LA ENTRADA
specific plan

Final Environmental Impact Report

SCH NO. 2012071061

Volume IV - Responses to Comments

Lead Agency
CITY OF COACHELLA

October 9, 2013

1.0 INTRODUCTION

The Final Environmental Impact Report (Final EIR) for the proposed La Entrada Specific Plan has been prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines and the City of Coachella policies for implementing CEQA.

The following is an excerpt from the CEQA Guidelines Section 15132 that states:

"The Final EIR shall consist of:
(a) The Draft EIR or a version of the draft.
(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
(c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
(e) Any other information added by the Lead Agency."

The Final EIR includes all of these required components. Volumes I and II are the Draft EIR and Draft EIR Appendices, respectively. Volume III is the Draft Specific Plan, which forms the basis for the "Project" being evaluated in this EIR. This Volume IV document includes all of the additional items needed to comprise the Final EIR.

In accordance with § 15088 of the State CEQA Guidelines, the City of Coachella, as the lead agency for the proposed Project, evaluated comments received on the Draft EIR (State Clearinghouse No. 2012071061) and has prepared the following responses to the comments received. The preceding Table of Contents provides of a list of all persons, organizations and public agencies commenting on the Draft EIR. Section 2.0 includes the Responses to Comments received by the City of Coachella on the Draft EIR. It should be noted that responses to comments also resulted in various editorial clarifications and corrections to the original Draft EIR text. Added or modified text is shown in Section 3.0, Errata, by underlining (<u>example</u>) while deleted text is shown by striking (~~example~~). The additional information, corrections, and clarifications are not considered to substantively affect the conclusions within the Draft EIR. This Response to Comments document is part of the Final EIR, which includes the Draft EIR pursuant to § 15132 of the State CEQA Guidelines.

After review and discussion by City staff and the City Planning Commission, responses to comments will be sent to commenting agencies in a separate response document. This satisfies the requirement of Section 21092.5 of CEQA to send responses to the public agency comments received on the Draft EIR at least 10 days prior to project approval. This document includes responses to all written and verbal comments received on the Draft EIR.

BACKGROUND

On July 18, 2012, the City of Coachella issued a Notice of Preparation (NOP) for the proposed Project to identify the potential environmental impacts of the project (refer to Draft Program EIR Appendix A). An NOP is a document that is sent by the lead agency to notify public agencies and interested parties that the lead agency plans to prepare an EIR for the project. The purpose of the NOP is to solicit comments from public agencies and interested parties, and to identify issues that should be considered in the EIR.

The NOP for the proposed Project was sent to trustee and responsible agencies, members of the public, other interested parties, and the California Office of Planning and Research, State Clearinghouse for the required 30-day public review period, which ended on August 18, 2012. During the review period, public agencies and members of the public had the opportunity to respond to the NOP to identify issues of special concern to them and to suggest additional issues to be considered in the EIR.

In addition, the City held a public scoping meeting on August 28, 2012 to discuss characteristics of the proposed Project, its planning status, the nature of its potential environmental effects, and the scope (i.e., the specific issues) of the EIR analysis. The scoping meeting provided further opportunities for public input regarding environmental concerns and issues that should be addressed in the EIR. The scoping meeting notice was also provided in Spanish. A joint City Council/Planning Commission Study Session presentation was held on June 19, 2013. The June 19, 2013 presentation included a project summary slide that was presented both in English and in Spanish.

The Draft EIR for the proposed Project was distributed to trustee and responsible agencies, members of the public, other interested parties, and the California Office of Planning and Research, State Clearinghouse on July 11, 2013. This began the 45-day public review period, which ended on August 26, 2013 according to the State Clearinghouse.

Section 3.0 includes any additional or clarifying information resulting from preparation of the Responses to Comments as well as any minor revisions (additions or deletions) to the text of the Draft EIR. Additionally, it should be noted that these Responses to Comments and Errata merely clarify, amplify, and expand on the fully adequate analysis and significance conclusions that were already set forth in the Draft EIR for public review. CEQA Guidelines Section 15088.5 makes clear that such clarifications and amplifications are appropriate under CEQA and do not require recirculation of the EIR. Specifically, Section 15088.5 states:

"(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

> *(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
>
> *(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
>
> *(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.*

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. "

As set forth in more detail in these Responses to Comments and Errata, none of the clarifications or amplifications set forth herein change the significance conclusions presented in the Draft EIR or the substantially alters the analysis presented for public review. Furthermore, the Draft EIR circulated for public review was fully adequate under CEQA such that meaningful public review was not precluded. Thus, the clarifications provided in these Responses to Comments and Errata do not constitute significant new information that might trigger recirculation.

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

August 27, 2013

Luis Lopez
City of Coachella
1515 Sixth Street
Coachella, CA 92236

Subject: La Entrada Specific Plan
SCH#: 2012071061

Dear Luis Lopez:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 26, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

1a

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH#	2012071061
Project Title	La Entrada Specific Plan
Lead Agency	Coachella, City of

Type	**EIR** Draft EIR
Description	The proposed project includes the development of the La Entrada Specific Plan on a 2,200 ac site. The proposed project includes the development of a master-planned community that would consist of six primary land uses, including: (1) approximately 7,800 residential units on approximately 981 ac (includes 720 dwelling units within the mixed-use area); (2) 135 ac of mixed uses (includes high-density residential, commercial, public facilities, and other nonresidential uses); (3) educational uses (three elementary schools and one middle school) on approximately 70 ac; (4) 345 ac of parks/recreation uses, including multipurpose trails; (5) 112 ac of roadway uses; and (6) 557 ac of open space. The proposed project also includes two roadway extensions near the west side of the project site at Avenues 50 and 52, which would provide access to the project site.

Lead Agency Contact

Name	Luis Lopez		
Agency	City of Coachella		
Phone	760 398 3102	*Fax*	
email			
Address	1515 Sixth Street		
City	Coachella	*State* CA	*Zip* 92236

Project Location

County	Riverside				
City	Coachella				
Region					
Lat / Long	33° 41' 10.3" N / 116° 6' 8.41" W				
Cross Streets	I-10, Fillmore Street, Avenue 52, no eastern boundary road				
Parcel No.	603360001, 717020002 + others				
Township	5S	*Range* 8E	*Section* 35	*Base*	SBB&M

Proximity to:

Highways	86S
Airports	
Railways	
Waterways	All American Canal - Coachella Branch
Schools	
Land Use	Various

Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Geologic/Seismic; Population/Housing Balance; Public Services; Sewer Capacity; Solid Waste; Traffic/Circulation; Growth Inducing; Cumulative Effects; Other Issues
Reviewing Agencies	Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 6; Department of Parks and Recreation; Office of Emergency Management Agency, California; California Highway Patrol; Caltrans, District 8; Department of Housing and Community Development; Air Resources Board, Major Industrial Projects; Regional Water Quality Control Board, Region 7; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Coachella Valley Mountains Conservancy

Date Received	07/11/2013	*Start of Review*	07/11/2013	*End of Review*	08/26/2013

COMMENT LETTER NO. 2

STATE OF CALIFORNIA Edmund G. Brown, Jr.Governor

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3715
Fax (916) 373-5471
Web Site www.nahc.ca.gov
Ds_nahc@pacbell.net

July 15, 2013

Mr. Luis Lopez, Director
City of Coachella Development Services Department
1515 – 6th Street
Coachella, CA 92236

Sent by FAX to 760-398-5421
No. of Pages: 3

RE: Native American Consultation pursuant to California Government Code Sections 6540.2, 65092, 65351, 65352.3,, 65352.4, 65562.5 *et seq.* for the proposed "La **Entrada Specific Plan;"** located on 2,200-acres in the City of Coachella; Riverside County, California.

Dear Mr. Lopez:

Government Code Sections 65351, 65352.3, 65562.5, *et seq.* requires local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of protecting and/or mitigating impacts to cultural places. The Native American Heritage Commission (NAHC) is the state 'agency with responsibilities for Native American cultural resources.

In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites. Note that the NAHC does NOT APPROVE General or Specific Plan; rather, it provides a list of tribal governments with which local jurisdictions must consult concerning any proposed impact to cultural resources as a result of the proposed action. 2a

An NAHC Sacred Lands File search was not conducted. As part of the consultation process, the NAHC recommends that local governments and project developers contact the tribal governments and individuals to determine if any cultural places might be impacted by the proposed action. Also, the absence of specific site information in the sacred lands file does not preclude their existence. Other sources of cultural resources should also be 2b

contacted for information regarding known and recorded sites. 2b cont.

Attached is a consultation list of tribal governments with traditional lands or cultural places located in the vicinity of the Project Area (APE). The tribal entities on the list are for your guidance for **government-to-government consultation** purposes.

A Native American tribe or individual may be the only source of the presence of traditional cultural places. For that reason, a list of Native American Contacts is enclosed as they may have knowledge of cultural resources and about potential impact, if any, of the proposed project. 2c

If you have any questions, please contact me at (916) 373-3715.

