 4.14.4-20
Planning Area 10 Inbound Trip Distribution

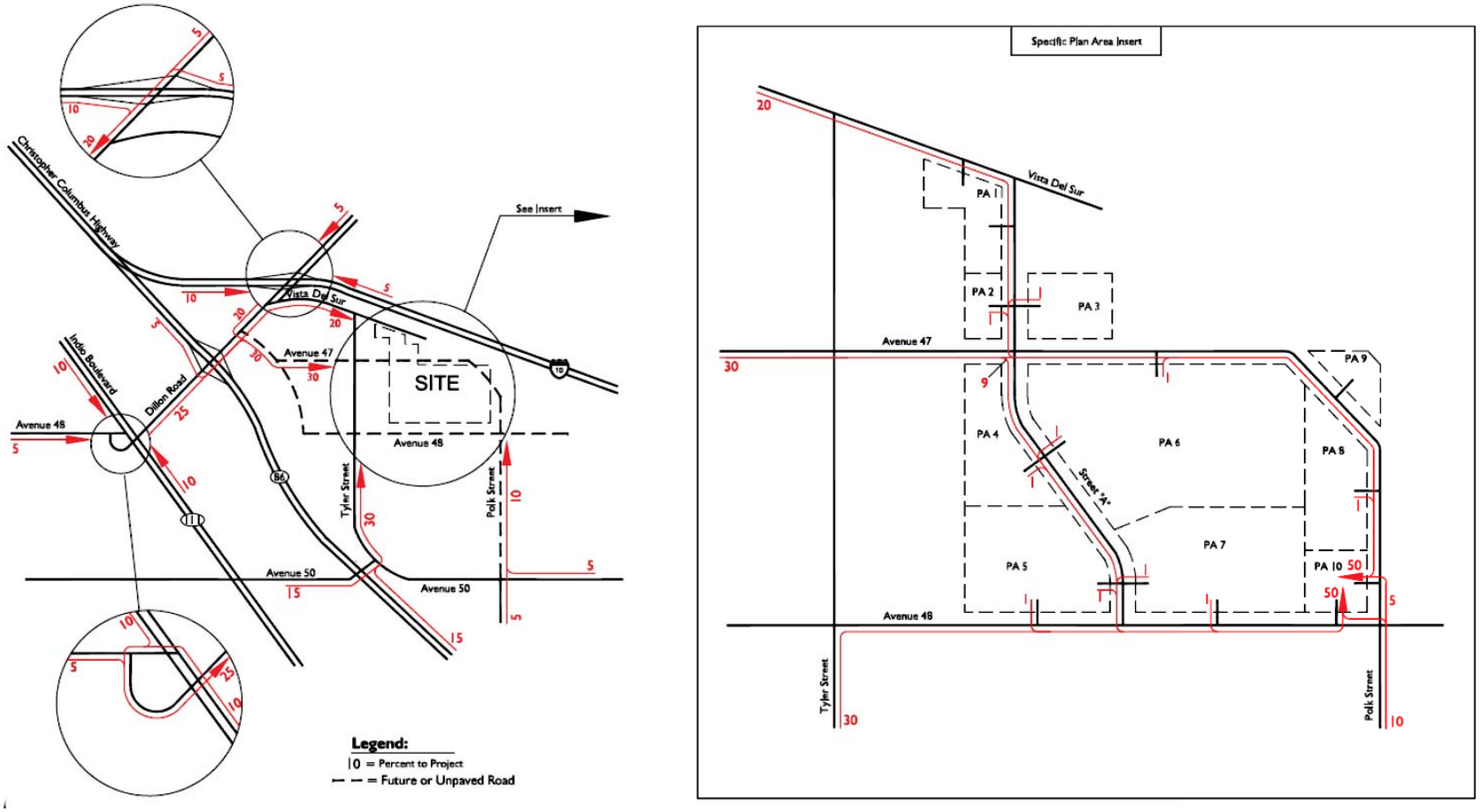


Figure 4.14.4-21
Project Traffic Volumes

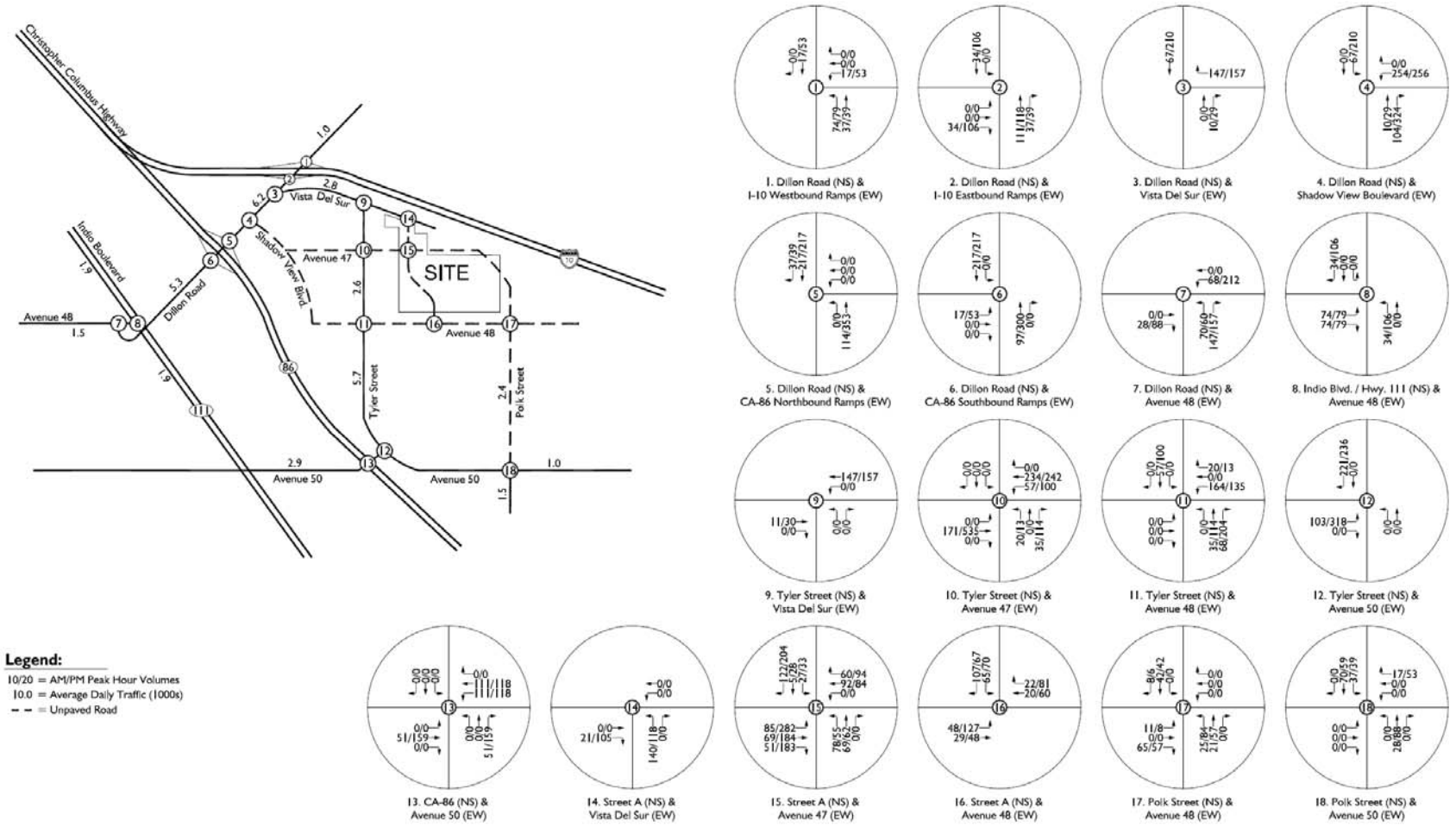
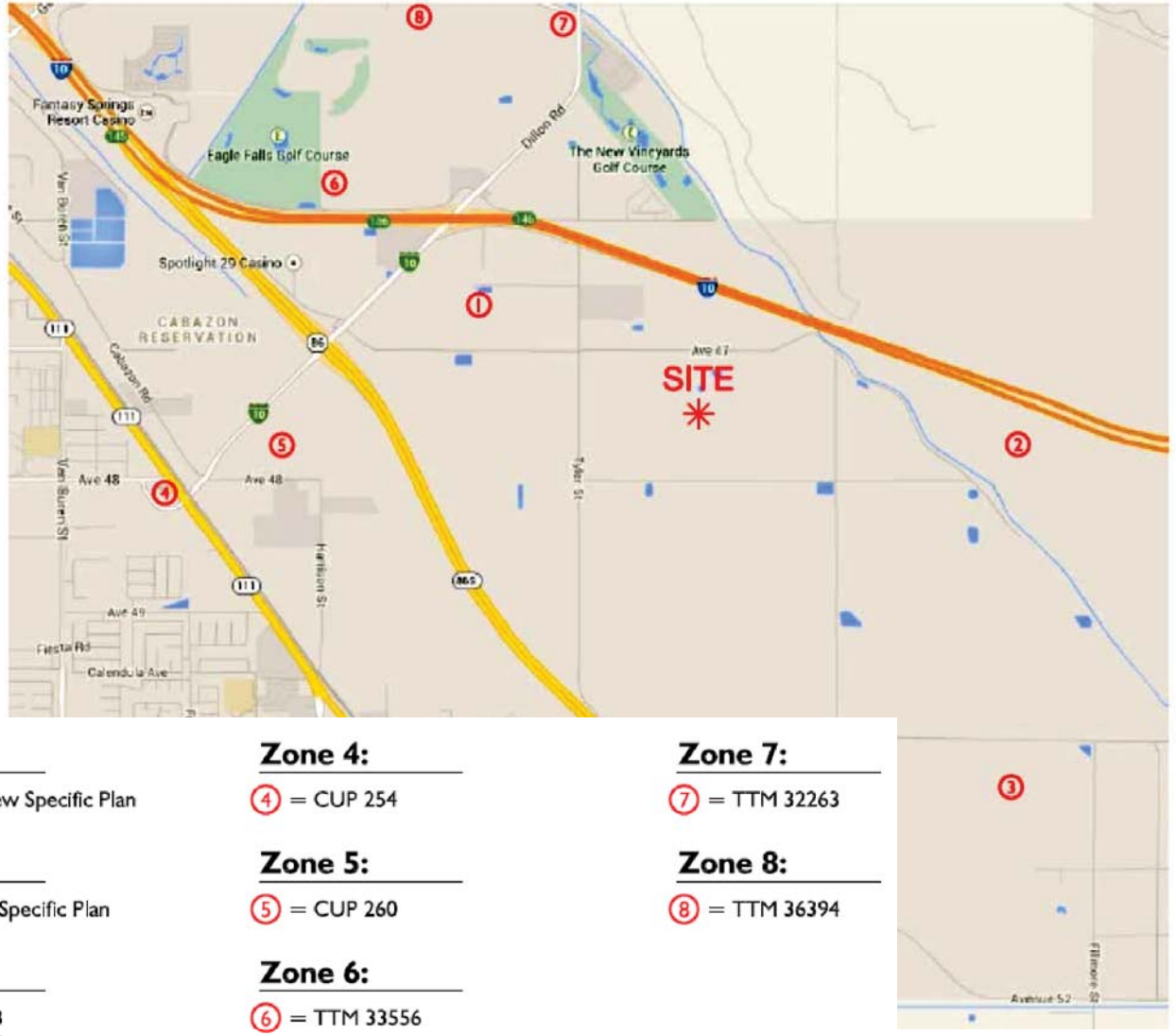


Figure 4.14.4-22
Cumulative Project Location Map



Zone 1:
① = Shadow View Specific Plan

Zone 2:
② = La Entrada Specific Plan

Zone 3:
③ = TTM 34293
= TTM 35005

Zone 4:
④ = CUP 254

Zone 5:
⑤ = CUP 260

Zone 6:
⑥ = TTM 33556

Zone 7:
⑦ = TTM 32263

Zone 8:
⑧ = TTM 36394

Figure 4.14.4-23
Cumulative Project Traffic Volumes

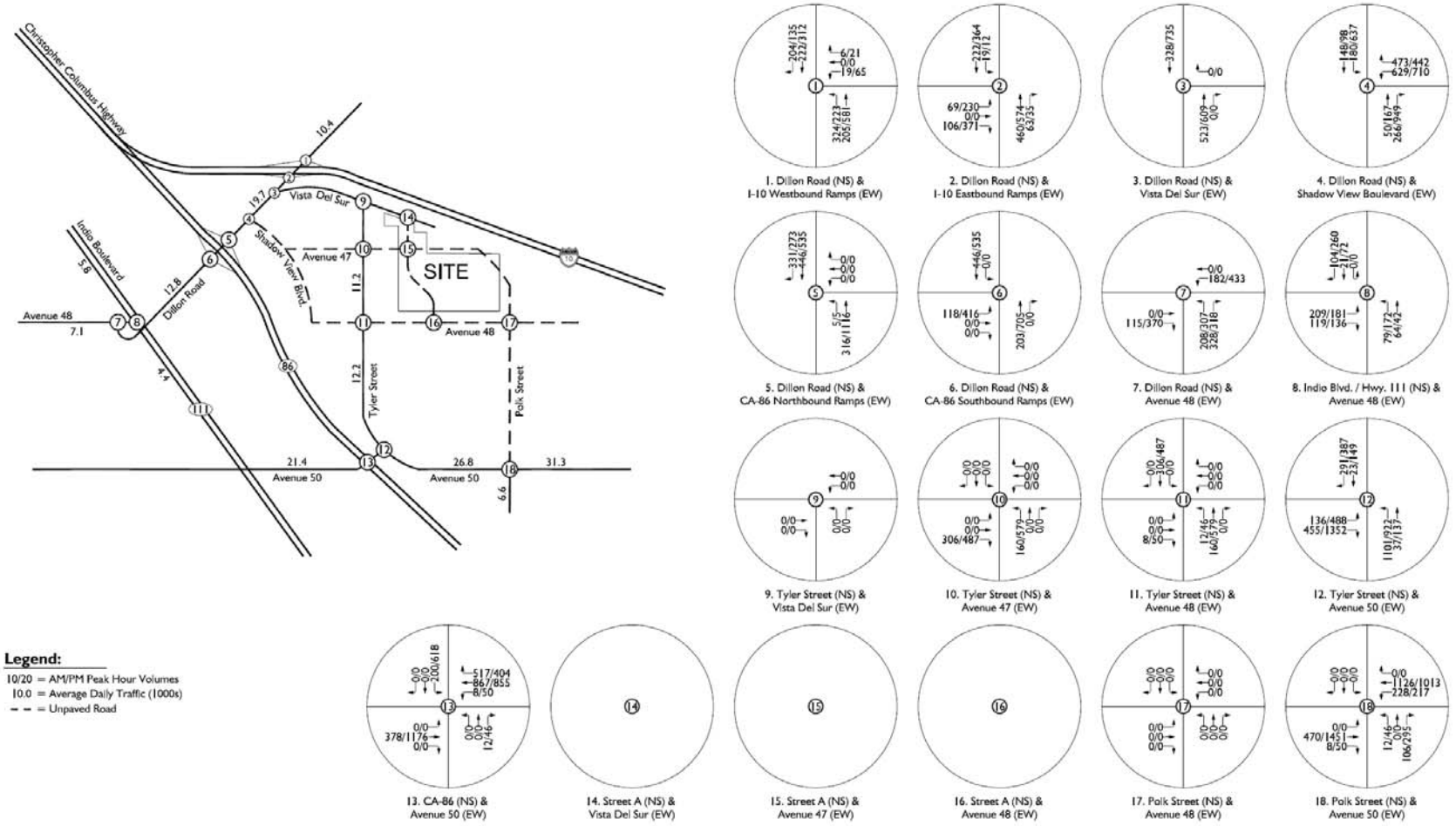


Figure 4.14.4-24
Existing Plus Project Traffic Volumes

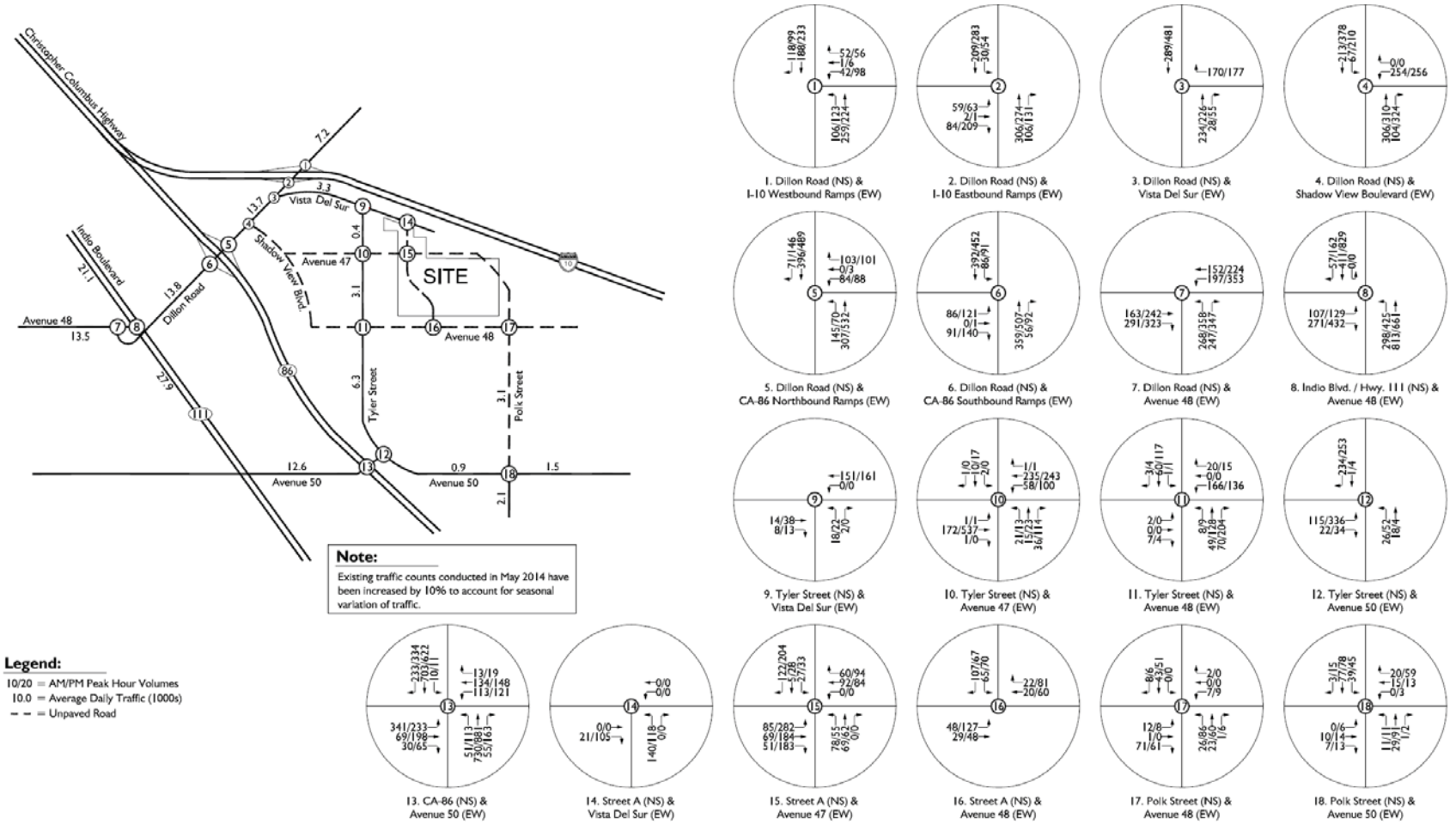
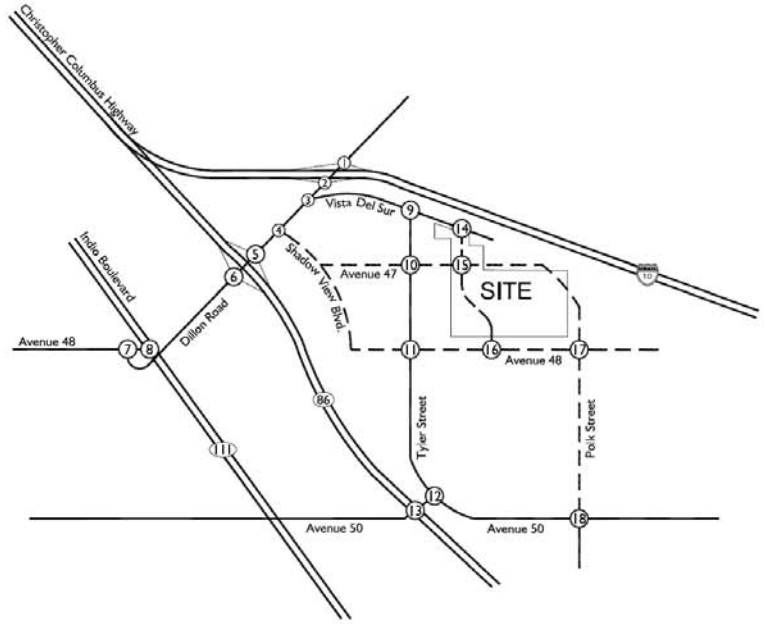


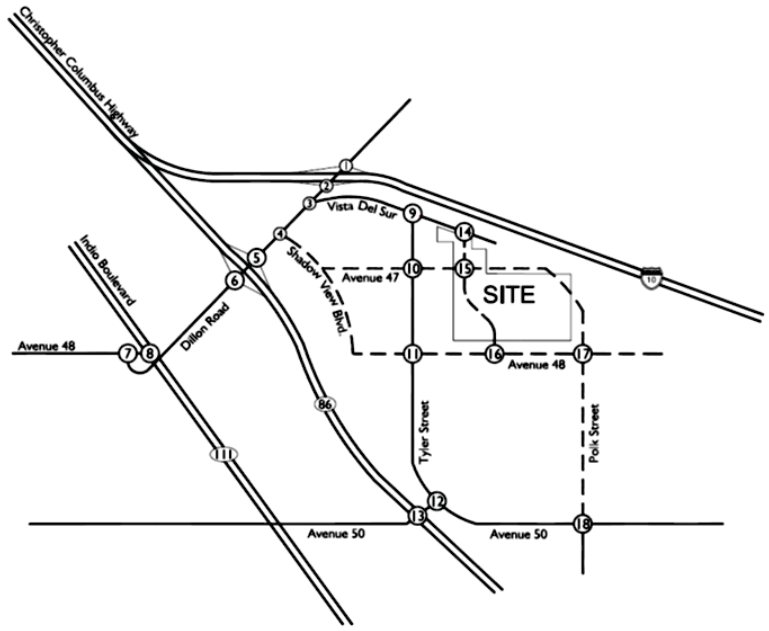
Figure 4.14.4-25
Recommended Intersection Improvements



Legend:
① = Study Area Intersection
= Traffic Signal
Ⓢ = All Way Stop
RTO = Right Turn Overlap
= Defacto Right Turn
= Current Phase Improvement
= Previous Phase Improvement

	Existing	Existing + Project	Project Completion (Year 2022) With Project	Project Completion (Year 2022) With Project and Cumulative Projects	General Plan Buildout (Year 2035) Without Project	General Plan Buildout (Year 2035) With Project
① Dillon Road (NS) at I-10 WB Ramps (EW)		No Change	No Change			
② Dillon Road (NS) at I-10 EB Ramps (EW)		No Change	No Change			
④ Dillon Road (NS) at Shadow View Blvd. (EW)				RTO	RTO	RTO
⑤ Dillon Road (NS) at SR-86 NB Ramps (EW)		No Change	No Change			
⑥ Dillon Road (NS) at SR-86 SB Ramps (EW)		No Change	No Change			
⑦ Dillon Road (NS) at Avenue 48 (EW)		No Change	No Change			
⑩ Tyler Street (NS) at Avenue 47 (EW)		Ⓢ	Ⓢ			
⑪ Tyler Street (NS) at Avenue 48 (EW)		Ⓢ	Ⓢ			

Figure 4.14.4-25
Recommended Intersection Improvements, continued



Legend:
① = Study Area Intersection
= Traffic Signal
Ⓢ = All Way Stop
RTO = Right Turn Overlap
= Defacto Right Turn
= Current Phase Improvement
= Previous Phase Improvement

	Existing	Existing + Project	Project Completion (Year 2022) With Project	Project Completion (Year 2022) With Project and Cumulative Projects	General Plan Buildout (Year 2035) Without Project	General Plan Buildout (Year 2035) With Project
⑫ Tyler Street (NS) at Avenue 50 (EW)		No Change	No Change			
⑬ SR-86 (NS) at Avenue 50 (EW)		No Change	No Change			
⑭ Street "A" (NS) at Vista Del Sur (EW)	Proposed Project Intersection. Improvements not applicable in current scenario.				Proposed Project Intersection. Improvements not applicable in current scenario.	
⑮ Street "A" (NS) at Avenue 47 (EW)	Proposed Project Intersection. Improvements not applicable in current scenario.				Proposed Project Intersection. Improvements not applicable in current scenario.	
⑯ Street "A" (NS) at Avenue 48 (EW)	Proposed Project Intersection. Improvements not applicable in current scenario.				Proposed Project Intersection. Improvements not applicable in current scenario.	
⑰ Polk Street (NS) at Avenue 48 (EW)						
⑱ Polk Street (NS) at Avenue 50 (EW)		No Change	No Change			

Figure 4.14.4-26
Project Completion (Year 2022) With Project Traffic Volumes, for Project Completion (Year 2022) With Project Traffic Conditions

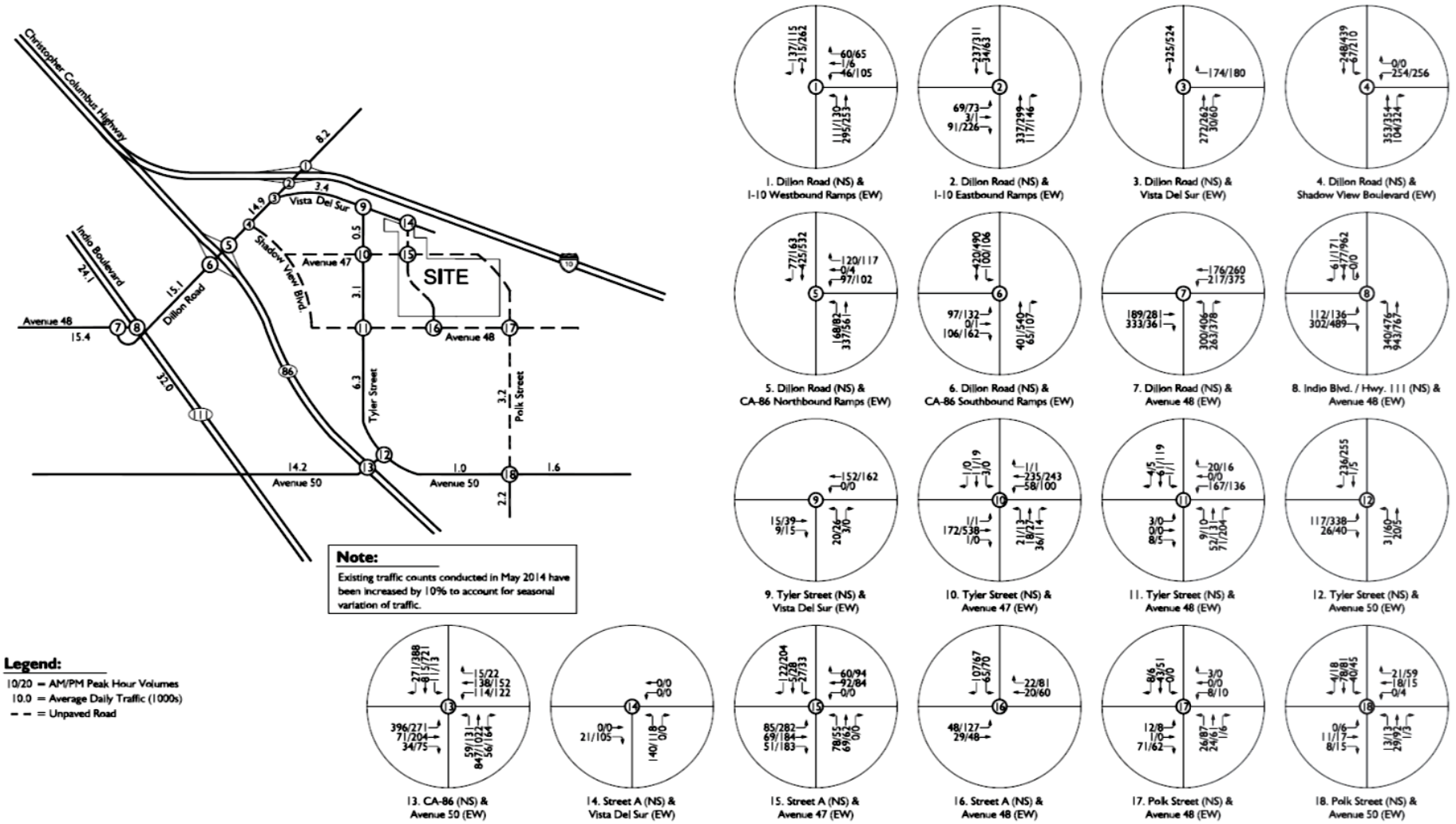


Figure 4.14.4-27
Project Completion (Year 2022) With Project and Cumulative Project Traffic Volumes

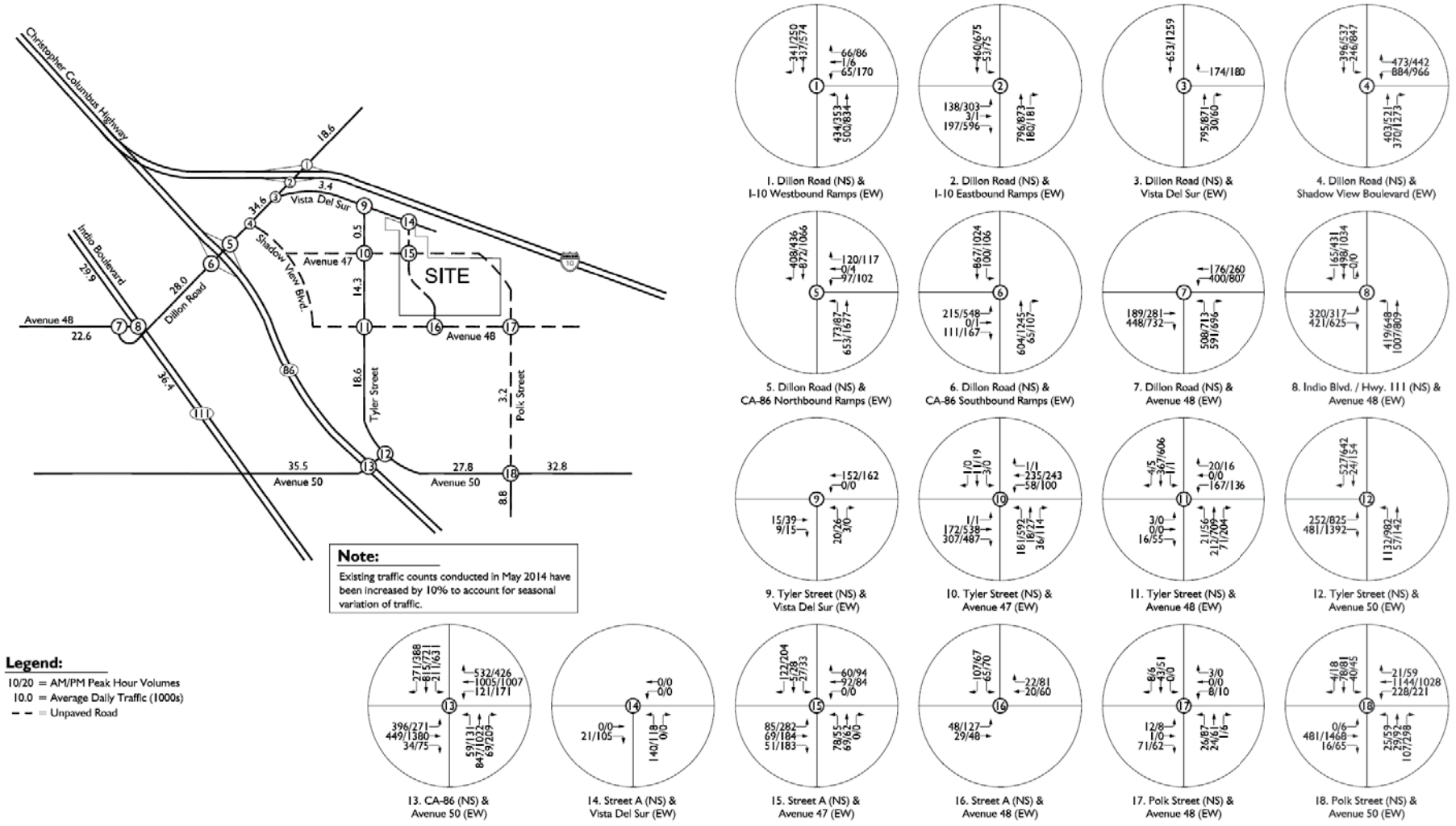


Figure 4.14.4-28
General Plan Buildout (Year 2035) Without Project Traffic Volumes

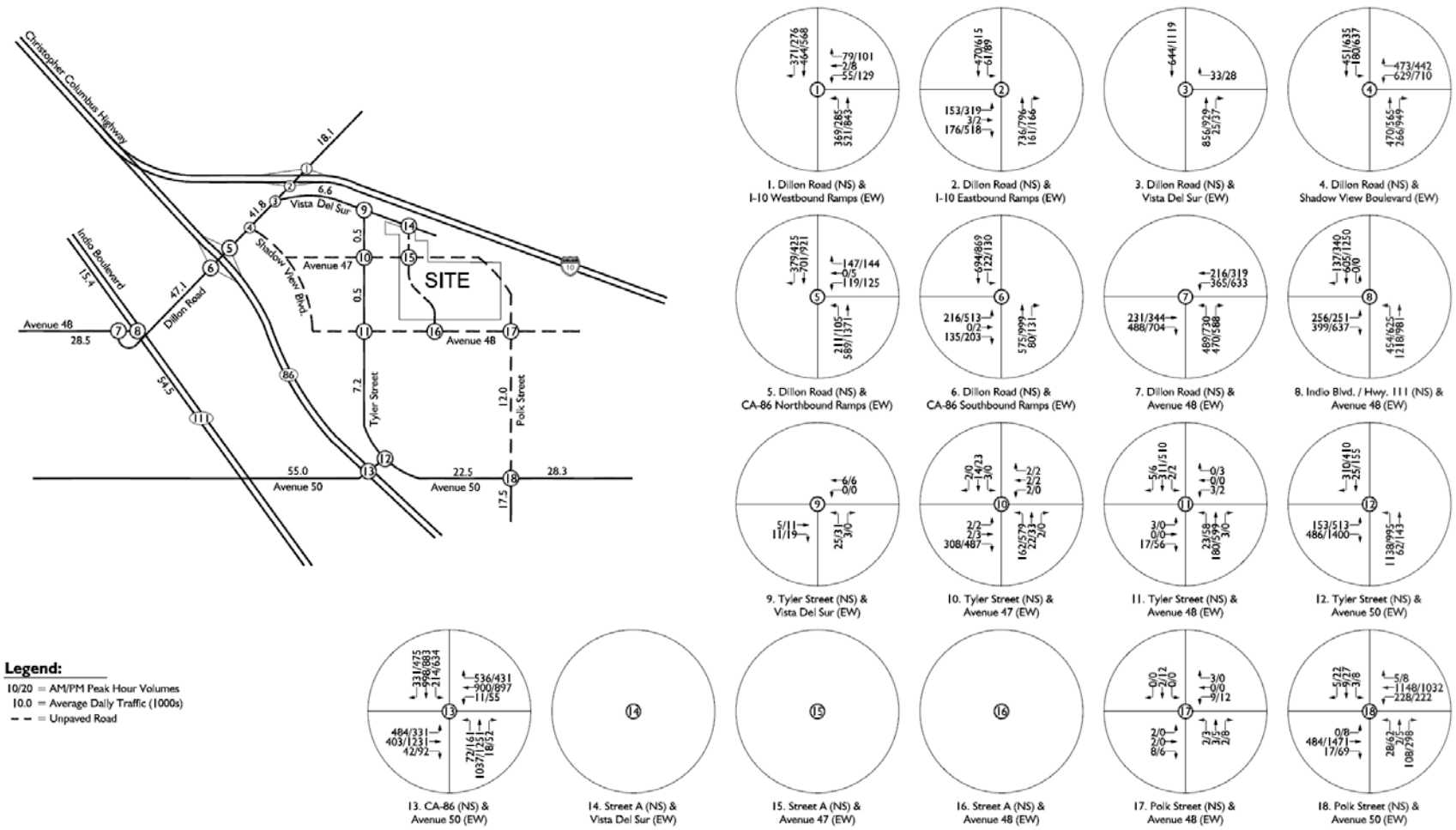
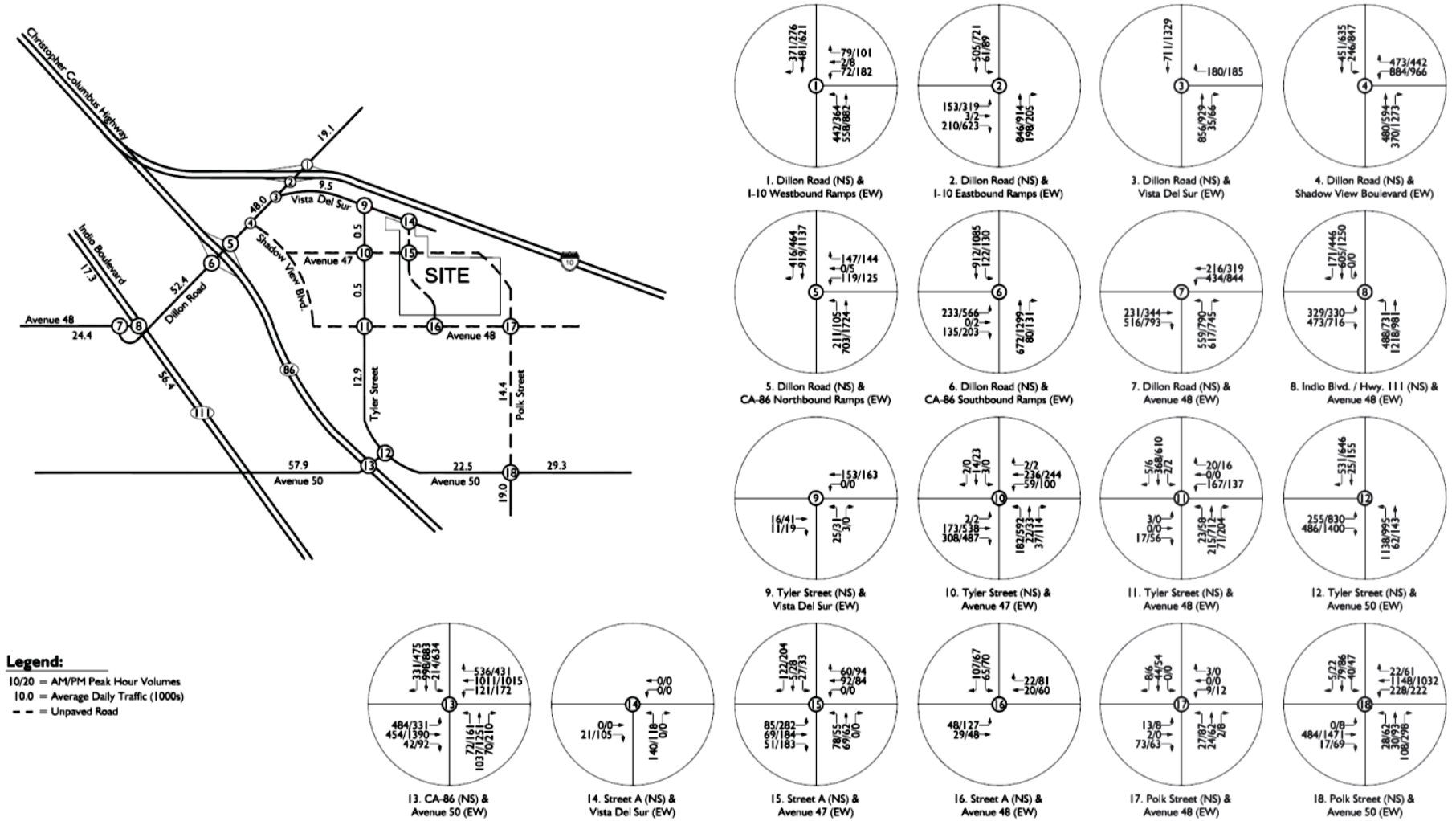


Figure 4.14.4-29
General Plan Buildout Year (2035) With Project Traffic Volumes for General Plan Buildout (Year 2035) With Project Traffic Conditions



CHAPTER 4 – ENVIRONMENTAL IMPACT EVALUATION

All Subchapter 4.15 figures are located at the end of this subchapter, not immediately following their reference in text.

4.15 UTILITIES AND SERVICE SYSTEMS

4.15.1 Introduction

This subchapter will evaluate the environmental impacts to the issue area of utilities and service systems resources from implementation of the Project. Section XVII, Utilities and Service Systems, of the Initial Study posed the questions, asking whether the Project would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- 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?
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- Comply with federal, state, and local statutes, and regulations related to solid waste?

As indicated in the City's Initial Study under Section XVII a-e) storm water drainage facilities are discussed in Subchapter 4.9, Hydrology and Water Quality.

In addition, this subchapter will analyze the following:

- Require or result in the construction of new facilities or the expansion of existing facilities; the construction of which could cause significant environmental effects:
    - Electricity?
    - Natural gas?
    - Communication systems?

The following references were used in preparing this subchapter of the Environmental Impact Report (EIR).

- City of Coachella, *General Plan Update,* adopted April 22, 2015 http://www.coachella.org/services/document-central/-folder-20;
- City of Coachella, *General Plan Update Final EIR*, adopted April 22, 2015 http://www.coachella.org/services/document-central/-folder-20;
- Coachella Valley Water District, *2015 Urban Water Management Plan Final Report*, dated

January 2012 http://cvwd.org/ArchiveCenter/ViewFile/Item/516 ;
- City of Coachella, *Vista Del Agua Draft Specific Plan SP-14-01*, prepared by United Engineering Group, January 2018 (**Appendix A**);
- City of Coachella, *Draft Vista Del Agua Water Supply Assessment*, prepared by TKE Engineering, Inc., dated December 2017 (**Appendix J**);
- La Entrada Draft Environmental Impact Report Wastewater Study https://laentradacommunity.com/;
- Waste Characterization, Residential Developments: Estimated Solid Waste Generation Rates: http://www.calrecycle.ca.gov/wastechar/wastegenrates/Residential.htm;
- E-mail correspondence with Cástulo R. Estrada, Utilities Manager, City of Coachella, May 24, 2018;
- E-mail correspondence with Riverside County Department of Waste Resources, May 25, 2018;
- Waste Characterization, Commercial Sector: Estimated Solid Waste Generation and Disposal Rates http://www.calrecycle.ca.gov/wastechar/wastegenrates/Commercial.htm; and
- Riverside County Nondisposal Facility Element, dated July 2015 http://www.rcwaste.org/Portals/0/Files/Planning/CIWMP/NDFE.PDF.

The Coachella Valley Water District inquired into the status relative to the Coachella Valley Water Management Plan, the potential impact on water supplies as well as drainage lines and facilities, and the District emphasized the importance to work in partnership with the development to ensure sufficient water supplies are available for new development (Letter #8).

