6.0 LONG-TERM IMPLICATIONS OF THE PROJECT

6.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2 (c) of the *Guidelines for the California Environmental Quality Act (CEQA Guidelines)* requires that the Environmental Impact Report (EIR) consider and discuss significant irreversible changes that would be caused by implementation of the La Entrada Specific Plan (proposed project). The CEQA Guidelines specify that the use of nonrenewable resources during the construction and operation of the project be discussed because a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary and secondary impacts (such as a highway improvement that provides access to a previously inaccessible area) should also be discussed because such changes generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with the project and should be discussed.

Project development is an irreversible commitment of the land. After the 50- to 75-year structural lifespan of the buildings is reached, it is improbable that the site would revert to an undeveloped state. Once developed, the proposed project would have indefinitely altered the characteristics of the project site from vacant land to one characterized by residential, commercial, retail, public facilities, open space, and park uses.

Construction of the project would result in a commitment of limited, slowly renewable, and nonrenewable resources. Such resources may include certain types of lumber and other forest products; raw materials such as steel; aggregate materials used in concrete and asphalt such as sand and stone; water; petrochemical construction materials such as plastic; and petroleum-based construction materials. Fossil fuels used by construction equipment would also be consumed. Project construction will also result in an increased commitment of public maintenance services such as waste disposal and sewage treatment.

Similarly, operation of the proposed project would result in the commitment of limited, nonrenewable, and slowly renewable resources such as natural gas, electricity, petroleum-based fuels, fossil fuels, and water. Natural gas and electricity will be used for lighting, heating, and cooling of buildings and operation of the project land uses. As discussed in Section 4.14, Public Services and Utilities, although the project would result in an increase in demand for both natural gas and electrical resources when compared to existing site conditions, the increases are within the existing and future delivery capacities of the service providers. The project would not result in a significant adverse impact related to the provision of natural gas or electricity. In addition, Title 24 of the California Code of Regulations (CCR) requires conservation practices that will limit the amount of energy consumed by the proposed project. The Specific Plan also encourages energy efficiency by designing development in accordance with United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED), GreenPoint Standards, and installing light-emitting diode (LED) lighting, energy-efficient appliances, solar/photovoltaic systems, and energy-efficient lighting. Compliance with Title 24 is mandated by the State, and participation in the LEED program is voluntary. Nevertheless, the use of such resources by the proposed project will continue to represent a long-term commitment of essentially nonrenewable resources.

Operation of the proposed project would also require potable water. The total average annual project water demand is estimated to be approximately 6,520 acre feet per year which, when added to the current annual production, is still within the production capacity of the City of Coachella's (City) existing wells. Based on the conclusions documented in the La Entrada Water Supply Assessment, the total projected water supplies available to the City during normal, single dry, and multiple dry water years during a 20-year projection period are sufficient to meet the projected water demand associated with the proposed La Entrada Project, in addition to the City's existing and planned future uses, including agricultural and manufacturing uses. However, the increase in water use will continue to represent a long-term commitment of this essentially nonrenewable resource.

On-site surface water drainage in the developed condition would be different from the existing natural condition, as described in Section 4.9, Hydrology and Water Quality. Project hydrology would meet drainage system standards, and pollutants of concern would be controlled through implementation of structural and nonstructural best management practices (BMPs) during project construction and operation.

As discussed in Section 4.4, Biological Resources, implementation of the proposed project would result in impacts to native plant communities, jurisdictional areas, wildlife and wildlife habitat, and a species protected under the Migratory Bird Treaty Act (MBTA). In addition, site topography would be modified per the conceptual grading plan for the site, and on-site topography would be substantially different after project implementation.

The commitment of limited, slowly renewable, and nonrenewable resources required for construction and operation of the proposed project would limit the availability of these resources for future generations or for other uses during the life of the project. However, the use of such resources for the project would be consistent with regional and local plans and projected growth in the area.

6.2 GROWTH-INDUCING IMPACTS

Sections 15126(d) and 15126.2(d) of the *CEQA Guidelines* require that an EIR analyze growth-inducing impacts and should discuss the ways in which the project could foster economic or population growth or construction of additional housing, either directly or indirectly, in the surrounding environment. This section examines ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. An assessment of other projects that could affect the environment, individually or cumulatively, is also required. To address this issue, potential growth-inducing effects were examined through analysis of the following questions:

- Would the project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

It should be noted that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment (*CEQA Guidelines*, Section 15126.2(d)). This issue is presented to provide additional information on ways in which this project could potentially contribute to significant changes in the environment, beyond the direct consequences of developing the proposed land uses as described in earlier sections of this EIR. The following sections address the questions related to the potential growth-inducing effects analysis for this project.