Best regards,

Dave Singleton
Program Analyst

Attachment

x **Native American Tribal Government Consultation**
Riverside County
July 15, 2013

Cabazon Band of Mission Indians
Doug Welmas, Chairperson
84-245 Indio Springs Parkway Cahuilla
Indio , CA 92203-3499
(760) 342-2593

Augustine Band of Cahuilla Mission Indians
Mary Ann Green, Chairperson
P.O. Box 846 Cahuilla
Coachella , CA 92236
(760) 398-4722

Los Coyotes Band of Mission Indians
Shane Chapparosa, Chairman
P.O. Box 189 Cahuilla
Warner , CA 92086
(760) 782-0711

Morongo Band of Mission Indians
Robert Martin, Chairperson
12700 Pumarra Rroad Cahuilla
Banning , CA 92220 Serrano
(951) 849-8807
(951) 755-5200

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670 Cahuilla
Anza , CA 92539
admin@ramonatribe.com
(951) 763-4105

Agua Caliente Band of Cahuilla Indians THPO
Patricia Garcia, Tribal Historic Perservation Officer
5401 Dinah Shore Drive Cahuilla
Palm Springs , CA 92264
ptuck@augacallente-nsn.gov
(760) 699-6907

Torres-Martinez Desert Cahuilla Indians
Mary Resvaloso, Chairperson
PO Box 1160 Cahuilla
Thermal , CA 92274
mresvaloso@torresmartinez.
(760) 397-0300

Cahuilla Band of Indians
Luther Salgado, Chairperson
PO Box 391760 Cahuilla
Anza , CA 92539
tribalcouncil@cahuilla.net
915-763-5549

Santa Rosa Band of Mission Indians
John Marcus, Chairman
P.O. Box 391820 Cahuilla
Anza , CA 92539
(951) 659-2700
(951) 659-2228 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Section 65352.3. and 65362.4. et seq.

Coachella Valley Mosquito and Vector Control District

43-420 Trader Place • Indio, CA 92201 • (760) 342-8287 • Fax (760) 342-8110
• Toll Free 1-888-343-9399
E-mail: CVmosquito@cvmvcd.org • Website: www.cvmvcd.org

August 19, 2013

To: Luis Lopez
Development Services Director
City of Coachella
1515 Sixth Street
Coachella, CA 92236

Subject: Comments regarding Draft Environmental Impact Report for the La Entrada Specific Plan

Dear Mr. Lopez,

Thank you for the opportunity to express the position and concern of the Coachella Valley Mosquito and Vector Control District (hereafter, the District) regarding the Draft Environmental Impact Report (EIR) for the La Entrada Specific Plan.

The District is a non-enterprise independent special district accountable to the citizens of the Coachella Valley, charged with the protection of public health through the control of vectors and vector-borne diseases within its boundaries. We operate under the California Health and Safety Code Division 3, Sections 2000-2910 (known as the Mosquito Abatement and Vector Control District Law). Our activities include the prevention and control of mosquitoes, filth flies, eye gnats, and the red imported fire ant.

3a

We appreciate the inclusion of our services in the Hydrology and Water Quality section of the EIR. The prevention of vectors works in agreement with the water conservation goals of California and of the City of Coachella. Standing water, particularly from irrigation run-off into stormwater structures, can provide habitat for larval mosquitoes. For our normal operations, we will need to have access to the planned retention basins if they are deemed necessary by the Coachella Valley Water District. Our daily operation includes the inspection, and when necessary, treatment of the stormwater structures in the valley to control mosquito breeding. By using desert landscape and other plants that are water efficient in combination with smart irrigation systems, we expect to see minimal run-off to the stormwater structures. Given that the water quality features will be designed to drain within 72 hours or be sealed against mosquitoes, we expect that with proper maintenance mosquito production will be minimal.

The red imported fire ant is an invasive species in the Coachella Valley. It is found most often in irrigated turf, though we have found it in desert landscaping associated with sprinklers as well as under artificial turf. We have been unable to eradicate the species from the valley, and your commitment to limit landscaped turf to areas where it is deemed necessary will help us to limit the spread of this species and the impact to people in Coachella.

Residents and employees within La Entrada may encounter problems with flies at various times of the year. The site is adjacent to the Coachella Branch of the All-American Canal and will be connected to nearby agricultural fields through the road improvements proposed in other projects. Winds from the north and west may push flies into the area. The use of open space and parks adjacent to the canal should help to minimize fly activity at homes. As flies are difficult to control, prevention of breeding at the homes will be paramount. This means that good sanitation practices will be necessary, as noted in Mitigation Measure 4.9.4. We look forward to working with the Project Applicants to develop the program to address this.

3a cont.

Thank you for the inclusion of our services within the EIR. We look forward to continuing to work to protect the residents from vector-borne diseases.

Sincerely,

Jennifer Henke, M.S.
Environmental Biologist
jhenke@cvmvcd.org

cc: Branka B. Lothrop, Ph.D., General Manager
Jeremy Wittie, M.S., Scientific Operations Manager

Established in 1918 as a public agency
Coachella Valley Water District

Directors:
John P. Powell, Jr., President - Div. 3
Franz W. De Klotz, Vice President - Div. 1
Ed Pack - Div. 2
Peter Nelson - Div. 4
Debi Livesay - Div. 5

Officers:
Jim Barrett, Acting General Manager
Julia Fernandez, Board Secretary

Redwine and Sherrill, Attorneys

August 22, 2013

File: 0126.2
1150.10
1150.102

Luis Lopez
Director of Development Services
City of Coachella
1515 Sixth Street
Coachella, CA 92236

Dear Mr. Lopez:

Subject: Notice of Availability of Draft Environmental Impact Report for La Entrada Specific Plan

Thank you for affording the Coachella Valley Water District (CVWD) the opportunity to review the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the La Entrada Specific Plan located in Coachella, Riverside County. CVWD provides domestic water, wastewater, recycled water, irrigation/drainage, regional stormwater protection and groundwater management services to a population of 265,000 throughout the Coachella Valley in Southern California. 4a

At this time, we submit the following comments regarding the DEIR:

Domestic Water

1. Section 3.7.2, Water Supply, page 3-16: Please revise the first three sentences of this paragraph to read:

   The proposed project will connect to the city of Coachella's domestic water system which relies on groundwater as its source of supply. In September 2009, a Memorandum of Understanding (MOU) was reached between the City and CVWD to work cooperatively to implement its provisions, which includes the City complying with the Coachella Valley Water Management Plan and providing for a supplemental source of domestic water for City development projects. A subsequent MOU was reached in 2013 that further specifies how the City can finance and acquire supplemental water supplies to meet projected water demands and establishes a process between CVWD and the City for approving Water Supply Assessments. 4b

2. Section 3.7.4, Off-Site Infrastructure, page 3-17: Please revise the first sentence in this section to read:

   The proposed project includes off-site infrastructure connections to the Specific Plan project site, including 24-inch-diameter water lines in the ROW of both the Avenue 50 and Avenue 52 extension, from the city of Coachella's domestic water system and a 24-inch-diameter sewer line in the extended Avenue 52 ROW.

4c

Stormwater

1. CVWD and our consultant, Northwest Hydraulic Consultants (NHC), have reviewed the report entitled "*La Entrada Specific Plan Development: Drainage Master Plan, City of Coachella and County of Riverside, California, Final Report, June 2013*" submitted by RBF Consulting (RBF), and conditionally approved the concept of the existing-condition hydrology and project-related impacts to the existing CVWD facilities. The conceptual approval indicates that the developer has determined the flood hazards in accordance with CVWD, County of Riverside Ordinance 458, California Drainage Law and FEMA regulations and standards. This supersedes paragraph 1 of the attached CVWD letter dated March 6, 2012.

4d

2. The project area is designated "Zone D" on the Federal Flood Insurance Rate Maps, which are in effect at this time. Zone D is defined as an area of undetermined, but possible, risk of flood hazard.

4e

3. Flood protection measures shall comply with California Drainage Law and provide that stormwater flows are received onto and discharged from this property in a manner that is reasonably compatible with pre-development conditions.

4. The developer shall provide written notice to all downstream property owners located within 600 feet of this area of the proposed construction of flood control facilities before commencing construction of any CVWD-approved flood control facilities. Said notice shall include wording that indicates that the project includes construction of flood control facilities, which may affect downstream properties.

5. Prior to issuance of grading permits, CVWD requests the City require the developer to:

   - Provide flood control plans that incorporate the required mitigation measures to protect existing CVWD facilities, and satisfy all applicable regulations and standards.
   - Obtain a Conditional Letter of Map Revision (CLOMR) through FEMA.
   - Execute an agreement with CVWD which shall include provisions outlined in CVWD Ordinance No. 1234.1.

4f

- Submit to CVWD a Flood Control Facility Operations and Maintenance Manual for review and approval.
- Grant flooding easements over the flood control facilities in a form and content reasonably acceptable to CVWD.
- Submit final construction plans for the proposed flood control facilities and a detailed hydrological and hydraulic design report for review and approval.