No other comments were raised at the public scoping meeting, nor were any comments received regarding utilities and service systems resources in response to the Notice of Preparation. The issues identified in the Initial Study, and NOP, are the focus of the following evaluation of utilities and service systems resources.

4.15.2 Environmental Setting

Water Supply

Water service will be provided by the City of Coachella Water Authority (CWA). CWA receives its water entirely from groundwater. The main groundwater source is the Coachella Valley Groundwater Basin, Indio Sub-basin; Basin Number 7-21-01 (also referred to as the Whitewater River Sub-basin), shown in **Figure 14.15.2-1, *Coachella Valley Groundwater Sub-basins***.

The Whitewater River Sub-basin underlies a major portion of the valley floor and encompasses approximately 400 square miles and is shared by Coachella Valley Water District (CVWD), Desert Water Agency (DWA), the cities of Indio and Coachella, and numerous private groundwater producers. The Basin is divided into the upper and lower sub-basins, with an estimated current reserve of approximately 25 million acre feet (MAF). The cities of Indio and Coachella obtain water from the lower (or East) Whitewater River Sub-basin. The water in this Basin originates from mountain front recharge and recharge efforts made in the region through recycled and imported water supplies. It has substantial available storage space that has been utilized and will continue to be utilized to store millions of acre-feet of supplemental supplies that become available during normal and above-normal wet years. Those surplus supplies are recharged to the Basin for later use during dry periods.

Overall management of water resources for the Coachella Valley has historically been the responsibility of CVWD and DWA. In December 2010, the Coachella Valley Integrated Regional Water Management Plan (IRWMP) was developed to promote a regional approach for addressing water management issues. The IRWMP was created by the Coachella Valley Regional Water Management Group (CVRWMG), which is a partnership of the following five Coachella Valley water purveyors: Coachella Water Authority, Coachella Valley Water District, Desert Water Agency, Indio Water Agency, and the Mission Springs Water District. The Plan describes the groundwater basin in detail, documents historical groundwater levels, estimates existing and future groundwater production rates, and identifies regional management goals and objectives.[1]

In order to ensure an adequate water supply for all domestic users in the Coachella Valley, it is necessary for the City to work with CVRWMG. In summary, the Coachella Valley IRWMP states that the demand for groundwater in the Basin has annually exceeded the limited natural recharge of the groundwater basin. This overdraft condition has caused groundwater levels to decrease in portions of the Lower Valley and has raised concerns about water quality degradation and irreversible land subsidence. The direct effect of the overdraft condition will result in increased groundwater pumping costs and continued decline of groundwater levels could result in degradation of water quality in the Basin. Because of the difficult nature of quantifying overdraft, CVWD has based the "overdraft" condition on the change in freshwater storage. In 2015, the annual water balance in storage in the lower portion of the Whitewater River Sub-basin was a gain of 26,900 AF, which is a positive change in the loss trends of previous years.[2]

CVWD and DWA are both responsible for recharging the Basin, therefore, CVWD and DWA obtain imported water supplies from the State Water Project (SWP). CVWD and DWA are two of 29 agencies holding long-term water supply contracts with the State of California for SWP water. However, CVWD and DWA do not directly receive SWP water. Instead, their SWP water is delivered from the Metropolitan Water District of Southern California (MWD) pursuant to the Exchange Agreement. MWD, in turn, delivers an equal amount of Colorado River water to CVWD and DWA at the Whitewater River via the MWD Colorado River Aqueduct.

As a public water supplier in the Coachella Valley, the City maintains a close and cooperative relationship with CVWD. The CVWD is a multi-faceted agency that delivers irrigation and domestic water (including drinking water), collects and recycles wastewater, provides regional storm water protection, replenishes the groundwater basin and promotes water conservation. As the Basin is not an adjudicated basin, there are no deeded rights to withdraw water. However, pursuant to County Water District Law, the City does pay a replenishment assessment charge (RAC) to CVWD, the wholesale water agency responsible for basin management in the region. In 2015, when the RAC was $52 per acre-foot, the City produced approximately 6,531 AF of groundwater and paid approximately $339,612 in RAC. As currently proposed, the RAC for the East Whitewater River Sub-basin is $66 per acre-foot of groundwater pumped, to be effective July 1, 2015, if approved.[3]

In September 2009, CVWD and the City signed a Memorandum of Understanding (2009 MOU) to assist in ensuring a sufficient and reliable water supply for development projects within the

[1] Final Volume 1: IRWMP Plan Chapters, 2014 Coachella Valley Integrated Regional Water Management Plan.
[2] CVWD's 2015/2016 Engineer's Reports on Water Supply and Replenishment Assessment, pp. 28.
[3] CVWD's 2015/2016 Engineer's Reports on Water Supply and Replenishment Assessment, pp. 30.

City and its sphere of influence (SOI). Under the terms of the 2009 MOU, various means are identified by which the City can provide for the supply of supplemental water to offset the demands associated with development projects approved by the City. For instance, under the 2009 MOU the City can participate in funding CVWD's acquisition of supplemental water supplies to offset demands associated with newly approved projects within the City's SOI. In February 2013, CVWD and the City signed a Memorandum of Understanding (2013 MOU) regarding implementation of the 2009 MOU. Among other things, the 2013 MOU further specifies the mechanism by which the City can finance and acquire supplemental water supplies from CVWD to meet the projected demands of new development projects and establishes a process for preparing and adopting Water Supply Assessments (WSA) and Written Verifications for such projects. Although the City's 2010 Urban Water Management Plan (UWMP) did not specifically reflect the demands associated with the Project, the 2013 MOU expressly acknowledges and applies to the Project, and the supplemental water supplies referred to in the 2013 MOU have been considered by CVWD as part of the 2010 Coachella Valley Water Management Plan (CVWMP) Update and related 2011 Subsequent Program Environmental Impact Report (SPEIR). Importantly, and as noted throughout the Project WSA and the water supply planning and California Environmental Quality Act (CEQA) documents that support its analysis, Basin conditions have been and will continue to be fully addressed and comprehensively managed. Consistent with the conclusions of CVWD's 2010 CVWMP Update and 2011 SPEIR, it is expected that continued implementation of CVWMP recommendations will improve overdraft conditions and have a beneficial effect on the groundwater basin.

Therefore, the projected water demands associated with the Project have been already been accounted for as part of CVWD's regional water supply planning efforts, which specifically include population projections within the City and the City's SOI through the year 2045 in accordance with the Riverside County Center for Demographic Research RCP 06 planning process.[4]

Water Demands

The City of Coachella supplies 100 percent of its potable water from City owned and operated wells. The City presently 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). In 2016, the City produced approximately 2,096 MG (6434 AF) of groundwater. The operating conditions and controls for the wells vary, with some wells operating year-round and some turned on only seasonally. The system is controlled by a Supervisory Control and Data Acquisition (SCADA) system to ensure maximum efficiency of groundwater resources. The City presently uses approximately five percent of the total volume of water withdrawn from the East Whitewater River Sub-basin each year. **Table 4.15.2-1, *City of Coachella Historic Well Production***, below, shows the City's annual groundwater production in the Sub-basin from 2000-2014.

[4] See 2010 CVWMP, pp. 3-4 to 3-5.

Table 4.15.2-1
City of Coachella Historic Well Production

Year	Well Production	
	(MG)	(AFY)
2000	1,786.4	5,483
2001	1,882.4	5,777
2002	1,901.3	5,835
2003	2,111.8	6,481
2004	2,168.7	6,656
2005	2,314.8	7,104
2006	2,895.2	8,886
2007	2,827.8	8,679
2008	2,728.1	8,373
2009	2,715.5	8,334
2010	2,691.8	8,261
2011	2,530.0	7,765
2012	2,604.4	7,993
2013	2,586.9	7,939
2014	2,514.3	7,716

Source: City of Coachella Public Water Statistic Sheets.

Table 4.15.2-2, *Estimated Groundwater Volume Pumped from East Whitewater River Sub-basin,* below, shows estimated total groundwater production in the Sub-basin over the past 15 years. Water provided by these wells is of excellent quality and requires no treatment, other than chlorination, to maintain quality requirements of the California Department of Public Health.

Table 4.15.2-2
Estimated Groundwater Volume Pumped from East Whitewater River Sub-basin

Groundwater Type	Location or Basin Name	2012	2013	2014	2015	2016
Alluvial Basin	East Whitewater River Sub-basin	7,993	7,939	7,716	6,531	6,434
Total:		**7,993**	**7,393**	**7,716**	**6,531**	**6,434**
NOTES: Units are in Acre-Feet (AF)						

Source: *WSA* (**Appendix J**)

The City's water supply service area is shown in **Figure 4.15.2-1** and includes the service area outside the city limits but within the SOI, which was significantly increased in April 2006 by the Local Area Formation Commission (LAFCO). In addition to increasing the City's SOI, some areas currently served by the City will be served by the City of Indio in the future. The existing infrastructure in this area presents an opportunity to create inter connections between each city to facilitate exchange and sharing agreements.

Under the Coachella General Plan Update (2015), the City of Coachella service area population is expected to increase at an average annual growth rate of approximately 7.4 percent. These population projections take into consideration specific policies which have been included in the General Plan Update 2015 document which address land use changes and housing densities. However, full build-out of the City's SOI, for a total service area of approximately 53 square miles, is not anticipated until sometime after 2050. See **Table 4.15.2-3, *City of Coachella Population Projections***, below.

Table 4.15.2-3
City of Coachella Population Projections

	2015	2020	2025	2030	2035
Service Area Population	**40,947**	**55,783**	**71,278**	**91,078**	**116,377**

Source: *WSA* (**Appendix J**)

As indicated above, population in the City will continue to increase over time. It should be noted that water deliveries and metered account growth rates do not directly reflect population growth since population growth is estimated from County data and the metered accounts are a direct representation of accounts added by the City over the same time period. The principal influencing factor is the various types of development that were built (i.e., single-family residential households generally have a lower number of persons per unit compared to multi-family residential development). Additionally, approximately 49.6 percent of households in the City had at least 5 people.

Table 4.15.2-4, *2005 and 2010 Water Deliveries per Water Use Sector*, below, shows the 2005 and 2010 water use for the City's water service area shown by water use sectors.

Table 4.15.2-4
2005 and 2010 Water Deliveries per Water Use Sector

Water use sectors	2005	2010
	Volume	Volume
Single family	2,904	4,375
Multi-family	681	943
Commercial/Institutional	549	1,155
Industrial	421	133
Landscape Irrigation	426	957
Agriculture Irrigation	0	0
Other	2,124	697
Total	**7,105**	**8,260**

Units: acre-feet per year
Source: *WSA* (**Appendix J**)

The projected (next 20 years) water use for the City of Coachella is generally expected to increase at a similar rate to that of the projected population increase within the City and its SOI; provided, however, that per capita water use reductions achieved pursuant to the Water

Conservation Act of 2009 (SBx7-7) may be expected to affect the relationship between increased population and increases in total water use.

The City Development Services Department show active processing for several proposed and recently approved development projects, ranging in size from 10 residential units to mixed-use developments with over 7,800 residential units. The total number of proposed residential units associated with these entitlement applications is approximately 20,000, including the proposed Project. These units are included in the City's SOI, which is not anticipated for full build out until after 2050. Thus, many of these development projects are either in the preliminary planning stages or may have been put on hold by applicants for various reasons.

Projected water use for 2015 through 2035 in five-year increments is provided in **Table 4.15.2-5, *Future per Capita Water Use***, below. These demand projections are based on projected population and per capita water use. The population projections are based on General Plan Update (2015) data as presented in the WSA. Per capita water use was calculated in the City's 2010 UWMP. As presented in the City's 2010 UWMP, the water use is currently 210 gallons per capita per day (gpcd), with a reduction to 205 gpcd by 2015 and 200 gpcd by 2020 and beyond.

Table 4.15.2-5
Future per Capita Water Use

Year	Total Service Area Population	Per Capita Water Use (GPCD)[a]	Total Water Use per Day (MGD)	Total Annual Water Use (AFY)	% Increase
2010[b]	40,208	210	8.55	9,575	-
2015[b]	40,947	205	8.39	9,403	-2%
2020	55,783	200	11.16	12,498	33%
2025	71,278	200	14.26	15,969	28%
2030	91,078	200	18.22	20,405	28%
2035	116,377	200	23.28	26,074	28%

NOTES:
[a] As presented in the City's 2010 UWMP, Table 3.2-3, and in Sections 5-6 and 5-7 herein, the base daily per capita water use 5-year average is 210 gpcd.
[b] Note that both 2010 and 2015 Total Annual Water Use are planning number based on a 5-year average per capita water use baselines and targets and vary from actual metered sales presented in Table 4-1B, providing a more conservative outlook.

Source: *WSA* (**Appendix J**)

Riverside County was hit particularly hard by the economic downturn in the late 2000 decade. The County experienced some of the highest rates of foreclosures and unemployment in the country. Due to this economic downturn, growth in the County had significantly decreased for several years around the late 2000's. The slowdown in the housing market was one of the

primary components of the recession. The timing and extent of this reduced growth rate cannot be accurately predicted.

Because the planning period for the 2015 CVWMP Update is through 2035, it is expected that the effect of the recent recession on growth in the Valley will attenuate over the long term.

Additionally, as shown in **Table 4.15.2-5,** above, actual water demand has declined significantly since 2010 and the City's current GPCD water use is 40.8 percent lower than the SBx7-7 2015 interim target (2015 Interim Target = 204 GPCD v. 2015 Actual Water Use = 142 GPCD).

That assumption results in a particularly conservative analysis for purposes of the 2010 CVWMP, General Plan Update (2015) and this WSA because the actual growth and the actual increases in water demand associated with growth are likely to be much lower than the forecasts that have been used for long term water supply planning purposes (shown in **Table 4.15.2-6, *Projected 2020, 2025, 2030, and 2035 Water Demands***), below.

Table 4.15.2-6
Projected 2020, 2025, 2030, and 2035 Water Demands

Use Type	Projected Water Use			
	2020	2025	2030	2035
Single Family	7,166	9,156	11,700	14,949
Multi-Family	1,226	1,566	2,001	2,557
Commercial	1,735	2,217	2,833	3,620
Industrial	19	24	31	39
Landscape	1,046	1,336	1,707	2,181
Other	121	155	198	253
Losses	1,185	1,515	1,935	2,473
Total:	**12,498**	**15,969**	**20,405**	**26,074**

NOTES: Units are Acre-Feet per Year (AFY)

Source: *WSA* (**Appendix J**)

Certain other aspects of the water demand projections above and water supply reliability discussion in Section 4 of the *WSA* are noteworthy for purposes of the *WSA*. First, the City's 2015 UWMP, CVWD's 2015 UWMP, and CVWD's 2010 CVWMP demonstrate that the total projected water supplies available to CVWD and the City are sufficient to meet the water demands of the proposed Project and other demands throughout the City and CVWD service areas during normal, single-dry and multiple-dry periods throughout the year 2035 and beyond.

More importantly, those conclusions are made in the context of water demands associated with projected population growth in the City and CVWD service areas for the next 20 years – the standard established under the UWMP Act. Yet the UWMP Act standard is much more inclusive than the standards set forth by SB 610 and CEQA. Indeed, the water supply sufficiency standard established under SB 610 and CEQA is whether the total projected water supplies available to the City and CVWD over the next 20-year period is sufficient to meet the projected demand associated with the Project in addition to existing and planned future uses. Future water demands associated with the Project and "planned future uses" within the City and CVWD are considerably less than future water demands associated with projected population growth within the City and CVWD, and neither SB 610 nor CEQA requires a WSA to determine water supply sufficiency in the context of projected population growth. Accordingly, the *WSA* provides an ultra-conservative approach to water supply sufficiency.

The Project is within the Coachella Valley Water District's service area. Service will be provided to the Project by means of existing services as well as improvements constructed as part of the Project. The Project is located within the High Zone (or 150 Zone) of the City's water system. Connection for the site will take place at the water tank and booster station located at the southwest corner of the Project. Approximately 200' of off-site improvements would be required for this connection. In addition, it is likely that a connection will also be needed at Avenue 47 and Tyler Street to complete the "looped" system. Reference **Figure 3.4.2-8, *Master Water Plan***.

Wastewater

Several agencies provide sewer service in and near the City of Coachella including the Coachella Sanitary District (CSD), the Valley Sanitary District (VSD) within the incorporated area, the CVWD, and the Thermal Sanitary District (TSD) in the unincorporated area. The primary sewer provider within the incorporated City is the CSD with the Coachella City Council acting as its Board of Directors. The CSD is the service provider for the Project site.

According to the City of Coachella General Plan Update Final EIR (2015), the City's wastewater collection system includes approximately 340,000 linear feet of wastewater conveyance pipeline which is powered by two pump stations and conveyed to the City's Wastewater Treatment Plant (WWTP), located near Avenue 54 and Polk Street. This location takes advantage of the natural gravity flow that runs from north to southeast. The WWTP is an existing 30-acre domestic wastewater treatment facility that has been recently upgraded by the City and has an existing treatment capacity of approximately 4.9 mgd with an average daily flow of 2.9 mgd. The WWTP currently operates two independent treatment processes. The first, and oldest plant, consists of two circular activated sludge treatment tanks, and the second is an aeration pond system. Wastewater effluent is conveyed to the Salton Sea via the storm water channel.

As part of the existing sewer infrastructure system, the CSD operates the High School Lift Station located at the Coachella Valley High School campus at Van Buren Street and Airport Boulevard. This station handles wastewater generated by Coachella Valley High School and Westside Elementary School and currently has an average flow of 4,000 gpm. The CSD also provides domestic treatment capacity to the TSD, which is collected at a lift station and delivered by force main from TSD to the WWTP. Except for Thermal, sewer service to all unincorporated areas is handled by the CVWD.

In addition to the City's WWTP and lift stations, the CSD operates an Agricultural Wash Water Treatment Facility with a peak processing capacity of 175,000 gpd. This facility is located on the south side of Avenue 52, immediately west of the Whitewater Channel, and is an unmanned facility surrounded by vacant land. The CSD operates this 12-acre site primarily to manage the flows from several agricultural processing facilities including Sun Date, Great Date, and the Sun World Processing Plants. Wastewater conveyed to this facility by diversion pipelines is processed by means of furrow irrigation pasture.

Sewer service to the Project site will include construction of a 12-inch gravity sewer main within Avenue 48, which will tie in to the existing sewer main in Tyler Street. From this location, the sewer system gravity flows to the lift station located near Polk Street and State Route 86, where it is then lifted to another gravity system which flows to the City's treatment plant at Polk Street and Avenue 54. **Figure 3.4.1-6** illustrates the proposed Conceptual Sewer Plan for the Specific Plan. It is anticipated that all "backbone" sewer facilities will be installed, per the Conceptual Sewer Plan, in one phase.

The City collects Development Impact Fees for water and wastewater facilities as part of the water and sewer collection fees for new development in the City. The current connection fees are provided in **Table 4.15.2-7, *City Water and Sewer Connection Fees***, below.

Table 4.15.2-7
City Water and Sewer Connection Fees

Land Use	Connection Fees (As of Fiscal Year 2016/2017)
Water Connection Fees	
Single-family and Multi-family	$3,948.17 per EDU
Commercial	Calculated based on based on meter size and current residential rates
Sewer Connection Fees	
Single-family and Multi-family	$4,141.56 per EDU
Commercial	Calculated based on the multiplication of the fixture count and sewage factor

Source: Cástulo Estrada, City of Coachella (E-Mail May 24, 2018)
EDUs = Equivalent Dwelling Unit sf = square feet

In measuring wastewater flows it is important to attribute volume to individual user types and differentiate between residential, agricultural and commercial flows. To accomplish this breakdown customer demand is measured in equivalent dwelling units (EDUs). This EDU is determined to be a typical residential service connection and represents the usage and flow generation created by one single-family residence. All other user types are measured by applying an EDU value to each service connection based on land use and specific user characteristics. The current EDU flow generation factor is 270 gpd per EDU for Coachella, but for planning purposes and to build in a safety buffer a generation factor of 300 gpd is utilized. The generation factor for other local agencies range from 250 gpd/EDU to 300 gpd/EDU. The CSD currently serves 6,500 EDUs and approximately 3,500 customers via its wastewater conveyance network. This constituency base consists primarily of residential development with a light mix of commercial, industrial and some agricultural customers.

Recycled Water

Recycled water is a significant resource that can be used to help expand the local and regional water supply portfolio. Wastewater that has been highly treated and disinfected can be reused for landscape irrigation, certain agricultural applications, and a variety of other purposes. Recycled water has historically been used for irrigation of golf courses and urban landscaping in the Coachella Valley.

Currently, the City of Coachella does not have infrastructure in place to recycle water. However, the City is in the process of updating its sewer master plan, which will include a feasibility study on implementing a recycled water program. If the treatment system upgrade feasibility study produces a favorable result, and tertiary treatment is added to the facility, potential uses of recycled water could be implemented, including non-potable water systems for larger developments. In addition, the City has begun negotiations with Valley Sanitation District to acquire wastewater effluent from its treatment plant located north and uphill of the City. The investigation includes determining treatment plant improvements required to meet applicable recycled water quality standards.[5]

Urban growth is expected to increase the amount of wastewater generated, and thus will make additional recycled water available for reuse, primarily in the East Valley. As discussed in the 2010 CVWMP, with water conservation measures, recycled water supplies in the East Valley are projected to total about 67,000 acre-feet per year (AFY) by 2045.

In addition, growth is expected to occur in areas that are not currently served by wastewater treatment facilities. It is expected that the wastewater agency serving these areas will extend their wastewater collection systems as development occurs. For the areas within the cities of Coachella and Indio and their respective spheres of influence that are northeast of the San Andreas Fault, it is expected that one or more satellite treatment facilities will be constructed to treat wastewater generated in these areas. That recycled water can be reused for outdoor use within those developments to reduce the need for additional local potable and imported water supplies. Based on estimates of water demands and wastewater flows, recycled water could meet as much as 12,000 AFY of non-potable demand in this area by 2045.[6]

Solid Waste

Western Waste Industries provides solid waste and recycling services to residents and businesses within the City. Solid waste is taken to the Coachella Valley Transfer Station, located on Landfill Road north of Interstate 10, in the unincorporated area of the County. Although the County is the permitted owner of the facility, a Joint Power Authority between the City of Coachella and the City of Indio acts as the permitted owner of the transfer station. However, Burrtec Waste Industries is the practical owner and operator of the Coachella Valley Transfer Station.

According to the Riverside County Department of Waste Resources, the Coachella Valley Transfer Station is a 14-acre facility that accepts mixed municipal waste, recycling, construction and demolition waste, and green waste. The facility sorts this waste and then transfers it for disposal. As of 2017, the facility was processing an average of 417 tons of waste per day (tpd),

[5] City of Coachella, 2010 UWMP, pp. 4-16 to 4-19.
[6] 2010 CVWMP, pp. 8-5 to 8-10; and CVWD 2010 UWMP, pp.4-23 to 4-31.

with a maximum capacity of 1,100 tpd. The diversion rate (percentage of waste materials diverted from landfill disposal or incineration to be recycled, composted, or reused) for this facility is indicated to be at minimum of 5 percent. It is anticipated that solid waste disposal to service the Project site would be provided by Burrtec Waste Industries with the municipal waste transported to the Coachella Valley Transfer Station for sorting.

Once solid waste has been sorted at the Coachella Valley Transfer Station, it is typically disposed of at one of the two landfills that serve the City: (1) Badlands Sanitary Landfill, or (2) the Lamb Canyon Sanitary Landfill.

The Lamb Canyon Sanitary Landfill is permitted to receive 5,000 tons of solid waste per day. The total permitted capacity of the landfill is 38,935,653 cubic yards. As of 2015, the estimated remaining capacity of the Lamb Canyon Sanitary Landfill was 19,242,950 cubic yards.

The Badlands Landfill is currently permitted to receive 4,500 tons of trash per day. The total permitted capacity of the landfill is 33,560,993 cubic yards. As of 2015, the remaining capacity of this landfill was 15,748,799 cubic yards. Based on permitted daily disposal capacity, the estimated closure dates for the Lamb Canyon Landfill and the Badlands Landfill are 2022 and 2029, respectively. In addition, based on the proportion of acres currently permitted to accommodate solid waste compared to the total acreage of both the Lamb Canyon and the Badlands landfills, there is substantial potential for the future expansion of both landfills.

Electricity

The Project site is within the service territory of the Imperial Irrigation District's (IID) Energy Division. IID provides electric service to the area around the Project via a 92 kilovolt (kV) subtransmission and 13 kV distribution systems. IID is the third largest public power provider in the State, providing service to 145,000 customers in the Counties of Imperial, Riverside, and San Diego. In addition, IID provides more than 3,218,000 megawatt (MW) of energy to portions of the Imperial Valley and parts of Riverside and San Diego Counties.

The Coachella General Plan Update Final EIR (2015) provides the following discussion of IID's distribution system and electrical facilities in or proximate to the City of Coachella. The IID has a distribution system that contains 112 substations, 3,402 miles of overhead distribution lines, 675 miles of underground distribution lines, and 125,616 active meters. Electricity is delivered to the City of Coachella via a 230 kV transmission line located in Indio Hills, which is north of the City of Coachella. Electricity is transferred from this transmission line to one of the four substations in the Planning Area maintained by IID. These four substations which include the Coachella Valley Substation, Coachella City Substation, 52nd Avenue Substation, and Thermal Substation. These four facilities are brief discussed below.

- Coachella Valley Substation – This facility is located at 52nd Avenue and Pierce Street. The facility is one of the major injection points of power into the Coachella Valley's 92 kV sub-transmission network. Two transformers, each rated 150 million volt amperes (MVA), convert the voltage from 230 kV to 92 kV lines. A third transformer, rated 125 MVA, converts voltage from 161 kV to 92 kV.
- Coachella City Substation – This facility is located on Highway 111 north of 52nd Avenue and is a major sub-transmission station. Power is received on two 92 kV lines from the

Coachella Valley Substation and rerouted over six other 92 kV lines. There are also four gas turbine generators located at this site. Each generator is rated at 20 MW.

- 52nd Avenue Substation – This facility is located on 52nd Avenue, east of Tyler Street. The facility is a distribution substation with one 28 MVA transformer which converts the voltage from 92 kV to 12.47 kV.
- Thermal Substation – This facility is located on Highway 111 at 50th Avenue. The facility is a distribution substation with one 12.5 MVA transformer, which converts the voltage from 92 kV to 12.47 kV, and electrical distribution lines that transmit power between from 92 kV and 230 kV.

IID is presently engaged in a project to extend a 230 kV transmission line to the 42nd Avenue substation, located on 42nd Avenue, west of Madison Street. The purpose of the project is to prevent potential overloads at the Coachella Valley Substation. Southern California Edison has a major transmission corridor in Indio Hills, which contains three regional transmission lines. One 230 kV line is owned by IID and Southern California Edison owns a 220 kV line and a 500 KV line operating along this corridor.

Electrical distribution lines transmit power from the substations to individual users. As noted above, these transmission lines transmit power from 92 kV to 230 kV. The Coachella Valley Substation functions as a key link between IID and Southern California Edison and has allowed IID to strengthen its access to the rest of the power grid. In the event that the power flow from the Imperial Valley is disrupted, IID could use this route to service its customers in the Coachella Valley.

Natural Gas

The Project site is within the service territory of Southern California Gas (SCG). SCG is the largest natural gas distribution utility in the nation, serving approximately 20.9 million consumers through 5.8 million gas meters in over 500 communities. The service area for SCG consists of over 20,000 square miles throughout central and southern California. Of the current total 134 billion cubic feet (cf) of storage capacity for southern California, 81 billion cf are allocated by SCG to residential, small industrial, and commercial customers. In an effort to ensure that natural gas is always available to its customers, SCG employs the use of four underground storage tanks. These facilities help balance the energy supply and demand.

SCG operates a gas distribution facility west of the Project site in the City. North of the Project site and Interstate 10, SCG operates two high-pressure transmission lines. These high-pressure lines are 20-inches and 12-inches in diameter and traverse from Texas to San Pedro, California. Approximately 6 miles east of the Project site, the existing transmission gas mains connect SCG's compressor station in Moreno Valley with SCG's monitoring station.

Telecommunications

Telephone service is primarily provided to the Project site and surrounding areas by Verizon. Cable television service is primarily provided to the Project site and surrounding areas by Time Warner Cable. Currently, Time Warner Cable provides cable television to the City, including the Project area. Verizon currently operates copper and fiber optic facilities from its Coachella Central Office in the City. Verizon also provides high speed fiber optic communications and

internet services to residences and businesses throughout southern California, including to the City.

Related Regulations

Federal Safe Drinking Water Act (SDWA)

The Federal Safe Drinking Water Act (42 U.S.C Section 300f et seq.) 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 United States Environmental Protection Agency (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 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, CCR, Division 4, Chapter 15, Domestic Water Quality and Monitoring Regulations).

California Urban Water Management Planning Act (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% reduction in per-capita urban water consumption by the year 2020, as required in the Water Conservation Bill of 2009 SBX7-7. 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 UWMPs. The plans must be prepared every 5 years and submitted to the California Department of Water Resources for review. A 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 5-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.

Water Conservation Act of 2009 (SBx7-7)

The Water Conservation Act of 2009 (CWC Sections 10608 et seq.) establishes the goal of achieving a statewide 20 percent reduction in urban per capita water use by December 31, 2020. SBX7-7 substantially expanded the role of UWMPs by requiring all urban retail water suppliers to develop baseline daily per capita water use data, urban water use targets, and other technical information, and to report all of the information in their 2010 UWMPs.

Senate Bill 1420 (SB 1420)

Senate Bill 1420, enacted on September 19, 2014, updates state law (CWC, Part 2.6, Chapter 3 et seq.) to require urban water suppliers to file their water management plans with the Department of Water Resources (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 (AB 2067)

Assembly Bill 2067, enacted on September 19, 2014, further amends 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, as provided. The bill would require, for urban retail water suppliers, the narrative to address the nature and extent of each water demand management measure implemented over the past 5 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 would require each urban water supplier to submit its 2015 plan to the DWR by July 1, 2016.

Senate Bill 610 (SB 610)

Enacted on October 9, 2001, Senate Bill 610 (SB 610) resulted in additions and amendments to CWC Sections 10910-10915 and 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 Water Supply Assessment (WSA) to support the proposed development.

Senate Bill 221 (SB 221)

Senate Bill 221 (SB 221), enacted October 9, 2001, amends state law (BPC Section 11010 and CGC 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 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 of 2006

In September 2008, the Water Conservation in Landscaping Act was amended in accordance with Assembly Bill 1881 (AB 1881) (California Government Code Section 65591 et seq.). 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 DWR's 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 nonpotable 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 California Code of Regulations (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.

2010 California Green Building Standards Code (CALGreen Code) (Sec. 4.304) Irrigation Controllers. The 2010 CALGreen Code now requires new residences to install weather or soil moisture irrigation controllers starting in 2011. Studies have shown that these controllers result

in an additional 13 percent water savings. Beginning in 2011, all landscape irrigation demand for future residential development should be reduced an additional 13 percent.

2010 California Green Building Standards Code for Non-Residential. The 2010 CALGreen Code also includes standards for non-residential buildings. Separate meters or metering devices must be installed to help reduce indoor water use. For example, for buildings in excess of 50,000 square foot (sf), separate submeters must be installed for each individual leased, rented, or other tenant space within the building projected to consume more than 100 gallons per day (gpd). Submeters must also be installed for spaces used for laundry or cleaners, restaurant or food service, medical or dental office, laboratory, or beauty salon or barber shop projected to consume more than 100 gpd.

California Urban Water Conservation Council Memorandum of Understanding. The California Urban Water Conservation Council (CUWCC) was created to increase efficient water use statewide through partnerships among urban water agencies, public interest organizations, and private entities. The CUWCC's goal is to integrate urban water conservation Best Management Practices (BMPs) into the planning and management of California's water resources. The CUWCC MOU was signed by nearly 100 urban water agencies and environmental groups in December 1991. Since then the CUWCC has grown to 389 members. The MOU is a policy document that establishes guidelines to achieve a baseline water conservation level in given water service areas. Signers of the MOU agree to set goals in an effort to meet standards established by the MOU. The City became a signatory to the MOU in November 2000. The City has established programs to reduce water demands, including residential water audits, residential plumbing retrofits, and large landscape ordinances.

Legal Decisions Regarding Water Supply Analyses under CEQA. The California Supreme Court has provided additional guidance regarding a lead agency's consideration of water supplies for purposes of CEQA review. In reviewing the CEQA and WSA analyses for a long-term, multiphase master-planned community, *Vineyard* states that CEQA does not require assurances of certainty regarding future water supplies at the early phase of planning and project approval, such as the approval of a specific plan without construction permits or a subdivision map. The Court found that requiring water supply certainty at an initial approval stage of a long-term, large-scale development project would likely be unworkable because water planning would far outpace land use planning. Consequently, the certainty required for potential water sources for a project varies with the stage of project approval and is much lower when a conceptual plan is approved than at the time when building permits are sought. Specifically, the Court noted that a WSA prepared in connection with CEQA at the early stages of a master-planned community is not required to provide the same level of water supply assurances that are required in a Written Verification prepared under SB 221 at the subdivision map approval stage.

California Integrated Water Management Act of 1989

The California Integrated Waste Management Act of 1989 (more commonly referred to as Assembly Bill 939), required all California cities and counties to implement programs to reduce, recycle, and compost at least 50 percent of wastes by 2000 [Public Resources Code (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

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.

Appendix F of the California Environmental Quality Act (CEQA) Guidelines

Appendix F, Energy Conservation, states that Environmental Impact Reports (EIRs) are required to include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. In addition, Appendix F seeks inclusion of information in the EIR addressing the following:

- Measures to reduce wasteful, inefficient, and unnecessary consumption of energy during construction, operation, and maintenance of the project;
- The siting and orientation of buildings and structures to minimize energy consumption, including transportation energy;
- Measures for reducing peak energy demand;
- Incorporation of alternative fuels (particularly renewable ones) or energy systems; and
- Incorporation of recycling of nonrenewable resources.

California Code of Regulations

California Code of Regulations 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 Assembly Bill 970 to reduce California's electricity demand. The new standards went into effect on August 1, 2009. The standards (along with standards for energy efficient appliances) have saved more than $206 billion in electricity and natural gas costs since 1978. It is estimated the standards will save an additional $23 billion by 2013.

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 and Regional Plans and Policies

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 subregional and local level, and more specifically in and around the City of Coachella, water resources are cooperatively managed by regional and retail water agencies such as CVWD, the Coachella Water Authority, the Indio Water Authority, and others.

In accordance with the UWMP Act, the Integrated Water Resources Management Planning Act (CWC 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 SOI.[7] Those planning documents include, but are not limited to:

- City of Coachella 2010 Urban Water Management Plan (City 2010 UWMP);
- Coachella Valley Water District 2015 Urban Water Management Plan (CVWD 2010 UWMP);
- Coachella Valley Water District 2010 Coachella Valley Water Management Plan Update (2010 CVWMP Update);
- Coachella Valley Water District Coachella Valley Water Management Plan Update Final Subsequent Programmatic Environmental Impact Report (2011 SPEIR); and
- Final Coachella Valley Integrated Regional Water Management Plan (2010 IRWMP).

City of Coachella Municipal Code

The City of Coachella Municipal Code contains several provisions that are expressly designed to reduce the stream of solid waste going to landfills, as well as meet State mandated waste diversion goals. Specifically, the following provision of the Municipal Code regulates impacts on solid waste facilities serving the City:

Chapter 15.54.040(B) - New Construction. All covered projects must do the following:

1. Meet the diversion requirement of at least fifty (50) percent of all construction waste.
2. Submit a construction and demolition waste plan (on the required forms).

[7] City of Coachella Draft Vista Del Agua Water Supply Assessment, dated March 2015.

3. 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.

City of Coachella General Plan

The City of Coachella's recently adopted General Plan Update (2015) includes a number of goals and policies intended to facilitate the City's vision of long-term growth, development and conservation between now and 2035. The Program Environmental Impact Report (PEIR) prepared in conjunction with the General Plan Update (2015) document evaluates potential impacts to the environment as a result of development in accordance with the updated General Plan. Section 4.14, Utilities, and Section 4.16, Water Supply + Wastewater, of the PEIR provides a complete discussion of the existing environment and regulatory framework for the analysis of impacts on utilities and service systems and water supply and is incorporated by reference. The PEIR may be reviewed at the City of Coachella, 1515 Sixth Street, Coachella, CA, 92236 and is available online at http://www.coachella.org/services/document-central/-folder-20.

City of Coachella General Plan Goals and Policies

The following General Plan Update 2015 goals and policies address impacts on utilities and service systems and water supply. A number of policies are included under other chapters of the EIR where they may be more appropriate to address (e.g., Air Quality, Greenhouse Gas, Transportation, etc.).

Land Use + Community Character Element

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.

2.12 High priority development areas. Identify subareas 5, 6, 7, 8, 9, 10, and 11 as Priority Growth Areas to be targeted for growth through City policies and actions and to receive priority for funding, community facilities and services.

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.

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.

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.

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.

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.

10.2 Concurrency. Prohibit the issuance of precise grading plans and building permits unless the City has made a determination that adequate stormwater facilities, parks, solid waste, water, sewer and transportation facilities are operating to serve each phase of development.

10.3 Phasing of project site improvements. Require that new subdivisions complete the public improvements before occupancy inspections unless a development agreement is implemented.

Goal 13. Fiscal Stability. A City with thorough economic development strategies and reasoned decisions based on sound fiscal policies.

13.1 Fiscal impact assessment. For all major development projects, including but not limited to specific plans, annexations and changes in General Plan designations for areas over 20 acres in size, require a fiscal impact assessment to determine possible fiscal impact of the development project and use the information to formulate conditions of approval for the project.

13.7 Fiscal impacts of infrastructure: When considering new development proposals, discourage developments that require the construction of new infrastructure across large expanses of the City's undeveloped areas.

Sustainability + Natural Environment

Goal 1. Climate Change. A resilient community that is prepared for the health and safety impacts of and minimizes the risks of climate change.

1.12 Reduced water supplies: When reviewing development proposals, consider the possibility of constrained future water supplies and require enhanced water conservation measures.

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.

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.

2.5 Construction standards: Consider and evaluate new construction practices and standards that increase building energy efficiency.

2.6 Energy performance targets – new construction: Require new construction to exceed Title 24 energy efficiency standards by 15 percent and incorporate solar photovoltaics.
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.

Goal 3. Water Resources. Protected and readily available water resources for community and environmental use.

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.

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.

3.3 Greywater: Support the use of greywater and establish criteria and standards to permit the safe and effective use of greywater (also known as on-site water recycling).

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.

3.7 Landscape design: Encourage the reduction of landscaping water consumption through plant selection and irrigation technology.

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.

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.

3.10 Retention Basins: Establish requirements for water storage of a certain size be stored underground to preserve land. Include storm water retention basins to be underground in future development.

Goal 4. Green Building. Community building stock (both new construction and renovations) that demonstrates high environmental performance through green design

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.

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.

Goal 7. Waterways. Waterways and desert washes that serve a natural, environmental function and provide aesthetically pleasing open space for the community.

7.2 Development impacts: When considering development applications, require consideration of onsite detainment of stormwater runoff and require the incorporation of appropriate stormwater treatment and control measures, in accordance with the most recent NPDES permit requirements.

Infrastructure + Public Services Element

Goals 1. Citywide Utilities. A healthy community with well maintained, efficient, high-quality public infrastructure facilities and services throughout the city.

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.

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.

2.5 Water supply for new development: Ensure water supply capacity and infrastructure capacity is in place before granting building permits for new development.

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.

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.

2.13 Water-efficient landscaping: Require the use of water-efficient landscaping in all new development.

2.14 Grey water: Strongly encourage new development to utilize on-site grey water systems.

Goal 3. Wastewater Systems. Adequate and reliable sewer and wastewater facilities that collect, treat and safely dispose of wastewater.

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.

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.
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.

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 5. Solid Waste Management. An integrated solid waste management system that recycles resources locally and minimizes contributions to the county landfill.

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.

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.

4.15.3 Thresholds of Significance

This subchapter of the EIR will rely upon the City's Initial Study as the primary source of a significance threshold, which indicates that impacts related to Utilities and Service Systems may be considered potentially significant if the Project would cause the following adverse impact:

a. Would the Project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

b. Would the Project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
c. Would the Project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
d. Would the Project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
e. 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?
f. Would the Project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
g. Would the Project comply with federal, state, and local statutes, and regulations related to solid waste?
h. Would the Project require or result in the construction of new facilities or the expansion of existing facilities; the construction of which could cause significant environmental effects to Electricity?
i. Would the Project require or result in the construction of new facilities or the expansion of existing facilities; the construction of which could cause significant environmental effects to Natural gas?
j. Would the Project require or result in the construction of new facilities or the expansion of existing facilities; the construction of which could cause significant environmental effects to Communication systems?

4.15.4 Potential Impacts

THRESHOLD a: Would the Project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than Significant Impact

Compliance with federal regulations for both wastewater plant operations and the collection systems which convey wastewater to the Wastewater Treatment Facility (WWTF) falls within the responsibility of local governments and water districts. Proper operation and maintenance is critical for sewage collection and treatment as impacts from these processes can degrade water resources and affect human health. For these reasons, Publicly Owned Treatment Works (POTWs) receive Waste Discharge Requirements (WDRs) or National Pollutant Discharge Elimination System (NPDES) permits to ensure that such wastewater facilities operate in compliance with water quality regulations set forth by federal and State governments. WDRs and NPDES permits, issued by the State, establish effluent limits on the kinds and quantities of pollutants that POTWs can discharge. These permits also contain pollutant monitoring, recordkeeping, and reporting requirements. Each POTW that intends to discharge into the nation's waters must obtain a permit prior to initiating its discharge. NPDES permits are further discussed in detail in Subchapter 5.9, Hydrology and Water Quality of the EIR.

Wastewater generated within the Specific Plan area would be routed to and treated by the City's existing WWTF. Because the WWTF is considered to be a POTW, operational discharge flows treated at the WWTF must comply with permits issued by the Colorado River Basin Regional

Water Quality Control Board (RWQCB). Specifically, the POTW discharges are governed by WDRs issued for each individual POTW. For the City's WWTF, the Colorado River Basin RWQCB adopted WDRs Order No. R7-2005-0083 (NPDES Permit No. CA0104493) on June 29, 2005. WDRs Order No. R7-2005-0083 specifies effluent limitations, prohibitions, specifications, and provisions necessary to protect the beneficial uses of the surface and ground waters within the Colorado River Basin Region. Since wastewater from the Project site would be regulated by the Colorado River Basin RWQCB adopted WDRs Order No. R7-2005-0083, compliance with the WDRs would ensure that wastewater discharges generated by the Project and treated by the WWTF system would not exceed applicable Colorado River Basin RWQCB wastewater treatment discharge requirements.

As indicated under subsection 4.15.2 Environmental Setting, Wastewater, above, the Project is required to pay Development Impact Fees for water and wastewater facilities as part of the water and sewer collection fees for new development in the City. With the recent expansion of the City's WWTF, there is adequate capacity to accommodate the increase in wastewater demand from the proposed Project. Therefore, the Project will not result in impacts related to the exceedance of wastewater treatment requirements or require the construction of new or expanded WWTFs. Impacts are considered less than significant.

Would the Project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects

THRESHOLD b: **Would the Project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Less than Significant Impact

Water

The City's 2015 UWMP, CVWD's 2015 UWMP, and CVWD's 2010 CVWMP demonstrate that the total projected water supplies available to CVWD and the City are sufficient to meet the water demands of the proposed Project and other demands throughout the City and CVWD service areas during normal, single-dry and multiple-dry periods throughout the year 2035 and beyond.