6.2.1 Removal of Obstacles to Growth

The project site is currently undeveloped and is surrounded by undeveloped parcels of land some agricultural land uses, the Coachella Branch of the All-American Canal (Coachella Canal) and Interstate 10 (I-10). As discussed earlier in Section 4.14, implementation of the project would require infrastructure improvements necessary to connect to the existing surrounding infrastructure. Extensions of existing utility facilities would provide sufficient tie-ins to the existing utility system to serve the proposed project. However, because the proposed project is a large mixed-use master plan being developed on a currently vacant site, the proposed project would be considered to be growth-inducing with respect to utilities and service systems.

The proposed project also includes almost 100 acres (ac) of land dedicated to the internal roadway network necessary to serve the proposed project. The extensions of Avenues 50 and 52 are required and included as part of the project in order to provide access into the project site. The extensions of Avenues 50 and 52 would increase the capacity of these roads and would remove an obstacle to growth, primarily associated with the proposed Specific Plan, because they would extend roadway facilities to an area not presently served. As discussed in Section 4.16, Traffic and Circulation, s traffic improvements to area intersections would also be required with project implementation. These physical improvements are proposed to improve the operational efficiency of these intersections and address future operational issues resulting from project implementation. Therefore, road facilities would be considered growth-inducing as they would allow for implementation of the La Entrada Specific Plan, a large mixed-use development proposed on a currently undeveloped site.

In 1989, the City approved the McNaughton Specific Plan, on the same site as the proposed project. The McNaughton Specific Plan proposed the development of a 1,877 ac resort community with two 18-hole golf courses. The City's General Plan Land Use Element was amended to change the land use designation of the project site from Agricultural to Specific Plan, and the General Plan Circulation Element was amended to include the arterial system proposed for the McNaughton Specific Plan. The zoning designation for the site was changed from Agricultural Transition (A-T) to Specific Plan. Therefore, the La Entrada Specific Plan is proposed for a site that has already been planned for future growth and development as shown in the City's adopted General Plan. Therefore, although the proposed project's required public services, utilities, and roadway facilities could be considered growth-inducing, the City has already contemplated and approved a large Specific Plan development for the same site.

6.2.2 Expansion of Public Services

As discussed earlier in Section 4.14, the project site is not currently served by any public service providers, including police protection services, fire prevention services, public transit, schools, and libraries. Expansion of public services would be required for the proposed project. Existing public services facilities combined with planned facilities identified in the Specific Plan, are sufficient to accommodate demand for services generated by the proposed project. As described above, the City has already contemplated and approved a large Specific Plan development for the same site, and encouragement of other new growth would not result from implementation of the project.

6.2.3 Encourage/Facilitate Economic Effects

During project construction, a number of design, engineering, and construction-related jobs would be created, increasing economic activity. This would be a temporary situation, but lasting 20 to 30 years until constructing the proposed project is completed. As discussed in Section 4.13, Population and Housing, the proposed project is also expected to employ approximately 3,355 people on site after project completion.

Employees/residents generated by the project may seek shopping, entertainment, auto maintenance, and other economic opportunities in the surrounding area, inclusive of nearby areas, the entire City, and areas throughout Riverside County. This would represent increased demand for economic goods and services and could, therefore, encourage the creation of new business and/or the expansion of existing businesses that address these economic needs. In addition, the proposed project includes approximately 1.5 million square feet of mixed-use commercial uses, which would meet the demands of the proposed project as well as serve as a regional commercial center.

6.2.4 Precedent-Setting Action

The proposed project is a large Specific Plan community that will be implemented over the next 20 to 30 years. Due to the lack of additional suitable sites, and the scale of the proposed project, it is unlikely that the City would approve another similar sized plan within the foreseeable future. Therefore, the proposed project does not propose any precedent-setting actions that, if approved, would specifically allow or encourage other projects and resultant growth to occur.

In conclusion, the project would require infrastructure improvements, traffic improvements, the extensions of Avenues 50 and 52, and the expansion of public services that would be considered growth inducing. However, because the La Entrada Specific Plan would use the project site for the approved McNaughton Specific Plan, the growth in this area has been anticipated by the City and the development of the site has been considered in the City's General Plan.