6. Prior to occupancy, CVWD requests the City require the developer to:

- Obtain a Letter of Map Revision (LOMR) through the FEMA.
- At completion of the construction of the flood control facilities, submit as-built" topography, construction drawings and engineering analysis for CVWD review to verify that the design capacity is adequate.

4f

Irrigation

Please coordinate with CVWD regarding all improvements proposed within or immediately adjacent to the Coachella Canal and associated levee rights-of-way. The U.S. Bureau of Reclamation will need to approve all proposed right-of-way impacts along the Coachella Canal.

4g

If you have any questions, please call Luke Stowe, Senior Environmental Specialist, at extension 2545.

Sincerely,

Steve Bigley
Director of Environmental Services

Enclosure/as

LS:pr/eng/env/13/aug/Coachella La Entrada

Established in 1918 as a public agency

Coachella Valley Water District

Directors:
Peter Nelson, President - Div. 4
John P. Powell, Jr., Vice President - Div. 3
Patricia A. Larson - Div. 2
Debi Livesay - Div. 5
Franz W. De Klotz - Div. 1

Officers:
Steven B. Robbins, General Manager-Chief Engineer
Julia Fernandez, Board Secretary

Redwine and Sherrill, Attorneys

August 15, 2012

File: 0126.2
1150.10
1150.102

Luis Lopez
City of Coachella
1515 Sixth Street
Coachella, CA 92236

Dear Mr. Lopez:

Subject: Notice of Preparation of Draft Environmental Impact Report for La Entrada Specific Plan

Thank you for affording the Coachella Valley Water District (CVWD) the opportunity to review the Notice of Preparation of a Draft Environmental Impact Report for the La Entrada Specific Plan located in Coachella, Riverside County. CVWD provides domestic water, wastewater, recycled water, irrigation/drainage, regional stormwater protection and groundwater management services to a population of 265,000 throughout the Coachella Valley in Southern California.

At this time, we submit the following comments regarding the proposed project:

1. Water supply for the proposed project would be in accordance with: a) the enclosed September 9, 2009 Memorandum of Understanding between CVWD and the city of Coachella; and b) the 2010 Coachella Valley Water Management Plan Update.

2. CVWD is working closely with the developer to determine the regional flood hazards and required mitigation measures to protect existing CVWD facilities, as well as, meet applicable regulations and standards (please see enclosed letter dated March 6, 2012).

3. Please coordinate with CVWD regarding all improvements proposed within or immediately adjacent to the Coachella Canal and associated levee rights-of-way. The US Bureau of Reclamation will need to approve all proposed right-of-way impacts along the Coachella Canal.

If you have any questions, please call Luke Stowe, Senior Environmental Specialist, at extension 2545.

Yours very truly,

Mark L. Johnson
Director of Engineering

MAILED
AUG 16 2012
CVWD

Enclosures/2/as

LS:pr/eng/env/12/aug/Coachella La Entrada

Established in 1918 as a public agency

Coachella Valley Water District

Directors:
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Franz W. De Klotz - Div. 1

Officers:
Steven B. Robbins, General Manager-Chief Engineer
Julia Fernandez, Board Secretary

Redwine and Sherrill, Attorneys

March 6, 2012

File: 0163.1

Luis Lopez
Department of Building and Planning
City of Coachella
1515 Sixth Street
Coachella, CA 92236

Dear Mr. Lopez:

Subject: Pre-Application Review 12-02 (McNaughton Property)

Prior to approval of Pre-Application Review 12-02, Coachella Valley Water District (CVWD) requests the City require the developer to comply with Riverside County Ordinance No. 458 as amended in the preparation of on-site flood protection facilities for this project. The developer will be required to pay fees and submit plans to CVWD as part of the flood management review. Flood protection measures shall include detailed hydrologic and hydraulic analysis of off-site flows and engineered plans for flood protection. Flood protection measures may include design and construction of flood conveyance facilities.

This area is designated Zone D on the Federal Flood Insurance Rate Maps which are in effect at this time. Zone D is defined as an area of undetermined but possible risk of flood hazard.

Flood protection measures shall comply with California Drainage Law and provide that stormwater flows are received onto and discharged from this property in a manner that is reasonably compatible with predevelopment conditions.

The developer shall provide written notice to all downstream property owners located within 600 feet of this area of the proposed construction of flood control facilities before commencing construction of any CVWD approved flood control facilities. Said notice shall include wording that indicates that the project includes construction of flood control facilities, which may affect downstream properties.

If the proposed flood protection facilities are not to be built to CVWD's standard (Standard Project Flood), CVWD will not be responsible for ownership and maintenance of these flood control facilities. CVWD will only be responsible for annual and post storm inspection of these facilities.

MAILED MAR 7 2012 CVWD

Prior to issuance of grading permits, CVWD requests the City require the developer to:

- Obtain a Conditional Letter of Map Revision (CLOMR) through the Federal Emergency Management Agency.
- Execute an agreement with CVWD, which shall include provisions outlined in CVWD Ordinance No. 1234. A copy of Ordinance No. 1234 is enclosed for your convenience.
- Submit to CVWD a Flood Control Facility Operations and Maintenance Manual for review and approval.
- Grant flooding easements over the flood control facilities in a form and content reasonably acceptable to CVWD.
- Submit final construction plans for the proposed flood control facilities and a detailed hydrological and hydraulic design report for review and approval.

Prior to occupancy, CVWD requests the City require the developer to:

- Obtain a Letter of Map Revision (LOMR) through the Federal Emergency Management Agency, which removes the development from the special flood hazard area.
- At the completion of the construction of the flood control facilities, submit "as-built" topography, construction drawings and engineering analysis for CVWD review to verify that the design capacity is adequate.

Prior to approval of a Permanent Encroachment Permit for outlets discharging into CVWD facilities, the developer/applicant shall provide a letter from the land use authority for the project certifying that the project has been reviewed and determined to meet the requirements of the National Pollutant Discharge Elimination System permit and Waste Discharge Requirements for the discharge of stormwater in the Whitewater River Watershed, which is known as the MS4 Permit. This certification applies to requirements included in the Drainage Area Management Plan, Stormwater Management Plan, Stormwater Pollution Prevention Plan and Water Quality Management Plan described in the MS4 Permit and applicable to the project at the time of the application.

CVWD requires the developer/applicant to implement control measures to the maximum extent practicable to prevent the discharge of non-stormwater generated runoff into the Salton Sea. The developer/applicant shall repair and maintain the outlet structure and the channel to mitigate any condition of nuisance and/or damage to the outlet structure and the channel caused by the developer/applicant's discharge of non-stormwater as determined by CVWD. This maintenance and repair shall include, but not be limited to outlet concrete repairs, channel bottom scour repair, slope protection repair, vegetation clearing, ponded/nuisance water removal, etc. Failure to comply with these conditions of approval may result in CVWD revoking the Permanent Encroachment Permit associated with the outlet and removal or sealing of the outlet.

Plans for stormwater facilities shall be submitted to CVWD for review.

There are existing United States Bureau of Reclamation (USBR) facilities shown on the development plans. There may be conflicts with these facilities. We request the City of Coachella to withhold issuance of grading permits until CVWD has reviewed the proposed development and related impacts to the USBR facilities and associated right-of-way and provided the City of Coachella with written confirmation that there is no interference. The USBR conflicts include but are not limited to Dike 2 and portions of the Coachella Branch of the All American Canal.

Non-potable Colorado River water is available for use for cemeteries, parks, highway landscape areas, new industrial facilities and golf courses. The project may be required to use non-potable water for such uses. CVWD may need additional facilities for the orderly expansion of its non-potable water distribution system in order to serve the subject land. These facilities may include additional piping, reservoirs, booster pumping stations, etc. The developer may be required to install these facilities and provide land and/or easements to be deeded to CVWD for such purpose.

If you have any questions please call Joe Cook, Domestic Water Engineer, extension 2292.

Yours very truly,

Mark L. Johnson
Director of Engineering

cc: Mike Mistica
County of Riverside, Department of Environmental Health
P.O. Box 1206
Riverside, CA 92502

RBF Consulting
14725 Alton Parkway
Irvine, CA 92618-2027

JC:ch\eng\sw\12\March\PreApp Review 12-02

ec: Tommy Fowlkes
Joe Cook
Tesfaye Demissie

JC:ch\eng\sw\12\PreApp Review 12-02

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060906-4

File: 1150.10
1150.102

email S. Robbins
D. Parker
M. Johnson

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding ("MOU") is entered into this 9 day of September 2009 ("Effective Date"), by and between the City of Coachella, a general law city in California ("City") and Coachella Valley Water District, a public agency of the State of California ("CVWD"). Each party hereto may be hereafter referred to individually as a "Party" or collectively as the "Parties."