More importantly, those conclusions are made in the context of water demands associated with projected population growth in the City and CVWD service areas for the next 20 years – the standard established under the UWMP Act. Yet the UWMP Act standard is much more inclusive than the standards set forth by SB 610 and CEQA. Indeed, the water supply sufficiency standard established under SB 610 and CEQA is whether the total projected water supplies available to the City and CVWD over the next 20-year period is sufficient to meet the projected demand associated with the Project in addition to existing and planned future uses.

Future water demands associated with the Project and "planned future uses" within the City and CVWD are considerably less than future water demands associated with projected population growth within the City and CVWD. Lastly, the projected water demands associated with the

Project have been already been accounted for as part of CVWD's regional water supply planning efforts, which specifically include population projections within the City and the City's Sphere of Influence. The Project will be required to pay the applicable water connection fees at the time of building permit issuance in order to provide funding for existing and future facilities. This is reflected in **Standard Condition SC-UTIL-1**, in subsection 4.15.5, below. This is a standard condition and is not considered unique mitigation under CEQA.

Any impacts are considered less than significant.

Wastewater

As stated above, the Coachella Sanitary District (CSD) is the service provider for the Project site.

The City's wastewater collection system includes approximately 340,000 linear feet of wastewater conveyance pipeline which is powered by two pump stations and conveyed to the City's Wastewater Treatment Plant (WWTP), located near Avenue 54 and Polk Street. The WWTP is an existing 30-acre domestic wastewater treatment facility that has been recently upgraded by the City and has an existing treatment capacity of approximately 4.9 mgd with an average daily flow of 2.9 mgd. As shown on **Table 4.15.4-3, *Vista Del Agua Sewer Generation***, below, the Project will add approximately 523,710 gpd to this system. This is well within the capacity of the existing facility.

The Project will be required to pay the applicable sewer connection fees at the time of building permit issuance in order to provide funding for existing and future facilities. This is reflected in **Standard Condition SC-UTIL-1**, in subsection 4.15.5, below. This is a standard condition and is not considered unique mitigation under CEQA.

Any impacts will be considered less than significant.

THRESHOLD c: Would the Project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact

This issue was discussed in great detail in Chapter 4.9, Hydrology and Water Quality, of this EIR. Impacts were considered less than significant. **Standard Conditions SC-HYD-1**, **SC-HYD-2**, **SC-HYD-3**, and **SC-HYD-4** (construction general permit, water quality management plans, BMPs, and hydrology reports, respectively) were included on the Project to address Project effects upon storm water drainage facilities. The reader should refer to Subchapter 4.9.5, Standard Conditions and Mitigation Measures.

Therefore, consistent with the analysis in Chapter 4.9, the Project will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects with the inclusion of **Standard Conditions SC-HYD-1**, **SC-HYD-2**, **SC-HYD-3**, and **SC-HYD-4**. Impacts are less than significant.

THRESHOLD d: **Would the Project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

Less than Significant Impact

The Project includes a mixture of residential development (low density, medium density, and high density), mixed-use development with up to 281,400 square feet of commercial floor area, parks/recreation, and rights-of-way. **Table 4.15.4-1, *Proposed Vista Del Agua Land Use Summary***, below, outlines the land uses proposed for the Project. **Figure 2.1.2-1** illustrates the land uses proposed for the Project.

Table 4.15.4-1
Proposed Vista Del Agua Land Use Summary [1]

Plan Area	Land Use	Area (Acres)	Units
6	Single Family Residential (6.5 DU/ac)	71.65	466
5 / 7	Single Family Residential (5.5 DU/ac)	89.84	494
8	Single Family Residential (4.5 DU/ac)	14.78	67
2 / 3	Multi-Family Residential (20 DU/ac)	17.44	349
4	Multi-Family Residential (12 DU/ac)	22.05	265
1	General Commercial	16.80	-
10	Neighborhood Commercial [2]	8.27	-
-	Schools/Institutional	-	-
-	Industrial	-	-
9	Landscape Irrigation (Parks)	13.82	-
1	Open Space	0.81	-
-	Backbone Streets [3]	19.92	-
	Total:	**275.38**	**1,640**

Source: *WSA* (**Appendix J**)

As indicated in **Table 4.15.4-1**, above, the Project includes a mixture of residential development (low-density, medium-density, and high-density), mixed-use areas, parks/recreation, and rights-of-way. With the enactment of SBx7-7 and the requirements of that law to achieve a statewide reduction in per capita water use of 20 percent by the year 2020, the City's overall water use had declined approximately 28 percent over the last 5 years. As such, the City's existing water use factors, developed prior to these water conservation efforts, were outdated. Additionally, the 2009 and 2013 MOUs between the City and CVWD illustrate that projects relying on CVWD's Supplemental Water Supply program, such as this one, must strive to achieve consistency with the conservation programs identified in CVWD's 2010 CVWMP and the water use factors developed by CVWD for the use of supplemental water. In response, the City completed a Supplemental Water Supply Program and Fee Study (*SWS Study*).

The *SWS Study* provides an analysis and update to the City's annual water consumption factors (ACF), by land use. The ACFs were calculated using actual historical consumption by customers in each land use classification. After which, the most representative customers for

future growth were selected for each land use classification. These selections considered future land use densities and water conservation measures (e.g. limited use of turf areas, desert-friendly landscaping, high efficiency irrigation system, water efficient household fixtures, etc.). Further, the ACFs developed in the *SWS Study* are consistent with the per capita water use reduction goals of SBx7-7, ongoing conservation efforts, and water use factors developed by CVWD for the use of supplemental water.[8] These ACF's are used to estimate total water demands for a project according to its land uses and size (in acres). **Table 4.15.4-2, *Vista Del Agua Average Water Demands***, below, summarizes anticipated the total water demands of the Project based on these ACF's.

The following ACF's were applied to this Project:

- Single Family Residential ACF of 2.85 acre-feet per acre per year
- Multi-Family Residential ACF of 2.69 acre-feet per acre per year
- Commercial ACF of 1.78 acre-feet per acre per year
- Landscape Irrigation ACF of 1.80 acre-feet per acre per year

Table 4.15.4-2
Vista Del Agua Average Water Demands

Land Use	Units	Area (Acres)	City Consumption Factor (ac-ft/ac/yr)	Demand w/ City Factors (gpd)	Demand w/ City Factors (AFY)
Single Family Residential (6.5 DU/ac)	466	71.65	2.85	182,288	204.2
Single Family Residential (5.5 DU/ac)	494	89.84	2.85	228,566	256.0
Single Family Residential (4.5 DU/ac)	67	14.78	2.85	37,602	42.1
Multi-Family Residential (20 DU/ac)	349	17.44	2.69	41,879	46.9
Multi-Family Residential (12 DU/ac)	265	22.05	2.69	52,949	59.3
General Commercial	-	16.80	1.78	26,695	29.9
Neighborhood Commercial	-	8.27	1.78	13,141	14.7
Schools/Institutional	-	-	1.32	-	-
Industrial	-	-	0.96	-	-
Landscape Irrigation (Parks)	-	13.82	1.80	22,206	24.9
Open Space	-	0.81	0.00	-	-
Backbone Streets	-	19.92	0.00	-	-
Total:	**1,640**	**275.38**	**-**	**605,326**	**678.1**

Source: *WSA* (**Appendix J**)

Despite the data presented above and in **Table 4.15.4-2**, it must be noted that the City's Standard Specification and Procedures were developed many years ago, and certainly before the enactment of SBx7-7 and the requirements of that law to achieve a statewide reduction in per capita water use of 20 percent by the year 2020. To this end, the City is currently reviewing

[8] See City of Coachella Supplemental Water Supply Program and Fee Study, November 2016

its Standard Specifications and Procedures and water use factors in relation to new development proposals. In the meantime, however, CVWD recently completed a water system backup facilities charge study and, as part of that effort, updated and established water use factors that apply to new development within CVWD's retail service area. As shown in the Study, CVWD's updated water use factors are lower than the City's historic water use factors due to conservation efforts implemented to meet the regional and statewide goals of SBx7-7

For a variety of reasons, the City has determined that CVWD's updated water use factors can be applied to the proposed Project in lieu of the City's historic factors. As noted above, CVWD's updated factors are consistent with the per capita water use reduction goals of SBx7-7, whereas the City's Standard Specifications and Procedures were adopted prior to the enactment of SBx7-7. Furthermore, and as further illustrated in Project-Specific Water Conservation and Groundwater Reduction Measures below, the Project applicant has committed to ensuring that buildout of the Project will occur in a manner consistent with CVWD's efficient landscape ordinance. Indeed, the 2009 and 2013 MOUs between the City and CVWD illustrate that projects relying on CVWD's Supplemental Water Supply program must strive to achieve consistency with the conservation programs identified in CVWD's 2010 CVWMP and the water use factors developed by CVWD for the use of supplemental water. Moreover, CVWD's updated water use factors have already been applied to new development projects within CVWD's retail service area and have proven to be achievable depending on the character and unique design features of a given project.

As a general matter, new development projects within the City are required to implement the following measures to ensure the efficient use of water resources and to meet and maintain the goals of the 2010 CVWMP:

1. To the greatest extent practicable, native plant materials and other drought-tolerant plants will be used in all non-turf areas of Project landscaping. Large expanses of lawn and other water-intensive landscaped areas shall be kept to the minimum necessary and consistent with the functional and aesthetic needs of the Project, while providing soil stability to resist erosion;
2. Potential use of the Coachella Canal for construction water and Project landscaping may further reduce Project demand for potable water. This will be reviewed for feasibility and subject to agreements between the City and CVWD since the Project lies outside of the IID boundary;
3. In the event recycled water becomes available to the Project, the potential use of tertiary treated water will be reviewed to determine feasibility of its use for on-site landscaped areas to reduce the use of groundwater for irrigation;
4. The installation and maintenance of efficient on-site irrigation systems will minimize runoff and evaporation and maximize effective watering of plant roots. Drip irrigation and moisture detectors will be used to the greatest extent practicable to increase irrigation efficiency;
5. The use of low-flush toilets and water-conserving showerheads and faucets shall be required in conformance with Section 17921.3 of the Health and Safety Code, Title 20, California Code of Regulations Section 1601(b), and applicable sections of Title 24 of the State Code.

The Project will be required to comply with the goals of the 2010 CVGWMP. This is reflected in **Standard Condition SC-UTIL-2**, in subsection 4.15.5, below. This is a standard condition and is not considered unique mitigation under CEQA.

Consistent with these general requirements, the Project applicant has demonstrated its commitment to meeting and maintaining the water conservation goals of the 2010 CVWMP, as further provided below and in the Specific Plan.

The Specific Plan proposes an all-around approach to water efficiency. The proposed land use plan identifies trail corridors (paseos) that are intended to accommodate stormwater conveyance facilities that link to water quality treatment facilities designed to improve water quality on-site and limit downstream water quality impairments from the proposed development. Additionally, the Specific Plan proposes the efficient use of potable water through mandated building and site design requirements. The Specific Plan design strategies for water efficiency include:

- Reduce potable water demand through landscaping, non-potable reclaimed, well or canal water for irrigation purposes (when available), and high efficiency plumbing fixtures and appliances;
- Utilize high efficiency plumbing and fixtures;
- Utilize efficient irrigation controls to reduce water;
- Reduce the amount of irrigated turf in parks;
- Minimum of 75% of all front yard landscaping shall be limited to desert-scape or xeriscape materials;
- Implement an integrated stormwater collection and conveyance system 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;
- Support the development of reclaimed water supplies in the City of Coachella and the Specific Plan.

Landscaping within Specific Plan will complement the existing desert setting as well as provide parks and paesos for outdoor enjoyment and activity. The plant palette proposed in the Specific Plan contains drought tolerant plants approved for use by the City of Coachella. This palette serves as a guide and varieties may be substituted within each species if they are more appropriate for the Coachella Valley climate and/or Project design. Specific Plan landscape design strategies include:

- Utilize native plant choices to the greatest extent possible;
- Develop a plant palette that focuses on shading of pedestrian activity areas will promote use of non-motorized transportation and reduce the urban heat island effect;
- Promote the development of tree-lined streets to encourage walking, biking, and transit use, and reduce urban heat island effects;
- Minimum of 75% of all front yard landscaping shall be limited to desert-scape or xeriscape materials.
- Incorporate natural site elements (significant rock outcroppings, drainage corridors, bioswales) as design features;
- Use Low Impact Development (LID) techniques to control stormwater flows on-site;
- Incorporate stormwater and/or water quality facilities close to the source within each planning area, protecting site and regional water quality by reducing sediment and nutrient loads to water bodies on-site and downstream; and

- Mimic the predevelopment site hydrology by using site design techniques that store, infiltrate, evaporate, and retain runoff to reduce off-site runoff and facilitate groundwater recharge.

The following guiding principles set the general direction for design of the landscaped places if the Specific Plan community:

- Implementation of landscape concepts that use drought tolerant plant pallets that are low-water use and well adapted to the desert climates;
- Incorporate eco-friendly designs, such as optimizing building orientation, reducing potable water use for irrigation and implementing shade strategies;
- Alley-loaded design concepts, which maximize streetscapes with emphasis on pedestrians by providing shade, amenities and connectivity throughout the project site;
- Incorporate the latest design principles of environmental sensitivity, conservation, and sustainability into the landscape planning and design;
- Promote design concepts that create lots fronting to open space areas, creating community-gathering places for local residents;
- Provide structures, pedestrian friendly streets, bicycle lanes, sidewalks and public gathering places that facilitate local, non-vehicular transportation;
- Planting areas and medians will be irrigated with high efficiency automatic irrigation system;
- Collection and treatment of urban runoff using multiple water quality basins throughout the project;
- Utilize high-efficiency plumbing fixtures that meet or exceed the CALGREEN code.

The Project will be required to comply with the above referenced Design Features. This is reflected in **Standard Condition SC-UTIL-3**, in subsection 4.15.5, below. These are standard conditions and are not considered unique mitigation under CEQA.

Compliance with the Project-Specific Water Conservation and Groundwater Reduction Measures and incorporation of Specific Plan design strategies for water efficiency (**Standard Conditions SC-UTIL-1** through **Standard Conditions SC-UTIL-3**) will reduce impacts to existing water supplies to below a level of significance. Impacts are considered less than significant.

According to the Coachella Valley Water District letter dated 3/26/15:

"The development lies within the City of Coachella's water service area boundary. The District and the City have signed a Memorandum of Understanding (MOU) to work together to ensure sufficient water supplies for new development. The District requests the City of Coachella require that the developer annex the area into the stormwater unit of the District. The area is protected from regional stormwater flows by a system of channels and dikes and may be considered safe from regional stormwater flows. The Project lies within the Study Area Boundary of the Coachella Valley Water Management Plan."

As a standard condition, in order to address the water supply contingency measures, the Project shall comply with the measures contained within the 2014 Water Shortage Contingency Plan (WSCP).

It is anticipated that any impacts will be addressed and potentially mitigated on a project-by-project basis. Therefore, any impacts are considered less than significant.

According to the Coachella Valley Water District letter dated 3/26/15:

"There are existing U.S. Bureau of Reclamation facilities not shown on the development plans, and the project may be required to use Nonpotable Colorado River water for specific uses."

The CVWD's 2010 UWMP identifies recycled water as another significant local resource that can be used to supplement the water supply of the Coachella Valley. Wastewater that is highly treated and disinfected can be reused for a variety of landscape irrigation and other purposes. Recycled water has been used for irrigation of golf courses and municipal landscaping in the Coachella Valley since 1968. It is expected that golf course irrigation will remain the largest use of recycled water in the future. Current and projected future uses of recycled water include irrigation of urban landscape and golf course lands. Recycled water use is limited by the lack of urban development in the east valley. As urbanization occurs in the future, a recycled water distribution system will be developed to serve recycled water for urban golf course irrigation and municipal irrigation.[9]

THRESHOLD e: **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?**

Less than Significant Impact

As stated above, the Coachella Sanitary District (CSD) is the service provider for the Project site.

The City's wastewater collection system includes approximately 340,000 linear feet of wastewater conveyance pipeline which is powered by two pump stations and conveyed to the City's Wastewater Treatment Plant (WWTP), located near Avenue 54 and Polk Street. The WWTP is an existing 30-acre domestic wastewater treatment facility that has been recently upgraded by the City and has an existing treatment capacity of approximately 4.9 mgd with an average daily flow of 2.9 mgd. Generation rate assumptions are as follows:

- Residential flow factor of 300 gpd/unit;
- Commercial (Retail) area assumes 1 EDU (300 gpd) per 2000 sq. ft. of office space; and
- Commercial (Office) area assumes 1 EDU (300 gpd) per tenant (assuming each tenant has 10,000 sq. ft. of area).

As shown on **Table 4.15.4-3, *Vista Del Agua Sewer Generation***, below, the Project will add approximately 523,710 gpd to this system. This is well within the capacity of the existing facility. Any impacts will be considered less than significant.

[9] CVWD 2010 UWMP, pp. 4-23

Table 4.15.4-3
Vista Del Agua Sewer Generation

Land Use	Units	Area (Acres)	Square Feet	EDU	Sewer Generation (gpd)
Single Family Residential (6.5 DU/ac)	466	71.65	N/A	466	139,800
Single Family Residential (5.5 DU/ac)	494	89.84	N/A	494	148,200
Single Family Residential (4.5 DU/ac)	67	14.78	N/A	67	20,100
Multi-Family Residential (20 DU/ac)	349	17.44	N/A	349	104,700
Multi-Family Residential (12 DU/ac)	265	22.05	N/A	265	79,500
General Commercial	-	16.80	191,337	95.7	28,710
Neighborhood Commercial	-	8.27	90,060	9	2,700
Schools/Institutional	-	-	N/A	N/A	
Industrial	-	-	N/A		
Landscape Irrigation (Parks)	-	13.82	N/A	N/A	0.00
Open Space	-	0.81	N/A	N/A	0.00
Backbone Streets	-	19.92	N/A	N/A	0.00
Total:	**1,640**	**275.38**	**281,397**	**1,745.68**	**523,710**

Source: La Entrada Draft Environmental Impact Report Wastewater Study https://laentradacommunity.com/

THRESHOLD f: Would the Project be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?

Less than Significant Impact

As discussed under subsection 4.15.2 Environmental Setting, Solid Waste, above, the City of Coachella currently contracts with Western Waste Industries (WWI) to provide solid waste collection and disposal management services. Municipal solid waste generated in the City of Coachella is taken to the Coachella Valley Transfer Station, located on Landfill Road east of Dillon Road and north of Interstate 10. A Joint Power Authority between the City of Coachella and the City of Indio acts as the permitted operator of the transfer station, while the County of Riverside is the permitted owner of the facility. Burrtec Waste Industries is the practical owner and operator of the site. In 2017, the facility was processing an average of 417 tons of waste per day (tpd), with a maximum capacity of 1,100 tpd.

The City has a curbside recycling program for single-family residences that serves to reduce waste sent to landfills. In 2006, the curbside recycling efforts translated into an approximate diversion rate of 44 percent citywide. Waste is sorted to remove recyclables and hazardous waste. Refuse is redirected to either the Lamb Canyon Landfill in Beaumont or the Badlands Landfill in Moreno Valley, and recyclables are redirected to their respective markets.

In addition, the Riverside County IWMP has instituted a means of managing long-term solid

waste issues. The plan includes source reduction, recycling and composting programs, household hazardous waste management programs, and public education awareness programs as a means to reduce, reuse, and recycle solid wastes.

As previously stated, the two County landfills which service the City of Coachella include the Lamb Canyon Landfill and the Badlands Landfill. The Lamb Canyon Sanitary Landfill is permitted to receive 5,000 tons of solid waste per day. The total permitted capacity of the landfill is 38,935,653 cubic yards. As of 2015, the estimated remaining capacity of the Lamb Canyon Sanitary Landfill was 19,242,950 cubic yards.

The Badlands Landfill is currently permitted to receive 4,500 tons of trash per day. The total permitted capacity of the landfill is 33,560,993 cubic yards. As of 2015, the remaining capacity of this landfill was 15,748,799 cubic yards. Based on permitted daily disposal capacity, the estimated closure dates for the Lamb Canyon Landfill and the Badlands Landfill are 2022 and 2029, respectively. In addition, based on the proportion of acres currently permitted to accommodate solid waste compared to the total acreage of both the Lamb Canyon and the Badlands landfills, there is substantial potential for the future expansion of both landfills.

Build out of the proposed Project would generate approximately 98.7 tpd of solid waste as shown in **Table 4.15.4-4, *Generation of Solid Waste at Project Buildout***. Because the permitted daily capacities for the Badlands and Lamb Canyon Sanitary Landfills are 4,500 and 5,000 tpd, respectively, the total solid waste generated at Project build out would represent approximately 2 (98.7/4,500 = 0.02) and 2 percent (98.7/5,000 = 0.02) of the maximum daily permitted capacity of the Badlands and the Lamb Canyon Sanitary Landfills, respectively.

Table 4.15.4-4
Generation of Solid Waste at Project Build Out

Solid Waste Generation	Generation Rate[1]	Project Development	Solid Waste Generation	Total Solid Waste Generation
Residential	0.41/tons/unit/year	7,800	3,198 tons/year	8,76 tons/day
Mixed Use				
Commercial	0.024/tons/square	1,260,879	30,261 tons/year	82.91 tons/day
Office	.006/lbs./square feet/day	250,000	1,500 tons/year	4.11 tons/day
Total				**98.7tons/day**

Source: LSA Associates, Inc. (May 2013).
[1] Riverside County General Plan, Final EIR, http://www.rctlma.org/genplan/content/eir/volume1.html#4.15.3, accessed May 13, 2013.
[2] 1 ton = 2,000 lbs.
EIR = Environmental Impact Report
lbs. = pounds
Source: La Entrada Draft Environmental Impact Report https://laentradacommunity.com/

The City of Coachella Municipal Code contains several provisions that are expressly designed to reduce the stream of solid waste going to landfills, as well as meet State mandated waste diversion goals. Specifically, the following provision of the Municipal Code regulates impacts on solid waste facilities serving the City:

Chapter 15.54.040(B) - New Construction. All covered projects must do the following:

1. Meet the diversion requirement of at least fifty (50) percent of all construction waste.
2. Submit a construction and demolition waste plan (on the required forms).
3. 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.

Standard Condition SC-UTIL-4 requires all construction activities to comply with Chapter 15.54.040(B) of the City's Municipal Code. This is a standard condition and is not considered unique mitigation under CEQA.

During operations, the Project will be required to participate in curbside recycling and compliance with Riverside County's IWMP will reduce Project impacts on existing solid waste facilities and mandated AB 939 diversion goals. This is included as **Standard Condition SC-UTIL-5**. This is a standard condition and is not considered unique mitigation under CEQA. Any impacts are considered less than significant.

THRESHOLD g: Would the Project comply with federal, state, and local statutes, and regulations related to solid waste?

Less Than Significant Impact

Solid waste practices in California are governed by multiple federal, State, and local agencies that enforce legislation and regulations ensuring that landfill operations minimize impacts to public health and safety and the environment. Recycling plays an important role in how solid waste is managed by Burrtec Waste Industries. Burrtec Waste Industries emphasizes the importance of recycling because it reduces the demand on existing landfills and reduces the need for landfills. In addition, Burrtec Waste Industries maintains a goal of operating in a way to ensure the environment is preserved and sustained for future generations.[10]

It should be noted that the City complies with all federal, State, and local statutes and regulations related to solid waste see **Standard Condition SC-UTIL-5**). The proposed Project would comply with solid waste diversion requirements established by California Green Building Standards Code (CalGreen), requiring the diversion of at least 75 percent of solid waste. The City's Municipal Code requires all new construction to meet the State requirement (California Integrated Water Management Act of 1989) of at least 50 percent diversion for all construction waste (see **Standard Condition SC-UTIL-4**). Therefore, the proposed Project would comply with federal, State, and local statutes and regulations related to solid waste. Any impacts are considered increment, yet less than significant.

THRESHOLD h: Would the Project require or result in the construction of new facilities or the expansion of existing facilities; the construction of which could cause significant environmental effects to Electricity?

Less Than Significant Impact

It is anticipated that the Coachella City Substation will continue to be the primary source of electricity for the area, including the Project. This line will not be impacted by the Project. All

[10] Burrtec Waste Industries, Organic and Food Waste Recycling, http://www.burrtec.com/organic-and-food, accessed April 24, 2013.

new distribution lines will be constructed as underground facilities concurrently with Project development.

It is possible that interruption of existing service could occur off-site during construction, but this impact is considered minimal.

Standard Condition SC-UTIL-6 requires the Project be consistent with California Code of Regulations Title 24, Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings. This is a standard condition and is not considered unique mitigation under CEQA. Any impacts are considered less than significant.

THRESHOLD i: Would the Project require or result in the construction of new facilities or the expansion of existing facilities; the construction of which could cause significant environmental effects to Natural Gas?

No Impact

It is anticipated that natural gas will supply the site from regional natural gas lines that traverse the City, including two 30-inch lines and a 36-inch line located along the powerline corridor within the Mecca Hills. The distribution network in the City of Coachella connects to these regional lines through an 8-inch, 6-inch, and 4-inch high-pressure lines. It is possible that interruption of existing service could occur off-site during construction, but this potential is considered minimal. No impacts will occur.

THRESHOLD j: Would the Project require or result in the construction of new facilities or the expansion of existing facilities; the construction of which could cause significant environmental effects to Communication Systems?

No Impact

The analysis of cable, telephone and internet services is defined as the service territory for Time Warner Cable and Verizon. These services are not operating above capacity. Both Time Warner Cable and Verizon would extend current facilities to meet Project service demands. With these infrastructure improvements, these service providers are anticipated to meet communication demands associated with past, present, and future development within the Project area.

Therefore, no impacts related to cable, telephone, and internet service will occur due to Project implementation.

4.15.5 Standard Conditions and Mitigation Measures

Standard Condition(s)

SC-UTIL-1 Prior to the issuance of a building permit, the Project proponent shall pay the applicable connection fee for water and sewer.

SC-UTIL-2 **The Project shall implement the following measures to ensure the efficient use of water resources and to meet and maintain the goals of the 2010 CVWMP:**

1. **To the greatest extent practicable, native plant materials and other drought-tolerant plants will be used in all non-turf areas of Project landscaping. Large expanses of lawn and other water-intensive landscaped areas shall be kept to the minimum necessary and consistent with the functional and aesthetic needs of the Project, while providing soil stability to resist erosion;**
2. **Potential use of the Coachella Canal for construction water and Project landscaping may further reduce Project demand for potable water. This will be reviewed for feasibility and subject to agreements between the City and CVWD since the Project lies outside of the IID boundary;**
3. **In the event recycled water becomes available to the Project, the potential use of tertiary treated water will be reviewed to determine feasibility of its use for on-site landscaped areas to reduce the use of groundwater for irrigation;**
4. **The installation and maintenance of efficient on-site irrigation systems will minimize runoff and evaporation, and maximize effective watering of plant roots. Drip irrigation and moisture detectors will be used to the greatest extent practicable to increase irrigation efficiency;**
5. **The use of low-flush toilets and water-conserving showerheads and faucets shall be required in conformance with Section 17921.3 of the Health and Safety Code, Title 20, California Code of Regulations Section 1601(b), and applicable sections of Title 24 of the State Code.**

SC-UTIL-3 **Implementing Projects within the Specific Plan shall incorporate the following design features:**

Design strategies for water efficiency include:

- **Reduce potable water demand through landscaping, non-potable reclaimed, well or canal water for irrigation purposes (when available), and high efficiency plumbing fixtures and appliances;**
- **Utilize high efficiency plumbing and fixtures;**
- **Utilize efficient irrigation controls to reduce water;**
- **Reduce the amount of irrigated turf in parks;**
- **Minimum of 75% of all front yard landscaping shall be limited to desert-scape or xeriscape materials;**
- **Implement an integrated stormwater collection and conveyance system 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;**
- **Support the development of reclaimed water supplies in the City of Coachella and the Specific Plan.**

Landscape design strategies include:

- **Utilize native plant choices to the greatest extent possible;**
- **Develop a plant palette that focuses on shading of pedestrian activity areas will promote use of non-motorized transportation and reduce the urban heat island effect;**
- **Promote the development of tree-lined streets to encourage walking, biking, and transit use, and reduce urban heat island effects;**
- **Minimum of 75% of all front yard landscaping shall be limited to desert-scape or xeriscape materials.**
- **Incorporate natural site elements (significant rock outcroppings, drainage corridors, bioswales) as design features;**
- **Use Low Impact Development (LID) techniques to control stormwater flows on-site;**
- **Incorporate stormwater and/or water quality facilities close to the source within each planning area, protecting site and regional water quality by reducing sediment and nutrient loads to water bodies on-site and downstream; and**
- **Mimic the predevelopment site hydrology by using site design techniques that store, infiltrate, evaporate, and retain runoff to reduce off-site runoff and facilitate groundwater recharge.**

General direction for design of the landscaped places:

- **Implementation of landscape concepts that use drought tolerant plant pallets that are low-water use and well adapted to the desert climates;**
- **Incorporate eco-friendly designs, such as optimizing building orientation, reducing potable water use for irrigation and implementing shade strategies;**
- **Alley-loaded design concepts, which maximize streetscapes with emphasis on pedestrians by providing shade, amenities and connectivity throughout the project site;**
- **Incorporate the latest design principles of environmental sensitivity, conservation, and sustainability into the landscape planning and design;**
- **Promote design concepts that create lots fronting to open space areas, creating community-gathering places for local residents;**
- **Provide structures, pedestrian friendly streets, bicycle lanes, sidewalks and public gathering places that facilitate local, non-vehicular transportation;**
- **Planting areas and medians will be irrigated with high efficiency automatic irrigation system;**
- **Collection and treatment of urban runoff using multiple water quality basins throughout the project;**
- **Utilize high-efficiency plumbing fixtures that meet or exceed the CALGREEN code.**

SC-UTIL-4 **The Project shall comply with the following provisions of the Municipal Code regulates impacts on construction solid waste:**

1. **Meet the diversion requirement of at least fifty (50) percent of all construction waste.**
2. **Submit a construction and demolition waste plan (on the required forms).**
3. **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.**

SC-UTIL-5 **The Project shall participate in curbside recycling and compliance with Riverside County's IWMP will reduce Project impacts on existing solid waste facilities and mandated AB 939 diversion goals.**

SC-UTIL-6 **The Project shall be consistent with the provisions of California Code of Regulations Title 24, Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings.**

Mitigation Measure(s)

No specific mitigation measures are required for utility and service systems resources.

4.15.6 Cumulative Impacts

According to CVWD, there is an adequate water supply and sewer capacity, respectively, to meet the demand of the Project(s). Based on the analysis above and in the referenced documentation, water and wastewater management systems are capable of meeting the cumulative demand for these systems. Recycled water is available in the CVWD system. Thus, the Project will not cause cumulatively considerable significant adverse impacts on these systems.

Cumulative impacts to landfill capacity will be less than significant due to the Project construction debris and operational waste representing a less than substantial cumulative increment with adherence to **Standard Conditions SC-UTIL-4** and **SC-UTIL-5**. Therefore, due to available capacity and implementation of the above **Standard Conditions**, which provide for recycling on site to reduce Project operational waste, cumulative impacts to the existing landfills resulting from waste generated by Project implementation are considered less than significant.

Since the project would constitute a small incremental increase of the current residential and commercial customer base and the Project is required to comply with California Code of Regulations Title 24, Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings (see **Standard Condition SC-UTIL-6**) and be served by existing service and transmission lines within and around the Project area, this Project's cumulative energy impacts are concluded to a less than significant cumulative impact.

As previously stated, the analysis of cable, telephone and internet services is defined as the service territory for Time Warner Cable and Verizon. Both Time Warner Cable and Verizon would extend current facilities to meet project service demands. As these services are not operating above capacity, these service providers are anticipated to meet communication demands associated with past, present, and future development within the project area.

Therefore, no cumulative impacts related to cable, telephone, and internet service will occur due to Project implementation.

4.15.7 Unavoidable Significant Adverse Impacts

The foregoing evaluation demonstrates that even though the Project will cause an unavoidable change in the demand for water and wastewater water utility systems, these various systems can be expanded to meet this increased demand and the facilities required to sustain these systems can be installed without causing an unavoidable significant adverse impact.

Implementation of the Project will result in the additional generation of construction and operational solid waste. Standard conditions address construction debris recycling and reuse to achieve a reduction in waste beyond the County requirement of a 50 percent reduction by weight. This would reduce the construction waste from the Project at a higher level than required by the City. Therefore, no significant and unavoidable impacts are anticipated.

The Project will comply with all Title 24 energy conservation requirements. No conflict with any adopted energy conservation plans would occur if the proposed Project is implemented. Implementation of the proposed Project will serve to implement energy conservation plans. No impacts are anticipated. No significant cumulative impacts are anticipated. The Project will not cause unavoidable significant adverse impacts with any adopted energy conservation plans.

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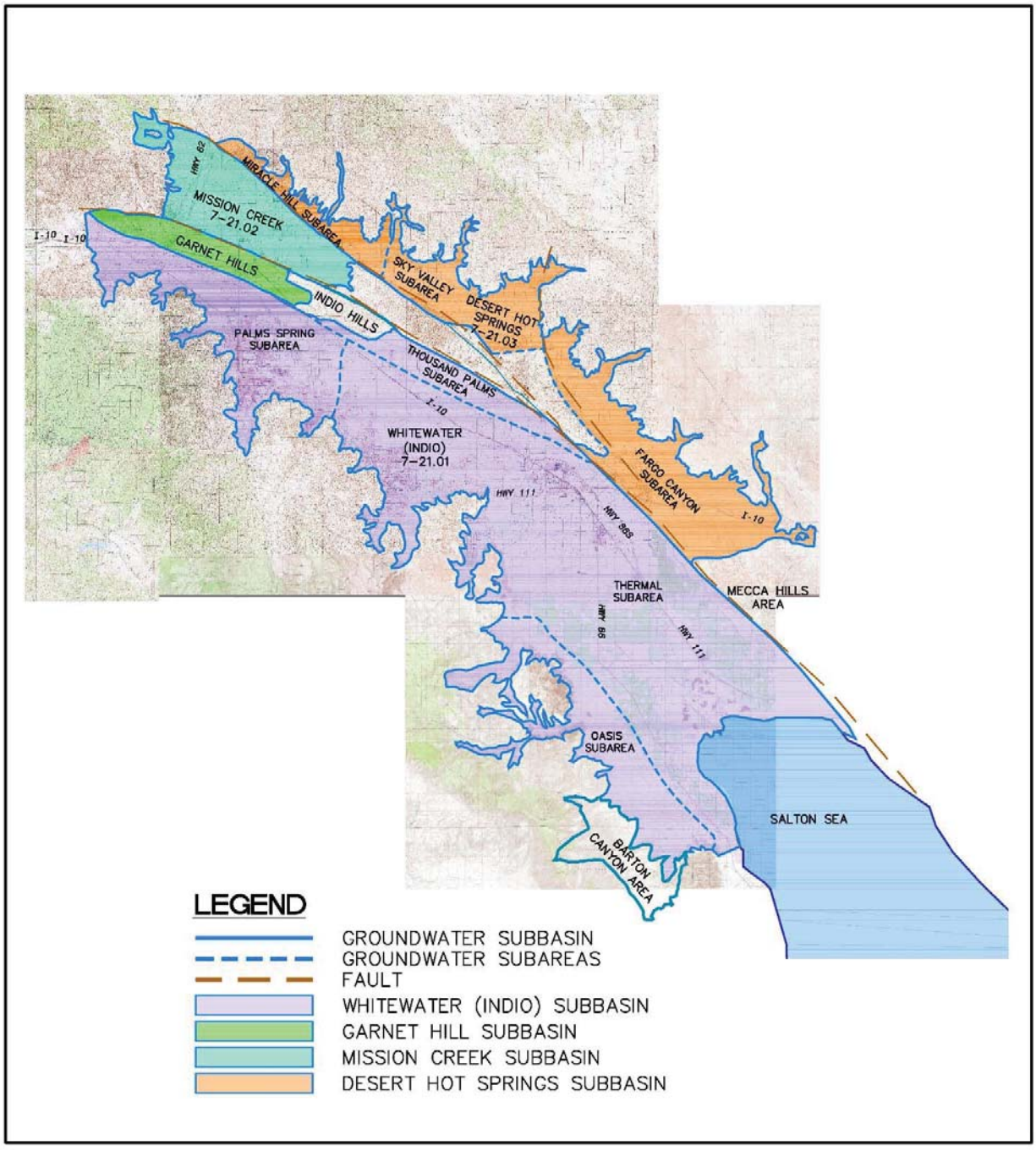
Figure 4.15.2-1
Coachella Valley Groundwater Sub-basins



Source: *WSA* (**Appendix J**)

CHAPTER 5 – ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) and the CEQA Guidelines require an evaluation of alternatives to the proposed action. The purpose of the alternatives evaluation under CEQA is to determine whether one or more feasible alternatives is capable of reducing potentially significant impacts of a preferred project to a less than significant level. The applicable text in the State CEQA Guidelines occurs in Section 15126 as follows:

> Section 15126.6 (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.*
>
> Section 15126.6 (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.*

The Project Objectives are defined in Chapter 3, Project Setting and Project Description. The Project's Objectives are as follows:

- Create a distinctive "sense of community" unifying areas through high quality design criteria and utilizing the natural surroundings;
- High Connectivity - Implement an aesthetically pleasing and functional community concept by integrating community areas, residential areas, parks and commercial areas through connection of walkways, paseos and trails;
- Provide community focus areas within walking distance between neighborhoods;
- Provide a balanced mix of economically viable commercial and residential land uses that will promote local job creation;
- Provide a transition blend of rural and suburban lifestyles; and
- Provide a diverse mix of housing options.

One of the alternatives that must be evaluated is the "no project alternative," regardless of whether it is a feasible alternative to the proposed Project, i.e. would meet the Project objectives or requirements. Under this alternative, the environmental impacts that would occur if the Project is not approved and implemented are identified.

In addition to the no project alternative, a second alternative of developing the Project site at a reduced residential density will be considered in this document. This would require standard subdivision improvements, such as paved access roads, managing drainage and undergrounding of utilities being delivered to each residential lot.

The Project could theoretically be developed at alternative locations within the vicinity of the Project site. However, the California Supreme Court determined that examination of infeasible alternatives need not be given exhaustive evaluation. Specifically, the court case Citizens of Goleta Valley v. Board of Supervisors, 1988 the court stated:

[A] Project alternative which cannot be feasibly accomplished need not be exhaustively considered. A feasible alternative is one which can be accomplished in a successful manner within a reasonable period of time, taking into account economic, legal, social and technological factors [Citations.] Surely whether a property is owned or can reasonably be acquired by the project proponent has strong bearing on the likelihood of a project's ultimate costs and the chances for an expeditious and successful accomplishment.

The State CEQA Guidelines, Section 15126.6(f)(1) state: *Feasibility. Among the factors that may be taken into account 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 alternatives.*

The Project site is approximately 275 acres in size with approximately 29 acres of off-site infrastructure improvements, totaling approximately 304 acres, both on and off-site. The alternative locations discussed in the previously certified La Entrada Draft Environmental Impact Report (La Entrada DEIR), which were determined to have potential as an alternative location were:

"Desert Lakes Property: The 1,500 ac Desert Lakes property on the north side of I-10 between Polk Street and Lincoln Street was considered as an alternative site. This alternative site would still need infrastructure to be brought up through La Entrada to get potable water and sewer flows to the Coachella Waste Water Treatment Plant at Avenue 54 and Polk Street.

Shadow View Area: The 750 ac Shadow View Specific Plan property and land adjacent to that property was considered. The Shadow View area is bounded on the west by the 86-S Expressway and Dillon Road, on the north by I-10, on the east by the Coachella Canal, and on the south by Avenue 50."

These alternative locations have been dismissed from this subchapter because they were not under the control of the applicant, and they are considerably larger in size than the proposed Project. Analysis of an alternative site is therefore not feasible.

A final (3rd) alternative has been selected for analysis. This is referred to as the Vista del Sur Access (VDSA) Alternative. This alternative is being analyzed in the event that the westerly extension of Avenue 48/Shadow View Boulevard cannot no be completed due to the need for the Project applicant to acquire the necessary right-of-way to install this roadway. Vista del Sur is a currently a dedicated City roadway which connects to the northerly extension of Street "A." This alternative would allow for the development of the Project as proposed, but with alternative connection to Dillon Road, to the west of the Project site.

No other alternatives to the proposed Project are given consideration or evaluated in this chapter since no other practical or feasible alternatives have been proposed. For example, a

light industrial or commercial project would have no demand in this Project area due to lack of adequate population to support commercial uses and the lack of any rationale for a light industrial uses to locate in this general Project area. Thus, the alternatives considered in this chapter include:

1 No Project Alternative (NPA);
2 Reduced Residential Density Alternative (RRDA); and
3 Vista del Sur Access Alternative (VDSA).

The following evaluation also includes identification of an environmentally superior alternative as required by the CEQA Guidelines. No other plausible alternatives were identified during the review process for consideration in this EIR.

In addition to the preceding subchapters, the following sources were used for the analysis in this Subchapter:

- The City of Coachella General Plan Update (2015) http://www.coachella.org/services/document-central/-folder-20;
- The City of Coachella General Plan Final EIR (2015) http://www.coachella.org/services/document-central/-folder-20;
- Vista Del Agua Specific Plan (**Appendix A**);
- La Entrada Specific Plan DEIR https://laentradacommunity.com/; and
- Tentative Parcel Map No. 36872 (**Appendix B**).

5.2 NO PROJECT

5.2.1 Overview of No Project Alternative

The No Project Alternative (NPA) is required under CEQA to evaluate the environmental effects associated with no action on the part of the Lead Agency. Pursuant to State CEQA Guidelines (Section15126.6[e][2]), the NPA should discuss what would reasonably be expected to occur, based on current plans and consistent with available infrastructure and community services, in the foreseeable future. The NPA includes continued use of the site(s) in their undeveloped states, and no additional changes to the existing land uses. This alternative evaluates the environmental impacts resulting from a hypothetical continuance of the existing land uses, as described in Chapter 3, Project Description.

Aesthetic Resources

The NPA would not result in any change to the current aesthetics of the Project site. The proposed Project's contribution to the change in visual setting within the Project area is considered to be an unavoidable significant adverse visual change. Aesthetic impacts from the NPA would be less than those of the proposed Project and eliminate a significant adverse impact.

Agriculture and Forestry Resources

The NPA would not change the current agricultural status of the Project site(s). The conversion of sites from vacant land to residential, commercial and open space uses will permanently remove the potential for the land to be farmed in the future. However, this change is consistent

with future land uses planned for the City in the General Plan Update (2015). Implementation of the Project (on-site and off-site components) will not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use. The eastern 30% of the property is currently covered with vineyards. The majority of the site is disturbed with evidence of ground clearing, as well as off-road vehicle use and illegal refuse dumping. Portions of the site are also being used as a paintball course. Under the NPA, will not have any impact on the farmlands discussed above. Based on this information, impacts from the NPA would be less than those of the Project.

Air Quality/Greenhouse Gas

Since no construction activity would occur, the NPA would not have any short-term impacts on air quality/greenhouse gas, as the site(s) are currently vacant. Also, no new, long-term sources of air pollution would result from increased traffic; or increased use of energy resources. No change from existing levels in carbon dioxide or other emissions related to global warming would result from the NPA.