There are beneficial effects related to the development of the project site. Jobs would be created for project construction and local businesses would benefit from construction workers needs for goods and services in the area. Over the 20 to 30 years as the site is developed, employees and residents who live and/or work at the development, would support local businesses and may encourage other economic opportunities in the surrounding area.

6.3 SIGNIFICANT EFFECTS THAT CANNOT BE AVOIDED

Section 15126.2(b) of the *CEQA Guidelines* requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. The Executive Summary of this EIR contains a detailed summary table that identifies the project's environmental impacts, proposed mitigation measures, and the level of significance of those impacts after mitigation. The following is a summary of the impacts that are considered significantly adverse and unavoidable after all mitigation is applied. These impacts are also described in detail in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures.

6.3.1 Inventory of Significant Unavoidable Adverse Impacts

The following discussion provides the project's significant unavoidable adverse impacts:

Aesthetics. As discussed in Section 4.1, Aesthetics, the proposed project would result in significant unavoidable adverse impacts related to visual character because there are no feasible mitigation measures to reduce impacts associated with a change in visual character to a less than significant impact.

Agricultural and Forestry Resources. As discussed in Section 4.2, Agricultural and Forestry Resources, the proposed project would result in the permanent conversion of Prime Farmland and Unique Farmland to nonagricultural uses. The conversion of 0.025 ac of Prime Farmland and 9.5 ac of Unique Farmland would be considered a permanent loss. No feasible mitigation measures are available to offset such impacts to this agricultural resource on a project-specific and cumulative level.

Air Quality. As discussed in Section 4.3, Air Quality, construction emissions from the project would exceed the South Coast Air Quality Management District (SCAQMD) daily emissions thresholds for ROG, $NO_{X,}$ and CO emissions for Phases 1 through 2 5. In addition, operational emissions from the proposed project would exceed SCAQMD daily emissions thresholds for ROG, NO_x, CO, and PM_{10} emissions. Because these impacts cannot be fully mitigated, construction and operation air quality impacts are also considered cumulatively significant. In addition, because there is no feasible mitigation to reduce all construction and operation emissions to a less than significant level, there is no way to mitigate the partial inconsistency with General Plan policies. Impacts related to two General Plan policies are, therefore, also considered unavoidable significant impacts.

Geology and Soils. As discussed in Section 4.6, Geology and Soils, the proposed project would result in significant unavoidable adverse geologic impacts, specifically related to impacts that would result from exposing people or utilities/infrastructure to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Due to the presence of the San Andreas Fault, even with

the incorporation of mitigation measures, the potential for significant unavoidable adverse impacts from fault rupture may still result with implementation of the proposed project.

Global Climate Change. As discussed in Section 4.7, Global Climate Change, the proposed project would result in a significant unavoidable adverse impacts related to the generation of GHG emissions and GCC, and would also result in a significant contribution to cumulative GHG emissions.

Public Services and Utilities. As discussed in Section 4.14, the proposed project would result in significant unavoidable adverse impacts related to fire, police, school, library, wastewater, and solid waste services. However, impacts related to police and fire are considered short-term and would be mitigated subsequent to the construction of planned facilities on the reserved sites included as part of the La Entrada Specific Plan. In addition, the proposed project would result in significant adverse unavoidable impacts related to wastewater and solid waste. No feasible mitigation measures are available to offset the project impacts related to solid waste and wastewater treatment.

Traffic and Circulation. As discussed in Section 4.16, Traffic and Circulation, the proposed project would result in the following significant unavoidable adverse traffic impacts: The reason for these significant unavoidable adverse impacts is that the City cannot control the timing of improvements that are not fully within its own jurisdiction. For this reason, local intersection improvements wholly or partly in the City of Indio or Riverside County and local intersection improvements also wholly or partly on State facilities (i.e., SR-111, SR-86, and I-10) cannot be controlled by the City. However, it should be noted that the proposed project is consistent with the City's General Plan; therefore, the associated land uses have been included in the regional transportation planning efforts conducted by SCAG and CVAG, as well as the citywide transportation planning efforts of the City. For this reason, there is no feasible mitigation for impacts to the following intersection and freeway locations.