RECITALS

A. Whereas CVWD and City recognize that the Whitewater River Groundwater Basin is in a state of overdraft, and that Coachella Valley water purveyors must act together to ensure that the Coachella Valley has sufficient water supplies to meet its current and future demands;

B. Whereas, Coachella Valley Water Management Plan ("CVWMP") was adopted to provide for management of the water supplies to meet the water needs of the Coachella Valley and correct the overdraft of the groundwater basin, and

C. Whereas, the CVWMP planning period is thirty-five years in the future, and is updated each five years, and

D. Whereas the District is currently conducting the first five-year update to the CVWMP,

E. Whereas, the CVWMP relies on water conservation, source water substitution and supplemental water supplies to meet the areas water needs, and

F. Whereas the City is a municipal water supplier which pumps water from the Whitewater River Groundwater Basin, and

G. Whereas the City through its General Plan recognized and supports the CVWMP including water conservation, source water substitution and supplemental water supplies water to meet the areas water needs, and

H. Whereas, the City desires to insure a reliable water supply within its Sphere of Influence through actions consistent with the CVWMP, and

I. Whereas the City desires to provide for its fair share of supplemental water for developments approved by the City or served by the City's water system, and

J. Whereas the City desires to provide water service to future developments with water needs that were not included in the current CVWMP, and

K. The Parties desire to enter certain understandings with respect to insuring reliable long-term water supplies.

NOW, THEREFORE, for good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

1. The City agrees to:

   (a) Undertake measures effective to satisfy the water conservation goals of the CVWMP.

   (b) Cooperate with source substitution projects identified in the CVWMP.

   (c) Provide for supply of supplemental water for developments approved by the City and/or supplied by the City's water system after January 1, 2010, by any combination of the following, in a manner consistent with, and not in excess of, any requirements imposed by CVWD within its service territory:

      (1) Water Conservation criteria in excess of the goals of the CVWMP. For example, by adopting low water use landscaping requirements which reduce water use in excess of the current CVWMP water conservation goals.

      (2) Source Substitution not identified in the current CVWMP. For example, using recycled wastewater effluent of the City's Wastewater Treatment Plant for landscape irrigation instead of using groundwater.

      (3) Acquire supplemental water supplies sufficient to offset the impacts of new water demands within the City or supplied by the City's water system.

      (4) Participate in funding CVWD's acquisition of supplemental water supplies sufficient to offset the impacts of new water demands approved by the City or supplied by the City's water system. The amount paid for supplemental water supplies shall not exceed CVWD's Supplemental Water Supply Charge for similar development types and water requirements in effect at the time paid.

   (d) Provide water system demand data and projected water demand data for proposed projects to be utilized for planning and water accounting purposes.

2. CVWD agrees to:

   (a) Include water demands projections for areas within the City's Water Service Area and/or City's Sphere of Influence in the current and successive updates of the CVWMP.

(b) Involve the City to extent reasonably possible in the CVMWP update process and consider in good faith any input the City may offer.

(c) If the City funds acquisition of supplemental supplies in paragraph 1 (c) (4), to use its powers to purchase and hold title to and deliver supplemental water supplies for the benefit of the City.

3. The City and CVWD agrees to:

(a) Work cooperatively to complete studies, and adopt regulations and MOUs necessary to formalize the understandings herein.

(b) Work cooperatively to each amend their Urban Water Management Plans to address water supplies for areas within the City's sphere of influence.

4. The Parties hereto agree to cooperate with each other in furthering the purposes of this MOU. The Parties hereby agree to take such other actions and execute such other reasonable documents as are consistent with this MOU and as are reasonably necessary to effectuate this MOU; provided, however, that the foregoing shall not require Parties to take any legislative action or exercise its discretion in any particular manner.

5. This MOU contains the final and complete agreement between the Parties with respect to the matters herein discussed and supersedes all previous communications and agreements between them with respect to the subject matter hereof, whether oral or written, to the extent such prior communications and agreements are not consistent with this MOU.

6. In the event that any action or proceeding is commenced between the Parties hereto to enforce or interpret any term of this MOU, each party shall bear its own costs and fees. The costs and fees shall include, without limitation, attorneys' costs and fees incurred on appeal and those incurred in enforcing any judgment rendered in any such action or proceeding.

7. All notices shall be in writing and shall be considered given and received: (i) when delivered in person to the recipient named below; or (ii) three days after deposit in the United States mail, postage prepaid, addressed to the recipient named below; or (iii) on the date of delivery shown in the records of an express courier such as Federal Express or DHL; or (iv) on the date of delivery by facsimile transmission to the recipient named below. All notices shall be addressed as followed:

If to District:

General Manager/Chief Engineer
Coachella Valley Water District
P.O. Box 1058
Coachella, Ca 92236-1058

If to City:

City Manager
City of Coachella
1515 Sixth Street
Coachella, CA 92236

Any Party may, by notice given at any time, require subsequent notices to be given to another person or entity, whether a Party or an officer or representative of a Party, or to a different address, or both. Notices given before actual receipt of notice of change shall not be invalidated by the change.

8. This MOU and all its provisions shall in all respects be interpreted, construed, enforced, and governed by and under the laws of the State of California, without regard to its conflict of laws principles.

9. Any action or proceeding brought respecting this MOU shall be instituted and maintained in the appropriate court in the County of Riverside, California.

10. This MOU may be modified only by another written instrument duly authorized, executed, acknowledged by both Parties. The MOU may be terminated by either party after 6 months notice and only after a good faith effort to resolve any dispute that may arise hereunder.

11. The provisions of this MOU are specifically made severable. If any clause, provision, right, or remedy provided for herein is determined to be unlawful or unenforceable, the remainder of this MOU shall remain in effect and shall be enforced as if such clause, provision, right, or remedy were not contained herein.

12. The language in all parts of this MOU shall in all respects be construed as a whole according to its fair meaning, and not strictly for or against any other Party. This MOU is the product of mutual negotiation and drafting efforts. Accordingly, the judicial rule of construction that ambiguities in a document are to be construed against the drafter of that document shall have no application to the interpretation or enforcement of this MOU.

13. This MOU may be executed in one or more counterparts, each of which shall be an original and all such counterparts together shall constitute the entire agreement of the Parties hereto.

14. Each individual executing this MOU hereby represents and warrants that he or she has the full power and authority to execute this MOU on behalf of the named Parties.

IN WITNESS WHEREOF, the Parties have demonstrated their intent to implement the terms of the MOU by signing this MOU, effective as of the date above written.

DISTRICT:

COACHELLA VALLEY WATER DISTRICT, a public agency of the State of California

By: _____

Its: GENERAL MANAGER

CITY:

CITY OF COACHELLA, a general law city of the State of California

By: _____

Its: Interim City Manager

Excerpt from

MINUTES

OF A REGULAR MEETING
OF THE
CITY COUNCIL OF THE CITY OF COACHELLA,

September 9, 2009

11f. Consideration of the City Council to Approve a Memorandum of Understanding with Coachella Valley Water District for Determining Service Areas.

Motion:	To approve
Made by:	Mayor Pro Tem Steven Hernandez
Seconded by:	Councilmember Martinez
Approved:	5-0, by the following roll call vote:
AYES:	Councilmember Martinez, Councilmember Ramirez, Councilmember Villarreal, Mayor Pro-Tem Hernandez, and Mayor Garcia.
NOES:	None.
ABSTAIN:	None.
ABSENT:	None.

I, Isabel Castillon, City Clerk of the City of Coachella, do hereby certify that the above mentioned item was passed and adopted at a regular meeting of the City Council held on the 9th day of September, 2009.

I. Castillon

Isabel Castillon, City Clerk

RESOLUTION OF THE BOARD OF DIRECTORS OF
COACHELLA VALLEY WATER DISTRICT

RESOLUTION NO. 2009-167

BE IT RESOLVED by the Board of Directors of the Coachella Valley Water District assembled in adjourned regular meeting this 18th day of August, 2009, that the appropriate officers are hereby authorized to execute on behalf of this District, a Memorandum of Understanding with the City of Coachella.

****

STATE OF CALIFORNIA)
COACHELLA VALLEY WATER DISTRICT) ss.
OFFICE OF THE SECRETARY)

I, JULIA FERNANDEZ, Secretary of the Board of Directors of the Coachella Valley Water District, DO HEREBY CERTIFY that the foregoing is a full, true and correct copy of Resolution No. 2009-167 adopted by the Board of Directors of said District at a adjourned regular meeting thereof duly held and convened on the 18th day of August, 2009, at which meeting a quorum of said Board was present and acting throughout. The Resolution was adopted by the following vote:

AYES: Five

NOES: None

ABSTAIN: None

Dated this 18th day of August, 2009.