During operation, on-site emissions would be negligible and would primarily consist of the intermittent on-site travel of motor vehicles. There, due to the lack of stationary source emissions, no long-term localized significance threshold analysis is warranted. The mitigated construction emissions incorporate **Standard Condition SC-AQ-1**, and **Mitigation Measures MM-AQ-1** through **MM-AQ-10**. Daily emissions CalEEMod outputs are located in Appendix A of the Air Quality/Greenhouse Gas (AQ/GHG) Analysis. The emissions will be below the South Coast Air Quality Management District (SCAQMD) thresholds of significance for regional construction emissions. Construction localized significance threshold (LST) emissions will be below the SCAQMD thresholds of significance for localized construction emissions. For all construction phases, the daily total construction emissions with standard control measures, would be below the daily thresholds established by the SCAQMD. Due to the distance of the nearest receptors from the proposed Project site and through compliance to SCAQMD's Rule 402, no significant impact related to odors would occur during operation. The potential risk for naturally occurring asbestos (NOA) during Project construction is small and less than significant.

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed Project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk." "Individual cancer risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively limited number of heavy- duty construction equipment and the short-term construction schedule, the proposed Project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk.

Long-term air pollutant emission impacts are those associated with stationary sources, mobile sources and area sources involving any project-related changes. The stationary source emissions would come from additional natural gas consumption for on-site buildings and electricity for the lighting in the buildings and at the parking area. Mobile sources are associated with new trips generated by the Project. Area sources include architectural coatings, consumer products, and landscaping. Energy sources include natural gas consumption for heating.

When the Project is fully operational, the Project would exceed SCAQMD regional thresholds for volatile organic compounds (*VOC*), oxides of nitrogen (NOx), and carbon monoxide (CO). Even with the incorporation of **Mitigation Measures MM-AQ-11** through **MM-AQ-13** the Project would have a significant and unavoidable impact.

The SCAQMD has demonstrated in the CO attainment redesignation request to the Environmental Protection Agency (EPA) that there are no "hot spots" anywhere in the air basin, even at intersections with much higher volumes, much worse congestion, and much higher background CO levels than anywhere in Riverside County. If the worst-case intersections in the air basin have no "hot spot" potential, any local impacts will be below thresholds.

The City of Coachella's Climate Action Plan provides direction on how the City plans to achieve a 15% reduction below 2010 (per service population) emissions by 2020. Projects that do not exceed 3,000 million metric tons of carbon dioxide equivalent (MTCO2e) per year will be consistent with the GHG Plan with the incorporation of **Mitigation Measures MM-AQ-10** through **MM-AQ-13** and the planting of approximately 2,406 new trees, the Project's emissions would be reduced to 3.27 MTCO2e/SP/yr, which meets the threshold. Therefore, operation of the proposed Project would not create a significant cumulative impact to global climate change. No significant unavoidable impacts are anticipated.

Overall, air quality impacts and cumulative greenhouse gas emissions from the NPA would be less than those of the Project.

Biological Resources

The NPA would not result in a change to the existing biology of the Project site(s). Development of the Project will contribute to the change of the general area with an intensification of development substantially greater than that which presently occurs on the site or in the surrounding vicinity. With the incorporation of **Mitigation Measures MM-BIO-1, MM-BIO-2**, and **Standard Conditions SC-BIO-1** and **SC-BIO-2**, the Project will not cause adverse cumulative effects related to the reduction of sensitive vegetation communities present in the City of Coachella and Riverside County because there are no such species located within the Project area and the Project can be implemented consistent with the criteria identified in the Coachella Valley Multi-Species Habitat Conservation Plan (CVMSHCP). No unavoidable significant impacts are anticipated.

Therefore, based on this information, the NPA would have lesser impacts on biological resources as those of the Project.

Cultural Resources

The NPA would not result in a change to the existing cultural resources of the project site and would not introduce large numbers of people into the area which can cause indirect impacts to cultural resources. The cultural resources information presented in Subchapter 4.6 indicates the proposed Project can be implemented without significant cultural resource impacts based on implementation of **Mitigation Measures MM-CUL-1** through **MM-CUL-5**. Therefore, based on this information, the NPA would have less overall impact to cultural resources than the proposed Project.

Geology and Soils Resources

The NPA would not involve additional development on the site; therefore, no people or structures are subject to onsite geological constraints. The proposed Project includes a geotechnical study that identifies the Project area as susceptible to seismic and geological hazards, such as groundshaking. According to the geotechnical study summarized for the project site in Subchapter 4.7, the proposed Project development at the project site is feasible from a geotechnical standpoint with implementation of **Mitigation Measures MM-GEO-1** through **MM-GEO-4**. No severe onsite geologic or soil-related hazards or constraints were identified that would preclude development of the site. The addition of people to the area would expose structures and humans to risk, but the nature of geologic risks can be mitigated. The NPA reduces overall risk to structures and future residents, but neither alternative would have any significant geology and soil impacts.

Hazards and Hazardous Materials

The NPA would not involve structural development on the site(s); therefore, few/much fewer people are subject to hazards and hazardous materials issues.

Development of the Project may result in releases of hazards and hazardous materials. According to the analysis above, with adherence to **Mitigation Measures MM-HAZ-1** through **MM-HAZ-5**, Project impacts will not exceed established thresholds for hazards and hazardous materials. The thresholds have been established to address project-specific impacts, as well as their contribution to cumulative impacts. Since the Project is below the established thresholds, cumulative impacts will remain less than significant. On the other hand, as the City grows, the demand for public service resources to respond to hazard and hazardous material grows incrementally. The Project will add to the cumulative demand for such resources. As stated in Subchapter 4.13.2.5, the Project will have an incremental impact to the City Fire Department's ability to provide an acceptable level of service. These impacts are forecast to include an increased number of emergency and public service calls due to the increased presence of structures and population.

Each project proponent shall participate in the Development Impact Fee to mitigate a portion of these impacts. This will provide funding for capital improvements such as land, equipment purchases and fire station construction. The Project will contribute incrementally to cumulative impacts related to the need to reduce cumulative effects on Fire Services.

The Project's potentially significant or cumulative considerable impacts to Fire Protection and Emergency Response (FPER) Services can be reduced to less than significant and payment of fees by all cumulative projects can effectively reduce the overall cumulative impacts to such services. Therefore, cumulative impacts are considered less than significant. No significant unavoidable impacts are anticipated.

Therefore, based on this information, even though any impacts will be fully mitigated, hazards and hazardous materials resources impacts from the NPA would be less than those of the Project.

Hydrology and Water Quality Resources

Under the NPA, the existing vacant site would remain and the site(s) would not be developed. The current hydrology would remain the same.

Based on the discussion in this subchapter of the EIR, implementation of the Project will not to substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site; violate any water quality standards or waste discharge requirements; substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted); create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map; place within a 100-year flood hazard area structures which would impede or redirect flood flows; otherwise substantially degrade water quality; include new or retrofitted stormwater Treatment Control Best Management Practices (BMPs) (e.g. water quality treatment basins, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g. increased vectors and odors); substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site; changes in absorption rates or the rate and amount of surface runoff; expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam (Dam Inundation Area); or, changes in the amount of surface water in any water body. City application materials, site-specific analysis, **Standard Conditions SC-HYD-1** through **SC-HYD-4**, and **Mitigation Measure MM-HYD-1**, will ensure that impacts to hydrology and water quality resources are fully addressed. Any impacts will be considered less than significant. No unavoidable significant impacts are anticipated.

Hydrology/water quality resources (primarily water quality) impacts from the NPA would be less than those of the Project.

Land Use and Planning

Under the No Project Alternative, the existing vacant site would remain and the site(s) would not be developed. These existing uses are not consistent with the existing General Plan Update (2015) and zoning underlying the Project site.

Development of the Project will contribute to the change of the general area with an intensification of development in addition to than that which presently occurs on the site (vacant) or in the Project vicinity. The proposed Project is consistent with the General Plan Update (2015).

Based on the analysis contained in Subchapters 4.10.4.1 and 4.10.4.2 of the EIR, the Project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an

environmental effect. Nor will it conflict with any applicable habitat conservation plan or natural community conservation plan with the incorporation of **Standard Condition SC-BIO-1**. As a result, these Project specific impacts will not contribute to cumulative impacts.

Therefore, land use and planning resources impacts from the NPA would be greater than those of the Project.

Mineral Resources

The NPA would not result in a change to the existing mineral resources potential of the Project site(s).

There will be no cumulative impacts to mineral resources due to implementation of the Project. There will be no unavoidable significant adverse impacts to mineral resources due to implementation of the Project.

Therefore, mineral resources impacts from the NPA would be the same as those of the Project.

Noise

Since no construction**,** or project use activity would occur, the NPA would not have any short- or long-term noise impacts.

The existing noise setting of the Project site will be permanently altered. Even though intensification of development will be greater than that which presently occurs on the site, it will not result in an unavoidable adverse noise impact. Based on the data and analysis presented in Subchapter 4.8, implementation of the Project will cause an adverse noise impact to these specific resources. The Project itself does not contribute significantly to local, site specific impacts that cannot be reduced to a less than significant level with incorporation of **Standard Condition SC-NOI-1** and **Mitigation Measures MM-NOI-1** through **MM-NOI-5**.

Because of the far lesser amount of development, noise impacts from the NPA would be less than those of the Project.

Population and Housing

The NPA would not result in any change to the population and housing at the Project site. The Project is being developed consistent with the City's General Plan Update (2015), and therefore, will not exceed official regional or local population projections. It will induce population growth in an area – primarily directly, by proposing new homes. Because of consistency with the General Plan Update (2015), this would not be considered an unavoidable adverse impact. Indirect effects from implementation of the Project (the through the extension of roads or other infrastructure) would not create any unavoidable adverse impacts, as the roadways and other infrastructure (with the exception of water, sewer and natural gas) are already available in the Project vicinity. Therefore, the population growth from the Project is not considered an unavoidable adverse impact.

Because of the far lesser amount of development, population and housing resources impacts from the NPA would be less than those of the Project.

Public Services

Fire and Sheriff Services

The NPA would not result in the creation of additional demand for sheriff and fire department services. Sheriff Department and Fire Department response times would remain unchanged.

The Project will have an incremental impact to the County Fire Department's ability to provide an acceptable level of service. These impacts are forecast to include an increased number of emergency and public service calls due to the increased presence of structures and population.

Each Project proponent shall participate in the Development Impact Fee Program as adopted by the Riverside County Board of Supervisors to mitigate a portion of these impacts (see **Standard Condition SC-REC-1**). This will provide funding for capital improvements such as land, equipment purchases and fire station construction. The Project will contribute incrementally to cumulative impacts related to the need to reduce cumulative effects on Fire Services.

The Project's potentially significant or cumulative considerable impacts to FPER Services can be reduced to less than significant and payment of fees by all cumulative projects can effectively reduce the overall cumulative impacts to such services. Therefore, cumulative impacts are considered less than significant.

The Project contributes a relatively small, incremental increase to the need for Sheriff Services. Thus, the Project will contribute to a cumulative adverse impact to the County Sheriff Department's ability to provide an acceptable level of service without mitigation. These impacts are forecast to include an increased number of emergency and public service calls due to the increased presence of urban/suburban uses and population.
Each Project proponent shall participate in the Development Impact Fee Program as adopted by the Riverside County Board of Supervisors to mitigate a portion of these impacts. This will provide funding for capital improvements such as land, equipment purchases and fire station construction. The Project will contribute incrementally to cumulative impacts related to the need to reduce cumulative effects on Sheriff Services.

The Project's potentially significant or cumulative considerable impacts to Sheriff Services can be reduced to less than significant and payment of fees by all cumulative projects can effectively reduce the overall cumulative impacts to such services. Therefore, cumulative impacts are considered less than significant.

Since existing response times are adequate to meet the needs and standards for rural areas, this impact would be less than those of the Project.

Therefore, based on this information, even though any impacts will be fully mitigated, fire and sheriff services resources impacts from the NPA would be less than those of the Project.

Libraries

The NPA would not create any additional demand upon existing library services within the Project area. Development impact fees for libraries would occur for the Project (see **Standard Condition SC-REC-1**). Based on this information, the impacts from the NPA would be less than those of the Project.

Schools

The NPA would not generate additional students for the existing school districts, thereby not creating an impact upon existing schools. The Project would generate students, but payment of school fees would reduce impacts to ales than significant level. Neither alternative would cause a significant impact on school system services, but impacts from the NPA would be substantially less than the proposed Project.

Health Services

The Project, in conjunction with other projects anticipated within the area will generate a population that is anticipated to incrementally increase the need for Health Service facilities. The Project results in an increase in population; therefore, any impacts to Health Services will be incrementally cumulative and less than significant.

The NPA would not generate additional need for health services. Therefore, health services impacts from the NPA would be less than those of the Project.

Transportation / Traffic

The NPA would not increase site-generated traffic above current levels and therefore, would not contribute to the need for area-wide off-site road improvements. The Project will contribute to the generation of additional traffic on local and regional roadways.

Development of the Project will not result in impacts that would conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit; conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways; result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; alter waterborne, rail or air traffic; substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment); cause an effect upon, or a need for new or altered maintenance of roads; cause an effect upon circulation during the Project's construction; result in inadequate emergency access or access to nearby uses; conflict with adopted policies, plans or programs regarding public transit, bikeways or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities; or, bicycle trails.

According to the analysis above, with adherence to **Standard Condition SC-TR-1**, and incorporation of **Mitigation Measures MM-TR-1** though **MM-TR-6**, the Project will exceed established thresholds related to transportation/traffic. The thresholds have been established to address project-specific impacts, as well as their contribution to cumulative impacts. Since the Project is above the established thresholds, cumulative impacts will be significant and unavoidable.

The Project's contribution to the Transportation Uniform Mitigation Fee (TUMF) program as a fair share contribution is considered sufficient (refer to Section 15130(a)(3) of the State CEQA

Guidelines) to address the Project's fair share toward a mitigation measure or measures designed to alleviate any potential cumulative impacts.

Therefore, transportation/traffic impacts from the NPA would be less than those of the Project.

Utilities and Service Systems

Water and Sewer

The site is currently vacant; therefore, the NPA would not increase the use of water on the Project. According to Coachella Valley Water District (CVWD), there is an adequate water supply and sewer capacity, respectively, to meet the demand of the Project(s). Based on the analysis in this EIR and the referenced documentation, the water, wastewater management systems are capable of meeting the cumulative demand for these systems. Recycled water is available in the CVWD system. **Standard Condition SC-UTIL-1** requires payment of applicable connection fees for water and sewer, **Standard Condition SC-UTIL-2** requires efficient use of water resources and to meet and maintain the goals of the 2010 CVWMP, and **Standard Condition SC-UTIL-3** reflects Project design features for water efficiency. Thus, the Project will not cause cumulatively considerable significant adverse impacts on these systems. Therefore, utilities – water and sewer resources impacts from the NPA would be less than those of the Project.

Natural Gas and Electricity

The NPA would not create an increased need in the amount or natural gas and electricity services. Under the proposed Project, natural gas and electricity demand will increase as a result of the construction the Project on-site and off-site components. Any impacts from the proposed Project can be reduced to a less than significant level with the incorporation of **Standard Conditions SC-UTIL-1** and **SC-UTIL-6**. Still, due to the scale of the proposed Project, the overall impacts will be substantially greater than the No Project Alternative. Therefore, utilities – natural gas and electricity impacts from the NPA would be less than those of the proposed Project, but neither alternative would cause a significant adverse impact to these utility systems.

Solid Waste

The NPA would not create an increase in the amount of solid waste generated on the Project sites, as they are currently vacant. Implementation of the Project will result in the additional generation of construction and operational solid waste. **Standard Conditions SC-UTIL-4** and **SC-UTIL-5** address construction debris recycling and reuse to achieve a reduction in waste beyond the County requirement of a 50 percent reduction by weight.

Cumulative impacts to landfill capacity will be less than significant due to the Project construction debris and operational waste representing a less than substantial cumulative increment with mitigation. Therefore, due to available capacity and implementation of the above **Standard Conditions**, which provide for recycling on site to reduce Project operational waste, cumulative impacts to the existing landfills resulting from waste generated by the Project during operations are considered less than significant. The overall impacts will be greater than the NPA.

Maintenance of Public Facilities and Other Governmental Services

The NPA would not create an increase in the Maintenance of Public Facilities and Other Governmental Services, as they are currently vacant. Maintenance of public facilities was addressed in Subchapters 5.13 (Public Facilities) and 5.14 (Transportation/Traffic). The proposed Project will not have an impact on other governmental services not discussed in other subchapters of this EIR. No significant cumulative impacts are anticipated. No mitigation will be required. Overall impacts of the Project will be less than the NPA.

Adopted Energy Conservation Plans

The NPA would not conflict with Adopted Energy Conservation Plans, as they are currently vacant. The Project will comply with all Title 24 energy conservation requirements. No conflict with any adopted energy conservation plans would occur if the proposed Project is implemented. Implementation of the proposed Project will serve to implement energy conservation plans. No impacts are anticipated. No significant cumulative impacts are anticipated. No mitigation is required. Overall Project impacts will be greater than the NPA.

5.2.2 Summary of No Project Alternative

With respect to the NPA, all Project objectives (listed on P. 5-1, above) are not attained because no development is included as a part of the NPA. It is also unlikely that the NPA is not feasible, since change, in one form or another, is inevitable in this area, as envisioned by the General Plan Update (2015).

The NPA will have fewer impacts than the Project to the following resources:

- Aesthetic Resources
- Agricultural Resources
- Air Quality/Greenhouse Gas
- Biological Resources
- Cultural Resources
- Geology and Soils Resources
- Hazards and Hazardous Materials
- Hydrology/Water Quality Resources
- Noise
- Population and Housing
- Public Services and Recreation Resources
  - Fire and Sheriff Services
  - Health Services
  - Libraries
  - Maintenance of Public Facilities and Other Governmental Services
  - Schools
- Transportation/Traffic
- Utilities and Service Systems
  - Water and Sewer
  - Natural Gas and Electricity
  - Solid Waste
  - Maintenance of Public Facilities and Other Governmental Services
  - Adopted Energy Conservation Plans

The NPA will have similar impacts than the Project to the following resources:

- Mineral Resources

The NPA will have greater impacts than the Project to the following resources:

- Land Use/Planning

Therefore, the NPA is an environmentally superior alternative to the Project.

5.3 REDUCED RESIDENTIAL DENSITY ALTERNATIVE (RRDA)

5.3.1 Overview of Reduced Residential Density Alternative

A Reduced Density Residential Alternative (RRDA) was chosen to address significant unavoidable impacts associated with implementation of the Project. The Project proposes up to 1,640 dwelling units within seven (7) Planning Areas (PAs). PAs 2, 3 and 4 have a multi-family designation. Densities range from 12 dwelling units per acre to 20 dwelling units per acre. PAs 5, 6, 7 and 8 have single-family designations. Densities range from 4.2 dwelling units per acre to 6.3 dwelling units per acre.

Planning Area 1 (PA1) will be the general commercial component to the Specific Plan and will consist of approximately 17.6 acres. PA1 is located on both sides of Street "A" at the intersection with Vista Del Sur. This designation will provide for a wide range of community-oriented and regional-oriented commercial businesses. PA1 will allow for large retail, entertainment and commercial service business centers including large retail uses, theaters, hotels and restaurants as well as professional and medical offices.

A second commercial Planning Area, Planning Area 10 (PA10) consists of 8.3 acres of neighborhood center at the southeast corner of the Project site. This designation provides for small-scale shopping centers offering convenient retail goods and services. Examples of permitted uses include small-scale restaurants, grocery and convenience stores, service businesses that generate limited traffic, and boutique retail sales. It is anticipated that the neighborhood center will be compatible in design and scale with adjacent residential areas.

For purposes of analysis, it will be assumed that the all 216.48 acres of residential acreage development will be developed at 4.2 dwelling units per acre, for a total of 909 dwelling units overall under the RRDA.

Aesthetic Resources

The RRDA will still result in a change to the current aesthetics of the Project site. The Project development overall footprint may be assumed to remain the same. The scale and amount of development would be comparable. Aesthetic impacts from the RRDA would be similar to that of the Project.

Agricultural Resources

The RRDA will result in a change to the current agricultural resources of the Project site(s). The Project development overall footprint may be assumed to remain the same. Agricultural resources impacts from the RRDA would be similar to that of the Project.

Air Quality/Greenhouse Gas

The RRDA will result in a change to the current air quality/greenhouse gas of the Project site(s). Because the RRDA is contains fewer residential units, air quality impacts and cumulative greenhouse gas emissions from the RRDA would be less than that of the Project.

Biological Resources

The RRDA will result in a change to the current biological resources of the Project site(s).

Because the RRDA is similar in size as the Project, biological resources impacts from the RRDA would be similar to that of the Project.

Cultural Resources

The RRDA will result in a change to the cultural resources of the Project site(s). The Project development overall footprint would remain the same. Because the RRDA is similar in size as the Project, cultural resources impacts from the RRDA would be similar to that of the Project.

Geology and Soils Resources

The proposed Project includes a geotechnical study that identifies the Project area as susceptible to seismic and geological hazards, such as groundshaking. Because the RRDA is similar in size as the Project, geology and soils impacts from the RRDA would be similar to that of the Project.

Hazards and Hazardous Materials

The RRDA will result in a change to the current hazards and hazardous materials of the Project site. Because the RRDA has fewer residential units than the Project, hazards and hazardous materials resources impacts from the RRDA would be less than the Project.

Hydrology and Water Quality Resources

The RRDA will result in a change to the current hydrology and water quality resources of the Project site.

The RRDA would be required to implement the same requirements as the Project. Therefore, hydrology/water quality resources (primarily water quality) impacts from the RRDA would be similar to those of the Project.

Land Use and Planning

Under the RRDA, the proposed Project would not be consistent with the General Plan Update 2015 and zoning underlying the Project site.

Therefore, land use and planning resources impacts from the RRDA would be greater than those of the Project.

Mineral Resources

There will be no cumulative impacts to mineral resources due to implementation of the Project. There will be no unavoidable significant adverse impacts to mineral resources due to implementation of the Project.

Therefore, mineral resources impacts from the RRDA would be the same as those of the Project.

Noise

The existing noise setting of the Project site will be permanently altered. Under the RRDA, these impacts would occur, but they would be reduced, due to the reduction in the overall Project development. Therefore, noise impacts from the RRDA would be less than that of the Project.

Population and Housing

Because of the far lesser amount of development, population and housing impacts from the RRDA would be less than those of the Project.

Public Services and Recreation Resources

Fire and Sheriff Services

The RRDA would result in the creation of additional demand for sheriff and fire department services. Because of the far lesser amount of development and population, fire and sheriff services resources impacts from the RRDA would be less than those of the Project.

Libraries

Because of the far lesser amount of development, impacts to libraries would be less than the Project. Based on this information, the impacts to libraries from the RRDA would be less as those of the Project.

Schools

Because of the far lesser amount of development and population, impacts from the RRDA would be less than the proposed Project.

Health Services

The Project, in conjunction with other projects anticipated within the area will generate a population that is anticipated to incrementally increase the need for Health Service facilities..

Because of the far lesser amount of development and population, health services resources impacts from the RRDA would be less than those of the Project.

Transportation / Traffic

The Project will contribute to the generation of additional traffic on local and regional roadways. Because of the far lesser amount of development and population, transportation/traffic impacts from the RRDA would be less than those of the Project.

Utilities and Service Systems

Water and Sewer

Because of the far lesser amount of development and population, utilities – water and sewer resources impacts from the RRDA would be less than those of the Project.

Natural Gas and Electricity

Because of the far lesser amount of development and population, utilities – natural gas and electricity impacts from the RRDA would be less than those of the proposed Project.

Solid Waste

Under the RRDA, these solid waste impacts would occur, but they would be reduced, due to the reduction in the overall Project development. Therefore, utilities - solid waste impacts from the RRDA would be less than that of the Project.

Maintenance of Public Facilities and Other Governmental Services

Maintenance of public facilities was addressed in subchapters 5.13 (Public Facilities) and 5.14 (Transportation/Traffic). The proposed Project will not have an impact on other governmental services not discussed in other subchapters of this EIR. Under the RRDA, these impacts would occur, but they would be reduced, due to the reduction in the overall Project development.

Adopted Energy Conservation Plans

The Project will comply with all Title 24 energy conservation requirements. No conflict with any adopted energy conservation plans would occur if the proposed Project is implemented. Implementation of the proposed Project will serve to implement energy conservation plans. No impacts are anticipated. Under the RRDA, these impacts would occur, but they would be reduced, due to the reduction in the overall Project development.

5.3.2 Summary of Reduced Residential Density Alternative

With respect to the RRDA, the reduction of the Project size has a comparable negative effect on the ability of the Project to meet Project costs, i.e., development feasibility and certain Project objectives may not be attained because certain infrastructure improvements may not be feasible. In particular, the RRDA will not meet the following Project objectives:

- Provide a balanced mix of economically viable commercial and residential land uses that will promote local job creation;
- Provide a transition blend of rural and suburban lifestyles; and
- Provide a diverse mix of housing options.

The RRDA will have fewer impacts than the Project to the following resources:

- Air Quality/Greenhouse Gas
- Hazards and Hazardous Materials
- Noise
- Population and Housing
- Public Services and Recreation Resources
  - Fire and Sheriff Services
  - Libraries
  - Schools
  - Health Services
- Transportation/Traffic
- Utilities and Service Systems
  - Water and Sewer
  - Natural Gas and Electricity
  - Solid Waste
  - Maintenance of Public Facilities and Other Governmental Services
  - Adopted Energy Conservation Plans

The RRDA will have similar impacts than the Project to the following resources:

- Aesthetic Resources
- Agricultural Resources
- Biological Resources
- Cultural Resources
- Geology and Soils Resources
- Hydrology/Water Quality Resources
- Mineral Resources

The RRDA will have greater impacts than the Project to the following resources:

- Land Use/Planning

It should be noted that less fees and funding would be provided through the RRDA to upgrade regional transportation infrastructure; public services and utilities.

Therefore, the RRDA is an environmentally superior alternative to the Project.

5.4 VISTA DEL SUR ALTERNATIVE

5.4.1 Overview of Vista del Sur Alternative

The Vista del Sur Alternative (VDSA) is being analyzed in the event that the westerly extension of Avenue 48/Shadow View Boulevard cannot be completed due to the need for the Project applicant to acquire the necessary right-of-way to install this roadway. Vista del Sur is a dedicated City roadway which connects to the northerly extension of Street "A." This alternative would allow for the development of the Project as proposed but with another connection to Dillon Road to the west of the Project site. Under the VDSA scenario, approximately 5,834 linear feet of roadway (at 30' in width) will be constructed. This is in contrast to the Project's westerly extension of Avenue 48/Shadow View Boulevard that would involve 11,600 linear feet of roadway improvements.

Aesthetic Resources

The VDSA would not involve the removal of the aesthetic resources that would occur under the westerly extension of Avenue 48/Shadow View Boulevard. All other Project impacts to aesthetic resources would remain the same. Aesthetic resource impacts from the VDSA would be less than those of the proposed Project.

Agricultural Resources

The VDSA would not involve the removal of the agricultural resources that would occur under the westerly extension of Avenue 48/Shadow View Boulevard. All other Project impacts to agricultural resources would remain the same. Agricultural resources impacts from the VDSA would be less than that of the Project.

Air Quality/Greenhouse Gas

Because the VDSA will result in a 50% reduction in construction emissions (5,834 linear feet versus 11,600 linear feet of off-site roadway improvements) that the Project, air quality impacts and cumulative greenhouse gas emissions from the VDSA would be less than that of the Project. All other Project impacts to air quality/greenhouse gas resources would remain the same.

Biological Resources

The VDSA would not involve the removal of any potential biological resources that would occur under the westerly extension of Avenue 48/Shadow View Boulevard. All other Project impacts to biological resources would remain the same. Biological resources impacts from the VDSA would be less than that of the Project.

Cultural Resources

The VDSA would not involve the removal of any potential cultural resources that would occur under the westerly extension of Avenue 48/Shadow View Boulevard. All other Project impacts to cultural resources would remain the same. Cultural resources impacts from the VDSA would be less than that of the Project.

Geology and Soils Resources

Because the VDSA is similar in size to the Project, geology and soils impacts from the VDSA would be similar to that of the Project.

Hazards and Hazardous Materials

Because the VDSA is similar in size to the Project, hazard and hazardous materials impacts from the VDSA would be similar to that of the Project.

Hydrology and Water Quality Resources

Because the VDSA is similar in size to the Project, hydrology/water quality resources (primarily water quality) impacts from the VDSA would be similar to those of the Project.

Land Use and Planning

Because the land use and planning issues associated with the VDSA are similar to the Project, land use and planning resources impacts from the VDSA would be similar to those of the Project.

Mineral Resources

Because the mineral resources issues associated with the VDSA are similar to the Project, mineral resources impacts from the impacts from the VDSA would be the same as those of the Project.

Noise

Under the VDSA, noise impacts would occur, but they would be reduced, due to access changing from 48th Avenue/Shadow View Boulevard to Vista Del Sur, and the proximity of Vista Del Sur to the ambient noise levels of the I-10 freeway. Therefore, noise impacts from the VDSA would be less than that of the Project, pertaining to off-site areas.

Population and Housing

Because the population and housing issues associated with the VDSA are similar to the Project, population and housing resources impacts from the VDSA would be similar to those of the Project.

Public Services and Recreation Resources

Fire and Sheriff Services

Because the fire and sheriff services issues associated with the VDSA are similar to the Project, fire and sheriff services resources impacts from the VDSA would be similar to those of the Project.

Libraries

Because the library services issues associated with the VDSA are similar to the Project, library services resources impacts from the VDSA would be similar to those of the Project.

Schools

Because the school services issues associated with the VDSA are similar to the Project, school services resources impacts from the VDSA would be similar to those of the Project.

Health Services

Because the health services issues associated with the VDSA are similar to the Project, health services resources impacts from the VDSA would be similar to those of the Project.

Transportation / Traffic

Because the transportation/traffic issues associated with the VDSA are similar to the Project, transportation/traffic resources impacts from the VDSA would be similar to those of the Project.

Utilities and Service Systems

Water and Sewer

Because the utilities – water and sewer resources issues associated with the VDSA are similar to the Project, utilities – water and sewer resources impacts from the VDSA would be similar to those of the Project.

Natural Gas and Electricity

Because the utilities – natural gas and electricity resources issues associated with the VDSA are similar to the Project, utilities – natural gas and electricity resources impacts from the VDSA would be similar to those of the Project.

Solid Waste

Because the utilities – solid waste resources issues associated with the VDSA are similar to the Project, utilities – solid waste resources impacts from the VDSA would be similar to those of the Project.

Maintenance of Public Facilities and Other Governmental Services

Because the utilities – Maintenance of Public Facilities and Other Governmental Services resources issues associated with the VDSA are similar to the Project, utilities – Maintenance of Public Facilities and Other Governmental Services resources impacts from the VDSA would be similar to those of the Project.

Adopted Energy Conservation Plans

Under the VDSA, these impacts would occur, but they would be similar to those of the Project.

5.4.2 Summary of Vista del Sur Alternative

With respect to the VDSA, it meets all of the Project objectives identified above (p. 5-1).

The VDSA will have fewer impacts than the Project to the following resources:

- Aesthetic Resources
- Agricultural Resources
- Air Quality/Greenhouse Gas
- Biological Resources
- Cultural Resources
- Noise

The VDSA will have similar impacts than the Project to the following resources:

- Geology and Soils Resources
- Hazards and Hazardous Materials
- Hydrology/Water Quality Resources
- Land Use/Planning
- Mineral Resources
- Population and Housing
- Public Services and Recreation Resources
  - Fire and Sheriff Services
  - Libraries
  - Schools
  - Health Services
- Transportation/Traffic
- Utilities and Service Systems
  - Water and Sewer
  - Natural Gas and Electricity
  - Solid Waste
  - Maintenance of Public Facilities and Other Governmental Services
  - Adopted Energy Conservation Plans

The VDSA will have greater impacts than the Project to the following resources:

- None

Therefore, the VDSA is an environmentally superior alternative to the Project.

5.5 DISCUSSION OF ALTERNATIVES TO THE PROJECT

Of the three alternatives considered, all three have been determined to be environmentally superior alternatives to the Project. Section 15126.6(e)(2) indicates that where the no project alternative is environmentally superior, "the DEIR shall also identify an environmentally superior alternative among the other alternatives." Both the NPA and the RRDA have been evaluated as not being a feasible alternative because they do not meet some, or as in the case of the NPA, meet all of the Project objectives (respectively) discussed in Subchapter 3.2 of this document and summarized above.

The VDSA alternative is an environmentally superior alternative and meets all of the Project objectives.

As stated previously, an Alternate Location Alternative will not be analyzed since this was deemed infeasible.

No other alternatives to the Project are given consideration or evaluated in this Chapter because they are either impractical or infeasible.

CHAPTER 6 – TOPICAL ISSUES

6.1 GROWTH-INDUCING IMPACTS

6.1.1 Overview of Growth Inducement

Traditionally, significant growth is induced in one of two ways. In the first instance, a project is located in an isolated (meaning that it is not currently or routinely served by public service or utility infrastructure) area and when developed it brings sufficient urban infrastructure to cause new or additional development pressure on the intervening and surrounding land. This type of induced growth leads to conversion of adjacent acreage to higher intensity uses, either unexpectedly or through accelerated development. This conversion occurs because the adjacent land becomes more suitable for development and, hence, more valuable because of the availability of the new infrastructure. This type of growth inducement is typically termed "leap frog" or "premature" development because it creates an island of higher intensity developed land within a larger area of lower intensity land use.

The growth inducement issue is inherently tied to the land ownership issue because of the manner in which access and development of the Project site is envisioned and whether growth on adjacent land can be induced to occur as a result of a land owner's decision to convert from a vacant property to a higher intensity use such as residential and commercial land use. For a project to be growth inducing it must cause certain changes in circumstances affecting development constraints that are required for growth and the adjacent properties must be available to support such growth.

Growth inducement may be caused when a project of large size, relative to the surrounding community or area, is developed within a community and impacts the surrounding community by producing a "multiplier effect," which results in substantial indirect community growth, not necessarily adjacent to the development site or of the same type of use as the project itself. This type of stimulus to community growth is typified by the development of major destination recreation facilities, such as Disney World near Orlando, Florida, or around a military facility, such as the Marine Corps Air Ground Combat Center near Twentynine Palms. The Project does not propose any new major facilities that will cause growth "through a multiplier effect", as is discussed below. As primarily residential communities, with small commercial components, the future growth will occur as a result of regional growth rather than driving or forcing regional growth. Therefore, the Project is not considered a "large project" that would indirectly drive area growth due to its presence.

6.1.2 Growth Inducement

The proposed Project together with other commercial and residential developments within the City will serve an existing demand for employment, while also meeting the cumulative demand of employment that will result from the City's projected future population. These increases for population, housing, and employment would be within the total projected growth forecasts for 2035. In addition, implementation of the proposed project would be consistent with the City's vision of the Project site because the existing General Plan Update (2015) designation for the site is "Specific Plan." Implementation of the proposed project would not result in a cumulatively significant population or housing impact and the proposed Specific Plan land uses would not significantly induce growth in areas where growth was not previously anticipated. Therefore, the Project is not considered growth inducing.

6.2 IRREVERSIBLE AND/OR UNAVOIDABLE ENVIRONMENTAL CHANGES WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION, SHOULD IT BE IMPLEMENTED

In considering the topic of "Significant Irreversible and/or Unavoidable Environmental Impacts," it is important to define the terminology that is used in making impact forecasts. For example, an "unavoidable significant adverse environmental impact" is an effect of a proposed Project that cannot be avoided or reduced below some specific threshold of significance by any available or feasible mitigation measure or feasible alternative to that Project. These impacts are discussed in the subchapter text for each environmental issue in Chapter 4 of this document.

The following analysis of irreversible environmental effects is presented for the reviewer's consideration. The following is a summary of significant adverse impacts that are forecast to occur if the proposed Project is implemented as proposed, with specific attention to any significant irreversible impacts.

Based on the analysis contained in the EIR, the following impacts have been determined to have a significant impact:

Aesthetics Resources

Development of the proposed Project will contribute to the change of the general area with an intensification of development substantially greater than that which presently occurs on the site or in the surrounding vicinity. There will be an associated change in views, both to and from the Project site, and due to this Project's contribution to the change in the area pastoral landscape, this change in scenic views has been identified as cumulatively considerable and an unavoidable significant adverse impact if this Project is developed before any of the other proposed development in the area. The proposed Project modifications to the onsite landscape were not identified as being a significant adverse aesthetic/visual impact. Since the proposed Project makes a cumulatively considerable contribution to the cumulative change that will be experienced at this location, it is considered to cause/contribute to a cumulatively significant adverse impact. However, because the Project site and the immediate surrounding area are relatively undeveloped with little to no existing light sources, the proposed Project is anticipated to introduce a substantial amount of light and glare sources, where none previously existed, resulting in a significant adverse impact.

Agriculture and Forestry Resources

The conversion of sites from vacant land to residential, commercial and open space uses will permanently remove the potential for the land to be farmed in the future. However, this change is consistent with future land uses planned for the City in the General Plan Update (2015). Implementation of the Project (on-site and off-site components) will not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use. There are no forest lands on or near the site. Consistent with the General Plan Update Final EIR (2015), significant unavoidable impacts are anticipated due to Project implementation.

Air Quality - Operations

Long-term air pollutant emission impacts are those associated with stationary sources and

mobile sources involving any project-related changes. The stationary source emissions would come from additional natural gas consumption for on-site buildings and electricity for the lighting in the buildings and at the parking area. Based on trip generation factors included in the traffic study, long-term operational emissions associated with the proposed Project, calculated with the CalEEMod model, are shown in **Table 4.4.4-8, *Regional Significance – Operational Emissions***. Area sources include architectural coatings, consumer products, and landscaping. Energy sources include natural gas consumption for heating.

Table 4.4.4-8 shows that when the Project is fully operational, the Project would exceed South Coast Air Quality Management District (SCAQMD) regional thresholds for volatile organic compounds (VOC), oxides of nitrogen (NOx), and CO. Even with the incorporation of **Mitigation Measures AQ-10** through **AQ-13** the Project would have a significant and unavoidable impact.

Transportation/Traffic

Pursuant to Section 15130(b)(2) of the California Environmental Quality Act (CEQA) Guidelines, the cumulative Project list from the *Traffic Impact Study City of Coachella, California,* prepared by RK Engineering Group, Inc., dated October 14, 2014, revised June 14, 2016 (**Appendix O**), was utilized for the cumulative impacts within the City of Coachella, the Coachella Valley and Riverside County.

The Project's contribution to the Transportation Uniform Mitigation Fee (TUMF) program as a fair share contribution is considered sufficient to address the Project's fair share toward a mitigation measure or measures designed to alleviate any potential cumulative impacts.

According to the analysis above, with adherence to **Standard Condition SC-TR-1** and incorporation of **Mitigation Measures MM-TR-1** through **MM-TR-5**, established thresholds related to transportation/traffic can be mitigated under CEQA.

However, even though implementation of the improvements defined in **Mitigation Measure MM-TR-3** would reduce the significant impacts, the City cannot control the timing of when the intersection improvements for the locations on Caltrans facilities (SR-86, and I-10) are implemented. For this reason, even with implementation of **MM-TR-3**, cumulative impacts would remain significant and unavoidable at these locations (Caltrans facilities (SR-86, and I-10) with the Project and cumulative projects factored in.

In addition, the cumulative impacts to Dillon Road (1-10 to SR-86 and SR-86 to Highway 111) in 2035 Plus Project condition has been identified as a potentially significant and unavoidable impact because additional widening beyond the General Plan classification is likely infeasible.

6.3 CUMULATIVE IMPACTS

The intent of a cumulative impact evaluation is to provide the public and decision-makers with an understanding of a given Project's contribution to area-wide or community environmental impacts when added to other development occurring in the region. Typically, cumulative impacts are discussed in relation to a list of past, present and reasonably anticipated projects or in relation to broad growth projections contained in general or regional plans (see Section 15130(b) of the State California Environmental Quality Act (CEQA) Guidelines). For the Project cumulative impacts are evaluated in the context of both types of cumulative impact forecasts.

The cumulative impact projections were made using regional planning documents and site-specific technical studies. Cumulative impacts are discussed in each issue subchapter of Chapter 4 in this document. The following is a summary of cumulative impacts that are forecast to occur if the Project is implemented as proposed and is a restatement of the cumulative impacts from Chapter 4.

Aesthetics Resources

Development of the proposed Project will contribute to the change of the general area with an intensification of development substantially greater than that which presently occurs on the site or in the surrounding vicinity. There will be an associated change in views, both to and from the Project site, and due to this Project's contribution to the change in the area pastoral landscape, this change in scenic views has been identified as cumulatively considerable and an unavoidable significant adverse impact if this Project is developed before any of the other proposed development in the area. The proposed Project modifications to the onsite landscape were not identified as being a significant adverse aesthetic/visual impact. Since the proposed Project makes a cumulatively considerable contribution to the cumulative change that will be experienced at this location, it is considered to cause/contribute to a cumulatively significant adverse impact.

Agriculture and Forestry Resources

Pursuant to California Environmental Quality Act Guidelines §15130(d), previously approved land use documents such as general plans, specific plans, and local coastal plans may be used in the cumulative impact analysis of subsequent implementing projects. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master, or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the project have already been adequately addressed in the certified EIR for that plan.

The General Plan Update Final EIR (2015) determined that regional and county-wide trends of converting land uses away from agriculture to planned urban development may result in cumulatively significant losses of agricultural resources. While the General Plan Update (2015) provides extensive policy direction that helps minimize the impacts to agricultural resources, the scope of these cumulative impacts extends beyond the jurisdiction of the City. These cumulative impacts could possibly be mitigated with region-wide or countywide agricultural preservation programs; however, the establishment of such a program is beyond the scope of control of the City of Coachella, which is limited to its jurisdiction. Thus, the General Plan Update Final EIR (2015) found such mitigation to be infeasible for the City to implement, and, therefore, the conversion of Coachella's agricultural resources would be cumulatively considerable. Cumulative impacts to agricultural resources were determined to be significant and unavoidable and a Statement of Overriding Considerations was adopted on April 22, 2015, by the City of Coachella City Council.

The Project is consistent with the adopted General Plan Update (2015) and impacts on agricultural resources were determined to be significant and unavoidable as a result of the Project. Cumulative impacts to agricultural resources were determined to be adequately evaluated in the General Plan Update Final EIR (2015) and, therefore, pursuant to §15152(f)(1), cumulative impacts to agricultural resources are treated as significant for purposes of this EIR, consistent with the General Plan Update Final EIR (2015).

Air Quality/Greenhouse Gas

Pursuant to Section 15130(b)(2) of the State CEQA Guidelines, the cumulative Project list from the *TIS*, was utilized for the cumulative impacts within the Coachella Valley, Riverside County, and the greater setting of the South Coast Air Basin.

During operation, on-site emissions would be negligible and would primarily consist of the intermittent on-site travel of motor vehicles. Therefore, due to the lack of stationary source emissions, no long-term localized significance threshold analysis is warranted. The mitigated construction emissions incorporate **SC-AQ-1**, and **MM-AQ-1** through **MM-AQ-10**. Daily emissions CalEEMod outputs are located in Appendix A of the *AQ/GHG Analysis* (**Appendix D1**). The emissions will be below the SCAQMD thresholds of significance for regional construction emissions. Construction LST emissions will be below the SCAQMD thresholds of significance for localized construction emissions. For all construction phases, the daily total construction emissions with standard control measures, would be below the daily thresholds established by the SCAQMD. Due to the distance of the nearest receptors from the proposed Project site and through compliance to SCAQMD's Rule 402, no significant impact related to odors would occur during operation. The potential risk for naturally occurring asbestos (NOA) during Project construction is small and less than significant.