Existing Plus Phases 1 through 4. Project direct impacts from Existing Plus Phases 1 through 4 (without Avenue 50 Interchange) to the following intersections:

1. Jackson Street/50th Avenue (Indio)
2. Calhoun Street/52nd Avenue (County of Riverside)
3. Van Buren Street/Avenue 48 (Indo/Coachella)
4. Van Buren Street/Avenue 52 (Coachella/County of Riverside)
5. SR-86/Tyler Street (Caltrans)
6. SR-86/52nd Avenue (Caltrans)
7. Fillmore Street/52nd Avenue (Coachella/County of Riverside)
8. Pierce Street/52nd Avenue (Coachella/County of Riverside)
9. SR-111/62nd Avenue (Caltrans)

Existing Plus Project Build-out. Project direct impacts from Existing Plus Project Build-out (with Avenue 50 Interchange) to the following intersections:

1. Jackson Street/50th Avenue (Indio)
2. Calhoun Street/52nd Avenue (County of Riverside)
3. Van Buren Street/Avenue 48 (Indo/Coachella)
4. Van Buren Street/Avenue 52 (Coachella/County of Riverside)
5. Dillon Road/I-10 eastbound ramps (Caltrans)
6. SR-86/Tyler Street (Caltrans)
7. SR-86/52nd Avenue (Caltrans)
8. Fillmore Street/52nd Avenue (Coachella/County of Riverside)
9. Avenue 50/I-10 eastbound ramps (Caltrans)
10. Pierce Street/52nd Avenue (Coachella/County of Riverside)
11. SR-111/62nd Avenue (Caltrans)
12. Monroe Street/I-10 eastbound ramps (Caltrans)

Project direct impacts from Existing Plus Project Build-out (with Avenue 50 Interchange) to the following 3 I-10 freeway mainline lanes and 4 I-10 freeway ramp merge/diverge locations:

1. I-10 eastbound between SR-86 and Dillon Road
2. I-10 eastbound between Dillon Road ramps
3. I-10 eastbound between Dillon Road and Avenue 50
4. I-10 eastbound at the Monroe Street off-ramp
5. I-10 eastbound at the Dillon Road off-ramp
6. I-10 eastbound at the Dillon Road on-ramp
7. I-10 eastbound at the Avenue 50 off-ramp

Cumulative Year 2035 Plus Project Build-out. Cumulative Year 2035 impacts to the following 44 intersections:

1. Jackson Street/SR- 111 (Caltrans)
2. Jackson Street/Avenue 48 (Indio)
3. Jackson Street/50th Avenue (Indio)
4. Jackson Street/52nd Avenue (Indio/County of Riverside)
5. Golf Center Drive-Lorraine Street/SR-111 (Caltrans)
6. Golf Center Parkway/Avenue 45 (Indio)

7. Calhoun Street/52nd Avenue (County of Riverside)
8. Golf Center Parkway-Indio Center Drive/Avenue 44 (Indio)
9. Golf Center Parkway/Indio Springs Drive-Vista Del Norte (Indio)
10. Golf Center Parkway/I-10 westbound ramps (Caltrans)
11. Golf Center Parkway/I-10 eastbound ramps (Caltrans)
12. Dillon Road/SR-86 northbound ramps (Caltrans)
13. Dillon Road/SR-86 southbound ramps (Caltrans)
14. Harrison Street/SR-111 (LOS)
15. Harrison Street/Avenue 50 (LOS)
16. Dillon Road/I-10 westbound ramps (Caltrans)
17. Dillon Road/I-10 eastbound ramps (Caltrans)
18. Dillon Road/Fargo Canyon Road (County of Riverside)
19. SR-86 northbound ramps/Tyler Street (Caltrans)
20. SR-86 southbound ramps/Tyler Street (Caltrans)
21. Tyler Street/Airport Boulevard (County of Riverside)
22. SR-86 northbound ramps/52nd Avenue (Caltrans)
23. SR-86 southbound ramps/52nd Avenue (Caltrans)
24. SR-86/54th Avenue (Caltrans and LOS)
25. Polk Street/Airport Boulevard (County of Riverside)
26. SR-111/Airport Boulevard (Caltrans)
27. Polk Street/62nd Avenue (County of Riverside)
28. Fillmore Street/53rd Avenue (County of Riverside)
29. SR-86 southbound ramps/Airport Boulevard (Caltrans)
30. SR-86 northbound ramps/Airport Boulevard (Caltrans)
31. Fillmore Street/62nd Avenue (County of Riverside)
32. Avenue 50/I-10 westbound ramps (Caltrans)
33. Avenue 50/I-10 eastbound ramps (Caltrans)
34. Pierce Street/53rd Avenue (County of Riverside)
35. Pierce Street/54th Avenue (County of Riverside)
36. Pierce Street/Airport Boulevard (County of Riverside)
37. Pierce Street/62nd Avenue (County of Riverside)
38. SR-111/62nd Avenue (Caltrans)