(SEAL)

Julia Fernandez
Board Secretary

IID
www.iid.com
A century of service

GS-ES

August 19, 2013

Mr. Luis Lopez
Development Services Department
City of Coachella
1515 6th Street
Coachella, CA 92236

SUBJECT: La Entrada Specific Plan Draft Environmental Impact Report

Dear Mr. Lopez

Pursuant to the Notice of Availability of the Draft Environmental Impact Report (DEIR) for La Entrada Specific Plan, a project proposing the development of a master-planned community consisting of a mix of residential, commercial and other non-residential land uses to be located in the city of Coachella and in unincorporated Riverside County between Interstate 10, the Coachella Canal and the Little San Bernardino Mountains; the Imperial Irrigation District (IID) has reviewed the DEIR and in addition to our January 23, 2013 comment letter on the Draft Specific Plan (see attached letter) has the following comments: 5a

1. IID will determine the availability of preliminary construction power requirements based on load information and if panel location is in proximity of existing IID distribution lines. However, based on preliminary load information, as of today, the proposed project would necessitate the construction of at least two (2) multiple electrical distribution substations and 92 kV and possibly a 230 kV transmission lines.

2. The attached map shows the proposed substation site locations, and proposed 92 kV transmission lines routes running along the existing Avenue 52, Buchanan Street and Avenue 49 alignment. 5b

3. There are existing 230 kV transmission lines in the proximity of the project. However, IID will not be able to determine the final number of additional substation sites and transmission infrastructure needed until specific and final load information for the proposed land uses is provided by the developer. Developer should also be made aware and make provisions for a 1000 feet wide transmission corridor, parallel to the Coachella Canal and IID's existing 230 kV transmission lines, for 500 kV transmission lines planned to be routed through this area.

Should you have any questions, please do not hesitate to contact me by phone at 760-482-3609 or by e-mail at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

5c

Respectfully,

Donald Vargas
Environmental Analyst

Kevin Kelley – General Manager
Jesse Silva – Manager, Water Dept.
Carl Stills – Interim Manager, Energy Dept.
Vance Taylor – Asst. General Counsel
Tom King – Interim Deputy Energy Manager, Engineering & Operations
Paul G. Peschel – Interim Manager Planning & Engineering, Energy Dept.
Angela Evans - Interim Manager Distribution Services & Maintenance Operations
Juan Carlos Sandoval – Asst. Mgr., Transmission Expansion Development, Energy Dept.
David Zavala – Interim Portfolio Management Officer, Portfolio Mgmt. Office
Michael P. Kemp – Interim Superintendent, Environmental & Real Estate
Shayne Ferber – Asst. Supervisor, Real Estate
Vikki Dee Bradshaw – Asst. Supervisor, Environmental Management

IID

GS-ES January 23, 2013

Mr. Luis Lopez
Development Services Department
City of Coachella
1515 6th Street
Coachella, CA 92236

SUBJECT: La Entrada Master Planned Community Draft Specific Plan

Dear Mr. Lopez

Pursuant to the La Entrada Master Planned Community Draft Specific Plan the City of Coachella is circulating as of December 12, 2012, where the plan proposes the phased development of up to 7,800 residential units, 1.5 million sq. ft. of commercial floor area, 343 acres of park and recreational amenities, 557 acres of drainage and passive open space and completion of Avenue 58 and Avenue 52 roadway improvements per the City's General Plan, the Imperial Irrigation District (IID) has reviewed the document and has the following comments:

1. Project proponent should be advised that the IID plans to build a 500 kV transmission line just east of the Coachella Canal and west of the proposed La Entrada development. Furthermore, a 92 kV transmission line planned to supply electricity to the Paradise Valley development would traverse northwesterly along the east side of the Coachella Canal.
2. A review of the preliminary plans for the La Entrada Master Planned Community has determined that there will be a substantial impact on the IID electrical system within the areas proposed to be developed. The IID's policy provides that electrical facilities will be extended, whenever possible, to only those developments that have obtained the necessary approval of the City or County Planning Commission or other governmental authority having jurisdiction over said developments. Developer shall provide or acquire all easements and rights-of-way needed for any line extension(s), including transmission and distribution, relating to the proposed development prior to the installation of electrical service. Line extensions to serve this facility will be made in accordance with IID Regulations No. 15 and No. 2, which can be found at the following websites:

   Reg. No. 15: http://www.iid.com/Modules/ShowDocument.aspx?documentid=2555

   Reg. No. 2: http://www.iid.com/Modules/ShowDocument.aspx?documentid=2540

3. IID will determine the availability of preliminary construction power requirements based on load information and if panel location is in proximity of existing IID distribution lines. However, based on preliminary load information, the proposed project would necessitate the construction of multiple electrical distribution substations and 92 kV and possibly 230 kV transmission lines.

4. There are existing 230 kV transmission lines in the proximity of the development project. However, IID will not be able to determine the number of additional substation sites and transmission infrastructure needed until specific and final load information for the proposed land uses is provided by the developer. Developer should also be made aware and make provisions for a 300 feet wide transmission corridor, parallel to the Coachella Canal and IID's existing 230 kV transmission lines, for 500 kV transmission lines planned to be routed through this area.

5. It shall be the sole responsibility of the developer to provide the substation sites needed (fee title) to supply electrical service to the project. IID's minimum standard for an electrical distribution substation site is 315' by 315'. All requirements relating to the development of said sites as electrical substations, including the following: environmental compliance documentation, land improvements (on-site, off-site, as conditioned by the City or County), as well as all rights-of-way and easements for transmission line corridors needed to extend service to said substation sites, shall be borne by the developer. In addition to the dedication of the electrical substation site and rights-of-way needed to extend transmission service to the substation sites, the developer shall bear all costs associated with the construction of the electrical substations and transmission lines needed to bring electrical service to said substations.

6. The cumulative impact of projects of this size increase the electrical demand on the IID's existing facilities at peak loading periods, and result in the need for additional generation, transmission, substation and distribution facilities. Projects of this magnitude require IID to construct and maintain a great deal of additional electrical infrastructure which must be mitigated by these same projects. For further information on this matter contact Juan Carlos Sandoval, Asst. Manager IID Energy Department System Planning at (760) 482-3636.

7. Any construction or operation on IID property or within its existing and proposed right of way or easements will require an encroachment permit including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities. A copy of the encroachment permit application is included in the Imperial Irrigation District's *Developer Project Guide 2008*, and can be accessed at: http://www.iid.com/Modules/ShowDocument.aspx?documentid=2328. Also, instructions for the completion of encroachment applications can be found at http://www.iid.com/Modules/ShowDocument.aspx?documentid=2335. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits.

8. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, canals, drains, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

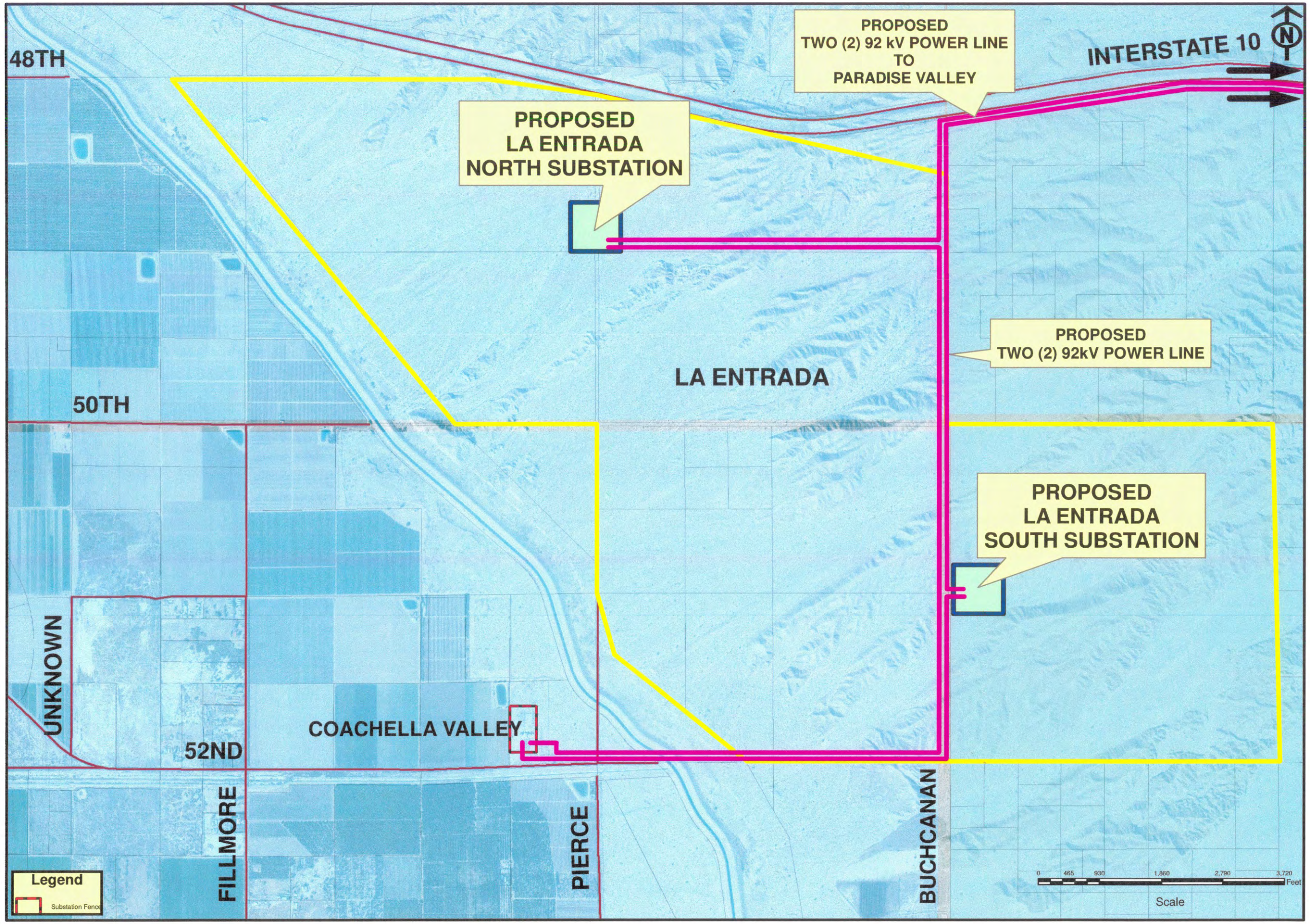
Should you have any questions, please do not hesitate to contact me by phone at 760-482-3609 or by e-mail at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Environmental Specialist