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed Project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk." "Individual cancer risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively limited number of heavy-duty construction equipment and the short-term construction schedule, the proposed Project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk.

Long-term air pollutant emission impacts are those associated with stationary sources and mobile sources involving any project-related changes. The stationary source emissions would come from additional natural gas consumption for on-site buildings and electricity for the lighting in the buildings and at the parking area. Based on trip generation factors included in the traffic study, long-term operational emissions associated with the proposed Project, calculated with the CalEEMod model, are shown in **Table 4.4.4-8, *Regional Significance – Operational Emissions***. Area sources include architectural coatings, consumer products, and landscaping. Energy sources include natural gas consumption for heating.

Table 4.4.4-8 shows that when the Project is fully operational, the Project would exceed SCAQMD regional thresholds for VOC, NO_x, and CO. Even with the incorporation of Mitigation Measures **MM-AQ-10** through **MM-AQ-13** the Project would have a significant and unavoidable impact.

The SCAQMD has demonstrated in the CO attainment redesignation request to the EPA that there are no "hot spots" anywhere in the air basin, even at intersections with much higher volumes, much worse congestion, and much higher background CO levels than anywhere in Riverside County. If the worst-case intersections in the air basin have no "hot spot" potential, any local impacts will be below thresholds.

The City of Coachella's Climate Action Plan provides direction on how the City plans to achieve a 15% reduction below 2010 (per service population) emissions by 2020. Projects that do not exceed 3,000 $MTCO_2e$ per year will be consistent with the GHG Plan with the incorporation of **MM-AQ-10** through **MM-AQ-13** and the planting of approximately 2,406 new trees, the Project's emissions would be reduced to 3.27 $MTCO_2e$/SP/yr., which meets the threshold. Therefore, operation of the proposed Project would not create a significant cumulative impact to global climate change.

Biological Resources

Cumulative biological impacts are defined as those impacts resulting from the development within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) Area as a result of build out of the Cities and County's General Plans. Development of the Project will contribute to the change of the general area with an intensification of development substantially greater than that which presently occurs on the site; however, development, of a larger acreage and scale that the Project is currently permitted on the site. With the incorporation of standard conditions and mitigation, the Project will not cause adverse cumulative effects related to the reduction of sensitive vegetation communities present in Riverside County because there are no such species located within the Project area and the Project can be implemented consistent with the criteria identified in the CVMSHCP.

According to Section 15130 of the CEQA Guidelines, cumulative impacts refer to incremental impacts of an individual project when viewed in connection with the effects of past projects, current projects, and probable future projects. Cumulative impacts could potentially include increased edge effects and increased wildlife mortality; however, it is likely that any current and future development may threaten wildlife in the project area.

The City of Coachella and surrounding Cities and the County of Riverside are signatories of the CVMSHCP, which protects 240,000 acres of open space and 27 species. The CVMSHCP was prepared to balance environmental protection and economic development objectives in the CVMSHCP area and to simplify compliance with endangered species related laws. The CVMSHCP is intended to satisfy the legal requirements for the issuance of Permits that will allow the Take of species covered by the Plan in the course of otherwise lawful activities. The CVMSHCP will, to the maximum extent practicable, minimize and mitigate the impacts of the taking and provide for conservation of the covered species. The objective of the CVMSHCP is to provide certain Essential Ecological Processes, particularly the fluvial sand deposition and Aeolian transport areas, which are necessary to support occupied habitat by covered species in the dunes and other blowsand habitats. Without the CVMSHCP, there would not be a coordinated system of Biological Corridors and Linkages provided to connect Conservation Areas and the ability to provide Linkages through project-by-project mitigation may be precluded over time through continued development in the Coachella Valley. The CVMSHCP includes the establishment of an MSHCP Reserve System, setting Conservation Objectives to ensure the conservation of the covered species and conserved natural communities in the MSHCP Reserve System, provisions for management of the MSHCP Reserve System, a Monitoring Program, and Adaptive Management. The Conservation Areas contained approximately 496,400 acres of Existing Conservation Lands as of 1996. By November 2006, this had increased to approximately 557,100 acres. A minimum of 129,690 acres in the Conservation Areas will be conserved as Additional Conservation Lands, to be acquired or otherwise conserved through State and federal acquisitions and Permittee contributions.

Several acquisition efforts for conservation purposes pre-date the MSHCP, and are ongoing efforts expected to conserve approximately 29,990 acres in the MSHCP Reserve System from November 2006 on. These include Bureau of Land Management (BLM) and United States Fish and Wildlife Service (USFWS) acquisition programs in the Santa Rosa and San Jacinto Mountains National Monument, BLM Wilderness inholdings acquisitions, and inholdings acquisitions in Joshua Tree National Park. These acquisition programs pre-date the MSHCP, have broader rationales than the MSHCP program, and are independent of the MSHCP effort. They complement implementation of the MSHCP but are not a Permittee obligation for purposes of the authorization of Take.

A minimum of 129,690 acres in the Conservation Areas will be conserved as Additional Conservation Lands, to be acquired or otherwise conserved through State and federal acquisitions and Permittee contributions. The Local Permittees will also protect the fluvial sand transport Essential Ecological Process on approximately 7,800 acres in the Cabazon, Long Canyon, and West Deception Canyon Conservation Areas through application of general plan land use designations and policies, and flood control guidelines.

Through the MSHCP and its Implementing Agreement (IA), the federal and state governments have agreed to partner with the Local Permittees in assembling, managing, and monitoring Reserve Lands. The federal and state governments will acquire approximately 21,390 acres of privately owned lands (this federal and state obligation is beyond any mitigation obligations for Development authorized by Local Permittees pursuant to the Plan) in the Conservation Areas after November 2006, as well as manage certain federal and state Existing Conservation Lands in the MSHCP Reserve System and participate in the Monitoring and Adaptive Management Program for Reserve Lands. The Permittees (Local and State) have an obligation to conserve approximately 115,340 acres in the Conservation Areas through:

- Conservation of 7,700 acres of currently non-conserved Local Permittee-owned lands.
- Conservation of 88,900 acres of Additional Conservation Lands by the Local Permittees and Caltrans through acquisition or other means, such are planning tools and land use regulation, and acquisition of 640 acres by State Parks (after 1996), of which 100 acres can be developed for State Park facilities.
- Management of 18,200 acres of Permittee Existing Conservation Lands consistent with the MSHCP.

In addition, the Permittees will maintain the fluvial sand transport Essential Ecological Process in the Cabazon, Long Canyon, and West Deception Canyon Conservation Areas as described in Section 4.2.2.2.4 of the CVMSHCP.

The CVMSHCP includes certain requirements for Covered Activities in the Conservation Areas to avoid, minimize, and mitigate impacts to bighorn sheep habitat, biological corridors, burrowing owl, covered riparian bird species, crissal thrasher, desert tortoise, fluvial sand transport, Le Conte's thrasher, mesquite hummocks and mesquite bosque natural communities, triple-ribbed milkvetch, Palm Springs pocket mouse, and Little San Bernardino Mountains linanthus. These measures do not apply to single-family homes and any non-commercial accessory uses and structures including, but not limited to, second units on an existing legal lot. Because the proposed Project and the cumulative projects in the Coachella Valley would comply with the CVMSHCP, and the CVMSHCP and its associated EIR/EIS have analyzed cumulative impacts within the region of the proposed project under CEQA, NEPA, CESA, and FESA, cumulative impacts to biological resources associated with the proposed Project have

been previously considered and analyzed. It was determined in the EIR/EIS that cumulative impacts to biological resources would be less than significant through the implementation of the CVMSHCP. The EIR/EIS for the CVMSHCP states:

> "The CVMSHCP incorporates private land acquisitions, creates large blocks capable of sustaining ecological systems, landform diversity, all trophic levels and populations large enough to be viable in the face of fluctuations caused by extremes in desert environment. The Proposed Action/Preferred Alternative is expected to result in and contribute cumulative impacts, both positive and negative. The beneficial cumulative impacts include the establishment of large, unfragmented habitat blocks, and the ecological processes that would provide for the proposed Covered Species long-term survival and recovery. The CVMSHCP proposes species-specific Avoidance, Minimization, and Mitigation Measures, and Land Use Adjacency Guidelines to avoid or minimize impacts from development in or adjacent to Conservation Areas. While the proposed CVMSHCP also allows Take, land outside of the Conservation Areas is constrained by physical conditions, isolation and a lack of cost-effective infrastructure, which could limit even very low densities of development and thereby reduce the potential Take that might occur in these areas. Nonetheless, development outside Conservation Areas facilitated by the CVMSHCP could put incremental pressure on the lands within the Reserve System.
>
> The CVMSHCP also includes comprehensive Monitoring and Management Programs. The primary purpose of the Monitoring and Management Programs is to determine whether the proposed Plan is achieving its Conservation Goals and Objectives to ensure that the Covered Species and natural communities are protected in perpetuity; specify the primary components of MSHCP Reserve System management; and determine how effective Adaptive Management strategies are to address changes in habitat condition, natural communities, and/or species status. The Management and Monitoring Programs focus on identifying changes in identified natural communities and Covered Species condition (numbers, distribution, etc.) and what factors may be causing the identified changes.
>
> The Monitoring Program would provide scientifically reliable data on the status of Covered Species; spatial and temporal dynamics (amplitude and magnitude) of ecosystem components for the covered plant and animal species and natural communities; the threats to these species and natural communities; and the results of research and the management of covered species. The Management Program would incorporate Adaptive Management, which includes an integrated multidisciplinary approach to addressing management practices, evaluating management actions, and assessing threats using appropriate experimental approaches at species, community, and landscape levels."

The proposed Project and any other future public or private projects are subject to CVMSHCP compliance including the payment of fees (see **SC-BIO-1**), which helps cover the cost of acquiring habitat and implementing the CVMSHCP and, therefore, any cumulative impacts on biological resources are less than significant.

Cultural Resources

The cumulative study area for cultural and paleontological resources is the geographical area of

the City of Coachella, which is the geographical area covered by the City General Plan, including all goals and policies included therein. Future development in the City could include excavation and grading that could potentially impact archaeological and paleontological resources and human remains. The cumulative effect of the proposed Project is the continued loss of these resources. The proposed Project, in conjunction with other development in the City, has the potential to cumulatively impact archaeological and paleontological resources; however, it should be noted that each development proposal received by the City undergoes environmental review pursuant to CEQA. If there is a potential for significant impacts to archaeological or paleontological resources, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures. If subsurface cultural resources are assessed and/or protected as they are discovered, impacts to these resources would be less than significant. In addition, the City's General Plan policies would be implemented as appropriate to reduce the effects of additional development within the City.

MM-CUL-1 through **MM-CUL-4** would be implemented during initial mass grading of the Project to reduce potential Project impacts by ensuring avoidance, evaluation, and, as applicable, scientific recovery and study of any resources encountered. Therefore, with implementation of **MM-CUL-1** through **MM-CUL-5**, the contribution of the Specific Plan to the cumulative loss of known and unknown cultural resources throughout the City would be reduced to below a level of significance.

Geology and Soils Resources

Geologic and soil impacts are, by their nature, site-specific. As described in the analysis above, the Project site is located within an Alquist-Priolo Earthquake Fault Hazard Zone. Additionally, the Project site contains areas of potentially expansive soils, subsidence, liquefaction, and is located on a geologic formation that is susceptible to lateral spreading. As such, the proposed Project would be required to implement **MM-GEO-1** through **MM-GEO-4**, and comply with applicable State and local requirements, including but not limited to the City of Coachella Building Code and the California Building Code. Seismic impacts are a regional issue, and all projects must adhere to applicable seismic codes and design standards. The proposed Project's individual impacts related to geotechnical constraints are considered less than significant after mitigation. Therefore, the Project's contribution to regional cumulative impacts regarding geotechnical constraints is considered potentially less than significant.

Hazards and Hazardous Materials

Pursuant to Section 15130(b) of the State CEQA Guidelines, the geographic scope of the cumulative setting for hazards and hazardous materials analysis is the City of Coachella, the Coachella Valley, and Riverside County.

Development of the Project may result in releases of hazards and hazardous materials. According to the analysis above, with adherence to standard conditions, and mitigation measures, Project impacts will not exceed established thresholds for hazards and hazardous materials. The thresholds have been established to address Project-specific impacts, as well as their contribution to cumulative impacts. Since the Project is below the established thresholds, cumulative impacts will remain less than significant.

On the other hand, as the City grows, the demand for public service resources to respond to hazards and hazardous materials grows incrementally. The Project will add to the cumulative

demand for such resources. As stated in Subchapter 4.13.2.5, the Project will have an incremental impact to the City's Fire Department's ability to provide an acceptable level of service for responding to calls related to hazards and hazardous materials releases. These impacts are forecast to include an increased number of emergency and public service calls due to the increased presence of structures and population, and vehicles.

Each future Project within the Vista Del Agua Specific Plan shall participate in the Development Impact Fee Program as adopted by the City to mitigate a portion of these impacts. This will provide funding for capital improvements such as land, equipment purchases and fire station construction. The Project will contribute incrementally to cumulative impacts related to the need to reduce cumulative effects on Fire Services.

The Project's potentially significant or cumulative considerable impacts to Fire Protection and Emergency Response Services can be reduced to less than significant and payment of fees by all cumulative projects can effectively reduce the overall cumulative impacts to such services. Therefore, cumulative impacts are considered less than significant.

Hydrology and Water Quality Resources

The cumulative study area for hydrology and water quality is the Whitewater Watershed. Each of the cumulative projects, individually and cumulatively, could potentially increase the volume of storm water runoff and contribute to pollutant loading in storm water runoff reaching both the City's storm drain system and the Whitewater River, resulting in cumulative impacts to hydrology and surface water quality. However, as with the proposed Project, each of the cumulative projects would also be subject to NPDES and MS4 Permit requirements for both construction and operation. Each project would be required to develop a SWPPP and WQMPs and would be evaluated individually to determine appropriate BMPs to minimize impacts to surface water quality and vector. These requirements are reflected in **Standards Conditions SC-HYD-1**, **SC-HYD-2**, **SC-HYD-3**, and **SC-HYD-4** (construction general permit, water quality management plans, BMPs, and hydrology reports, respectively) in Subchapter 4.9.5, above, as well as **MM-HYD-1**, above.

In addition, the City 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. Thus, the Project's contribution to cumulative impacts to hydrology and water quality would be less than significant.

Land Use and Planning

Implementation of the proposed Project, when considered in conjunction with other existing and planned developments in the Project area, would result in the development of a mostly vacant and undeveloped site. The cumulative study area analyzed for potential land use impacts is the City of Coachella and the City's Sphere of Influence (SOI). **Table 4.1.1-1, *Cumulative Projects Trip Generation*** (refer to Chapter 4.0, Environmental Impact Evaluation – Introduction) lists adopted and planned projects within the City, and **Figure 4.1.1-1, *Cumulative Projects Location Map***, maps the locations of these projects.

The Specific Plan Project site currently has the following General Land Use Designation: Entertainment Commercial (C-E).

Approval of the proposed Project would ensure that the Specific Plan, in conjunction with the Coachella General Plan, would be the guiding land use policy documents for the Project area. As such, implementation of the proposed Project would not result in significant land use compatibility issues within the City's jurisdiction.

With the incorporation of the CVMSHCP Mitigation Fee (see **SC-BIO-1**), the Project will not conflict with any applicable habitat conservation plan or natural community conservation plan. Cumulative impacts are considered less than significant with incorporation of this standard condition.

Noise

For the proposed Project, cumulative impacts are the incremental effects of the proposed Project when viewed in connection with the effects of past, current, and potential future projects within the cumulative impact area of the City of Coachella

The cumulative study area for traffic noise is the proposed Project's traffic study area. The Traffic Study conducted a cumulative analysis for the existing plus project, Project Completion Year 2022, and General Plan Buildout 2035, with and without Project conditions. Therefore, the traffic noise analysis presented in this section is a cumulative impact analysis.

The City has an exemption for noise created during construction. Also, construction is limited to certain hours during the day. The Project will have a less than significant impact to the adjacent land uses, based on the City's noise ordinance during the construction phase of development.

The potential off-site noise impacts caused by the increase in vehicular traffic from the operation of the proposed Project on the nearby roadways (existing year), as demonstrated in **Table 4.11.4-3**, will be less than significant from the implementation of the proposed Project. This includes the extension of Avenue 48 westerly (as it becomes Shadow View Boulevard). Also, impacts will be less than significant from the implementation of the proposed Project at Project completion year (2022). Lastly, no significant impacts will result from the implementation of the proposed Project at General Plan Buildout Year (2035).

Portions of the Project site are located within the 65 to 70 dBA CNEL contours of subject roadways and will therefore require noise barriers (or equivalent mitigation) to shield any potential sensitive outdoor areas. Once a site plan or tract map is available, additional acoustical studies will need to be conducted to determine wall heights and placement to ensure compliance to the City's exterior noise standard. With mitigation incorporated, any impacts will remain less than significant.

Residences would need to be exposed to exterior noise levels exceeding 65 dBA CNEL (45 dBA + 20 dBA = 65 dBA) to potentially exceed the interior noise standard of 45 dBA CNEL with windows closed. With mitigation incorporated, any impacts will remain less than significant.

Construction activities can produce vibration that may be felt by adjacent land uses. It is anticipated that no significant vibration impact will occur to any adjacent buildings due to the distance of construction equipment from buildings. Any Impacts are considered less than significant.

Because Project impacts are below established thresholds for these issue areas, when

combined with other Projects in the area, it will not result in any cumulative impacts.

Population and Housing

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.

The proposed Project together with other commercial and residential developments within the City will serve an existing demand for employment, while also meeting the cumulative demand of employment that will result from the City's projected future population. These increases for population, housing, and employment would be within the total projected growth forecasts for 2035 by the City. These expectations align with the growth projections for the region as a whole. SCAG's 2016 RTP/SCS forecasts that the City will have a population of 143,300 in 2040. In addition, implementation of the proposed Project would be consistent with the City's vision of the Project site because of the existing General Plan Update (2015) designations for the site of Suburban Retail District, Urban, General, and Suburban Neighborhood, and Neighborhood Center. Implementation of the proposed project would not result in a cumulatively significant population or housing impact and the proposed Specific Plan land uses would not significantly induce growth in areas where growth was not previously anticipated.

Public Services & Recreation Resources

The Project, in conjunction with other developments will result in the incremental increased demands on public services. Cumulative impacts on public services were evaluated in the City of Coachella General Plan Update Final EIR (2015), adopted April 22, 2015. The demand for all public services within the City are expected to increase, as population increases and the need to maintain adequate quality of service, access, and response times for emergency vehicles. However, the General Plan Update (2015) proposes multiple strategies and policies to reduce potential cumulative impacts on an individual project basis through the requirement and phasing of infrastructure necessary to support the Project and payment of Development Impact Fees. The Coachella Municipal Code requires that development fees paid by individual projects be used to mitigate those incremental increased demands on fire protection and emergency response services, law enforcement services, park and recreational facilities, and libraries as a result of the project. Incremental increases to school services are mitigated through fees established by the individual school districts and paid for by the development project.

Development Impact Fees and School Fees are adjusted annually using statistical information, local planning policies, and by interacting with other agencies to delineate past service patterns, emerging trends, and future issues of concern. Once identified, service providers (private sources) are able to adjust resources, based on market demand, in order to meet future needs. New development projects are required to adhere to conditions placed on the project through the entitlement process.

These General Plan Update (2015) policies, conditions of approval, and payment of development fees will reduce potential incremental impacts on public facilities and ensure the

provision of adequate levels of service. Therefore, cumulative impacts would be less than significant. This finding is consistent with the General Plan Update Final EIR (2015).

The cumulative study area for recreation resources is the City of Coachella, which is the area used by the City when determining its park-to-population ratio goals. Implementation of the proposed Project would result in the construction and operation of approximately 13.82 acres of parkland, 12.7 acres of open space/recreational uses, and 19.0 acres of drainage/water quality basins.

The proposed Project would also contribute to a cumulative growth in population (refer to subchapter 4.12 of this EIR for a detailed analysis). However, because the proposed Project includes an amount of parkland and recreational areas that exceeds the minimum requirements of the City either through dedication or payment of in-lieu fees, implementation of the proposed Project would not have a significant cumulative contribution to increased uses and physical deterioration of existing parks and recreational facilities. Additionally, the proposed Project would not only meet the parkland needs for the anticipated growth in population associated with Project implementation, but it would help to reduce the existing Citywide deficit of parkland in the City.

Implementation of the proposed Project in combination with cumulative projects in the area would increase use of existing parks and recreation facilities. However, as future residential development is proposed, the City would require developers to provide the appropriate amount of parkland or pay the in-lieu fees, which would contribute to future recreational facilities. Payment of these fees and/or implementation of new parks on a project-by-project basis would offset cumulative parkland impacts by providing funding for new and/or renovated parks equipment and facilities, or new parks. Therefore, the Project's cumulative contribution impacts to parks and recreation resources would be less than significant.

Transportation / Traffic

Pursuant to Section 15130(b)(2) of the CEQA Guidelines, the cumulative Project list from the *Traffic Impact Study City of Coachella, California,* prepared by RK Engineering Group, Inc., dated October 14, 2014, revised June 14, 2016 (**Appendix O**), was utilized for the cumulative impacts within the City of Coachella, the Coachella Valley and Riverside County.

The Project's contribution to the Transportation Uniform Mitigation Fee (TUMF) program as a fair share contribution is considered sufficient to address the Project's fair share toward a mitigation measure or measures designed to alleviate any potential cumulative impacts.

According to the analysis above, with adherence to **Standard Condition SC-TR-1** and incorporation of **Mitigation Measures MM-TR-1** through **MM-TR-5**, established thresholds related to transportation/traffic can be mitigated under CEQA.

However, even though implementation of the improvements defined in **Mitigation Measure MM-TR-3** would reduce the significant impacts, the City cannot control the timing of when the intersection improvements for the locations on Caltrans facilities (SR-86, and I-10) are implemented. For this reason, even with implementation of **MM-TR-3**, cumulative impacts would remain significant and unavoidable at these locations (Caltrans facilities SR-86, and I-10) with the Project and cumulative projects factored in.

In addition, the cumulative impacts to Dillon Road (1-10 to SR-86 and SR-86 to Highway 111) in 2035 Plus Project condition has been identified as a potentially significant and unavoidable impact because additional widening beyond the General Plan classification is likely infeasible.

Utilities and Service Systems

According to the Coachella Valley Water District (CVWD), there is an adequate water supply and sewer capacity, respectively, to meet the demand of the Project(s). Based on the analysis above and in the referenced documentation, water and wastewater management systems are capable of meeting the cumulative demand for these systems. Recycled water is available in the CVWD system. Thus, the Project will not cause cumulatively considerable significant adverse impacts on these systems.

Cumulative impacts to landfill capacity will be less than significant due to the Project construction debris and operational waste representing a less than substantial cumulative increment with adherence to **Standard Conditions SC-UTIL-4** and **SC-UTIL-5**. Therefore, due to available capacity and implementation of the above **Standard Conditions**, which provide for recycling on site to reduce Project operational waste, cumulative impacts to the existing landfills resulting from waste generated by Project implementation are considered less than significant.

Since the project would constitute a small incremental increase of the current residential and commercial customer base and the Project is required to comply with California Code of Regulations Title 24, Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings (see **Standard Condition SC-UTIL-6**) and be served by existing service and transmission lines within and around the Project area, this Project's cumulative energy impacts are concluded to a less than significant cumulative impact.

As previously stated, the analysis of cable, telephone and internet services is defined as the service territory for Time Warner Cable and Verizon. Both Time Warner Cable and Verizon would extend current facilities to meet project service demands. As these services are not operating above capacity, these service providers are anticipated to meet communication demands associated with past, present, and future development within the project area. Therefore, no cumulative impacts related to cable, telephone, and internet service will occur due to Project implementation.

CHAPTER 7 – PREPARATION RESOURCES

7.1 REPORT PREPARATION

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- Biological Resources – AMEC Environment & Infrastructure
- Cultural Resources – Professional Archaeological Services
- Drainage and Water Quality - United Engineering Group
- Environmental Site Assessment - All Phase Environmental, Inc.
- Fiscal Impact Analysis – The Natelson Dale Group, Inc.,
- Geotechnical Investigation – Petra Geotechnical, Inc.
- Hydrological Off-site Impacts – JLC Engineering and Consulting, Inc.
- Noise – RK Engineering Group, Inc.
- Specific Plan and Parcel Map - United Engineering Group
- Transportation/Traffic – RK Engineering Group, Inc.
- Water Supply Assessment – TKE Engineering

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Riverside County Land Information System, (http://tlmabld5.agency.tlma.co.riverside.ca.us/website/rclis)

Riverside County Nondisposal Facility Element, dated July 2015, http://www.rcwaste.org/Portals/0/Files/Planning/CIWMP/NDFE.PDF.

South Coast Air Quality Management District (SCAQMD), http://www.aqmd.gov/prdas/aqguide/doc/aq_guidance.pdf

South Coast Air Quality Management District Final 2016 Air Quality Management Plan, March 2017,http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp

Southern California Association of Governments (SCAG), http://www.scag.ca.gov/about/Pages/Home.aspx

Southern California Association of Governments (SCAG) Sustainability Planning Grant Website: http://sustain.scag.ca.gov/Pages/Grants%20and%20Local%20Assistance/GrantsLocalAssistance.aspx

State of California laws governing the Scenic Highway Program are found in the Streets and Highway Code, Section 260 et seq, (http://codes.findlaw.com/ca/streets-and-highways-code/shc-sect-260.html)

Title 40 of the Code of Federal Regulations, https://www.gpo.gov/fdsys/pkg/CFR-2003-title40-vol1/content-detail.html

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=20.&title=&part=&chapter=6.11.&article

United States Department of Agriculture (USDA) Census of Agriculture, https://www.agcensus.usda.gov/index.php

Waste Characterization, Commercial Sector: Estimated Solid Waste Generation and Disposal Rates, http://www.calrecycle.ca.gov/wastechar/wastegenrates/Commercial.htm;

Waste Characterization, Residential Developments: Estimated Solid Waste Generation Rates, http://www.calrecycle.ca.gov/wastechar/wastegenrates/Residential.htm;

Water Recycling in Landscaping Act (California Government Code Sections 65601 through 65607), https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=1.&title=7.&part=&chapter=3.&article=10.9.

Water Reuse (CWC Sections 13550 through 13557), https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=WAT&sectionNum=13550

Web Soil Survey Online Database, http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

Western Regional Climate Center 2014, Indio Fire Station COOP, http://w2.weather.gov/climate/calendar_outlook.php?wfo=sgx&site=44259

Western Riverside Council of Governments (WRCOG), http://www.wrcog.cog.ca.us

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CHAPTER 8 – APPENDICES

8.1 NOTICE OF PREPARATION / INITIAL STUDY

8.2 NOP MAILING LIST / NOP COMMENT LETTERS

8.3 SCOPING MEETING POWERPOINT PRESENTATION

APPENDIX 8.1

NOTICE OF PREPARATION / INITIAL STUDY

City of Coachella

Notice of Preparation of Draft EIR

and Notice of Scoping Meeting

Date: March 2, 2015

To: Responsible and Trustee Agents/Interested Organizations and Individuals

Subject: **Notice of Preparation of a Draft Environmental Impact Report and Notice of a Public Scoping Meeting**

Lead Agency:

CITY OF COACHELLA
Community Development Department
1515 6th Street
Coachella, CA 92236
760.398.3102
Contact: Luis Lopez

Consulting Firm Preparing the Draft EIR:

MATTHEW FAGAN CONSULTING SERVICES
42011 Avenida Vista Ladera
Temecula, CA 92591
951.265.5428
Contact: Matthew Fagan

This NOP includes a project description and a list of the environmental issues to be examined in the environmental impact report (EIR).

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but no later than 30 days after receipt of this notice.

Please send your response to Mr. Luis Lopez, Development Services Director, at the City of Coachella address shown above. Please include the name, phone number, and address of a contact person in your response.

Project Title: Vista Del Agua Specific Plan

Location: South of Interstate 10 (I-10) and Vista Del Sur, east of Tyler Street, north of Avenue 48, and south of the All-American Canal (Coachella Branch).

Description

A. Introduction

CVP Palm Springs, LLC, in affiliation with Strategic Land Partners, LLC is proposing to implement a residential, commercial, and open space development, with asscociated on-site and off-site infrastructure improvements for the Vista Del Agua Specific Plan (the "Project"), an approximate 275.38-acre site located within the City of Coachella, in Riverside County. As presently proposed, the Project proponent is preparing a draft specific plan (Vista Del Agua Specific Plan No. 14-01), that would allow conversion of this property to a mixed use development with residential, commercial, park, and open space uses. To accomplish this, the Project proponent will submit applications

seeking approval from the City for a general plan amendment, a change of zone, a specific plan, a tentative parcel map for the individual planning areas, a community facilities district to fund the required on-site and off-site infrastructure improvements (water, sewer, roadways, etc.) for the Project area, and a development agreement. A more detailed Project description is provided in the following text.

B. Project Setting

The Project site is currently undeveloped, with numerous unimproved dirt access roads used primarily for agricultural activities in the area. Adjacent land uses consist of cropland and sparse, rural residential development to the south, east, and west, with I-10 at the Project's northernmost boundary. The Mecca Hills, which reach a peak elevation of 1,648 feet (Mecca Hill), are 4-5 miles to the southeast. The Indio Hills begin 2-3 miles to the north at elevations of a few hundred feet but later attain elevations over 6,500 feet to the northwest. Further to the east are the Little San Bernardino Mountains, which attain elevations over 3,000 feet. The Whitewater River, tamed by the Coachella Storm Water Channel, is the principal watercourse of the Coachella Valley and is about 0.75 miles southwest of the subject property. The Coachella Canal is directly adjacent to the northeast corner of the property.

The Project site is comprised of gently sloping desert and disturbed agricultural land with a seventy-six foot (76') elevation difference. The highest elevation at the northeast corner is approximately 37 feet above mean sea level (MSL) sloping toward the southwest corner to approximately 58 feet below MSL. Soils in the Coachella Valley area are primarily composed of alluvium and undifferentiated older alluvial sediments. Most of the Project site was once covered by Sonoran creosote bush scrub and saltbush scrub with the latter more common in the southern portion of the property. The eastern 30% of the property is currently covered with vineyards.

The Project site is disturbed with evidence of ground clearing, as well as off-road vehicle use and illegal refuse dumping. Portions of the site are also being used as a paintball course.

C. General Plan Amendment and Change of Zone

The existing General Plan Land Use designation within the City of Coachella General Plan is identified as Suburban Retail District, Urban, General, and Suburban Neighborhood, and Neighborhood Center for the Project site. This designation is proposed to be modified through a General Plan Amendment. The existing zoning classfications within the Project site include C-G (General Commercial), R-S (Single-Family Residential), M-S (Manufacturing Service) and A-T (Agricultural Transition). The proposed Change of Zone and Specific Plan will rezone the Project site to the zoning classifications proposed within the Vista Del Agua Specific Plan.

D. Specific Plan

A total of ten (10) Planning Areas are proposed within the Vista Del Agua Specific Plan (SP 14-01). The Vista Del Agua Specific Plan identifies a variety of residential and non-residential designations. A discussion of the residential and non-residential uses is provided in Table 1, presented below.

TABLE 1
Specific Plan Land Use Summary

Planning Area	Acres	Land Use	Density	Unit Count
PA1	17.57	GC	--	--
PA2	7.35	MF	20.0 Du/AC	146
PA3	10.09	MF	20.0 Du/AC	201
PA4	21.92	MF	12.0 Du/Ac	263
PA5	43.04	SF	5.8 Du/Ac	250
PA6	72.47	SF	6.3 Du/AC	460
PA7	46.46	SF	5.6 Du/Ac	260
PA8	14.34	SF	4.2 Du/Ac	60
PA9	13.82	Park	--	--
PA10	8.27	NC*	--	--
--	20.05	Roads	--	--
Totals	**275.38**	**--**	**5.96 Du/Ac**	**1640**

*** May be developed as 41 Single Family Units**

D.1 Residential

The Project proposes up to 1,640 dwelling units within seven (7) Planning Areas (PAs). PAs 2, 3 and 4 have a multi-family designation. Densities range from 12 dwelling units per acre to 20 dwelling units per acre. PAs 5, 6, 7 and 8 have single-family designations. Densities range from 4.2 dwelling units per acre to 6.3 dwelling units per acre.

D.2 Commercial

Planning Area 1 (PA1) will be the general commercial component to the Vista Del Agua Specific Plan and will consist of approximately 17.6 acres. PA1 is located on both sides of Street "A" at the intersection with Vista Del Sur. This designation will provide for a wide range of community-oriented and regional-oriented commercial businesses. PA1 will allow for large retail, entertainment and commercial service business centers including large retail uses, theaters, hotels and restaurants as well as professional and medical offices.

Planning Area 10 (PA10), a second commercial Planning Area, is comprised of an 8.3-acre commercial neighborhood center at the southeast corner of the Project site. This designation provides for small-scale shopping centers offering convenient retail goods and services. Examples of permitted uses include small-scale restaurants, grocery and convenience stores, service businesses that generate limited traffic, and boutique retail sales. It is anticipated that the neighborhood center will be compatible in design and scale with adjacent residential areas.

D.3 Open Space

Within the Project, an approximately 13.8 acre community park space is proposed, with an additional 12.7 acres of paseos and trails. The community park will function as a buffer to the San Andreas Fault, assuring no habitable structures will be constructed within any hazard zone of the fault line. The trails and open space areas will provide connectivity throughout the project as well as act as a bio-filter for stormwater runoff.

D.4 Circulation

The Circulation Plan for Vista Del Agua will balance the needs of pedestrians, bicyclists and vehicles. Another objective of the circulation plan is to provide direct access to the parks, open space and commercial areas nearby and within the Project.

The primary vehicle access to the Project is provided from Avenue 48 to the south and Vista Del Sur and Avenue 47 to the north. The north to south access will be provided by a new collector street, which will connect Vista Del Sur, Avenue 47 and Avenue 48. A majority of the Project traffic will use Avenue 48/Shadow View Drive as the main access roadway and Avenue 47 as a secondary roadway. This results in a total of approximately 11,600' of off-site street improvements. It is anticipated that the Project will be responsible for a 30' paved section of these improvements (the ultimate street section is 118' for Avenue 48 and 90' for Avenue 47). There will also be a traffic signal installed at Dillon Road and Vista Del Sur.

Bike routes will be located along Avenue 48, Avenue 47, Polk Street and Street "A". Regional bike paths will continue off-site from the Project area along Avenue 48, Avenue 47 and Polk Street per the City's General Plan.

D.5 Project Conceptual Grading

The grading concept is designed to minimize natural topography impacts and to accommodate drainage, utility and road circulation systems that comply with City standards. All grading shall be done in compliance with the City of Coachella's grading standards. Prior to any development within any Planning Area of the Specific Plan, an overall grading plan for the area shall be submitted and processed through the City of Coachella for approval. Grading procedures and Best Management Practices shall be employed, where feasible, to limit erosion and sedimentation as well as to limit source pollution onsite. Prior to grading or ground disturbing activities exceeding one acre, the required NPDES permit coverage shall be obtained.

D.6 Drainage / Hydrology / Water Quality

The Project will provide flood control facilities to intercept and convey off-site and on-site drainage areas and revert to existing conditions as the drainage leaves the Project site. The contours indicate that the general flow direction is in the southwesterly direction. The runoff emanating from the Project ultimately discharges into the Coachella Valley Storm Channel located approximately one mile southwest of the site. The existing flow rates off-site will be maintained with no additional off-site flows as a result of the Project.

Most of the drainage for the site will be conveyed along paseo areas with excess storm water released into a proposed detention basin in the southwest portion of the Project site. The runoff will be conveyed to the existing watercourse that discharges in the Coachella Valley Storm Channel. Drainage for Planning Areas 1-4 will be collected within subsurface storm drain facilities. The proposed storm drain will discharge into a separate basin for water quality and detention.

Several water quality basins as well as paseos areas will act as filtration facilities for the Project runoff. Soil filtration rates throughout this area are high, lending additional groundwater recharge and water quality opportunities.

The Project is located within FEMA Zone X. Zone X is defined as "areas determined to be outside 500-year floodplain determined to be outside the 0.2% annual chance floodplains." Development

within Zone X is acceptable as long as the finished floor elevations are 1 foot above the 100-year flood elevation.

D.7 Master Water Plan

The Project is within the Coachella Water District's service area. Service will be provided to the Project by means of existing services as well as improvements constructed as part of the Project. The Project is located within the High Zone (or 150 Zone) of the City's water system. Connection for the site will take place at the water tank and booster station located at the southwest corner of the Project. Approximately 200' of off-site improvements would be required for this connection. In addition, it is likely that a connection will also be needed at Avenue 47 and Tyler Street to complete a "looped" system.

D.8 Master Sewer Plan

The Project is within the Coachella Sanitary District service area. The sewer system for the Project will ultimately tie in to a 24" main line located in Tyler Street, approximately 1,300' west of the Project boundary, with one connection at the intersection of Avenue 48 and Tyler Street. Additionally, there will be a potential connection at Tyler Street and Avenue 47.

E. Tentative Parcel Map No. 36872

Tentative Parcel Map No. 36872 is proposed for the phasing and financing of infrastructure improvements required for the Project. While the precise design of this map is not specifically known at this time, the following assumptions will be utilized for the purpose of this EIR:

- The map boundary will be consistent with that of the Specific Plan;
- The map will be consistent with the City's General Plan;
- The map will conform to the requirements of Title 16 – Subdivisions, of the City's Municipal Code; and
- The map will conform to any and all other applicable City Ordinances.

F. Development Agreement

Pursuant to Government Code Section 65864-65869.5, the Project proponent may enter into a Development Agreement (DA) with the City to obtain assurances for the Project that, upon approval of the Project, the applicant may proceed with the Project in accordance with existing policies, rules and regulations, and subject to conditions of approval.

Environmental Issues to be Evaluated in the EIR

The City of Coachella, the lead agency for the proposed Vista Del Agua Project, is subject to specific environmental review under CEQA. CEQA Guidelines §15063 provide that if a lead agency determines that an EIR will clearly be required for a project, an Initial Study is not required.

In this case, the City has already determined that an EIR will need to be prepared based on the Project's potential to create short-term, long-term and cumulative impacts associated with other development along Interstate 10. Therefore, an EIR will be prepared to fully evaluate the potential impacts of the proposed Project. The EIR will be comprehensive in nature evaluating all identified issues from the CEQA Initial Study Checklist.

In particular, the following issues are anticipated to be addressed in the EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities and Service Systems

The EIR will address the short- and long-term effects of the Project on the environment, including the impacts of any off-site improvements. It will also evaluate the potential for the Project to cause direct and indirect growth-inducing impacts, as well as cumulative impacts. Alternatives to the proposed Project will be evaluated that may reduce impacts that are determined to be significant in the EIR. Mitigation will be proposed for those impacts that are determined to be significant. A mitigation monitoring program will also be developed as required by §15097 of the CEQA Guidelines.

The environmental determination in this Notice of Preparation is subject to a 30-day public review period per Public Resources §21080.4 and CEQA Guidelines §15082. Public agencies, interested organizations, and individuals have the opportunity to comment on the proposed Project, to identify those environmental issues, potentially affected by the Project which should be addressed further by the City of Coachella in the EIR.

The Initial Study/Environmental Documentation for the Project may be downloaded from the City's website:

http://www.coachella.org/departments/documents

The Initial Study/Environmental Documentation is also available for review Monday through Thursday, between 7am and 6pm at the following location:

City of Coachella
Development Services Department
1515 6th Street
Coachella, CA 92236

Public Scoping Meeting

The City will have a Scoping Meeting to:

1) Inform the public and interested agencies about the proposed Project; and
2) Solicit public comment on the scope of the environmental issues to be addressed in the EIR.

Date: 03/12/15
Time: 2:00PM

Location: City of Coachella, Council Chambers
1515 6th Street, Coachella, CA 92236

Environmental Assessment No. 14-04
for
Vista Del Agua Specific Plan (No. 14-01)
General Plan Amendment No. 14-01
Change of Zone No. 14-01
Specific Plan No. 14-01
Tentative Parcel Map No. 36872
Development Agreement

Lead Agency:
City of Coachella
Development Services Department
1515 6th Street
Coachella, CA 92236

Applicant:
CVP Palm Springs, LLC
145 E. Warm Springs Road
Las Vegas, NV 89119

In Affiliation With:
Strategic Land Partners, LLC
12671 High Bluff Drive, Suite 150
San Diego, CA 92130

Prepared by:
Matthew Fagan Consulting Services
42011 Avenida Vista Ladera
Temecula, CA 92591
(951) 265-5428

February 2015

Table of Contents

A. BACKGROUND INFORMATION

1. Project Title: Vista Del Agua
   - GPA 14-01
   - CZ 14-01
   - SPA 14-01
   - TPM 36872
   - Development Agreement

2. Lead Agency Name and Address: City of Coachella
   1515 Sixth Street
   Coachella, California 92236

3. Contact person and phone number: Luis Lopez, Development Services Director, (760) 398-3102

4. Project Location(s): <u>On-site</u>

   South of Interstate 10 (I-10) and Vista Del Sur, east of Tyler Street, north of Avenue 48, and south of the All-American Canal (Coachella Branch), and identified by Assessor's Parcel Numbers: 603-150-004, 603-150-005, 603-150-007, 603-150-009, 603-150-010, 603-150-011, 603-150-012, 603-150-008, 603-130-004, 603-130-003, 605-130-009, and, 603-122-005, in the City of Coachella, County of Riverside, California. Reference Figure 1, *Regional Location Map*, and Figure 2, *Site Location (USGS)*, and Figure 3, *Specific Plan Land Use Map*.

   <u>Off-Site</u>

   Sewer

   The sewer for the Project will ultimately tie in to a 24" main line located in Tyler Street, approximately 1,300' west of the Project boundary. A connection is proposed at the intersection of Avenue 48 and Tyler Street. Additionally, there will be a potential connection at Tyler Street and Avenue 47. Reference Figure 4, *Master Sewer Plan*.

   Water

   Connection for the site will take place at the water tank and booster station located at the southwest corner of the Project site. Approximately 200' of off-site improvements would be required for this connection. In addition, it is likely that a connection will also be needed at Avenue 47 and Tyler Street to complete the "looped" system. Reference Figure 5, *Master Water Plan.*

Street Improvements

The majority of Project traffic will use Avenue 48/Shadow View Drive as the main access road and Avenue 47 as a secondary roadway. This results in a total of approximately 11,600' of off-site street improvements. These off-site improvements will be a 30' paved section (the ultimate street section for Avenue 48 is 118' and for Avenue 47 is 90'). There will also be a signal installed at Dillon Road. Reference Figure 6, *Circulation Plan.*

5. Project sponsor's name and address: CVP Palm Springs, LLC
145 E. Warm Springs Road
Las Vegas, NV 89119

In Affiliation With:

Strategic Land Partners, LLC
12671 High Bluff Drive, Suite 150
San Diego, CA 92130

6.a. Current General Plan Designation: Suburban Retail District, Urban, General, and Suburban Neighborhood, and Neighborhood Center

6.b. Proposed General Plan Designation: Specific Plan (SP).

7.a. Current Zoning Designations: Manufacturing Services (M-S)
Residential Single Family (R-S), and
General Commercial (C-G)

7.b. Proposed Zoning Designation: Specific Plan (SP).