39. SR-86/62nd Avenue (Caltrans)
40. Buchanan Street/62nd Avenue (County of Riverside)
41. Monroe Street/I-10 westbound ramps (Caltrans)
42. Monroe Street/I-10 eastbound ramps (Caltrans)
43. Jackson Street/I-10 westbound ramps (Caltrans)
44. Jackson Street/I-10 eastbound ramps (Caltrans)

Cumulative Year 2035 impacts to the following 21 I-10 freeway mainline lanes, 1 SR-86 mainline lane, 20 I-10 freeway ramp merge/diverge locations, and 2 SR-86 freeway ramp merge/diverge locations.

1. I-10 eastbound west of Monroe Street
2. I-10 eastbound between Monroe ramps
3. I-10 eastbound between Monroe Street and Jackson Street
4. I-10 eastbound between Jackson Street ramps
5. I-10 eastbound between Jackson Street and Golf Center Parkway
6. I-10 eastbound between Golf Center Parkway ramps
7. I-10 eastbound between Golf Center Parkway and SR-86
8. I-10 eastbound between SR-86 and Dillon Road
9. I-10 eastbound between Dillon Road ramps
10. I-10 eastbound between Dillon Road and Avenue 50
11. I-10 eastbound east of Avenue 50
12. I-10 westbound west of Monroe Street
13. I-10 westbound between Monroe Street ramps
14. I-10 westbound between Monroe Street and Jackson Street
15. I-10 westbound between Jackson Street ramps
16. I-10 westbound between Jackson Street and Golf Center Parkway
17. I-10 westbound between Golf Center On-Ramp and Lane Drop
18. I-10 westbound between Lane Drop and Golf Center Parkway off-ramp
19. I-10 westbound between Golf Center Parkway and SR-86
20. I-10 westbound between SR-86 and Dillon Road
21. I-10 westbound between Dillon Road and Avenue 50
22. SR-86 northbound between I-10 and Dillon Road
23. I-10 eastbound at the Monroe Street off-ramp

24. I-10 eastbound at the Monroe Street on-ramp
25. I-10 eastbound at the Jackson Street off-ramp
26. I-10 eastbound at the Jackson Street on-ramp
27. I-10 eastbound at the Golf Center Parkway off-ramp
28. I-10 eastbound at the Golf Center Parkway on-ramp
29. I-10 eastbound at the SR-86 off-ramp
30. I-10 eastbound at the Dillon Road off-ramp
31. I-10 eastbound at the Dillon Road on-ramp
32. I-10 eastbound at the Avenue 50 off-ramp
33. I-10 westbound at the Monroe Street on-ramp
34. I-10 westbound at the Monroe Street off-ramp
35. I-10 westbound at the Jackson Street on-ramp
36. I-10 westbound at the Jackson Street off-ramp
37. I-10 westbound at the Golf Center Parkway on-ramp
38. I-10 westbound at the Golf Center Parkway off-ramp
39. I-10 westbound at the SR-86 on-ramp
40. I-10 westbound at the Dillon Road on-ramp
41. I-10 westbound at the Dillon Road off-ramp
42. I-10 westbound at the Avenue 50 slip on-ramp
43. SR-86 northbound at the Dillon Road on-ramp
44. SR-86 northbound at the Dillon Road off-ramp

As discussed in Chapter 4, Existing Environmental Setting, the project was determined not to result in significant unavoidable short- or long-term adverse impacts after mitigation related to:

- Biological Resources (as discussed in Section 4.4)
- Cultural Resources (as discussed in Section 4.5)
- Hazards and Hazardous Materials (as discussed in Section 4.8)
- Hydrology and Water Quality (as discussed in Section 4.9)
- Land Use and Planning (as discussed in Section 4.10)
- Mineral Resources (as discussed in Section 4.11)
- Noise (as discussed in Section 4.12)
- Population and Housing (as discussed in Section 4.13)

- Recreation Resources (as discussed in Section 4.15)
- Water Supply (as discussed in Section 4.17)

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