Kevin Kelley – General Manager
Jesse Silva – Manager, Water Dept.
Mario Escalera – Interim Deputy Manager – Operations, Energy Dept.
Cari Stilis – Interim Deputy Manager – Strategic Planning, Energy Dept.
Paul G. Peschel – Interim General Services Manager
Jeff M. Garber – General Counsel
Tom King – Interim Project Management Officer, Portfolio Mgmt. Office
Carlos Villalon – Asst. Mgr., Water Dept. System Control & Monitoring
Juan Carlos Sandoval – Asst. Mgr. Energy Dept.
Shayne Ferber – Asst. Supervisor, Real Estate
Vikki Dee Bradshaw – Interim Supervisor, Environmental Services

La Entrada
Proposed Power Line Route
August 15, 2013



From: Guerin, John [mailto:JGUERIN@rctlma.org]
Sent: Friday, August 02, 2013 3:57 PM
To: Luis Lopez
Cc: Cooper, Ed
Subject: Draft EIR, La Entrada Specific Plan

Thank you for providing the Riverside County Airport Land Use Commission with a CD copy of the Draft Environmental Impact Report for the La Entrada Specific Plan. This project is not located within an Airport Influence Area. Provided that no structures on the property would be 200 feet or greater in height, Airport Land Use Commission review of this project is not required. **6a**

Please note that this is a clearance relative to the Airport Land Use Commission only. As this project is located at a higher elevation than the airport, Federal Aviation Administration obstruction evaluation may be required for structures on properties (if any) within 20,000 feet of the northerly terminus of the north-south runway at Jacqueline Cochran Regional Airport. **6b**

John Guerin
Principal Planner

RCALUC
Riverside County Airport Land Use Commission
4080 Lemon Street, 14th Floor
Riverside, Ca 92501
(951) 955-0982
(951) 955-5177 (fax)
JGUERIN@RCTLMA.ORG

Please take our survey at:
http://www.rctlma.org/online/content/forms/TLMA_cust_svc_survey2.pdf

COMMENT LETTER NO. 7

COUNTY OF RIVERSIDE
TRANSPORTATION AND LAND MANAGEMENT AGENCY
Transportation Department

Juan C. Perez, P.E., T.E.
Director of Transportation

August 26, 2013

City of Coachella
Attn: Luis Lopez
Director of Development Services
1515 Sixth Street
Coachella, CA 92236

Subject La Entrada Draft Environmental Impact Report.
City of Coachella

Dear Mr. Lopez:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the La Entrada Specific Plan within the City of Coachella. The applicant proposes a Master Planned Community consisting of 7,800 residential units; 135 acres of mixed uses (includes high-density residential, public facilities, up to 1.51 million square feet of commercial use and other nonresidential uses); 70 acres for three elementary schools and one middle school; 345 acres of parks and recreational amenities; 557 acres of drainage and passive open space; and the completion of Avenue 50 and Avenue 52 General Plan roadway improvements. The project includes a 588 acre annexation of land within the Sphere of Influence of the City of Coachella that is currently within Riverside County. We offer the following comments. **7a**

The Riverside County Transportation Department (RCTD) has reviewed the proposal and found that the project may have a potential impact on the provision of access to APN: 763-190-006 located immediately to the south of the project and adjacent to the easterly side of the Coachella Canal. There is no explicitly identified roadway along that project boundary in the project design or discussion concerning the final disposition of the 30 foot offer of dedication that falls along and within the project boundary. The County requests for the project to preserve sufficient right-of-way for a local roadway on this alignment that will ensure future access rights for this parcel. This comment was included in our January 31, 2013 letter on the Notice of Preparation, but does not appear to have been evaluated in the DEIR. **7b**

The RCTD has been contacted by a developer of County lands to the north and east of the project that are interested in extending a 97 KV electric line from the existing substation that is south and west of the project to the south side of the Interstate 10 freeway at the northeast corner of the project. While this extension would be overseen by the Imperial Irrigation District, it would use existing road and utility rights-of-way on the alignments of 52nd Ave. and Buchanan St. which are to the south of the project and **7c**

4080 Lemon Street, 8th Floor • Riverside, California 92501 • (951) 955-6740
P.O. Box 1090 • Riverside, California 92502-1090 • FAX (951) 955-3198

pass through the project within County lands. There are currently no established road and utility rights-of-way easterly of Buchanan St that would provide an alternative to replace this proposed alignment that could go around the project site. The project design does not appear to accommodate the retention of the existing right-of-way or any equivalent right-of-way that would permit utility services to extend to County lands along the Interstate 10 freeway to the northwest of the project. The County requests that the project provide such accommodation. See the attached Proposed IID Power Alignment Exhibit for more details.

7c cont.

The traffic analysis in the DEIR has demonstrated the project causes direct impacts to four intersections which lie within or are partially located in the County. The analysis has identified the necessary improvements needed to mitigate the project's impacts. The County requests that the City condition the project to construct the identified improvements or pay its fair share towards intersection improvements. The County also requests that the design and construction of improvements be coordinated with RCTD. Please contact Kevin Tsang at (951) 955-6828 to coordinate the improvements.

7d

Under Section 4.16.4 – Regulatory Setting, the DEIR should also include the County of Riverside General Plan as a local plan which contains policies which are applicable to the portion of the proposed project that is within the County's jurisdiction.

7e

Thank you again for the opportunity to review the DEIR. Please contact me at (951) 955-2091 for questions or concerns regarding the comments above.