8. Description of the Project:

A. Introduction

CVP Palm Springs, LLC, in affiliation with Strategic Land Partners, LLC is proposing to implement a residential, commercial, and open space development, with asscociated on-site and off-site infrastructure improvements for the Vista Del Agua Specific Plan, an approximate 275.38-acre site located within the City of Coachella, in Riverside County. As presently proposed, the Project proponent is preparing a draft specific plan (Vista Del Agua Specific Plan No. 14-01), that would allow conversion of this property to a mixed use development with residential, commercial, park, and open space uses. To accomplish this, the Project proponent will submit applications seeking approval from the City for a general plan amendment, a change of zone, a specific plan, a tentative parcel map for the individual planning areas, a community facilities district to fund the required on-site and off-site infrastructure improvements (water, sewer, roadways, etc.) for the Project area, and a development agreement. A more detailed Project description is provided in the following text.

B. Project Setting

The Project site is currently undeveloped, with numerous unimproved dirt access roads used primarily for agricultural activities in the area. Adjacent land uses consist of cropland and sparse, rural residential development to the south, east, and west, with I-10 at the Project's northernmost boundary. The Mecca Hills, which reach a peak elevation of 1,648 feet (Mecca Hill), are 4-5 miles to the southeast. The Indio Hills begin 2-3 miles to the north at elevations of a few hundred feet but later attain elevations over 6,500 feet to the northwest. Further to the east are the Little San Bernardino Mountains, which attain elevations over 3,000 feet. The Whitewater River, tamed by the Coachella Storm Water Channel, is the principal watercourse of the Coachella Valley and is about 0.75 miles southwest of the subject property. The Coachella Canal is directly adjacent to the northeast corner of the property.

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The site is disturbed with evidence of ground clearing, as well as off-road vehicle use and illegal refuse dumping. Portions of the site are also being used as a paintball course. Refer to Figure 7, *Aerial Photo.*

C. General Plan Amendment and Change of Zone

The existing General Plan Land Use designation within the City of Coachella General Plan is identified as Suburban Retail District, Urban, General, and Suburban Neighborhood, and Neighborhood Center for the Project site. This designation is proposed to be modified through a General Plan Amendment. The existing zoning classfications within the Project site include C-G (General Commercial), R-S (Single-Family Residential), M-S (Manufacturing Service) and A-T (Agricultural Transition). The proposed Change of Zone and Specific Plan will rezone the Project site to the zoning classifications proposed within the Vista Del Agua Specific Plan.

D. Specific Plan

A total of ten (10) Planning Areas are proposed within the Vista Del Agua Specific Plan (SP 14-01). The Vista Del Agua Specific Plan identifies a variety of residential and non-residential designations. A discussion of the residential and non-residential uses is provided in Table 1, presented below. Figure 3, *Specific Plan Land Use Plan* contains a copy of the draft SP 14-01 proposed land uses on the approximate 275.38 acre Vista Del Agua property.

TABLE 1
Specific Plan Land Use Summary

Planning Area	Acres	Land Use	Density	Unit Count
PA1	17.57	GC	--	--
PA2	7.35	MF	20.0 Du/AC	146
PA3	10.09	MF	20.0 Du/AC	201
PA4	21.92	MF	12.0 Du/Ac	263
PA5	43.04	SF	5.8 Du/Ac	250
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PA8	14.34	SF	4.2 Du/Ac	60
PA9	13.82	Park	--	--
PA10	8.27	NC*	--	--
--	20.05	Roads	--	--
Totals	**275.38**	**--**	**5.96 Du/Ac**	**1640**

*** May be developed as 41 Single Family Units**

D.1 Residential

The Project proposes up to 1,640 dwelling units within seven (7) Planning Areas (PAs). PAs 2, 3 and 4 have a multi-family designation. Densities range from 12 dwelling units per acre to 20 dwelling units per acre. PAs 5, 6, 7 and 8 have single-family designations. Densities range from 4.2 dwelling units per acre to 6.3 dwelling units per acre.

D.2 Commercial

Planning Area 1 (PA1) will be the general commercial component to the Vista Del Agua Specific Plan and will consist of approximately 17.6 acres. PA1 is located on both sides of Street "A" at the intersection with Vista Del Sur. This designation will provide for a wide range of community-oriented and regional-oriented commercial businesses. PA1 will allow for large retail, entertainment and commercial service business centers including large retail uses, theaters, hotels and restaurants as well as professional and medical offices.

A second commercial Planning Area, Planning Area 10 (PA10) consists of 8.3 acres of neighborhood center at the southeast corner of the Project site. This designation provides for small-scale shopping centers offering convenient retail goods and services. Examples of permitted uses include small-scale restaurants, grocery and convenience stores, service businesses that generate limited traffic, and boutique retail sales. It is anticipated that the neighborhood center will be compatible in design and scale with adjacent residential areas.

D.3 Open Space

Within the project, an approximately 13.8 acre community park space is proposed, with an additional 12.7 acres of paseos and trails. The community park will function as a buffer to the San Andreas Fault, assuring no habitable structures will be constructed within any hazard zone of the fault line. The trails and open space areas will provide connectivity throughout the project as well as act as a bio-filter for storm runoff.

D.4 Circulation

The Circulation Plan for Vista Del Agua will balance the needs of pedestrians, bicyclists and vehicles. Another objective of the circulation plan is to provide direct access to the parks, open space and commercial areas nearby and within the Project. Reference Figure 6, *Circulation Plan.*

The primary vehicle access to the Project is provided from Avenue 48 to the south and Vista Del Sur and Avenue 47 to the north. The north to south access will be provided by a new collector street, which will connect Vista Del Sur, Avenue 47 and Avenue 48. A majority of the Project traffic will use Avenue 48/Shadow View Drive as the main access roadway and Avenue 47 as a secondary roadway. This results in a total of approximately 11,600' of off-site street improvements. It is anticipated that the Project will be responsible for a 30' paved section of these improvements (the ultimate street section is 118' for Avenue 48 and 90' for Avenue 47). There will also be a traffic signal installed at Dillon Road and Vista Del Sur.

Bike routes will be located along Avenue 48, Avenue 47, Polk Street and Street "A". Regional bike paths will continue off-site from the Project area along Avenue 48, Avenue 47 and Polk Street per the City's General Plan.

D.5 Project Conceptual Grading

The grading concept is designed to minimize natural topography impacts and to accommodate drainage, utility and road circulation systems that comply with City standards. All grading shall be done in compliance with the City of Coachella's grading standards. Prior to any development within any Planning Area of the Specific Plan, an overall grading plan for the area shall be submitted and processed through the City of Coachella for approval. Grading procedures and Best Management Practices shall be employed, where feasible, to limit erosion and sedimentation as well as to limit source pollution onsite. Prior to grading or ground disturbing activities exceeding one acre, the required NPDES permit coverage shall be obtained. Reference Figure 8, *Concept Grading Plan*.

D.6 Drainage / Hydrology / Water Quality

The Project will provide flood control facilities to intercept and convey off-site and on-site drainage areas and revert to existing conditions as the drainage leaves the Project site. The contours indicate that the general flow direction is in the southwesterly direction. The runoff emanating from the Project ultimately discharges into the Coachella Valley Storm Channel located approximately one mile southwest of the site. The existing flow rates off-site will be maintained with no additional off-site flows as a result of the Project.

Most of the drainage for the site will be conveyed along paseo areas with excess storm water released into a proposed detention basin in the southwest portion of the site. The runoff will be conveyed to the existing watercourse that discharges in the Coachella Valley Storm Channel. Drainage for Planning Areas 1-4 will be collected within subsurface storm drain facilities. The proposed storm drain will discharge into a separate basin for water quality and detention.

Several water quality basins as well as paseos areas will act as filtration facilities for the project runoff. Soil filtration rates throughout this area are high, lending additional groundwater recharge and water quality opportunities. Reference Figure 9, *Master Drainage Plan*.

The Project is located within FEMA Zone X. Zone X is defined as "areas determined to be outside 500-year floodplain determined to be outside the 0.2% annual chance floodplains." Development within Zone X is acceptable as long as the finished floor elevations are 1 foot above the 100-year flood elevation. Figure 10, *FIRM Map (Panel 2260G).*

D.7 Master Water Plan

The Project is within the Coachella Water District's service area. Service will be provided to the Project by means of existing services as well as improvements constructed as part of the Project. The Project is located within the High Zone (or 150 Zone) of the City's water system. Connection for the site will take place at the water tank and booster station located at the southwest corner of the Project. Approximately 200' of off-site improvements would be required for this connection. In addition, it is likely that a connection will also be needed at Avenue 47 and Tyler Street to complete the "looped" system. Reference Figure 5, *Master Water Plan*.

D.8 Master Sewer Plan

The Project is within the Coachella Sanitary District service area. The sewer system for the Project will ultimately tie in to a 24" main line located in Tyler Street, approximately 1,300' west of the Project boundary, with one connection at the intersection of Avenue 48 and Tyler Street. Additionally, there will be a potential connection at Tyler Street and Avenue 47. Reference Figure 4, *Master Sewer Plan*.

E. Tentative Parcel Map No. 36872

Tentative Parcel Map No. 36872 is for the purposed of phasing and financing the infrastructure improvements required for the Project. While the precise design of this map is not specifically known at this time, the following assumptions will be utilized for the purpose of this EIR:

- The map boundary will be consistent with that of the Specific Plan;
- The map will be consistent with the City's General Plan;
- The map will conform to the requirements of Title 16 – Subdivisions, of the City's Municipal Code; and
- The map will conform to any and all other applicable City Ordinances.

F. Development Agreement

Pursuant to Government Code Section 65864-65869.5, the Project proponent may enter into a Development Agreement (DA) with the City to obtain assurances for the Project that, upon approval of the Project, the applicant may proceed with the Project in accordance with existing policies, rules and regulations, and subject to conditions of approval. The physical improvements associated with the DA have been described in A.8.C-E, above.

B. SOURCES

The following documents are referenced information sources utilized by this analysis:

1. Technical Background Report to the Safety Element, 2014.
2. City of Coachella, General Plan 2035 Draft EIR, 2014.

Technical Studies referenced in this Environmental Assessment are included in Appendix B.

C. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☒ Aesthetics	☒ Agriculture and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Geology and Soils
☒ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials	☒ Hydrology and Water Quality
☒ Land Use and Planning	☐ Mineral Resources	☒ Noise
☒ Population and Housing	☒ Public Services	☒ Recreation
☒ Transportation/Traffic	☒ Utilities and Service Systems	☒ Mandatory Findings of Significance

D. DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☒ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as describe on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Luis Lopez	Dev. Services Director	2/24/15
Signature	Title	Date

E. ENVIRONMENTAL CHECKLIST

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicated whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

I. AESTHETICS.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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) Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

a-d) Implementation of the Project (primarily on-site components) may have a substantial adverse effect on a scenic vista; substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; substantially degrade the existing visual character or quality of the site and its surroundings; and/or, create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The Project represents a change to the physical environment, which will result in a long-term visual aesthetic that differs from the current agricultural setting. Grading of the site and future structures of varying heights within the Project site will have a potentially significant impact on the aesthetic quality of the site. Associated lighting from the new development, may substantially affect nighttime views in the area. A Project-specific aesthetic analysis shall be prepared in order to address questions I.a and c, above. In order to ensure a comprehensive discussion of all of the aesthetic resources issues raised above, they will be analyzed in the EIR.

II. AGRICULTURAL AND FORESTRY RESOURCES.

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☒	☐	☐	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526) or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) According to the 2035 General Plan EIR (Figure 4.2-1: Important Farmland in Coachella), and the Riverside County Land Information System (http://tlmabld5.agency.tlma.co.riverside.ca.us/website/rclis), the Project (on-site and off-site components) consists of Farmland of Local Importance, Prime Farmland, and Other Lands (not designated as farmland). The current General Plan designation for the Project (on-site and off-site components) is Suburban Retail District, Urban, General, and Suburban Neighborhood, and Neighborhood Center, therefore; it has been anticipated by the City that urbanization is planned and will ultimately occur in the Project vicinity. The Project is proposing uses that are different than the current land use designation; however, they are still urban/suburban, not agricultural in nature. Since implementation of the Project will convert Prime Farmland, and Farmland of Local Importance, in order to ensure a comprehensive discussion of this agricultural resource issue, and potential mitigation options (including mitigation fees), it will be analyzed in the EIR.

b) Williamson Act contract lands do not exist with the Coachella City limits. Therefore, implementation of the Project (on-site and off-site components) will not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

The current zoning on the Project site is:

- Manufacturing Services (M-S);
- Residential Single Family (R-S); and
- General Commercial (C-G).

Therefore, implementation of the Project will not conflict with existing zoning for agricultural use. No impacts are anticipated. No mitigation is required. This issue will not require any further analysis in the EIR.

c) There are no forest lands on or near the on-site or off-site Project components. Therefore, implementation of the Project (on-site and off-site components) will not 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)). No impacts are anticipated. No mitigation is required. This issue will not require any further analysis in the EIR.

d) There are no forest lands on or near the on-site or off-site Project components; therefore the Project would not impact any forest or timberlands. No impacts are anticipated. No mitigation is required. This issue will not require any further analysis in the EIR.

e) The conversion of sites from vacant land to residential, commercial and open space uses will permanently remove the potential for the land to be farmed in the future. However, this change is consistent with future land uses planned for the City in the General Plan. Implementation of the Project (on-site and off-site components) will not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use. There are no forest lands on or near the site. No impacts are anticipated. No mitigation is required. This issue will not require any further analysis in the EIR.

III. AIR QUALITY.

AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☒	☐	☐	☐

a-c) Implementation of the Project (on-site and off-site components) may conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standard or contribute substantially to an existing or projected air quality violation; or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). Air quality emissions will occur during the construction phase for installation of both on- and off-site improvements necessary for the Project.

Short-term construction emissions will be analyzed for both on- and off-site Project improvements to determine emissions are within the pollutant thresholds (regional and localized) established by the South Coast Air Quality Management District (SCAQMD). In addition, long-term operational activities will be analyzed to determine if Project related emissions are within the pollutant thresholds (regional and localized) established by the SCAQMD. A Project specific air quality study shall be prepared in order to address questions III.a-c, above. In order to ensure a comprehensive discussion of these air quality resources issues, they will be analyzed in the EIR.

d) Implementation of the Project (on-site and off-site components) may expose sensitive receptors, which are located within 1 mile of the Project site to substantial point source emissions. Single-family rural residences are located adjacent to and within a mile of the Project. Impacts from particulate matter and odors may be a concern during construction. A Project specific air quality study shall be prepared in order to address question III.d, above. In order to ensure a comprehensive discussion this air quality resource issue, it will be analyzed in the EIR.

e) Implementation of the Project (on-site and off-site components) may create a significant amount of objectionable odors affecting the surrounding uses during construction and operation. Odors expected to be generated by this Project will be primarily those from the construction equipment and delivery vehicles. These odors will be associated with exhaust emissions from the consumption of petroleum products (gasoline, diesel, etc.). In addition, the commercial component may result in potential uses that could result in potential objectionable odors. A Project specific air quality study shall be prepared in order to address question III.e, above. In order to ensure a comprehensive discussion of this air quality resource issue, it will be analyzed in the EIR.

IV. BIOLOGICAL RESOURCES.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 federally protected wetlands as defined by Section 404 of the Clean Water Act (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?	☒	☐	☐	☐
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?	☒	☐	☐	☐

a-f) Implementation of the Project (on-site and off-site components) may 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; 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; have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; 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; conflict with any local policies or ordinances protecting

biological resources, such as a tree preservation policy or ordinance; or, conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. A Project specific biological study shall be prepared in order to address questions IV.a-f, above. In order to ensure a comprehensive discussion of all of the biological resources issues raised above, and how they relate to the Coachella Valley Multiple Species Habitat Conservation Plan, they will be analyzed in the EIR.

V. CULTURAL RESOURCES.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☒	☐	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐

a-d) Implementation of the Project (on-site and off-site components) may cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5; cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5; or, disturb any human remains, including those interred outside of formal cemeteries. A Project specific cultural resources study shall be prepared in order to address questions V.a-d, above. In order to ensure a comprehensive discussion of these cultural resources issues, they will be analyzed in the EIR.

VI. GEOLOGY AND SOILS.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known 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.	☒	☐	☐	☐
ii) Strong seismic ground shaking?	☒	☐	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv) 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 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?	☐	☐	☐	☒

a-d)

Implementation of the Project (on-site and off-site components) may expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- Rupture of a known 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.
- Strong seismic ground shaking;
- Seismic-related ground failure, including liquefaction; and/or,
- Landslides.

In addition, implementation of the Project (on-site and off-site components) may:

- Result in substantial soil erosion or the loss of topsoil;
- 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; and/or;
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

The San Andreas Fault traverses the northeasterly portion of the Project site. According to the ESA, the primary soil type at the north half of the Property is Coachella fine sand. The landform setting for this soil is described as alluvial fan with a slope of 0 to 2 percent. The primary soil type at the south half of the Property is Gilman fine sandy loam. The landform setting for this soil is described as alluvial fan with a slope of 0 to 2 percent.

A Project specific geotechnical study shall be prepared in order to address questions a. i-iv, b-d, above. In order to ensure a comprehensive discussion of these geotechnical resources issues, they will be analyzed in the EIR.

e) No portions of the proposed Project will include the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water. Therefore, implementation of the Project (on-site and off-site components) will not 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. No impacts are anticipated. No mitigation is required. This issue will not require any additional analysis in the EIR.

VII. GREENHOUSE GAS EMISSIONS.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

a,b) Implementation of the Project (on-site and off-site components) may generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and may conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. A Project specific greenhouse gas emissions study shall be prepared in order to address questions VII.a. and b., above. In order to ensure a comprehensive discussion of greenhouse gas emissions resources issues, they will be analyzed in the EIR.

VIII. HAZARDS AND HAZARDOUS MATERIALS.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident condition involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas of where residences are intermixed with wildlands?	☐	☐	☐	☒

a,b) Implementation of the Project (on-site and off-site components) may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; and/or, create a significant hazard to the public or the environment through reasonable foreseeable upset and accident condition involving the release of hazardous materials into the environment. These impacts may occur during all phases of development. In order to ensure a comprehensive discussion of the hazards and hazardous materials issues related to questions VIII.a and b, above, they will be analyzed in the EIR.

c) According to a review of the Desert Sands Unified School District web site (https://www.dsusd.us) and the Coachella Valley Unified School District web site (http://www.coachella.k12.ca.us), the Project site is not located within one-quarter mile of an existing, or proposed school. Therefore, implementation of the Project (on-site and off-site components) will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impacts are anticipated. No mitigation is required. This issue will not require any additional analysis in the EIR.

d) According to the ESA (*Phase I Environmental Assessment of Vista Del Agua*, September 24, 2013, prepared by All Phase Environmental, Inc. (ESA), and is contained in Appendix B: Technical Studies, of this Environmental Assessment), the Project site, and sites within a 1 mile radius are not 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. However, the Project (on-site and off-site components) is located in an area that is currently, and has been historically devoted to agricultural activities. Therefore, in order to ensure a comprehensive discussion of potential hazards associated with these agricultural uses, they will be analyzed in the EIR.

e) The Project site is not located within two miles of a public airport or public use airport. The closest public airport, or public use airports are Thermal Airport (Jacqueline Cochran Regional Airport), located approximately 5 miles to the south, and the Bermuda Dunes Airport; located over 5 miles to the north-northwest. The southwest corner of the Project is about 2 miles northeast of Compatibility Zone E of the Thermal Airport. The Project is not located in a flight path. Therefore, implementation of the Project (on-site and off-site components) will not result in a safety hazard for people residing or working in the project area since the Project site is not 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. No impacts are anticipated. No mitigation is required. This issue will not require any additional analysis in the EIR.

f) According to the Riverside County Land Information System (http://tlmabld5.agency.tlma.co.riverside.ca.us/website/rclis/), the Project site is not located within the vicinity of a private airstrip. Therefore, implementation of the Project (on-site and off-site components) will not result in a safety hazard for people residing or working in the project area, since the Project site is not located within the vicinity of a private airstrip. No impacts are anticipated. No mitigation is required. This issue will not require any additional analysis in the EIR.

g) It is not anticipated that implementation of the Project (on-site and off-site components) will impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. All Project components will be required to be installed per City standard requirements, which ensure that there will be no conflicts. No impacts are anticipated. No mitigation beyond standard conditions shall be required. This issue will not require any additional analysis in the EIR.

h) According to Plate 4-1, *High Fire Hazard Areas*, of the Technical Background Report to the Safety Element, the Project site (on-site and off-site components) are not located in a High Fire Hazard Area. Therefore, implementation of the Project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas of where residences are intermixed with wildlands. No impacts are anticipated. No mitigation is required. This issue will not require any additional analysis in the EIR.

IX. HYDROLOGY AND WATER QUALITY.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☒	☐	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☒	☐	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☒	☐	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☒	☐	☐	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantially additional sources of polluted runoff?	☒	☐	☐	☐
f) Otherwise substantially degrade water quality?	☒	☐	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☒	☐
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☒	☐	☐	☐
j) Inundation by seiche, tsunami, or mudflow?	☒	☐	☐	☐

a-f) Implementation of the Project (on-site and off-site components) may violate any water quality standards or waste discharge requirements; substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which

would not support existing land uses or planned uses for which permits have been granted); substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site; substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or 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 substantially additional sources of polluted runoff; and/or, otherwise substantially degrade water quality.

A Project specific hydrology study and water quality management plan shall be prepared in order to address questions IX.a-f, above, including impacts to the existing tile drain. In order to ensure a comprehensive discussion of these hydrology and water quality resources issues, they will be analyzed in the EIR.

g-i) Implementation of the Project (on-site and off-site components) may place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map; place within a 100-year flood hazard area structures which would impede or redirect flood flows, and/or, expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam According to the FIRM Map (Panel 2260G), the majority of the site is within Zone X. Zone X is defined as "areas determined to be outside the 0.2% annual chance floodway." Development within Zone X is acceptable with finished floor elevations 1 foot above the 100-year flood elevation. There is the potential for failure of Coachella canal as part of an earthquake. In order to ensure a comprehensive discussion of this issue, it will be analyzed in the EIR.

j) A tsunami is a sea wave caused by submarine earth movement. A seiche is an oscillation of the surface of a lake or landlocked sea. The City of Coachella is not in close proximity to the ocean, a landlocked sea, or a lake; therefore the City is not at risk of inundation from these phenomena. In addition, the City's land is relatively flat and has a low risk of being impacted by mudslides. Therefore, implementation of the Project would not result in any impact due to inundation from seiche or tsunami. No impacts are anticipated. No mitigation is required. These issues will not require any additional analysis in the EIR. There is the potential for mudflows, especially in the event of a breach of the Coachella canal as part of an earthquake. In order to ensure a comprehensive discussion of this issue, it will be analyzed in the EIR.

X. LAND USE AND PLANNING.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☒	☐	☐	☐

a) The Project (on-site and off-site components) is located in an area that is predominately utilized in an agricultural capacity. The current General Plan designation for the Project (on-site and off-site components) is Suburban Retail District, Urban, General, and Suburban Neighborhood, and Neighborhood Center, therefore; it has been anticipated by the City, that urbanization is planned and will ultimately occur in the Project vicinity. The Project is proposing uses that are different than the current land use designation; however, they are still urban/suburban, not agricultural in nature. Should the Project be developed before any of the surrounding areas are developed, it may physically divide the established community. Since the General Plan anticipates urban/suburban uses, these impacts are considered less than significant. No additional mitigation is required. This issue will not require any further analysis in the EIR.

b) The Project (on-site and off-site components), as implemented will include a General Plan amendment, change of zone, specific plan, tentative parcel map, and a development agreement. The City will process all of these applications concurrently. Through this City review, as well as review by the applicable local agencies, special districts, state and federal agencies, etc., the Project will be required to comply with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Impacts will need to be completely identified and mitigation measures may be required to reduce impacts completely, or to the greatest extent feasible. In order to ensure a comprehensive discussion of this land use and planning resource issue, it will be analyzed in the EIR.

c) Please reference Response IV.a-f, above. Implementation of the Project (on-site and off-site components) may conflict with any applicable habitat conservation plan or natural community conservation plan, including the Coachella Valley Multiple Species Habitat Conservation Plan. In order to ensure a comprehensive discussion of this land use and planning resource issue, it will be analyzed in the EIR.

XI. MINERAL RESOURCES.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) 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?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a,b) The geotechnical section of the City of Coachella General Plan EIR notes that the buildout of the General Plan would contribute to potential cumulative impacts with regard to the loss of mineral resources, but note that cumulative impacts to mineral resources would be able to be mitigated through the widespread implementation of regional preservation production quotas as identified by the California Division of Mines and Geology. The Project site (on-site and off-site components) has been utilized currently and historically for agricultural activities. They have not been utilized currently and historically for any mining activities. Therefore, implementation of the Project (on-site and off-site components) will not 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; and/or, result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impacts are anticipated. No mitigation is required. This issue will not require any additional analysis in the EIR.

XII. NOISE.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a-d) Implementation of the Project (on-site and off-site components) may result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; and/or, a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. These potential noise impacts may occur during all phases of the Project. A Project specific noise study shall be prepared in order to address questions XII. a-d, above. In order to ensure a comprehensive discussion these noise resource issues, they will be analyzed in the EIR.

e) The Project site is not located within two miles of a public airport or public use airport. The closest public airport, or public use airports are Thermal Airport (Jacqueline Cochran Regional Airport), located approximately 5 miles to the south, and the Bermuda Dunes Airport (located over 5 miles to the north-northwest). Therefore, implementation of the Project (on-site and off-site components) will not expose people residing or working in the project area to excessive noise levels, since the Project site is not 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. Any impacts are considered less than significant. No additional mitigation is required. This issue will not require any additional analysis in the EIR.

f) According to the Riverside County Land Information System (http://tlmabld5.agency.tlma.co.riverside.ca.us/website/rclis/), the Project site is not located within the vicinity of a private airstrip. Therefore, implementation of the Project (on-site and off-site components) will not expose people residing or working in the project area to excessive noise levels, since the Project site is not located within the vicinity of a private airstrip. No impacts are anticipated. No mitigation is required. This issue will not require any additional analysis in the EIR.

XIII. POPULATION AND HOUSING.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial 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)?	☒	☐	☐	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Due to the nature of the Project, implementation of the Project (on-site or off-site components); may induce substantial 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). As a result of the proposed general plan amendment, change of zone, specific plan and tentative parcel map, the Project is proposing uses that are different than the current land use designation. In order to ensure a comprehensive discussion of the population and housing issues related to question XIII.a, above, they will be analyzed in the EIR.

b,c) There is no existing housing, or people located on the Project (on-site or off-site components); therefore the implementation of the Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or, displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. No impacts are anticipated. No mitigation is required. These issues will not require any further analysis in the EIR.

XIV. PUBLIC SERVICES.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new of 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:				
a. Fire Protection?	☒	☐	☐	☐
b. Police Protection?	☒	☐	☐	☐
c. Schools?	☒	☐	☐	☐
d. Parks?	☒	☐	☐	☐
e. Other public facilities?	☒	☐	☐	☐

a) Implementation of the Project (on-site or off-site components) may result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new of 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 and other public facilities. In order to ensure a comprehensive discussion, the questions raised in XIV.a, above, will be analyzed in the EIR. It is anticipated that the adverse physical effect on the environment resulting to recreational facilities will also be analyzed in the recreation resources section of the EIR.

XV. RECREATION.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☒	☐	☐	☐

a-b) Implementation of the Project (on-site components) may 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; and/or, include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. However, it is not anticipated that the off-site Project components will have any effect on these recreational resources. Do to the nature of the Project, additional recreation resources will be needed and existing recreation resources may be impacted. In order to ensure a comprehensive discussion, the questions raised in XV.a and b, above, will be analyzed in the EIR. It is anticipated that the adverse physical effect on the environment resulting from the construction or expansion of recreational facilities will be analyzed in the respective sections of the EIR (i.e., air quality, cultural resources, etc.).

XVI. TRANSPORTATION/TRAFFIC.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
e) Result in inadequate emergency access?	☒	☐	☐	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐

a-b) Implementation of the Project (on-site components) may result in a conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit; and/or, conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

A Project specific traffic study shall be prepared in order to address questions XVI.a and b, above. In order to ensure a comprehensive discussion of these transportation/traffic resources issues, they will be analyzed in the EIR.

c) The Project site is not located within two miles of a public airport or public use airport. The closest public airport, or public use airports are Thermal Airport (Jacqueline Cochran Regional Airport), located approximately 5 miles to the south, and the Bermuda Dunes Airport (located over 5 miles to the north-northwest). According to the Riverside County Land Information System (http://tlmabld5.agency.tlma.co.riverside.ca.us/website/rclis/), the Project site is not located within the vicinity of a private airstrip. Therefore, implementation of the Project (on-site and off-site components) will not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. No impacts are anticipated. No mitigation is required. This issue will not require any additional analysis in the EIR.

d) It is not anticipated that implementation of the Project (on-site and off-site components) will substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). However, in order to ensure a comprehensive discussion of these transportation/traffic resources issues, they will be analyzed in the EIR.

e) Please reference Response VIII.d, above. It is not anticipated that implementation of the Project (on-site and off-site components) will impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. All Project components will be required to be installed per City standard requirements, which ensure that there will be no conflicts. However, the distance to emergency responders, the lack of a direct connection to I-10 and community isolation, in the event of a large earthquake with multiple bridge failures (i.e. along SR 86) may occur. In order to ensure a comprehensive discussion of these transportation/traffic resources issues, they will be analyzed in the EIR.

f) It is not anticipated that implementation of the Project (on-site and off-site components) will conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. However, in order to ensure a comprehensive discussion of these transportation/traffic resources issues, they will be analyzed in the EIR.

XVII. UTILITIES AND SERVICE SYSTEMS.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☒	☐	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☒	☐	☐	☐
e) 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?	☒	☐	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☒	☐	☐	☐
g) Comply with federal, state, and local statutes, and regulations related to solid waste?	☒	☐	☐	☐

a-e) Implementation of the Project may exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require additional water supplies; and/or, result in a determination by the wastewater treatment provider which serves or may serve the project that it may not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. A Project specific Water Supply Assessment will be prepared for the Project to address question XVII.d, above. Question XVII.c will be addressed in the Hydrology and Water Quality section of the EIR. In order to ensure a comprehensive discussion, the questions raised in XVII.a through e, above, will be analyzed in the EIR. It is not anticipated that the off-site Project components will have any affect on the issues raised in XVII.a,b,d, and e.

f, g) Analysis will be provided in the EIR to determine if implementation of the Project (on-site or off-site components) may be served by a landfill with sufficient permitted capacity to accommodate the project's

solid waste disposal needs; and/or, comply with federal, state, and local statutes, and regulations related to solid waste. This will apply to all phases of the Project.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

a-c) Implementation of the Project (on-site or off-site components) may have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory; may have impacts that are individually limited, but cumulatively considerable ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects); and may have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. Where applicable, specific technical studies will be prepared to analyze these issue areas. In order to ensure a comprehensive discussion, the questions raised in XVIII.a-c will be analyzed in the EIR.

APPENDIX A

Figures

Figure 1*, Regional Location Map*

Figure 2, *Site Location (USGS)*

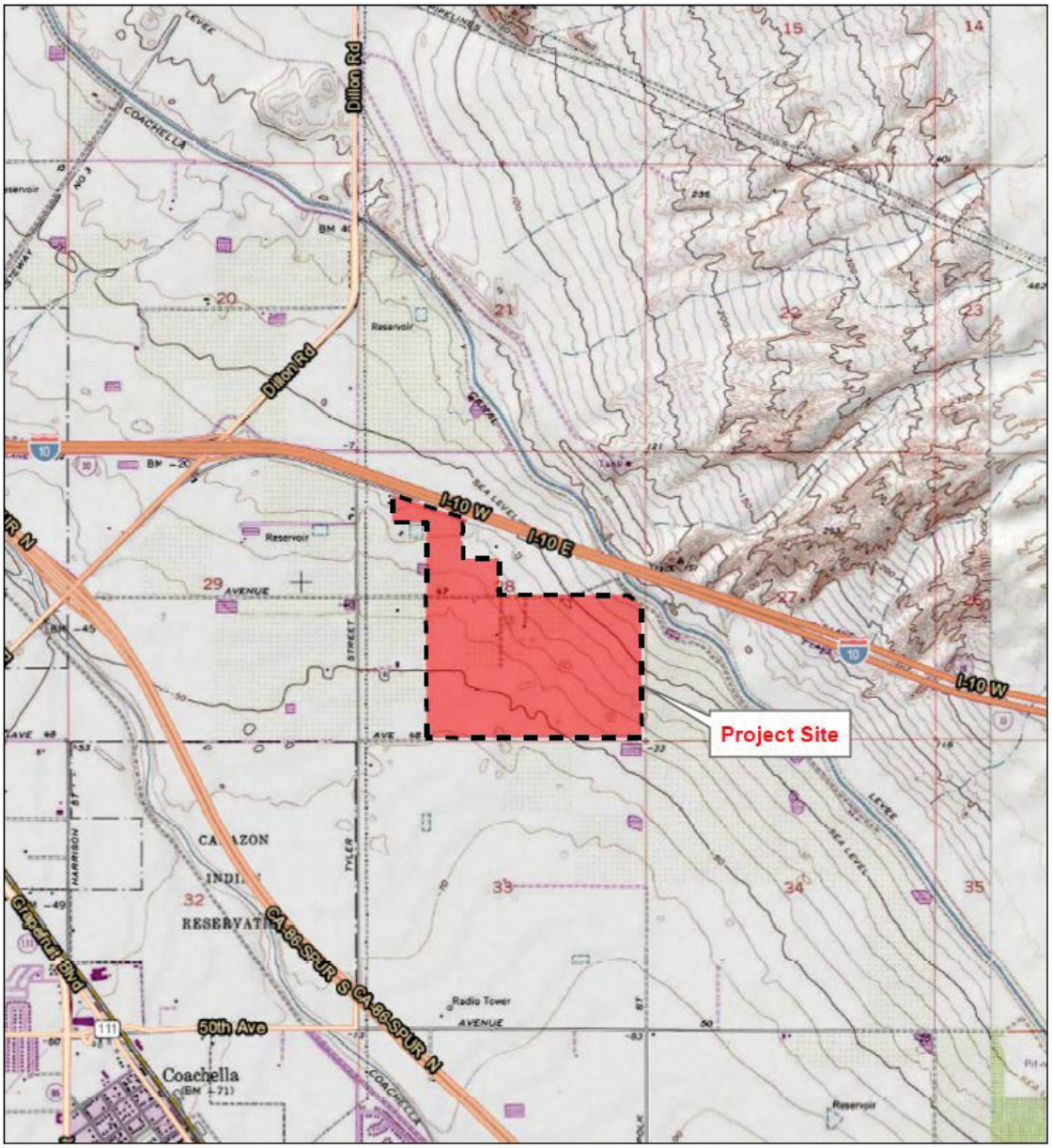


Figure 3, *Specific Plan Land Use Plan*

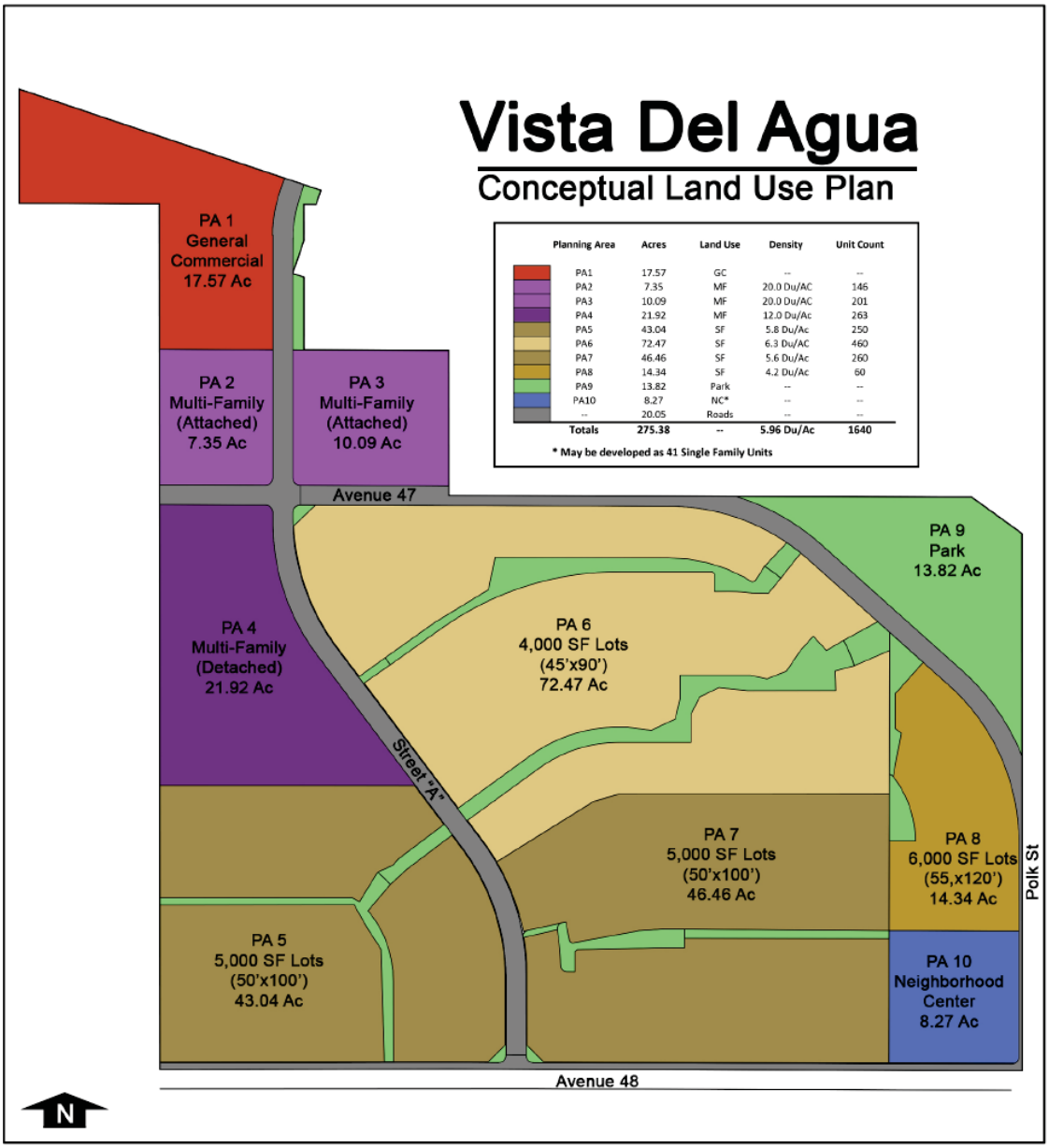


Figure 4, *Master Sewer Plan*

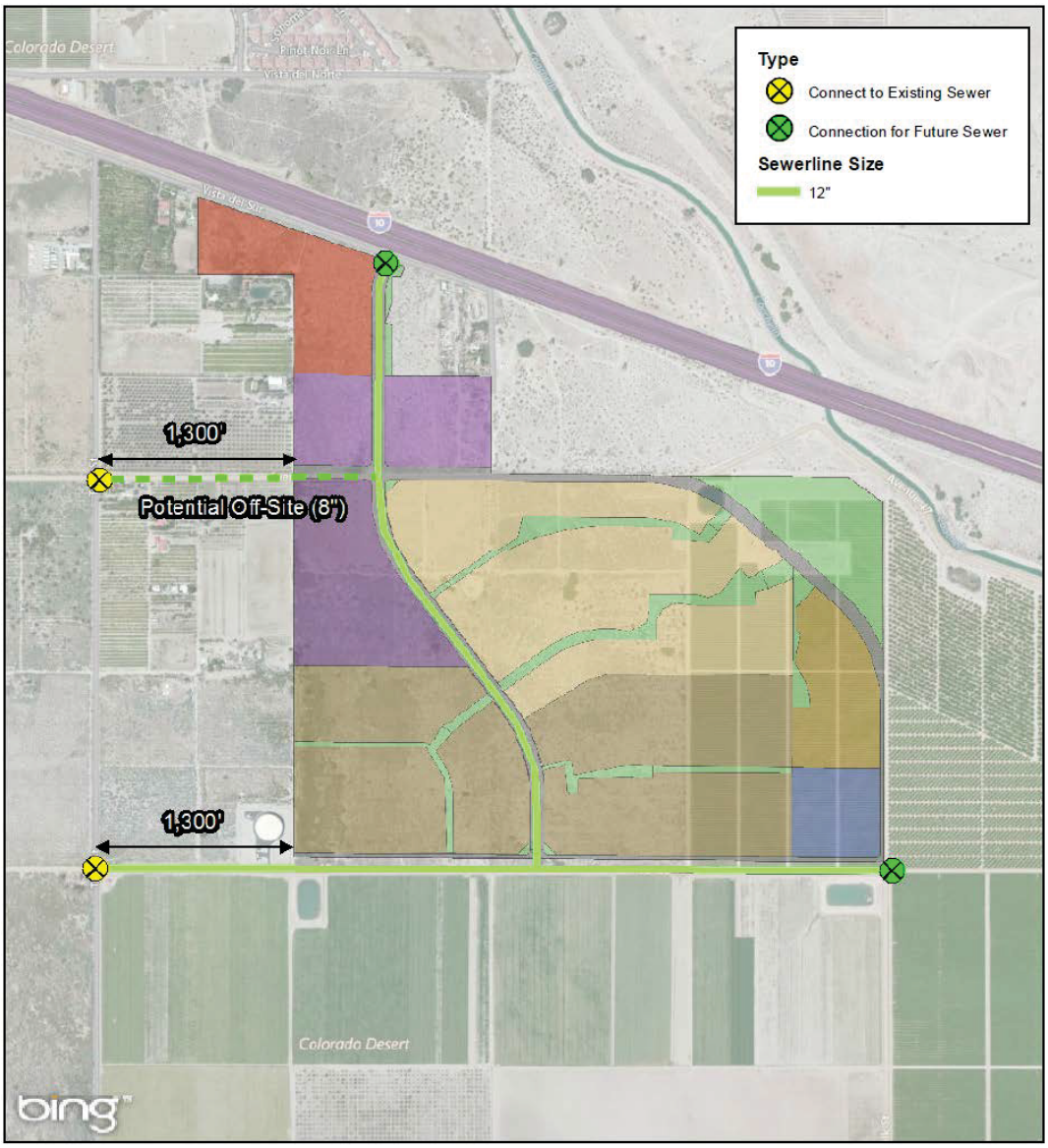


Figure 5, *Master Water Plan*

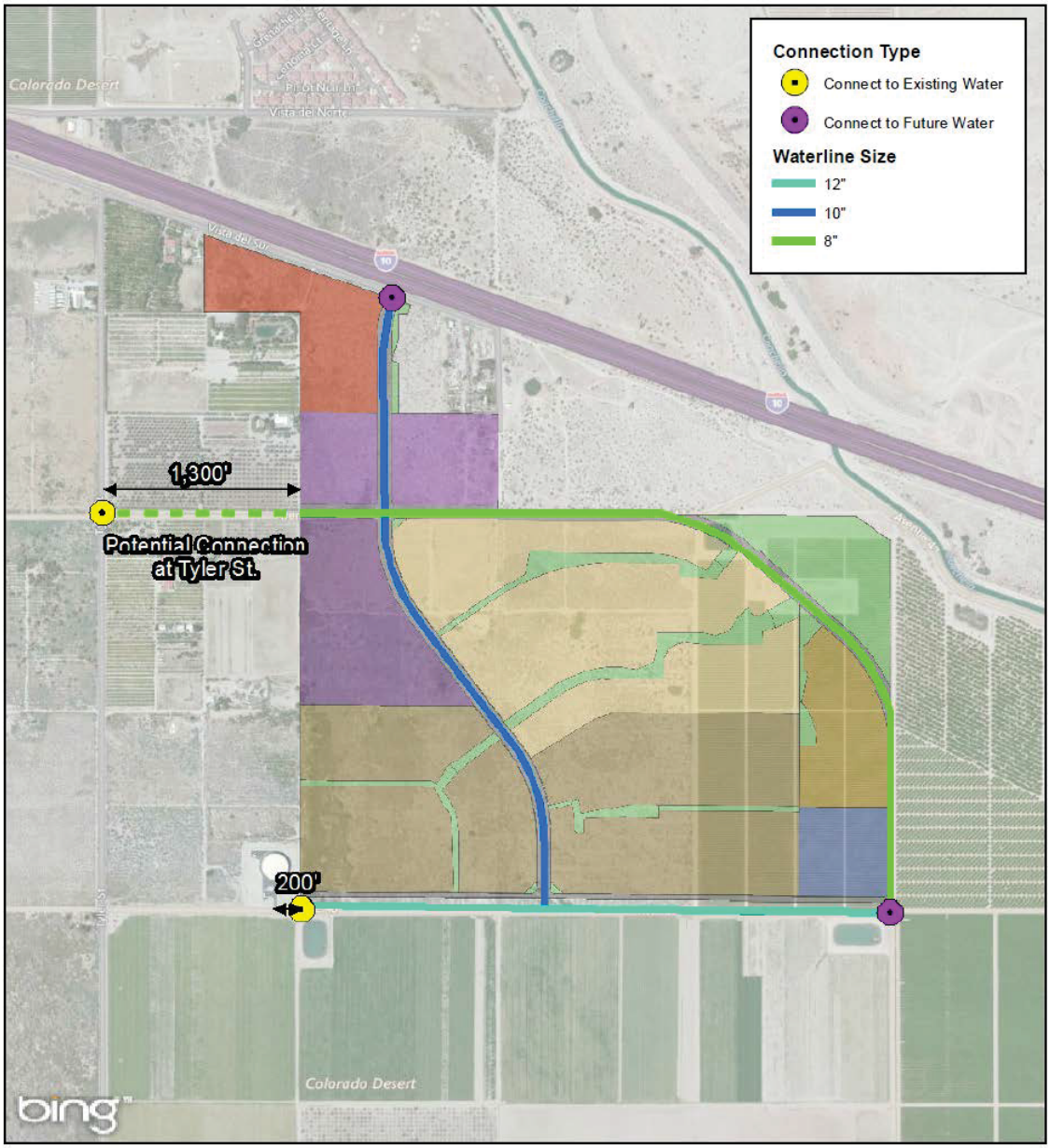


Figure 6, *Circulation Plan*

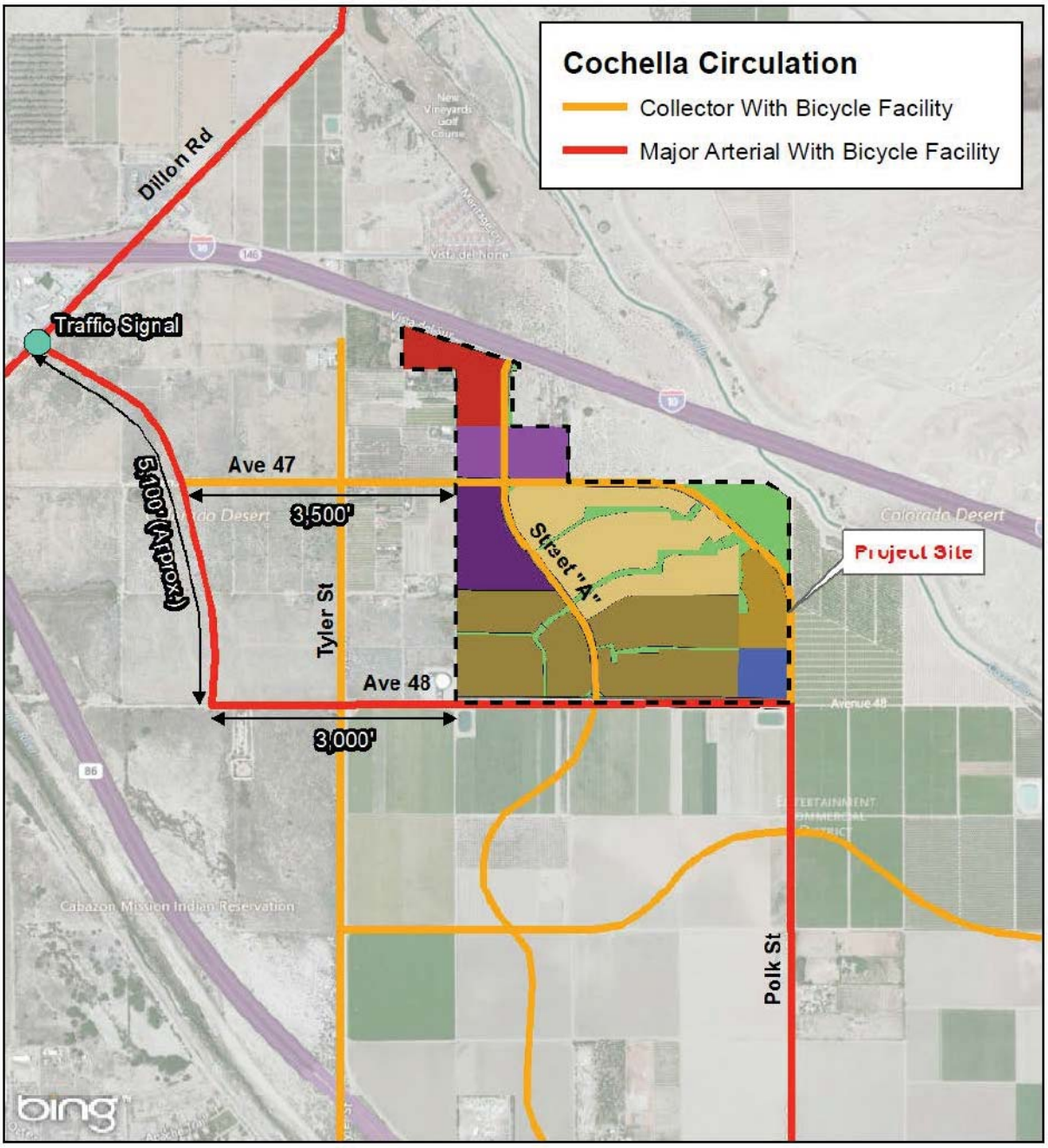


Figure 7, Aerial Photo

Figure 8, Concept Grading Plan

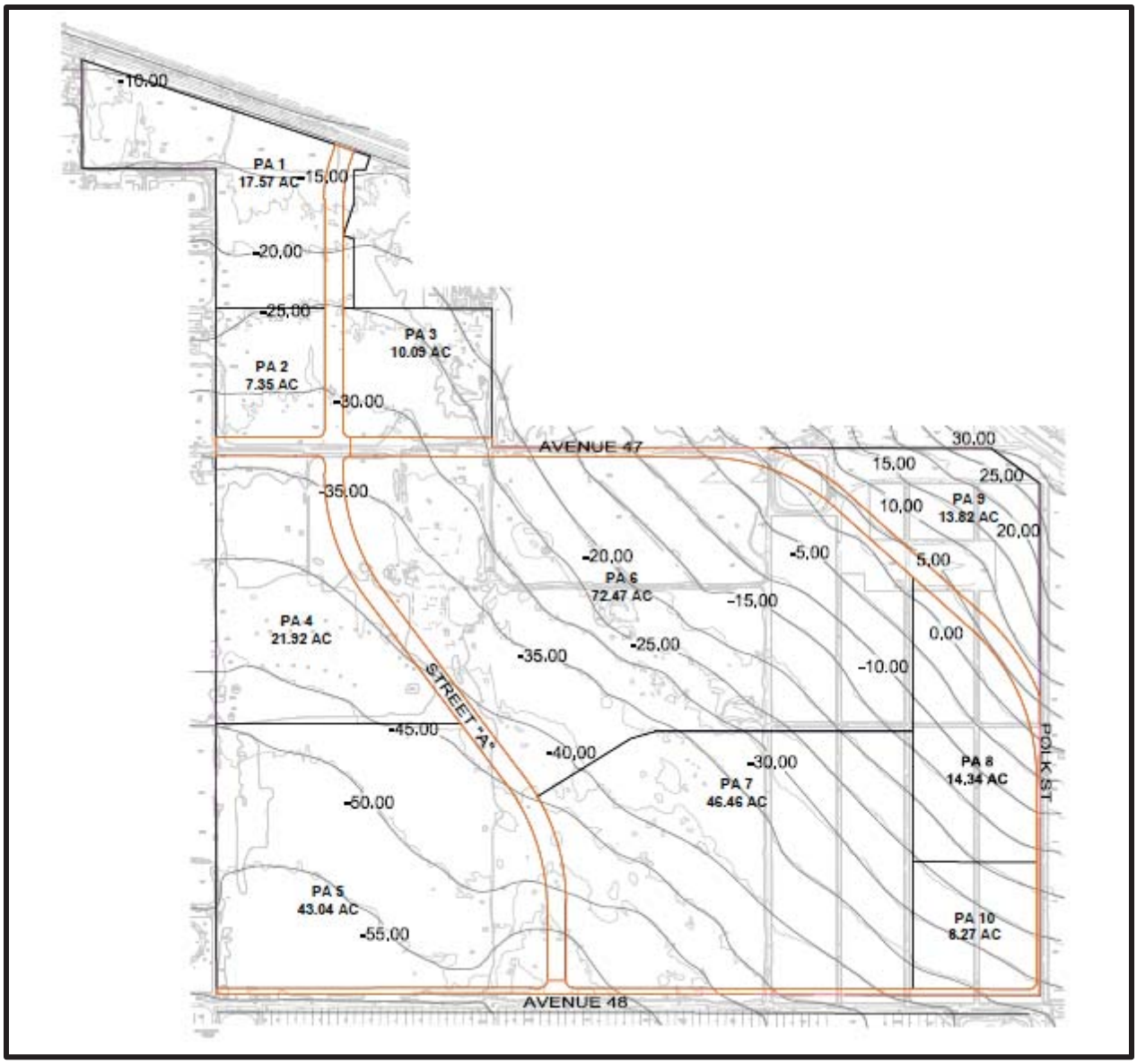


Figure 9, *Master Drainage Plan*

APPENDIX B

Technical Studies

All Phase Environmental, Inc.

September 24, 2014

CVP PALM SPRINGS, LLC
c/o Mr. Jim Nozak
Strategic Land Partners
12671 High Bluff Drive, Suite 150
San Diego, CA 92130

RE: Phase I Environmental Site Assessment, Vista Del Agua
Northwest Corner of the Intersection of 48th Avenue and Polk Street, Coachella, California 92236
APEI Project Number 13514.00

Dear Mr. Nozak:

CVP Palm Springs, LLC (Client) have requested our professional opinion regarding the existence of recognized environmental conditions on the above referenced site, hereinafter referred to as the "Property." In response to your request, All Phase Environmental, Inc. (APEI) has performed a Phase I Environmental Site Assessment (ESA) on the Property in conformance with the scope and limitations of ASTM Practice E-1527-13. Any exceptions to or deletions from this practice are described in Section 2.2 of this report. This report also meets the requirements of All Appropriate Inquiries as defined in CERCLA 42, U.S.C. 9601(35)(B). The enclosed report and opinion are based on the intent to develop the Property. We understand that you will rely on this opinion in connection with such purposes.

This assessment has revealed no evidence of recognized environmental conditions, historical recognized environmental conditions, controlled recognized environmental conditions, or de minimis conditions in connection with the Property. There are, however, several findings we would like to present:

1. *Previous Agriculture Use on Property*

   The Property use had been agricultural from at least 1952 through the present day. Prior to 1972, it was a common practice to use environmentally persistent pesticides. Specifically, pesticides that included DDT, DDD, DDE and Toxaphene. Environmentally persistent pesticides, if previously used on the Property, may still be present. However, specific information regarding the previous use of such chemicals was not found. The possible presence of residual concentrations of environmentally persistent pesticides, is a recognized environmental condition. There are human and animal receptors

in the area due to the unpaved condition of the Property. If the Property is intended for future development, sampling of the near surface soil to assess whether residual concentrations exceed State of California action levels is recommended in areas that were agricultural prior to 1972. The presence of pesticides in the soil may represent a health risk to tenants or occupants on the Property and the soil may require specialized handling and disposal. It is recommended that a grid be used to take representative samples where crops were grown on the Property. It is recommended that the samples be analyzed for pesticides using EPA Method 8081.

2. Wetlands on the Property

APEI screened the Property for the presence of suspect wetlands during the site reconnaissance and by reviewing the U.S. Department of the Interior, Fish and Wildlife Service, *National Wetlands Inventory* online map dated September 8, 2014 presented in Appendix A. This source indicated that there are two areas designated as wetlands on the Property. Near the center of the Property is an area designated as a Freshwater Pond. North of this is an area designated as a Freshwater Forested Shrub Wetland. Along the north Property border is a pond that has not been designated as a wetland but will require additional research to define its status. A wetland delineation was beyond the scope of this assessment. Based on the findings, APEI recommends that a comprehensive wetland determination and delineation be conducted on the Property prior to construction activities that may cause destruction or place fill material into known or suspected wetland areas.

3. Groundwater Wells On The Property

At least one groundwater well is located on the Property, near the water retention pond along the north Property border. A second well may also exist along the north Property border, south of the north adjacent scrap metal yard. Other wells may exist on the Property that were not identified during the Property reconnaissance. The presence of groundwater wells on the Property is not a recognized environmental condition, however, they must be properly decommissioned or protected if the Property is to be developed. The Riverside County Community Health Agency, Department of Environmental Health, Water Engineering Department in Indio, California (telephone 760-863-7000) have information on the locations of wells and specific requirements for the closure of wells and should be consulted if the Property is to be developed. No further investigation in regards to this condition is deemed necessary at this time.

4. Possible Septic System or Cesspool On The Property

Several structures appear to have once been developed along the north Property border, south of the north adjacent scrap metal yard. These appear to have been single family residences. A septic system or cesspool may have been associated with this former development and may still exist on the Property. However, since there have been no uses on the Property involving hazardous materials or petroleum products, it would not be a significant environmental concern. A septic system or cesspool on the Property is not considered a recognized environmental condition when used in association with a residential property. No further investigation in regards to this condition is deemed necessary at this time.

5. Solid Waste Disposal On The Property

There was evidence observed of debris, trash, empty cans, clothing, furniture, concrete, roofing, wood, cuttings, rubber tires, railroad ties, and other materials typical of illegal dumping noted throughout the Property. These materials were typically located in areas along the access roads. There were two other areas where more solid waste was identified including the former water retention pond near the center of the Property and the area south of the north adjacent scrap metal yard. The solid waste appeared to be innocuous household trash dumped illegally and there were no signs of disposed hazardous materials or petroleum products. Other than the recommendation that these material be removed to help avert further dumping, no further investigation in regards to this condition is deemed necessary at this time.

6. Suspect Asbestos Containing Materials On The Property

Physical sampling of suspect Asbestos Containing Materials (ACMs) was not part of the scope of this project and only a very limited and cursory visual inspection was performed. The presence of asbestos or suspect asbestos does not represent a recognized environmental condition for the Property.

APEI noted a pile of roofing materials that had been dumped on the Property in the vicinity of the former water retention pond near the center o the Property. The suspect asbestos containing materials included asphalt roofing, roof tar, and roofing felt. It is recommended that these materials be tested for asbestos. If found to contain asbestos, an asbestos abatement contractor will be required to have this material removed from the Property.

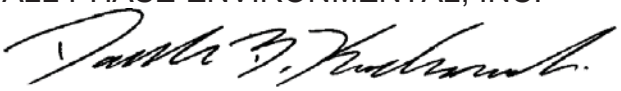
The shed located near the paintball field has suspect asbestos containing roofing. It is recommended that if this shed will be demolished, the roofing materials be tested for asbestos prior to the disturbance of this material. If found to contain asbestos, an asbestos abatement contractor will be required to have this material removed from the shed prior to its demolition.

No above grade indications were observed that cement asbestos pipes (Transite pipe) were used on the Property. However, cement asbestos pipes are known to have been used for water distribution systems for crop irrigation. It is recommended that during excavation activities on the Property, if suspect cement asbestos pipes are identified, they be removed and disposed of by a licensed asbestos abatement contractor.

It is recommended that the Client review the entire report prior to making any decisions in regards to the Property. If questions concerning this report arise or we may be of further service, please feel free to contact me anytime on my cell phone at (714) 719-0714.

Sincerely,

ALL PHASE ENVIRONMENTAL, INC.



Douglas B. Kochanowski; CAC, CHMM
Biologist, Project Manager

PHASE I ENVIRONMENTAL SITE ASSESSMENT

OF:

VISTA DEL AGUA

NORTHWEST CORNER OF THE INTERSECTION OF 48TH AVENUE AND POLK STREET
COACHELLA, CALIFORNIA, 92236

SEPTEMBER 24, 2014

PREPARED FOR:

CVP PALM SPRINGS, LLC
C/O STRATEGIC LAND PARTNERS
12671 HIGH BLUFF DRIVE, SUITE 150
SAN DIEGO, CA 92130

PREPARED BY:

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APEI PROJECT NO. 13514.00

INDEX

LIST OF APPENDIX SECTIONS

1.0 SUMMARY

All Phase Environmental, Inc. (APEI) has performed a Phase I Environmental Site Assessment (ESA) of the approximately 279.64-acres site located at the northwest corner of the intersection of 48th Avenue and Polk Street, in the City of Coachella, in the County of Riverside, California, 92236 referred to herein as the "Property."

APEI has conducted this Phase I ESA in conformance with the scope and limitations of ASTM Practice E-1527-13 of the Property. Any exceptions to or deletions from this practice are described in Section 2.2 of this report. This report also meets the requirements of All Appropriate Inquiries as defined in CERCLA 42, U.S.C. 9601(35)(B). The enclosed report and opinion are based on the intent to develop the Property. We understand that you will rely on this opinion in connection with such purposes.

This assessment has revealed no evidence of recognized environmental conditions, historical recognized environmental conditions, controlled recognized environmental conditions, or de minimis conditions in connection with the Property except for the following:

1. Previous Agriculture Use on Property

The Property use had been agricultural from at least 1952 through the present day. Prior to 1972, it was a common practice to use environmentally persistent pesticides. Specifically, pesticides that included DDT, DDD, DDE and Toxaphene. Environmentally persistent pesticides, if previously used on the Property, may still be present. However, specific information regarding the previous use of such chemicals was not found. The possible presence of residual concentrations of environmentally persistent pesticides, is a recognized environmental condition. There are human and animal receptors in the area due to the unpaved condition of the Property. If the Property is intended for future development, sampling of the near surface soil to assess whether residual concentrations exceed State of California action levels is recommended in areas that were agricultural prior to 1972. The presence of pesticides in the soil may represent a health risk to tenants or occupants on the Property and the soil may require specialized handling and disposal. It is recommended that a grid be used to take representative samples where crops were grown on the Property. It is recommended that the samples be analyzed for pesticides using EPA Method 8081.

2. Wetlands on the Property

APEI screened the Property for the presence of suspect wetlands during the site reconnaissance and by reviewing the U.S. Department of the Interior, Fish and Wildlife Service, *National Wetlands Inventory* online map dated September 8, 2014 presented in Appendix A. This source indicated that there are two areas designated as wetlands on the Property. Near the center of the Property is an area designated as a Freshwater Pond. North of this is an area designated as a Freshwater Forested Shrub Wetland. Along the north Property border is a pond that has not been designated as a wetland but will require additional research to define its status. A wetland delineation was beyond the scope of this assessment. Based on the findings, APEI recommends that a comprehensive wetland determination and delineation be conducted on the Property prior to construction activities that may cause destruction or place fill material into known or suspected wetland areas.

3. Groundwater Wells On The Property

At least one groundwater well is located on the Property, near the water retention pond along the north Property border. A second well may also exist along the north Property border, south of the north adjacent scrap metal yard. Other wells may exist on the Property that were not identified during the Property reconnaissance. The presence of groundwater wells on the Property is not a recognized environmental condition, however, they must be properly decommissioned or protected if the Property is to be developed. The Riverside County Community Health Agency, Department of Environmental Health, Water Engineering Department in Indio, California (telephone 760-863-7000) have information on the locations of wells and specific requirements for the closure of wells and should be consulted if the Property is to be developed. No further investigation in regards to this condition is deemed necessary at this time.

4. Possible Septic System or Cesspool On The Property

Several structures appear to have once been developed along the north Property border, south of the north adjacent scrap metal yard. These appear to have been single family residences. A septic system or cesspool may have been associated with this former development and may still exist on the Property. However, since there have been no uses on the Property involving hazardous materials or petroleum

products, it would not be a significant environmental concern. A septic system or cesspool on the Property is not considered a recognized environmental condition when used in association with a residential property. No further investigation in regards to this condition is deemed necessary at this time.

5. Solid Waste Disposal On The Property

There was evidence observed of debris, trash, empty cans, clothing, furniture, concrete, roofing, wood, cuttings, rubber tires, railroad ties, and other materials typical of illegal dumping noted throughout the Property. These materials were typically located in areas along the access roads. There were two other areas where more solid waste was identified including the former water retention pond near the center of the Property and the area south of the north adjacent scrap metal yard. The solid waste appeared to be innocuous household trash dumped illegally and there were no signs of disposed hazardous materials or petroleum products. Other than the recommendation that these material be removed to help avert further dumping, no further investigation in regards to this condition is deemed necessary at this time.

6. Suspect Asbestos Containing Materials On The Property

Physical sampling of suspect Asbestos Containing Materials (ACMs) was not part of the scope of this project and only a very limited and cursory visual inspection was performed. The presence of asbestos or suspect asbestos does not represent a recognized environmental condition for the Property.

APEI noted a pile of roofing materials that had been dumped on the Property in the vicinity of the former water retention pond near the center o the Property. The suspect asbestos containing materials included asphalt roofing, roof tar, and roofing felt. It is recommended that these materials be tested for asbestos. If found to contain asbestos, an asbestos abatement contractor will be required to have this material removed from the Property.

The shed located near the paintball field has suspect asbestos containing roofing. It is recommended that if this shed will be demolished, the roofing materials be tested for asbestos prior to the disturbance of this material. If found to contain asbestos, an asbestos abatement contractor will be required to have this material removed from the shed prior to its demolition.

No above grade indications were observed that cement asbestos pipes (Transite pipe) were used on the Property. However, cement asbestos pipes are known to have been used for water distribution systems for crop irrigation. It is recommended that during excavation activities on the Property, if suspect cement asbestos pipes are identified, they be removed and disposed of by a licensed asbestos abatement contractor.

2.0 INTRODUCTION

2.1 Definitions

To assist the reader with the interpretation of this report, APEI would like to provide the following definitions of significant ESA terminology as defined by ASTM E1527-13.

Recognized environmental condition

A recognized environmental condition is defined as*, "*the presence or likely presence of any hazardous substances or petroleum products in, on, or at a Property: (*1*) due to any release to the environment; (*2*) under conditions indicative of a release to the environment; or (*3*) under conditions that pose a material threat of a future release to the environment."

Historical recognized environmental condition

A *historical recognized environmental condition* is defined as, *"*a past release of any hazardous substances or petroleum products that has occurred in connection with the Property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the Property to any required controls (for example, Property use restrictions, activity and use limitations, institutional controls, or engineering controls)."

Controlled recognized environmental condition

A controlled recognized environmental condition is defined as*, "*a *recognized environmental condition* resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with *hazardous substances* or *petroleum products* allowed to remain in place subject to the implementation

of required controls (for example, *property* use restrictions, *activity and use limitations*, *institutional controls*, or *engineering controls*)."

De minimis condition

A de minimis condition is defined as*, "*a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis conditions* are not *recognized environmental conditions* nor *controlled recognized environmental conditions*."

2.2 Purpose and Scope

A Phase I ESA is intended to provide a brief description of the Property, its location and surroundings and to identify, to the extent feasible, associated r*ecognized environmental conditions, controlled recognized environmental conditions, historical recognized environmental condition,* and *de minimis conditions* associated with the Property or surrounding land use and to create a list of the potential human and environmental receptors. The protocol followed for this assessment is in conformance with the requirements of All Appropriate Inquiries as defined in CERCLA 42, U.S.C. 9601(35)(B) and the American Society for Testing and Materials Standard Practice for Environmental Site Assessment for Commercial Real Estate Transactions, ASTM Standard E-1527-13. Any exceptions are noted in Section 2.2 – Limiting Conditions and Methodology Used. APEI understands that this ESA will be used by CVP Palm Springs, LLC to perform due diligence with respect to environmental conditions at the Property.

2.3 Limitations, Exceptions and Methodology of Assessment

Due care was taken during the investigation process, but a Phase I ESA cannot eliminate uncertainty about a Property's potential for Environmental Conditions. It should be noted that all Phase I ESAs are inherently limited in the sense that conclusions are drawn and recommendations developed from information obtained from limited research and site evaluation. APEI accepts no liability for hidden conditions, variations in composition of materials and identification of materials not normally found in construction use. Subsurface conditions were not field investigated as part of this study and may differ from the conditions implied by the surface observations. APEI has relied on one or more documents developed by other parties and is not liable for any conclusions drawn using these sources if their findings or procedures were erroneous. Additionally, the passage of time may result in a change in the environmental characteristics at this Property and surrounding sites.

The scope of work for this report did not include testing of electrical equipment for the potential presence of polychlorinated biphenyls or the collection of other environmental samples. The scope of work did not include a detailed assessment of natural hazards such as naturally occurring asbestos, arsenic, radon gas or methane gas, an assessment of the potential presence of radionuclides, an assessment of nonchemical hazards such as the potential for damage from earthquakes or floods, or the presence of endangered species or wildlife habitats. The scope of work for this report did not include an assessment of the environmental compliance status of the Property, the businesses operating at the Property, or a health-based risk assessment. The scope of work for this report did not include any wetland studies, indoor air quality assessment, or vapor intrusion assessment.

Our professional services have been performed, our findings obtained and our recommendations prepared in accordance with customary principles and practices in the field of environmental science and engineering. The Property boundaries and other drawings have been compiled from the best available recorded information and have not been verified by a field survey, therefore, actual conditions may vary.

All areas of the Property were visually inspected as part of this investigation except for some areas where thick vegetation prevented access. In addition, some of the vineyards and fallow areas were inspected by traversing the grounds in a crossing pattern intended to cover representative areas but not all of these areas were visually inspected. It is the opinion of APEI that the ability to identify conditions indicative of releases or threatened releases has not been hampered by the lack of the visual inspection in these areas.

2.4 Data Gaps

In accordance with the ASTM standard, an attempt to confirm the history and use of the Property was performed from the present back to when the Property was first developed with any structures or was used for residential, agricultural, commercial, industrial or governmental purposes. Multiple historical sources were consulted to fill in any data gaps dating back to 1904, the first reasonably available information. Information from the Property owner representative, Mr. Beau Cooper, dated back approximately three-years to 2011. Aerial photographs with coverage of the Property were found and reviewed from the years 1953, 1959, 1978, 1989, 1996, 2002, 2005, 2006, 2009, 2010, and 2012. City Directories were reviewed in intervals of approximately five-years beginning in 1975. Historical USGS topographic maps of the Property were reviewed from the years 1904, 1947, 1956, and 1972. APEI reviewed the FEMA Flood Insurance Map (2003 and 2011) and

the U.S. Department of the Interior, Fish and Wildlife Service, *National Wetlands Inventory* online map (September 8, 2014).

Sanborn Fire Insurance Maps with coverage of the Property were searched but no maps were made for this area. Due to the undeveloped nature of the Property and its lack of a street address; building department records, and fire department records could not be effectively researched. There were no users or tenants on the Property. ASTM 1527-13 does not require the environmental professional to undertake a review of recorded land title records or search for environmental liens. This responsibility is placed upon the user. It is APEI's understanding that a lender will engage a title company or title professional to undertake a review of reasonably ascertainable recoded land title records and lien records relating to the Property. Per the scope of work, APEI did not obtain recorded land title records or conduct an environmental lien search. If the Client provides APEI with this information, it can be added to the Phase I report.

2.5 Reliance

This report was prepared for the sole use and benefit of CVP Palm Springs, LLC, Strategic Land Partners, and United Engineering Group. The information and opinions rendered in this report are for the exclusive use and reliance by CVP Palm Springs, LLC, Strategic Land Partners, and United Engineering Group. APEI will not distribute or publish this report without the consent of CVP Palm Springs, LLC, Strategic Land Partners, or United Engineering Group except as required by law and court order. The information and opinions expressed in this report are given in response to a limited assignment by CVP Palm Springs, LLC and should be considered and implemented only in light of that assignment. The services provided by APEI in completing this project have been provided in a manner consistent with normal standards of the profession. This report is not a legal opinion and does not offer warranties or guarantees expressed or implied.

3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The Property is approximately 279.64-acres, has no street address, and is located at the northwest corner of the intersection of 48th Avenue and Polk Street, in the City of Coachella, in the County of Riverside, California, 92236. Vista Del Sur and Avenue 47 delimit portions of the north Property border, Avenue 48 delimits the Property to the south, Polk Street delimits a portion of the Property to the east, and unpaved roads delimit the Property to the west.

The approximate latitude and longitude near the center of the Property are 33°42'14.40" (33.704) north and 116°9'16.92" (116.1547) west, respectively. The Property is composed of twelve parcels. The APN numbers for the Property are 603-122-005, 603-130-003, 603-130-004, 603-130-009, 603-150-004, 603-150-005, 603-150-007, 603-150-008, 603-150-009, 603-150-010, 603-150-011, and 603-150-012. The Property is irregular in shape with the longest dimensions consisting of approximately 4,600-feet from east to west and 4,500-feet from north to south.

The Property was undeveloped except for utilities, a shed, groundwater wells, retention ponds, a vineyard, paintball field, and remnants from former structures. The current owners of the Property were reported by the Property owner representative to be CVP Palm Springs, LLC. A Record Boundary Map presented in Appendix A contains a legal description of the Property.

3.2 Site and Vicinity Characteristics

3.2.1 Surface Characteristics

The general topography of the Property slopes to the south at a rate of approximately 34-feet per mile. According to the U.S. Geological Survey (USGS) topographic map, Indio, Quadrangle, the finished elevation of the Property is approximately 38-feet below Mean Sea Level (MSL). Except for several concrete pads, there were no paved areas on the Property.

3.2.2 Drainage Patterns/Basins

No special flood hazards are noted at the Property on the FEMA Q3 Flood Insurance Rate Map, Riverside (panel number 06065C) dated 2003 and 2011. The nearest significant surface water, other than the pond located along the north Property border, is the Coachella Channel located near the northeast Property corner. This channel flows to the southeast.

There was no industrial water discharge from the Property into a sanitary sewer system. Stormwater drainage on the Property is primarily downward surface percolation. There were no groundwater monitoring wells, floor drains, clarifiers, sumps, or french drains noted on the Property.

At least one groundwater well is located on the Property, near the water retention pond along the north Property border. A second well may also exist along the north Property border, south of the north adjacent scrap metal yard. Other wells may exist on the Property that were not identified during the Property reconnaissance. The presence of groundwater wells on the

Property is not a recognized environmental condition, however, they must be properly decommissioned or protected if the Property is to be developed. The Riverside County Community Health Agency, Department of Environmental Health, Water Engineering Department in Indio, California (telephone 760-863-7000) have information on the locations of wells and specific requirements for the closure of wells and should be consulted if the Property is to be developed. No further investigation in regards to this condition is deemed necessary at this time.

Several structures appear to have once been developed along the north Property border, south of the north adjacent scrap metal yard. These appear to have been single family residences. A septic system or cesspool may have been associated with this former development and may still exist on the Property. However, since there have been no uses on the Property involving hazardous materials or petroleum products, it would not be a significant environmental concern. A septic system or cesspool on the Property is not considered a recognized environmental condition when used in association with a residential property. No further investigation in regards to this condition is deemed necessary at this time.

3.2.3 Physiology and Geology

The Property lies within the Coachella Valley of the Peninsula Range province of Southern California. A significant feature within the province is the Salton trough. The Salton Trough is a large northwest-trending structural depression that extends from San Gorgonio Pass, approximately 180-miles to the Gulf of California. Much of this depression in the area of the Salton Sea is below sea level. The Coachella Valley contains a thick sequence of sedimentary deposits that are Miocene to recent in age. Mountains surrounding the Coachella Valley include the Little San Bernardino Mountains on the northeast, foothills of the San Bernardino Mountains on the northwest and the San Jacinto and Santa Rosa Mountains to the southwest. These mountains expose primarily Precambrian metamorphic and Mesozoic granitic rocks. The San Andreas Fault zone within the Coachella Valley consists of the Garnet Hill Fault, the Banning Fault, and the Mission Creek Fault that traverse along the northeast margin of the valley. The Property is located at the base of a large, active alluvial fan derived from the terrestrial sediments of the San Jacinto Mountains.

According to the *Web Soil Survey* by the National Resources Conservation Service dated December 18, 2003, the primary soil type at the north half of the Property is Coachella fine sand. The landform setting for this soil is described as alluvial fan with a slope of 0 to 2 percent. This soil is moderately well drained and the depth to the water table is more than 80-inches. The

primary soil type at the south half of the Property is Gilman fine sandy loam. The landform setting for this soil is described as alluvial fan with a slope of 0 to 2 percent. This soil is moderately well drained and the depth to the water table is more than 80-inches.

3.2.4 Hydrogeology

The Property is located within the Colorado River hydrologic region, Coachella Valley groundwater basin, Indio subbasin (Groundwater Basin No. 7-21.01, DWR, 2003). The Indio sub basin is bound by the Garnet Hill fault to the northeast, the San Jacinto and Santa Rosa Mountains to the west and south, and the Thermal subarea of the Indio subbasin to the east. Groundwater in this subbasin generally flows in a southerly direction toward the Salton Sea from the main recharge areas along the base of the San Jacinto Mountains and near the San Gorgonio Pass. The alluvial materials within this subbasin are primarily heterogeneous alluvial fan deposits exhibiting little sorting and with a low percentage of fine grained material (DWR, 1964).

APEI reviewed data from a Leaking Underground Storage Tank site located near the Property. Coachella Travel Center is located approximately 3,500-feet west of the northwest Property corner. In a report dated April 10, 2009 by Kleinfelder West, Inc. entitled "*First Quarter Groundwater Monitoring Report and Request For No Further Action, Coachella Travel Center*" the average depth to groundwater was 21.60 feet bgs (9.04 feet below MSL). The groundwater gradient was to the southeast at a rate of 0.04 feet per foot (ft/ft).

Specific information about the groundwater depth on the Property was not reasonably available. Based upon the information presented above, the depth to groundwater is estimated at approximately 10 to 30-feet bgs. This number is an approximation and physical testing must be performed to state the true depth to groundwater due to the possibility of varying levels of perched groundwater in the area of the Property.

Based solely on the surface topography at the Property and the presumed groundwater flow direction at the Property is south. This is consistent with the surface topography that drops towards the south. South is only the presumed groundwater flow direction and only physical testing can accurately state the true groundwater flow direction.

3.2.5 Wetlands

APEI screened the Property for the presence of suspect wetlands during the site reconnaissance and by reviewing the U.S. Department of the Interior, Fish and Wildlife Service, *National Wetlands Inventory* online map dated September 8, 2014 presented in Appendix A. This source indicated that there are two areas designated as wetlands on the Property. Near the center of the Property is an area designated as a Freshwater Pond. North of this is an area designated as a Freshwater Forested Shrub Wetland. Along the north Property border is a pond that has not been designated as a wetland but will require additional research to define its status. A wetland delineation was beyond the scope of this assessment. Based on the findings, APEI recommends that a comprehensive wetland determination and delineation be conducted on the Property prior to construction activities that may cause destruction or place fill material into known or suspected wetland areas.

3.2.6 Earthquake Fault Lines, Epicenters, and Liquefaction

The State of California, California Division of Mines and Geology has published a Fault Zone Map dated July 1, 1974 which is presented in Appendix A. This map indicates that a Fault Zone traverses the northeast Property corner. While this may affect the development of the Property or the condition of the Property in the event of an earthquake, it is not considered to be a recognized environmental condition.

The Department of Commerce, National Oceanic and Atmospheric Administration (NOAA) publishes the locations of earthquake epicenters measuring five (5) or greater on the Richter scale. This information was researched and there were no such epicenters reported with one-mile of the Property.

State of California Seismic Hazard Zones delineating Liquefaction or Earthquake Induced Landslide Areas have not been developed for the Indio, California Quadrangle.

3.2.7 Methane Zone

There were no indications from the data reviewed that the Property is located over an oil field or in an area where methane is an issue. Additional oil field information and oil well data are described below in Section 5.8.

3.3 Structures, Roads and Other Improvements on the Site

There are multiple unpaved roads traversing the Property, the only named one being Avenue 47. Power lines run along portions of the north Property border and into the center of the Property. There are two concrete pads along the north Property border, south of the north adjacent scrap metal yard. Near the center of the Property, at the paintball field, are a shed and a small concrete pad. Irrigation pipes are assumed to exist in former and existing agricultural areas of Property. Stormwater drains appear to exist in some areas of the Property. There is at least one groundwater well located near the retention pond along the north Property border. Approximately one-third of the west side of the Property is occupied by a vineyard.

The Property can be accessed from Vista Del Sur, 48th Avenue, and Polk Street.

Electricity serving the Property is from Southern California Edison (SCE). Natural gas is supplied by Southern California Gas Company. Sewer service is provided by the city municipal system. A solid waste disposal company serving the Property was not identified. The supplier of potable water is Coachella Valley Water District (CVWD). In a report entitled, "*2013-14 Annual Review, Water Quality Report"* by the CVWD dated 2014, it is stated, "This annual report documents that the water served to all CVWD water users (obtained from wells drilled into the Coachella Valley's vast groundwater basin) meets state (California Department of Public Health) and federal (U.S. Environmental Protection Agency) drinking water quality standards."

3.4 Current Uses of the Property

At the time of the Property reconnaissance on September 10, 2014, the only uses identified on the Property were as a vineyard and as a paintball field. Except for the possible use of pesticides on the Property as described below in Section 3.6, there are no significant hazardous materials or petroleum products identified with these uses.

3.5 Owner and User Interviews

Mr. Beau Cooper, Entitlement Manager with Untied Engineering Group, the Property owner's representatives for CVP Palm Springs, LLC (also the users of this report) filled out an environmental questionnaire dated September 23, 2014. A copy of this form is provided in Appendix H. Mr. Cooper indicated that he knew of no significant amounts of hazardous or petroleum products used on the Property. To the best of his knowledge, Mr. Cooper stated that the Property has never had any industrial uses. Mr. Cooper marked that he

knew of no current or past environmental liens in association with the Property. He wrote that he is not aware of any Activity or Use Limitations (ALUs) such as engineering controls, land use restrictions or institutional controls in place or on file under federal, tribal, state or local law. He indicated that he had no knowledge of any Underground Storage Tanks (USTs), Above Ground Storage Tanks (ASTs) or the storage of any hazardous materials or petroleum products on the Property. Mr. Cooper wrote that to the best of his knowledge, there have never been any spills or violations on the Property in association with hazardous materials or petroleum products. Mr. Cooper was aware of no soil or groundwater contamination on the Property or on adjacent sites. He wrote that he is not aware of a reduction in the Property value due to environmental issues. Mr. Cooper wrote that to the best of his knowledge, the Property use have been limited to agricultural and is otherwise vacant land. Mr. Cooper indicated that there is an irrigation basin in the northeast area of the Property.

3.6 Historical Uses of the Property

Historical information was obtained from aerial photographs (1953, 1959, 1978, 1989, 1996, 2002, 2005, 2006, 2009, 2010, and 2012) presented in Appendix C, USGS Topographic maps (1904, 1947, 1956, and 1972) presented in Appendix D, and City Directories (intervals of five years or less, where available, beginning in 1975) presented in Appendix E. Information from the Property owner representative, Mr. Beau Cooper, dated back approximately three-years to 2011.

The Property appears to have been developed at one time with one or more single-family residences. Sometime between 1947 and 1952, several areas of the Property had been converted to agricultural use. Except for the existing vineyard, all of these areas have become fallow farmland. The existing vineyard was planted on the Property sometime between 1996 and 2002. The existing paintball filed was constructed on the Property sometime between 2010 and 2012.

There were no historical recognized environmental conditions or controlled recognized environmental conditions identified in the historical documents reviewed.

The Property use had been agricultural from at least 1952 through the present day. Prior to 1972, it was a common practice to use environmentally persistent pesticides. Specifically, pesticides that included DDT, DDD, DDE and Toxaphene. Environmentally persistent pesticides, if previously used on the Property, may still be present. However, specific information regarding the previous use of such chemicals was not found. The possible presence of

residual concentrations of environmentally persistent pesticides, is a recognized environmental condition. There are human and animal receptors in the area due to the unpaved condition of the Property. If the Property is intended for future development, sampling of the near surface soil to assess whether residual concentrations exceed State of California action levels is recommended in areas that were agricultural prior to 1972. The presence of pesticides in the soil may represent a health risk to tenants or occupants on the Property and the soil may require specialized handling and disposal. It is recommended that a grid be used to take representative samples where crops were grown on the Property. It is recommended that the samples be analyzed for pesticides using EPA Method 8081.

3.6.1 Sanborn Fire Insurance Maps

Sanborn Fire Insurance Maps with coverage of the Property area were searched but no maps were made for this area.

3.6.2 Historical Aerial Photographs

The following are descriptions of the historical aerial photographs taken at the Property and reviewed by APEI. This review has been supplemented by geographic place names and other data obtained in other assessment activities of this ESA. These photographs can be found in Appendix C.

1953

In the 1953 aerial photograph the southwest Property corner was occupied by crops. South of the center of the north Property border was a small structure or concrete pad (this area was not accessible during the Property reconnaissance due to heavy surrounding vegetation). There was a triangular water retention pond along the north Property border, west of the existing retention pond. Several small sheds, pads, or stored materials were visible on several areas of the Property. The remainder of the Property was undeveloped and occupied by native vegetation. The Coachella Channel was visible north and east of the Property. Vista Del Sur was visible and appeared to have been paved. The existing unpaved roads through and adjacent to the Property were also visible. The adjacent sites were either undeveloped or agricultural. There were no obvious signs of the storage or disposal of hazardous materials on the Property in this photograph.

1959

In the 1959 aerial photograph a water retention pond was visible in the area listed as a freshwater pond in wetland maps that was observed as dry during the Property reconnaissance. Additional areas of the west side of the Property had been cleared and were agricultural. Some of the west adjacent sites were developed with single family residences or were changed from vacant land to agricultural use. There were no other significant differences on the Property or adjacent sites in the 1959 aerial photograph from the 1953 aerial photograph. There were no obvious signs of the storage or disposal of hazardous materials on the Property in this photograph.

1953

In the 1953 aerial photograph the southwest Property corner was occupied by crops. South of the center of the north Property border was a small structure or concrete pad (this area was not accessible during the Property reconnaissance due to heavy surrounding vegetation). There was a triangular water retention pond along the north Property border, west of the existing retention pond. Several small sheds, pads, or stored materials were visible on several areas of the Property. The remainder of the Property was undeveloped and occupied by native vegetation. The adjacent sites were either undeveloped or agricultural. There were no obvious signs of the storage or disposal of hazardous materials on the Property in this photograph.