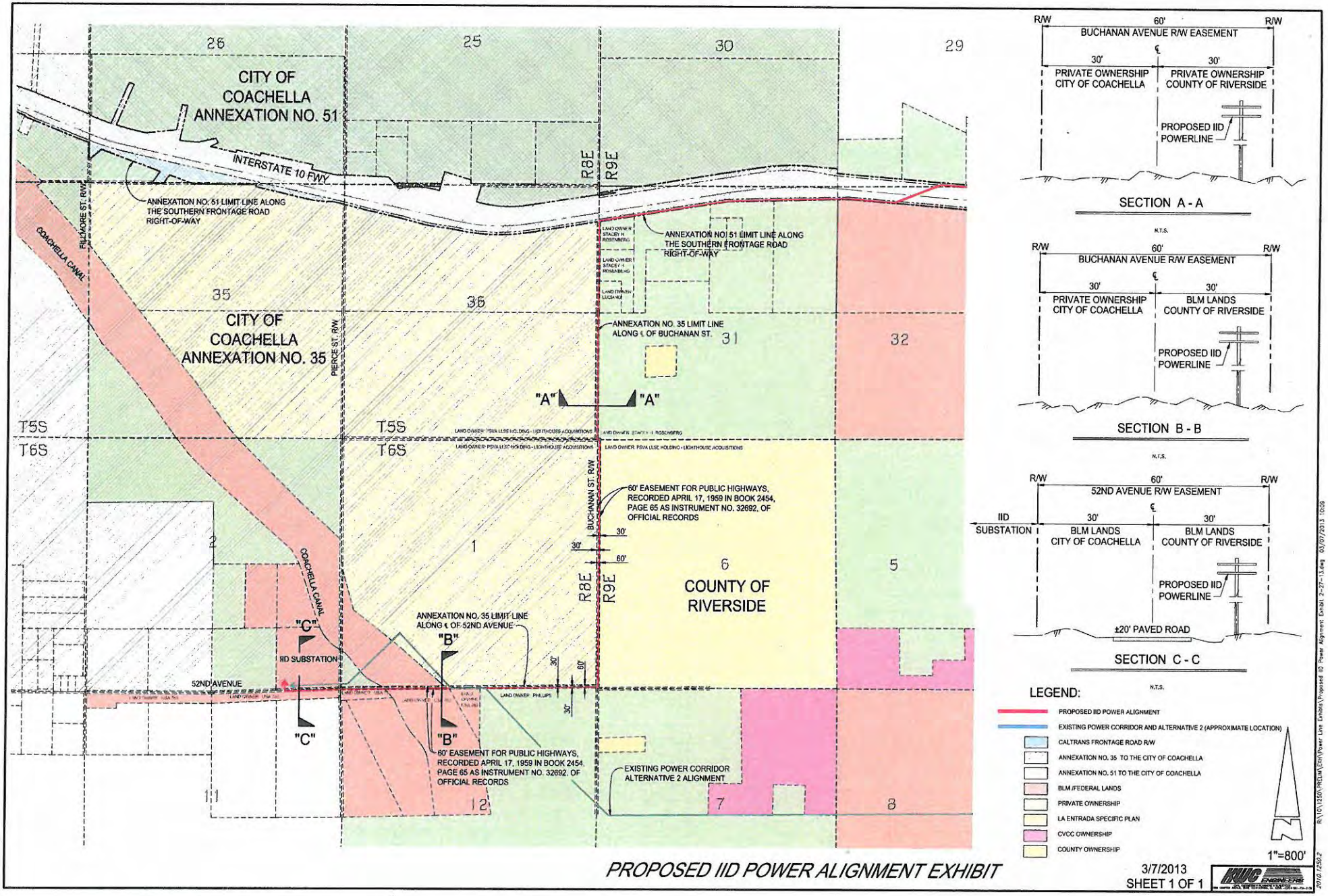
Sincerely,

Farah Khorashadi

Farah Khorashadi, P.E.
Engineering Division Manager

FK:RF:KKT:rg

cc: Juan C. Perez, Director of Transportation and Land Management
Patricia Romo, Deputy Director
Ken Teich, County Surveyor
Carolyn Syms Luna, Planning Director
Frank Coyle, Deputy Director of Planning



SECTION A - A

N.T.S.

SECTION B - B

N.T.S.

SECTION C - C

N.T.S.

LEGEND:

- PROPOSED IID POWER ALIGNMENT
- EXISTING POWER CORRIDOR AND ALTERNATIVE 2 (APPROXIMATE LOCATION)
- CALTRANS FRONTAGE ROAD R/W
- ANNEXATION NO. 35 TO THE CITY OF COACHELLA
- ANNEXATION NO. 51 TO THE CITY OF COACHELLA
- BLM /FEDERAL LANDS
- PRIVATE OWNERSHIP
- LA ENTRADA SPECIFIC PLAN
- CVCC OWNERSHIP
- COUNTY OWNERSHIP

1"=800'

PROPOSED IID POWER ALIGNMENT EXHIBIT

3/7/2013

SHEET 1 OF 1

R:\TD\1250\PRELIM\EXH\Power Line Exhibits\Proposed IID Power Alignment Exhibit 2-27-13.dwg 03/07/2013 10:08

2012.1250.2

SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS

Main Office
818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435

t (213) 236-1800
f (213) 236-1825

www.scag.ca.gov

August 26, 2013

Mr. Luis Lopez
City of Coachella
1515 6th Street
Coachella, CA 92236
Llopez@coachella.org

RE: Comments on the Draft Environmental Impact Report for the La Entrada Specific Plan [SCAG No. I20130177]

Dear Mr. Lopez

Thank you for submitting the Draft Environmental Impact Report for the La Entrada Specific Plan to the Southern California Association of Governments (SCAG) for review and comment. Based on SCAG staff's review, the proposed project supports overall the goals of the 2012-2035 RTP/SCS by developing a master-planned community on approximately 2,200 acres in the City of Coachella and its approved Sphere of Influence that incorporates numerous sustainable community design site planning strategies. Considering this is a currently vacant and undeveloped site, maximizing the sustainable design features of the proposed project where feasible is encouraged. SCAG staff comments are detailed in the attachment to this letter. **8a**

When available, please send a copy of the Final Environmental Impact Report to the attention of Pamela Lee at SCAG, 818 West 7th Street, 12th floor, Los Angeles, California, 90017 or by email to leep@scag.ca.gov. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895 or leep@scag.ca.gov. Thank you.

Sincerely,

Jonathan Nadler,
Manager, Compliance and Performance Assessment

SCAG STAFF COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LA ENTRADA SPECIFIC PLAN [SCAG NO. I20130177]

SUMMARY

SCAG is the designated Regional Transportation Planning Agency under state law responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the adopted 2012-2035 RTP/SCS. 8b

Based on SCAG staff review, the proposed project generally supports the applicable goals of the 2012-2035 RTP/SCS, and the analysis in the DEIR is based on the growth forecasts adopted as part of the 2012-2035 RTP/SCS.

2012-2035 RTP/SCS GOALS

The 2012-20135 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see http://rtpscs.scag.ca.gov). The goals included in the 2012-2035 RTP/SCS, listed below, may be pertinent to the proposed project.

2012-2035 RTP/SCS GOALS	
RTP/SCS G1:	*Align the plan investments and policies with improving regional economic development and competitiveness*
RTP/SCS G2:	*Maximize mobility and accessibility for all people and goods in the region*
RTP/SCS G3:	*Ensure travel safety and reliability for all people and goods in the region*
RTP/SCS G4:	*Preserve and ensure a sustainable regional transportation system*
RTP/SCS G5:	*Maximize the productivity of our transportation system*
RTP/SCS G6:	*Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)*
RTP/SCS G7:	*Actively encourage and create incentives for energy efficiency, where possible*
RTP/SCS G8:	*Encourage land use and growth patterns that facilitate transit and non-motorized transportation*
RTP/SCS G9:	*Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*

8c

SCAG Staff Comments

The SCAG Regional Comprehensive Plan (RCP), cited in the Draft EIR, is no longer the most up-to-date policy document to guide development projects in relation to regional planning and policies. While design features based on the RCP may be relevant, SCAG staff recommends a review and consideration of the goals and policies in the adopted 2012-2035 RTP/SCS, as applicable.

In order to maximize mobility and foster accessibility, the project proposes a mixture of uses in three Mixed Use nodes within each village of the Specific Plan. The street system has been created to foster access and mobility

within the Specific Plan area and with the rest of the City of Coachella, particularly through the connection and extensions of Avenue 50 and 52 (4.16-53). The proposed project is relying on the existing regional transportation network and maximizing mobility and accessibility through its location near the I-10. A new freeway interchange will be provided to the project site. Additional local access to the project site would be provided via extensions of Avenue 50 and Avenue 52 (4.16-7). The proposal for conditional approvals for project phases relying on infrastructure improvements is appropriate.

Various energy conservation and generation practices are outlined in the La Entrada Specific Plan that would reduce energy demands. Specifically, the proposed project would be designed to maximize the use and generation of renewable energy on the project site through the use of photovoltaic systems. The proposed project would also be designed to United States Green Building Council, Leadership in Energy and Environmental Design (LEED), and GreenPoint Rated standards for all new building to meet energy efficiency and building standards (4.14-24).

8c

La Entrada Specific Plan also incorporates a network of on- and off-street non-motorized circulation elements to promote walkability and reduce vehicle miles traveled within the project. The system provides for bicycles, pedestrians and allows for future use by NEVs (4.16-19).

While the proposed project includes many forward looking community design features, it inherently introduces impacts associated with development on a vacant site as identified in the Draft EIR. SCAG staff encourages consideration of the feasibility of maximizing important design features to ensure sustainability well into the future, including active (non-motorized) transportation infrastructure, NEV infrastructure (including charging stations for NEVs and other PEVs), other clean fuel strategies such as electric hook ups for truck transport refrigeration units at commercial facilities, first/last mile strategies to public transit, complete streets concepts, housing density, water conservation and replenishment, and energy efficiency requirements (e.g., percentage of buildings with photovoltaic systems).

2012-2035 RTP/SCS REGIONAL GROWTH FORECASTS

The most recently adopted SCAG forecasts are the 2012-2035 RTP/SCS population, household and employment forecasts (adopted by the SCAG regional Council in April 2012). The forecasts for the region and jurisdiction are below.

Adopted SCAG Region Wide Forecasts			Adopted City of Coachella Forecasts		
	Year 2020	Year 2035		Year 2020	Year 2035
Population	19,663,000	22,091,000	Population	70,200	128,700
Households	6,458,000	7,325,000	Households	17,300	34,000
Employment	8,414,000	9,441,000	Employment	12,800	27,900

8d

SCAG Staff Comments
Page 4.12-2 indicates that the Draft EIR population and employment analyses were based on the adopted SCAG 2012-2035 RTP/SCS Regional Growth Forecasts.