1978, 1989, and 1996

There were no significant differences on the Property or adjacent sites in the 1978, 1989, and 1996 aerial photographs from the 1953 aerial photograph. The only exception were the presence of small structures and stored materials observed in the area of the Property south of the north adjacent scrap metal yard and the presence of the existing single family residences to the north of this area beginning in 1978. There were no obvious signs of the storage or disposal of hazardous materials on the Property in these photographs.

2002

Except for some areas of the Property that were agricultural in 2002 that are no longer cultivated, the conditions of the Property and adjacent sites appeared in this photograph to be similar to that observed during the Property reconnaissance. There were no obvious signs of the storage or disposal of hazardous materials on the Property in this photograph.

2005, 2006, 2009, 2010, and 2012

There were no significant differences on the Property or adjacent sites in the 2005, 2006, 2009, 2010, and 2012 aerial photographs from the 2002 aerial photograph. There were no obvious signs of the storage or disposal of hazardous materials on the Property in these photographs.

3.6.3 Topographic Maps

Topographic maps from 1904, 1947, 1956, and 1972 are presented in Appendix D. The 1904 map depicted no roads, uses, or developments on the Property, adjacent sites, or surrounding area. The 1947 map depicted Vista Del Sur as a paved road and the Property and adjacent sites as vacant with no uses or developments identified. The 1956 and 1972 maps depicted half of the existing retention pond along the north Property border and orchards on parts of the west side of the Property. Avenue 47, Avenue 48, Tyler Street, Vista Del Sur, and the Coachella Channel were depicted on these maps. There were two small nondescript structures depicted near the center of the Property. The adjacent sites were depicted as either vacant or occupied by orchards. There were no obvious signs of the storage or disposal of hazardous materials on the Property in any of the topographic maps.

3.6.4 Building Permits

Because the Property has no street address, building permits were not researched.

3.6.5 Environmental Liens

No environmental liens were found during this investigation. The Property was not listed in the search of the Federal NPL Liens database. The Property owner representative stated that there were no environmental liens on the Property. In order for there to be an environmental lien against the Property, it must be a suspected, or confirmed, contributor to subsurface contamination. Research conducted for this report did not find any uses that would have contributed to subsurface contamination on the Property and no regulatory agencies identified it as such.

3.6.6 City Directories

APEI retained Environmental Data Resources, Inc. (EDR) to perform historical city directory research of the Property. APEI reviewed the report, "*The EDR-City Directory Abstract*" by EDR dated September 18, 2014. The complete city directory search is presented in Appendix E. Because the Property had no street addresses, there were no listings for the Property.

The City Directory report was then used to obtain data on some of the adjacent sites. There were no listings in the city directory report that identified any of the adjacent sites as those that may use, store, or dispose of significant quantities of hazardous materials or petroleum products.

3.6.7 Title Report

It was not in the scope of work for APEI to obtain a Title report for the Property. The Client did not provide APEI with a Title report for review.

3.7 Current Uses of Adjoining Sites

Current uses of the immediately adjacent sites and their addresses as noted on the buildings or researched on-line are as follows:

- North – North of Vista Del Sur is Interstate 10 and beyond that is vacant land. North of Avenue 47 is vacant land. North of the center area of the Property is occupied by single family residences and a scrap metal yard; 86475 through 86485 Vista Del Sur;
- South – Avenue 48 with agricultural land and retention ponds beyond; no address posted;
- East – Polk Street with lemon orchards beyond; no address posted;
- West – Single family residences, Corona Yacht Club, nursery's, agricultural land, and a water tank; 46600 through 47610 Tyler Street and 86201 47th Avenue.

The scrap metal yard adjacent to the north of the Property is storing former above ground and below ground steel storage tanks. APEI inspected these tanks and determined that they had no product and were not associated with any use on this adjacent site. It appears that these tanks are on this site based only on their value as scrap metal. Based on observations and research, there is a low likelihood that a recognized environmental condition exists at the Property as a result of the current adjacent land use. APEI did not detect obvious indications that adjacent sites have Underground Storage Tanks (USTs) or are engaged in any manufacturing processes that would involve the use of significant quantities of hazardous materials.

3.8 Past Uses of Adjoining Sites

3.8.1 North

Historical sources noted above, along with field notations, indicate that the site adjacent to and north of the Property across Vista Del Sur was undeveloped in 1904. Between 1959 and 1972, this adjacent site was developed with Interstate 10 and the land beyond has never been developed.

The site adjacent to and north of the Property across Avenue 47 was undeveloped in 1904 and has never been developed.

Some of the land north of the center of the Property has never been developed. Some of the land adjacent to the north of the Property had been developed with single family residences sometime between 1959 and 1978. Between 1978 and 1989, material storage was observed at the existing scrap metal yard.

There were no signs of the storage or disposal of hazardous materials on the north adjacent sites in the historical information reviewed. There were no indications from any historical sources that the Property has suffered environmental damage from the north adjacent sites.

3.8.2 South

Historical sources noted above, along with field notations, indicate that the sites adjacent to and south of the Property, across Avenue 48, were undeveloped in 1904. Between 1947 and 1953, some of these adjacent sites began being used for agricultural purposes. Except for water retention ponds, there have been no other significant uses of these sites.

There were no signs of the storage or disposal of hazardous materials on the south adjacent sites in the historical information reviewed. There were no indications from any historical sources that the Property has suffered environmental damage from the south adjacent sites.

3.8.3 East

Historical sources noted above, along with field notations, indicate that the sites adjacent to and east of the Property, across Polk Street, were undeveloped in 1904. Between 1959 and 1972, these adjacent sites began being used for agricultural purposes. There have been no other significant uses of these sites.

There were no signs of the storage or disposal of hazardous materials on the east adjacent sites in the historical information reviewed. There were no indications from any historical sources that the Property has suffered environmental damage from the east adjacent sites.

3.8.4 West

Historical sources noted above, along with field notations, indicate that the sites adjacent to and west of the Property were undeveloped in 1904. Between 1947 and 1953, some of these adjacent sites began being used for agricultural purposes. Since 1953, these sites have been improved with nurseries, single family residences, and a water tower.

There were no signs of the storage or disposal of hazardous materials on the west adjacent sites in the historical information reviewed. There were no indications from any historical sources that the Property has suffered environmental damage from the west adjacent sites.

4.0 RECORDS REVIEW

4.1 Standard Environmental Record Sources, Federal and State

A Federal, State and Local Radius Profile Report from Environmental Data Resources, Inc. dated September 5, 2014 was reviewed by APEI. The radius report, found in Appendix G, contains records of registered sites in the vicinity of the Property for the classifications and distances listed in the following tables and as required by ASTM Practice E-1527-13. Report dates for each database searched are listed in this appendix.

TABLE I - FEDERAL ENVIRONMENTAL RECORD SOURCES SUMMARY		
FEDERAL DATABASES	**SEARCH RADIUS**	**NUMBER OF REPORTED SITES**
National Priorities List (NPL)	1.00 mile	0
De-listed National Priorities List (NPL)	1.00 mile	0
Resource Conservation and Recovery Act (RCRA) Corrective Action Facilities (CORRACTS)	1.00 mile	0
Records of Decision (ROD)	1.00 mile	0
Superfund Consent Decrees (CONSENT)	1.00 mile	0
Sites currently or formerly under review by US EPA (CERCLIS and CERCLIS/NFRAP)	0.50 mile	0
RCRA permitted Treatment, Storage and Disposal Facilities (TSD)	0.50 mile	0
Mines Master Index File (MINES)	0.25 mile	0
RCRA Administrative Action Tracking System (RAATS)	0.25 mile	0
RCRA Registered Small or Large Generators of Hazardous Waste (GNRTR)	0.25 mile	0
Emergency Response Notification System (ERNS)	0.25 mile	0
Facility Index System/Facility Identification Initiative Program Summary Report (FINDS)	Property Only	0
Hazardous Materials Information Reporting System (HMIRS)	Property Only	0
Material Licensing Tracking System (MLTS)	Property Only	0
Federal Superfund Liens (NPL LIENS)	Property Only	0
PCB Activity Database System (PADS)	Property Only	0
Toxic Chemical Release Inventory System (TRIS)	Property Only	0
FIFRA/TSCA Tracking System (FTTS)	Property Only	0
Toxic Substances Control Act (TSCA)	Property Only	0

TABLE II - STATE AND LOCAL ENVIRONMENTAL RECORD SOURCES SUMMARY		
STATE AND LOCAL DATABASE	**SEARCH RADIUS**	**NUMBER OF REPORTED SITES**
Cal-Sites and Cal-Sites Annual Work Plan (AWP)	1.00 mile	0
Notify 65	1.00 mile	0
Areas Of Concern (AOCONCERN)	1.00 mile	0
California Bond Expenditure Plan (CA BEP)	1.00 mile	0
California EPA Office of Emergency Information (CORTESE) and Historical CORTESE	1.00 mile	0
Toxic Pits Cleanup facilities (TOXIC PITS)	1.00 mile	0
ENVIROSTOR	1.00 mile	0
RESPONSE	1.00 mile	0
Tribal Records (Indian Reservations, LUST, UST)	Up to 1.50 miles	0
California Spills, Leaks, Investigations & Clean-up Cost Recovery Listing (CA SLIC)	0.50 mile	0
State Landfills	0.50 mile	0
Leaking Underground Storage Tanks (LUST)	0.50 mile	0
Waste Management Unit Database/State Water Resources Control Board (WMUDS/SWAT)	0.50 mile	0
California City Land Fills (CA LA LF)	0.50 mile	0
Voluntary Cleanup Program Properties (VCP)	0.50 mile	0
Indian Reservation	0.50 mile	1
Registered Underground Storage Tanks (UST)	0.25 mile	0
California Facility Inventory Database Underground Storage Tanks (CA FID UST)	0.25 mile	0
Hazardous Substances Storage Container Database (HIST UST)	0.25 mile	0
Statewide Environmental Evaluation and Planning System UST (SWEEPS UST)	0.25 mile	0
Drycleaners	0.25 mile	0
Historical Auto Stations/Dry Cleaners	0.25 mile	0
Registered Above Ground Storage Tanks (AST)	0.25 mile	0
Emissions Inventory Data (EMI)	Property Only	0
Hazardous Waste Information System (HAZNET)	Property Only	0
California Hazardous Material Incident Report System (CHMIRS)	Property Only	0
California Waste Discharge System (CA WDS)	Property Only	0

4.1.1 Property and Adjacent Sites Summary

The Property and adjacent sites were not listed in any of the databases searched.

4.1.2 National Priorities List (NPL)

The National Priorities List (NPL) is the EPA's database of uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund program. A site must meet or surpass a predetermined hazard ranking system score, be chosen as a state's top priority site, or meet three specific criteria set jointly by the US Dept of Health and Human Services and the U.S. EPA in order to become an NPL site.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the Federal database search (1.0-mile radius) under this listing.

4.1.3 Sites currently or formerly under review by US EPA (CERCLIS/NFRAP)

Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) contains data on potentially hazardous waste sites that have been reported to the U.S. EPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites that are either on the NPL or sites that are in the screening and assessment phase for possible inclusion on the NPL.

NFRAP sites may be locations where, following an initial investigation, no contamination was found, contamination was removed quickly, or the contamination was not serious enough to require Federal Superfund action or NPL consideration.

The Property and the adjacent sites were not listed in the search of these databases. No additional sites were found in these Federal databases search (1.0-mile radius) under this listing.

4.1.4 Resource Conservation and Recovery Act (RCRA) Corrective Action Facilities (CORRACTS)

The EPA maintains this database of Resource Conservation and Recovery Act (RCRA) facilities that are undergoing "corrective action". A "corrective action order" is issued pursuant to RCRA Section 3008 (h) when there has been a release of hazardous waste or constituents into the environment from a RCRA facility. Corrective actions may be required beyond the facility's boundary and can be required regardless of when the release occurred, even if it predates RCRA.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the Federal database search (1.0-mile radius) under this listing.

4.1.5 Resource Conservation and Recovery Act (RCRA) Treatment, Storage and Disposal Facilities (TSD)

The EPA's RCRA Program identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA Facilities database is a compilation by the EPA of facilities that report generation, storage, transportation, treatment or disposal of hazardous waste. RCRA TSDs are facilities that treat, store and/or dispose of hazardous waste.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the Federal database search (0.5-mile radius) under this listing.

4.1.6 RCRA Registered Small and Large Generators of Hazardous Waste (GNRTR)

The EPA's RCRA Program identifies and tracks hazardous waste from the point of generation to the point of disposal. RCRA Large Generators are facilities that generate at least 1,000 kg/month of non-acutely hazardous waste (or 1 kg/month of acutely hazardous waste) and Small Generators generate less than these amounts.

The Property and the adjacent sites were not listed in the search of these databases. No additional sites were found in the Federal database search (0.25-mile radius) under these listings.

4.1.7 Emergency Response Notification System (ERNS)

The ERNS database records and stores information on reported releases of oil and hazardous substances.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the Federal database search (0.25-mile radius) under this listing.

4.1.8 Cal-Sites and Cal-Sites Annual Work Plan (AWP)

The Cal-Sites database contains potential or confirmed hazardous substances release properties in California. The AWP list (formerly the BEP list) identifies known hazardous substances sites target for cleanup.

The Property and the adjacent sites were not listed in the search of these databases. No additional sites were found in the State database search (1.0-mile radius) under these listings.

4.1.9 California Hazardous Materials Incident Report System (CHMIRS)

The CHMIRS database contains information on reported hazardous material incidents including accidental releases or spills.

The search in this database was limited to the Property. The Property was not listed in the search of this county database.

4.1.10 State Index of Sites With Hazardous Waste (CORTESE & HIST CORTESE)

The CORTESE and HIST CORTESE lists are composed of sites that have had releases designated by the State Water Resource Control Board (LUST), the Integrated Waste Board (SWF/LS) and the Department of Toxic Substances Control (Cal-Sites). The source is the California Environmental Protection Agency/Office of emergency Information. This database identifies public drinking water wells with detectable levels of contamination, hazardous substance sites selected for remedial action, sites with known toxic material identified through the abandoned site assessment program, sites with USTs having a reportable release and all solid waste disposal facilities from which there is known migration.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the State database search (1.0-mile radius) under this listing.

4.1.11 Notify 65

The Notify 65 list pertains to Proposition 65. This is a list of facilities that have released notifications about any release which could have impacted drinking water and thereby expose the public to a potential health hazard.

The Property and adjacent sites were not listed in the search of this database. No additional sites were found in the State database search (1.0-mile radius) under this listing.

4.1.12 Toxic Pits Cleanup Facilities (TOXIC PITS)

The State Water Resources Control Board maintains records of toxic pits. This list identifies sites suspected of containing hazardous substances where cleanup has not yet been completed.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the State database search (1.0-mile radius) under this listing.

4.1.13 State Landfill

The Integrated Waste Management Board maintains the Solid Waste Landfill (SWLF) records that contain an inventory of solid waste disposal facilities or landfills in the state of California. These may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites. Categories of waste are: Class I – municipal, household, shredded waste tires, Class II – industrial, Class III – farming, landscaping, land clearing waste, and Class IV – construction and demolition.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the State database search (0.5-mile radius) under this listing.

4.1.14 Waste Management Unit Database System (WMUDS/SWAT)

The State Water Resources Control Board maintains the WMUDS database. This listing is used for program tracking and inventory of waste management units. WMUDS is composed of the following databases: Facility Information, Scheduled Inspections, Waste Management Unit Information, SWAT Program and Summary Information, Chapter 15 Information and Monitoring Parameters, TPCA Program Information, RCRA Program Information, Closure Information and Interested Parties Information.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the State database search (0.5-mile radius) under this listing.

4.1.15 Leaking Underground Storage Tanks (LUST)

The State Water Resource Control Board maintains records of reported leaking UST incidents.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the State database search (0.5-mile radius) under this listing.

4.1.16 California Bond Expenditure Plan (CA BEP)

The Department of Health Services developed the CA BEP database. This plan is a site-specific expenditure plan as the basis for an appropriation of Hazardous Substance Cleanup Bond Act funds.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the State database search (1.0-mile radius) under this listing.

4.1.17 Underground Storage Tank Sites (UST)

The State Water Resources Control Board's Hazardous Substances Storage Container Database tracks USTs as regulated under Subtitle I of RCRA.

The Property and the adjacent sites were not listed in the search of this database. There were no other sites found in the State database search (0.25-mile radius) under this listing.

4.1.18 Voluntary Cleanup Program (VCP)

The Department of Toxic Substance Control (DTSC) maintains records of sites that are low threat level properties with confirmed or unconfirmed releases and the project proponents have requested the DTSC oversee investigation and/or cleanup activity.

The Property and the adjacent sites were not listed in the search of this database. There were no other sites found in the State database search (0.5-mile radius) under this listing.

4.1.19 California Facility Inventory Database Underground Storage Tanks (CA FID UST)

The California Environmental Protection Agency maintains the FID database that contains historical listings of active and inactive underground storage tank locations. This data is obtained from the State Water Resource Control Board. These sites are not necessarily those that have had releases or spills.

The Property and the adjacent sites were not listed in the search of this database. There were no other sites found in the State database search (0.25-mile radius) under this listing.

4.1.20 Hazardous Substances Storage Container Database (HIST UST)

The Hazardous Substances Storage Container Database is a listing of historical UST sites. This data is obtained from the State Water Resource Control Board. These sites are not necessarily those that have had releases or spills.

The Property and the adjacent sites were not listed in the search of this database. There were no other sites found in the State database search (0.25-mile radius) under this listing.

4.1.21 Statewide Environmental Evaluation & Planning System (SWEEPS UST)

The Statewide Environmental Evaluation & Planning System Database is a listing of UST sites updated by a company under the authority of the State Water Resource Control Board (SWRCB) in the early 1980s. This list is no longer updated. These sites are not necessarily those that have had releases or spills.

The Property and the adjacent sites were not listed in the search of this database. There were no other sites found in the State database search (0.25-mile radius) under this listing.

4.1.22 Superfund Consent Decrees (CONSENT)

The CONSENT list is released periodically by the United States District Courts after settlement by parties to litigation matters. The list contains major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the Federal database search (1.0-mile radius) under this listing.

4.1.23 Records Of Decision (ROD)

The ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the Federal database search (1.0-mile radius) under this listing.

4.1.24 De-listed National Priorities List (NPL)

The De-listed National Priorities List (NPL) is the EPA's database of uncontrolled or abandoned hazardous waste sites that have been identified for priority remedial actions under the Superfund program, have been cleaned up to meet the closure standards set for the site and have therefore been taken off the NPL. A site must meet or surpass a predetermined hazard ranking system score, be chosen as a state's top priority site, or meet three specific criteria set jointly by the US Dept of Health and Human Services and the U.S. EPA in order to become an NPL site.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the Federal database search (1.0-mile radius) under this listing.

4.1.25 Facility Index System (FINDS)

The FINDS database contains both facility information and "pointers" to other sources that contain more detail.

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.26 Hazardous Materials Information Reporting System (HMIRS)

The HMIRS database contains records of hazardous material spill incidents reported to the Department of Transportation (DOT).

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.27 Material Licensing Tracking System (MLTS)

The Nuclear Regulatory Commission maintains the MLTS database which contains a list of approximately 8,100 sites that possess or use radioactive materials and which are subject to NRC licensing requirements.

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.28 Mines Master Index File (MINES)

The Department of Labor, Mines Safety and Health Administration (MSHA) maintain a list of active and abandoned mines.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the Federal database search (0.25-mile radius) under this listing.

4.1.29 Federal Superfund Liens (NPL LIENS)

The USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner receives notification of potential liability.

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.30 PCB Activity Database System (PADS)

The PADS database identifies generators, transporters, commercial storage facilities, brokers and disposers of PCB's who are required to notify the EPA of such activities.

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.31 RCRA Administrative Action Tracking System (RAATS)

The RAATS list contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate

RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.32 Toxic Chemical Release Inventory System (TRIS)

The TRIS database identifies facilities that release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313 (Community Right to Know).

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.33 Toxic Substance Control Act (TSCA)

The TSCA database identifies manufactures and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.34 FIFRA/TSCA Tracking System (FTTS)

The Federal Insecticide, Fungicide & Rodenticide Act and the Toxic Substances Control Act track administrative cases, pesticide enforcement actions, and compliance activities related to FIFRA and TSCA. The EPA Office of Prevention, Pesticides and Toxic Substances maintain this database.

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.35 Above Ground Storage Tanks (AST)

The California State Water Resources Control Board maintains records of AST petroleum storage facilities. These sites are not necessarily those that have had releases or spills.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the Federal database search (0.25-mile radius) under this listing.

4.1.36 Drycleaners

The Department of Toxic Substances Control maintains records of drycleaner related facilities that have EPA ID numbers. These sites are not necessarily those that have had releases or spills.

The Property and the adjacent sites were not listed in the search of this database. There were no other sites found in the State database search (0.25-mile radius) under this listing.

4.1.37 California Waste Discharge System (CA WDS)

The CA WDS list is maintained by the California Environmental Protection Agency for sites that have been issued waste discharge requirements. These sites are not necessarily those that have had releases or spills.

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.38 California Spills, Leaks, Investigations & Clean-up Cost Recovery Listing (CA SLIC)

The CA SLIC list maintained by the City Regional Water Quality Board includes sites that have impacted groundwater or have the potential to impact groundwater.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the State database search (0.5-mile radius) under this listing.

4.1.39 Hazardous Waste Information System (HAZNET)

The HAZNET database compiled by the Department of Toxic Substance Control contains data extracted from copies of hazardous waste manifests. The annual volume of manifests is typically 700,000 to 1,000,000. These are unconfirmed and uncorrected and may contain some invalid values such as generator ID, treatment storage and disposal ID, waste category or disposal method. These sites are not necessarily those that have had releases or spills.

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.40 Historical Auto Stations and Dry Cleaners

EDR has searched select national collections of business directories and has collected partial listings of potential dry cleaners along with gas, filling, and service stations. EDR's review was limited to those categories of sources that might include dry cleaning, gas stations, filling stations and service stations. The categories reviewed included, but were not limited to: gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, dry cleaner, cleaners, laundry, laundromat, cleaning/laundry and wash & dry.

The Property and the adjacent sites were not listed in the search of this database. No additional sites were found in the State database search (0.25-mile radius) under this listing.

4.1.41 Areas of Concern (AOCONCERN)

The EPA Region 9 tracks areas where Volatile Organic Compound (VOC) contamination is at or above the Minimum Contaminant Level (MCL).

The Property and the adjacent sites were not designated as being in an AOCONCERN. There were no other sites found in the State database search (0.25-mile radius) under this listing.

4.1.42 Emissions Inventory Data (EMI)

The EMI database compiled by the local air pollution agencies lists sites where air pollution permits exist. These sites are not necessarily those that have had releases or spills.

The search in this database was limited to the Property. The Property was not listed in the search of this Federal database.

4.1.43 Department of Defense (DOD)

This data set from the USGS consists of federally owned or administered land, administered by the Department of Defense, that have any area equal to or great than 640-acres.

The Property and the adjacent sites were not listed in the search of this database. There were no other sites found in the State database search (1.0-mile radius) under this listing.

4.1.44 Tribal Records (Indian Reservations, Indian LUST, Indian UST)

This data set from tribal records consists of Indian reservations that have an area equal to or great than 640-acres, any leaking underground storage tanks, or registered underground storage tanks.

The Property and the adjacent sites were not listed in the search of these databases.

Cabazon Indian Reservation was on this list and is located approximately 1,500-feet west, southwest of the Property. There were no reports of spills, releases or violations on this site which is located down gradient from the Property in accordance with the presumed groundwater flow direction.

There were no other sites found in the database searches (up to 1.5-mile radius) under these listings.

4.1.45 ENVIROSTOR

This data from the Department of Toxic Substance Control (DTSC) Site Mitigation and Brownfields Reuse Program's lists sites that have known contamination or sites for which there may be reasons to investigate further.

The Property and the adjacent sites were not listed in the search of this database. There were no other sites found in the database searches (up to one-mile radius) under this listing.

4.1.46 RESPONSE

The RESPONSE list is composed of sites with confirmed releases and where the DTSC have been involved in the remediation. These confirmed releases sites are generally high-priority and high potential risk.

The Property and the adjacent sites were not listed in the search of this database. There were no other sites found in the database searches (up to one-mile radius) under this listing.

4.1.47 Indian Reservations

The Indian Reservations list is composed of areas under Indian jurisdiction. These are not sites that have necessarily had any releases or spills or were involved in the storage or use of hazardous materials or petroleum products.

The Property and the adjacent sites were not listed in the search of this database. There was one site found in the database search (up to one-mile radius) under this listing.

4.1.48 County of Riverside, Department of Environmental Health

APEI requested information for hazardous materials, petroleum product spills and USTs on the Property from the County of Riverside, Department of Environmental Health. In a telephone interview response to our request, Ms. Suzanne Cauffiel, Records Clerk, stated that without addresses, they would not be able to perform a comprehensive search of their records. She indicated that if there had been a release, spill, or UST on the Property, it would be likely that they would have applied for an address of the Property and therefore she implied that there are no records for the Property.

4.1.49 Orphan (Unmapped) Sites

Orphan (unmapped) sites indicated in the radius report were reviewed to determine their locations relative to the Property. These sites were not found to be in close proximity to the Property or their location could not be determined. Based upon APEI's area reconnaissance, types of regulatory listings identified for the orphan facilities, and conditions typical of the identified facilities activities, the orphan facilities were not considered suspect *recognized environmental conditions* to the subject property.

4.1.50 Previous Property Inspection Reports

The Client did not provide any previous inspection reports or Phase I Environmental Site Assessments for the Property.

4.1.51 Fire Department

The county and city fire departments have referred APEI to the County of Riverside, Environmental Health, Hazardous Materials Division for any inquires for USTs, spills or hazardous materials storage.

4.1.52 Santa Ana Regional Water Quality Control Board

Because the Property has never been developed and has no specific street address, a request for Santa Ana Regional Water Quality Control Board files could not be sent.

4.1.53 Department of Toxic Substances Control (DTSC)

DTSC Files

Because the Property has never been developed and has no specific street address, a request for DTSC files could not be sent.

Generator Information Services Section

Because the Property has never been developed and has no specific street address, a request for Generator Information Services Section files could not be sent.

EnviroStor

APEI searched for the Property and adjacent sites on the EnviroStor website published by the DTSC. This website contains listings of Federal Superfund sites, State Response sites, Voluntary Cleanup sites, School Cleanup sites, Evaluation sites, School Evaluation sites, Military Evaluation sites, Tiered Permit sites, Corrective Action sites, Operating Permit sites, Post Closure Permit sites, and Non-Operating Permit sites. The Property and adjacent sites were not listed on the EnviroStor website.

4.1.54 State Water Resources Control Board (GeoTracker)

APEI searched for the Property and adjacent sites on the GeoTracker website published by the State Water Resources Control Board. This site contains listing of DTSC cleanup sites, other cleanup sites, LUST sites, UST sites, land disposal sites, military sites, and DTSC Disposal Permit sites. The Property and adjacent sites were not listed on the GeoTracker website.

5.0 INFORMATION FROM SITE RECONNAISSANCE

5.1 Hazardous Substances in Connection with Identified Uses

An unaccompanied site reconnaissance of the Property was performed by Mr. Doug Kochanowski, Biologist and Project Manager, on September 10, 2014 that included a walk of the Property to determine the presence of hazardous materials and environmental conditions.

There were no signs of hazardous materials being used or stored on the Property.

5.2 Unidentified Substance Containers

Some empty 5-gallon buckets of various components such as paint were dumped on the Property in various areas, primarily near access roads. These containers did not contain any product and there were no sign of spills or releases from these containers onto the Property. The presence of these containers does not represent a recognized environmental condition for the Property.

5.3 Storage Tanks

No USTs or clarifiers were noted on the Property at the time of the Property reconnaissance.

Along the north Property border, south of the scrap metal yard, was a wooden Above Ground Storage Tank (AST) that was empty. This AST was approximately 10-feet in diameter, 30-feet long, and is estimated to have building been approximately 18,000-gallons. This AST appeared to have been illegally dumped on the Property and there were no visual or olfactory signs of spills or releases noted on the Property below or in the vicinity of the AST. Based on the size of this tank and its construction material, it is likely that it was a water tank. The presence of this AST on the Property does not represent a recognized environmental condition.

Near the groundwater well at the water retention pond along the north Property border were three plastic 500-gallon ASTs, one plastic 200-gallon tote, and one plastic 300-gallon AST. These containers appear to be associated with water treatment and storage. There were no signs of spills or releases noted at these containers. The presence of these ASTs and tote on the Property does not represent a recognized environmental condition.

5.4 Hydraulic Equipment

There were no above or below-grade hydraulic lift systems observed on the Property.

5.5 Indications of PCBs

There were no pad-mounted transformers, ballasts, or hydraulic lift systems located on the Property.

There are three pole-mounted transformers located near the water retention pond along the north Property border, one along the west Property border south of the adjacent Corona Yacht Club, and one near the center of the Property. These transformers are from Southern California Edison (SCE). In previous telephone conversations with SCE, personnel stated that transformers installed by SCE prior to 1978 contained insignificant concentrations of PCBs while those installed after 1978 were not likely to contain PCBs. In addition, SCE stated that in the event a SCE transformer leaked, it would be the responsibility of SCE to clean up the contamination. SCE also submits a form letter on the subject of PCBs in SCE transformers, which reads:

> "It is highly unlikely that the transformer serving your facility contains polychlorinated biphenyls (PCB) at concentration levels requiring special management under the Environmental Protection Agency's rules. Federal law has prohibited the manufacture of transformers containing PCB since 1977. In addition, SCE has never specified the purchase of distribution transformers utilizing PCB as the insulating/cooling fluid. SCE distribution transformers utilize mineral oil as the insulation/cooling fluid exclusively. In a statistically valid test of over 20,000 SCE distribution transformers, we determined that the concentration of PCB in the mineral oil is less than 50 parts per million (ppm) in over 96 percent of the units. The mineral oil in the 4 percent that tested above 50 ppm is generally below 100 ppm..."

The units appeared in good condition and evidence of leaks was not observed. The presence of these five pole-mounted transformers does not represent a recognized environmental condition for the Property.

5.6 Indications of Solid Waste Disposal

There was evidence observed of debris, trash, empty cans, clothing, furniture, concrete, roofing, wood, cuttings, rubber tires, railroad ties, and other materials typical of illegal dumping noted throughout the Property. These materials were typically located in areas along the access roads. There were two other areas where more solid waste was identified including the former water retention pond near the center of the Property and the area south of the north adjacent scrap metal yard. The solid waste appeared to be innocuous household trash dumped illegally and there were no signs of disposed hazardous materials or petroleum products. Other than the recommendation that these material be removed to help avert further dumping, no further investigation in regards to this condition is deemed necessary at this time.

5.7 Surface Staining

There was no evidence noted of discolored soils, odors or surface staining on the Property during the site reconnaissance. There was no evidence of sparse, stressed, or dead vegetation (from other than insufficient water). There was no visual evidence of improper handling or disposal of hazardous chemicals or materials on the Property grounds. Staining from paintball activities was noted in the area of the paintball field, however, the material used in paintballs is biodegradable, nontoxic, and does not require any special handling or disposal procedures,

5.8 Physical Setting Analysis

The Property is located in an area surrounded by commercial, residential, and agricultural uses. The area around the Property began to significantly develop in the 1970s.

There were no indications that the Property or any of the sites adjacent to the Property have been affected by the presence of oil or natural gas deposits. According to the California Department of Conservation Field and Wells Map from 2001 presented in Appendix A, the Property is not located in the proximity of an oil or gas field. The Property is located in a sedimentary basin with oil, gas, or geothermal production.

5.9 Non Scope ASTM Considerations

5.9.1 Asbestos

Physical sampling of suspect Asbestos Containing Materials (ACMs) was not part of the scope of this project and only a very limited and cursory visual inspection was performed. The presence of asbestos or suspect asbestos does not represent a recognized environmental condition for the Property.

APEI noted a pile of roofing materials that had been dumped on the Property in the vicinity of the former water retention pond near the center o the Property. The suspect asbestos containing materials included asphalt roofing, roof tar, and roofing felt. It is recommended that these materials be tested for asbestos. If found to contain asbestos, an asbestos abatement contractor will be required to have this material removed from the Property.

The shed located near the paintball field has suspect asbestos containing roofing. It is recommended that if this shed will be demolished, the roofing materials be tested for asbestos prior to the disturbance of this material. If

found to contain asbestos, an asbestos abatement contractor will be required to have this material removed from the shed prior to its demolition.

No above grade indications were observed that cement asbestos pipes (Transite pipe) were used on the Property. However, cement asbestos pipes are known to have been used for water distribution systems for crop irrigation. It is recommended that during excavation activities on the Property, if suspect cement asbestos pipes are identified, they be removed and disposed of by a licensed asbestos abatement contractor.

5.9.2 Lead Based Paint

Except for the shed which was not painted, the Property was undeveloped at the time of the site reconnaissance; therefore, no suspect lead based paint was noted on the Property.

5.9.3 Lead Contamination of Drinking Water

The condition of the drinking water at the Property is unknown.

5.9.4 Radon

Based on the results of the State of California Department of Health Services' 1990 California Statewide Radon Survey, the U.S. Environmental Protection Agency (U.S. EPA) lists Riverside County as being in Radon Zone 2. Zone 2 areas have a predicated average indoor radon screening potential of between 2.0 picocuries per liter (pCi/L) and 4.0 pCi/L. The level at which the U.S. EPA considers radon levels to be unhealthful is 4.0 pCi/L in residential structures.

There can be extreme variations of indoor radon levels within a local area based upon geologic, soil structure and building characteristics. The EPA recommends testing as the definitive method in determining the radon level within a specific structure. Radon testing was not part of this project's scope of work.

5.9.5 Urea-Formaldehyde

Except for the shed which had no urea-formaldehyde insulation, the Property was undeveloped at the time of the site reconnaissance; therefore, no suspect urea-formaldehyde containing materials were noted on the Property.

5.9.6 Mold

Except for the shed which showed no signs of mold growth or water intrusion, the Property was undeveloped at the time of the site reconnaissance, therefore, no molds that could potentially affect indoor air quality were present.

5.9.7 Fluorescent Light Tubes

There were no large quantities of fluorescent light tubes noted on the Property.

5.9.8 Mercury

Except for the shed which had no components suspected on containing mercury, the Property was undeveloped at the time of the site reconnaissance, therefore, no mercury containing components were identified on the Property.

5.9.9 Vapor Intrusion

APEI has not identified any potential sources of contamination by vapor intrusion emanating from the Property or adjacent sites. It should be noted that APEI was not contracted to perform an assessment of the Property in accordance with ASTM Standard E2600 nor does this assessment meet the requirements of said standard.

6.0 FINDINGS, CONCLUSIONS AND OPINIONS

All Phase Environmental, Inc. (APEI) has performed a Phase I Environmental Site Assessment (ESA) of the approximately 279.64-acre site located at the northwest corner of the intersection of 48th Avenue and Polk Street, in the City of Coachella, in the County of Riverside, California, 92236.

This assessment has revealed no evidence of recognized environmental conditions, historical recognized environmental conditions, controlled recognized environmental conditions, or de minimis conditions in connection with the Property except for the following:

1. Previous Agriculture Use on Property

The Property use had been agricultural from at least 1952 through the present day. Prior to 1972, it was a common practice to use environmentally persistent pesticides. Specifically, pesticides that included DDT, DDD, DDE and Toxaphene. Environmentally persistent pesticides, if previously used on the Property, may still be present. However, specific information regarding the previous use of such chemicals was not found. The possible presence of residual concentrations of environmentally persistent pesticides, is a recognized environmental condition. There are human and animal receptors in the area due to the unpaved condition of the Property. If the Property is intended for future development, sampling of the near surface soil to assess whether residual concentrations exceed State of California action levels is recommended in areas that were agricultural prior to 1972. The presence of pesticides in the soil may represent a health risk to tenants or occupants on the Property and the soil may require specialized handling and disposal. It is recommended that a grid be used to take representative samples where crops were grown on the Property. It is recommended that the samples be analyzed for pesticides using EPA Method 8081.

2. Wetlands on the Property

APEI screened the Property for the presence of suspect wetlands during the site reconnaissance and by reviewing the U.S. Department of the Interior, Fish and Wildlife Service, *National Wetlands Inventory* online map dated September 8, 2014 presented in Appendix A. This source indicated that there are two areas designated as wetlands on the Property. Near the center of the Property is an area designated as a Freshwater Pond. North of this is an area designated as a Freshwater Forested Shrub Wetland. Along the north Property border is a pond that has not been designated as a wetland but will require additional research to define its status. A wetland delineation was beyond the scope of this assessment. Based on the findings, APEI recommends that a comprehensive wetland determination and delineation be conducted on the Property prior to construction activities that may cause destruction or place fill material into known or suspected wetland areas.

3. Groundwater Wells On The Property

At least one groundwater well is located on the Property, near the water retention pond along the north Property border. A second well may also exist along the north Property border, south of the north adjacent scrap metal yard. Other wells may exist on the Property that were not identified during the Property reconnaissance. The presence of groundwater wells on the Property is not a recognized environmental condition, however, they must be properly decommissioned or protected if the Property is to be developed. The Riverside County Community Health Agency, Department of Environmental Health, Water Engineering Department in Indio, California (telephone 760-863-7000) have information on the locations of wells and specific requirements for the closure of wells and should be consulted if the Property is to be developed. No further investigation in regards to this condition is deemed necessary at this time.

4. Possible Septic System or Cesspool On The Property

Several structures appear to have once been developed along the north Property border, south of the north adjacent scrap metal yard. These appear to have been single family residences. A septic system or cesspool may have been associated with this former development and may still exist on the Property. However, since there have been no uses on the Property involving hazardous materials or petroleum products, it would not be a significant environmental concern. A septic system or cesspool on the Property is not considered a recognized environmental condition when used in association with a residential property. No further investigation in regards to this condition is deemed necessary at this time.

5. Solid Waste Disposal On The Property

There was evidence observed of debris, trash, empty cans, clothing, furniture, concrete, roofing, wood, cuttings, rubber tires, railroad ties, and other materials typical of illegal dumping noted throughout the Property. These materials were typically located in areas along the access roads. There were two other areas where more solid waste was identified including the former water retention pond near the center of the Property and the area south of the north adjacent scrap metal yard. The solid waste appeared to be innocuous household trash dumped illegally and there were no signs of disposed hazardous materials or petroleum products. Other than the recommendation that

these material be removed to help avert further dumping, no further investigation in regards to this condition is deemed necessary at this time.

6. Suspect Asbestos Containing Materials On The Property

Physical sampling of suspect Asbestos Containing Materials (ACMs) was not part of the scope of this project and only a very limited and cursory visual inspection was performed. The presence of asbestos or suspect asbestos does not represent a recognized environmental condition for the Property.

APEI noted a pile of roofing materials that had been dumped on the Property in the vicinity of the former water retention pond near the center o the Property. The suspect asbestos containing materials included asphalt roofing, roof tar, and roofing felt. It is recommended that these materials be tested for asbestos. If found to contain asbestos, an asbestos abatement contractor will be required to have this material removed from the Property.

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7.0 REFERENCES

Aerial Photographs, EDR Collection; 1953, 1959, 1978, 1989, 1996, 2002, 2005, 2006, 2009, 2010, and 2012.

California Statewide Radon Survey. 1990. California Department of Health Services.

California Department of Conservation. 2001. *Indio Quadrangle, Oil and Gas Fields in California*.

County of Riverside, Health Services Agency, Department of Environmental Health, Hazardous Materials Division, reviewed agency records, September 10, 2014.

EnviroStor website, Department of Toxic Substances Control, September 10, 2014.

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GeoTracker website, State Water Resources Control Board, September 10, 2014.

Sanborn Fire Insurance Maps, The Sanborn Library, LLC; no coverage found for Project area.

The EDR Radius Map Report with GeoCheck, Environmental Data Resources, Inc., September 5, 2014.

The EDR-City Directory Abstract," Environmental Data Resources, Inc., September 18, 2014.

State of California, Department of Conservation, Division of Oil, Gas and Geothermal Resources. *Munger Map Book of California to Alaska Oil and Gas Fields*, 1991, 1999 and 2003. *Regional Wildcat Map*, 2001.

United States Geological Survey Topographic Maps, 1904, 1947, 1956, and 1972, 7.5-minute series, *Indio California Quadrangle*.

National Wetlands Inventory, Wetlands Mapper, U.S. Department of the Interior, Fish and Wildlife Service, September 8, 2014.

2013-14 Annual Review, Water Quality Report, Coachella Valley Water District, 2014.

Web Soil Survey, National Resources Conservation Service, December 18, 2003.

First Quarter Groundwater Monitoring Report and Request For No Further Action, Coachella Travel Center, Kleinfelder West, Inc., April 10, 2009.

First Quarter Groundwater Monitoring Report and Request For No Further Action, Coachella Travel Center, Kleinfelder West, Inc., April 10, 2009.

Fault Zone Map, State of California, California Division of Mines and Geology, July 1, 1974.

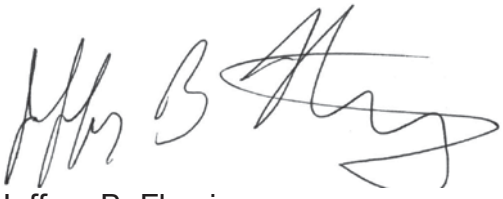
8.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONALS

The undersigned certifies that the professional services have been performed, our findings obtained and our recommendations have been prepared in accordance with customary principles and practices in the field of environmental science and engineering. APEI has acted in good faith and has no relationship with sellers, buyers or agents of the Property. There have been no conflicts of interest involved in the drawing of conclusions, which have been based solely on materials reviewed and visual inspections performed by APEI. The undersigned declares that to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in 40 CFR 312 Section 312.10. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the Property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312 with any exceptions noted in Section 2.2 - Limitations, Exceptions and Methodology of Assessment.

Prepared by:

Douglas B. Kochanowski, Biologist and Project Manager
CHMM (#9970), CAC (#99-2699)

Reviewed by:



Jeffrey B. Fleming
Regional Manager

9.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS PARTICIPATING IN THE PHASE I ESA

Name: Douglas B. Kochanowski
Title: Biologist and Project Manager
Education: Degree(s)/Year/Specialization
B.S. San Diego State University/1988/Biology
Active Registrations: Senior Level Certified Hazardous Materials Manager (CHMM)
Certification Number: 9970
Secretary on Board of Directors for So CAL ACHMM
Member of the American Indoor Air Quality Council
Certifications: California Certified Asbestos Consultant (CAC)
Certification Number: 99-2699
Certified AHERA Asbestos Inspector
Certified AHERA Asbestos Management Planner
Certified AHERA Asbestos Designer
Certified AHERA Supervisor
OSHA HAZWOPR 1910.120/Site Supervisor
Certified Radiation Worker
Confined Space Entry Trained
Years in Environmental Practice: 24

Name: Jeffrey B. Fleming
Title: Regional Manager
Education: Degree(s)/Year/Specialization
University of Washington, B.S./1988/Physics
San Diego State University, M.A./1990/Physical Geography
Certifications: AHERA Accredited Building Inspector
Certification Number: #298BIR3867
Years in Environmental Practice: 23

10.0 LIST OF APPENDIX SECTIONS

APPENDIX A	Maps, Figures, Additional Information & Documentation
APPENDIX B	Site Photographs
APPENDIX C	Aerial Photographs
APPENDIX D	Historical Topographic Maps
APPENDIX E	City Directory Research
APPENDIX F	Certifications
APPENDIX G	Radius Profile Report
APPENDIX H	Questionnaires