MITIGATION

SCAG Staff Comments
The Draft EIR includes appropriate mitigation measures, a couple of which are highlighted above. SCAG staff recommends review of the SCAG 2012-2035 RTP/SCS Final Program EIR List of Mitigation Measures Appendix (http://scag.ca.gov/igr/pdf/SCAG_IGRMMRP_2012.pdf) for additional guidance, as appropriate.

8e

California Clean Energy Committee

August 12, 2013

Mr. Luis Lopez, Director of Development Services
City of Coachella, Development Services Department
1515 Sixth Street
Coachella, California 92236

Re: Comments on Draft Environmental Impact Report
La Entrada Specific Plan
(SCH # 2012071061)

Dear Mr. Lopez:

This letter will constitute comments by the California Clean Energy Committee on the Draft Environmental Impact Report for the La Entrada Specific Plan (DEIR). The California Clean Energy Committee (Clean Energy) is a California non-profit corporation headquartered in Davis, California, which seeks to promote energy conservation, greenhouse gas reduction, and the development of clean-energy resources in California.

Clean Energy has extensive experience in the analysis of energy efficiency and renewable energy designs including residential and commercial projects. Clean Energy actively supports the application of the California Environmental Quality Act (CEQA) to energy conservation and related environmental impacts.

9a

Over 20 individuals in the Coachella area have joined Clean Energy's campaign to request that that city require robust energy conservation and environmental stewardship in the La Entrada Specific Plan. All notices regarding this project are requested to be sent to 3502 Tanager Avenue, Davis, California 95616-7531. Please feel free to contact the undersigned for additional information.

Accompanying this letter is a USB flash drive containing electronic copies in pdf format of each of the documents listed in the appendix to this letter. Please contact us if you have any difficulty displaying the documents.

California Clean Energy Committee | 3502 Tanager Avenue, Davis, CA 95616-7531
Voice: 530-756-6141 | Facsimile: 530-756-5930

The EIR should be amended to incorporate a complete analysis of energy conservation and to mitigate impacts to air quality, transportation, and climate and then be recirculated. 9b

1. Global Warming

Scientists now inform us that even if existing pledges to reduce GHG emissions were met, the planet is still likely to warm 3.5 – 4.0 degrees Celsius by end of century. The International Energy Agency reported in the 2011 World Energy Outlook that the planet is headed toward 6 degrees Celsius (11 degrees Fahrenheit) of warming. This type of warming will be especially devastating for communities in the Coachella Valley where summertime temperatures already can exceed 120.

Global temperatures and CO2 levels are closely linked. Atmospheric CO2 levels have increased 41 percent since the Industrial Revolution, and the climate is just beginning to react. The average daily concentration of CO2 in the atmosphere is now rising at a rate of 1.8 ppm per year. Global emissions are now approximately 35 trillion metric tons of CO2 per year. By 2020 emissions are expected to rise to 41 trillion metric tons annually. 9c

This past May the average daily level of atmospheric CO2 exceeded 400 ppm for the first time in three million years. A considerable amount of additional warming is already built into the atmosphere. Atmospheric concentrations of CO2 have not been this high for three million years. At that time sea levels were as much as 60 to 80 feet higher.[1]

Most of the excess heat energy is now being trapped in the oceans, which are subject to thermal expansion as their temperatures increase. Over the 20th Century, ocean levels rose by about 15 to 20 centimeters. The rate of sea-level rise is accelerating and has now reached 3.2 centimeters per decade.

South Florida is an example of the impending disaster for civilization. More than a third of South Florida would be inundated by a three-foot rise in sea level. By the end of this century, scientists expect a six foot sea level rise. Nor can South Florida be protected by

[1] See J. Gillis, "Heat-Trapping Gas Passes Milestone, Raising Fears," *New York Times* (May 10, 2013).

sea walls. The rock which underlies South Florida is porous. Sea walls would not be effective. Sea water already percolates underground.[2]

The San Francisco Bay Area and the Sacramento Delta will face huge sea-water intrusion impacts over coming decades threatening buildings, public infrastructure, agriculture, water supplies, and public health.

All countries will feel the effects of climate change, but poor and developing countries—regions that have the least financial, technological, and scientific resources to fight back—will experience the worst impacts.[3]

Arctic sea ice reached a new low in 2012. The increasing potential for thawing of the Arctic permafrost and for the connected release of methane with powerful short-term climate impacts has raised new concerns.[4]

9c cont.

The frequency and intensity of heat waves has increased. The Russian heat wave of 2010 resulted in 55,000 human deaths, 25 percent crop failure, and one million hectacres burning.

Increased temperatures have been observed to have a negative effect on agricultural production. A recent MIT study reported a significant correlation between increased temperatures in poor countries and reduced industrial output, reduced agricultural output, and reduced political stability.

Extreme drought is projected for many parts of the American West. Levels of aridity similar those reached during the Dust Bowl may cover areas from Kansas to California.[5] These losses are expected to take place while world population expands to some 9 billion by mid-century leading to increased food insecurity.

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[2] See J. Goodell, "Goodbye, Miami," *Rolling Stone* (Jun. 20, 2013).
[3] The World Bank, Turn Down the Heat (Nov. 2012).
[4] Vidal, J., Rapid Arctic Thawing Could Be Economic Timebomb, Scientists Say *The Guardian* (Jul. 24 2013).
[5] J. Romm, "Desertification: The Next Dust Bowl," *Nature* (Oct. 27, 2011).

2. Greenhouse Gas Emissions

The discussion of climate change in the EIR states that further planetary warming "could occur," that environmental changes "could include," higher sea levels, and that "special effects in California might include" a decline in the Sierra Nevada snowpack, erosion of the coastline and seawater intrusion into the Sacramento Delta. (DEIR 4.7-4.)

These statements are materially misleading and are not supported by substantial evidence. The impacts are not mere possibilities. They are already occurring and will continue to occur under any plausible set of circumstances. **9d**

The EIR refers to climate science as "the prevailing political/scientific opinion." (DEIR 4.7-5.) This is misleading and unsupported. Climate change is not a political perspective. It is a scientific fact. To suggest that climate change is a political view may put the project applicant at ease, but it hides from the public the severe heat waves, wildfire, flooding, water shortage, crop failure, and other climate change impacts that will result from projects such as this one, which has a significant and unmitigated climate impact even under the easiest of tests.

At a minimum, the city should determine whether the project would be consistent with Executive Order S-3-05, which provides that GHG emissions must be reduced 80% below 1990 levels by 2050 to stabilize climate impacts, and recirculate the EIR. S-3-05 is established public policy in California. **9e**

3. Energy Impacts

The EIR should evaluate the economic viability of renewable energy strategies and energy efficiency tools that could reduce energy demand from the project. The EIR should evaluate options for putting the entire project on renewable energy. It should compare the relative efficiencies of different technologies to provide energy to the project for operation, construction, and transportation.

9f

The EIR should evaluate strategies for reducing reliance on fossil fuels, increasing reliance on renewable resources, reducing peak loads, and reducing the impacts of reliance on remote generation facilities. It should discuss the portion of the electricity which would be supplied from renewable resources and what portion is from various fossil fuels. The impacts of relying on those resources should be discussed including the reliance on natural gas and coal-fired power. The EIR should discuss and quantify the energy mix

and the resulting emissions and pollutants and the environmental and health impacts that will result. **9f cont.**

The EIR should discuss the energy resources available to the project. There are considerable wind resources in the area which might include the project site or be available for community wind projects developed in conjunction with the site. Green waste, food scraps and waste water from the site are baseload biomethane resources. The Coachella canal could provide micro-hydro resources which could be developed in cooperation with IID. There are geothermal resources in the region which should be discussed and considered in connection with the project. **9g**

The discussion should include the relative impacts resulting from different energy resources. The EIR should discuss the renewable content of the energy to the project. It should discuss the average efficiency achieved by the generation, transmission, and distribution systems and how that efficiency compares to the available distributed resources. The EIR should discuss adequacy of the substations, distribution, and transmission resources to be used and the cumulative impact of the expansion of those systems. It should address the cost of expanding those facilities as it relates to the feasibility of distributed systems. The EIR should address peak energy usage. Feed-in-tariffs and net metering should be discussed as applicable to this project. **9h**

The EIR should discuss energy use. Loads should be reported for typical building lighting, space conditioning, battery recharging, equipment, transportation, water heating, etc. Facilities for electric vehicle charging should be discussed as a cost-effective way to reduce energy impacts. The EIR should include an energy efficiency calculation demonstrating how typical residential and commercial structures will use energy for lighting, water heating, space heating, water heating, pool pumps, pipe loss, cooling, plug load, appliances, etc. and determine whether upgrading to more energy efficiency systems would be cost-effective in view of energy savings. **9i**

The analysis of energy conservation should be based on scientific and factual data. The EIR should not rely on a subjective comparisons. There is no evidence to support the assertion that adherence to Title 24, Part 6, would insure that the project would avoid the inefficient use of energy. The EIR should provide the total energy requirements of project operation by fuel type and end use.

4. Solar Photovoltaic

Electricity supplied by rooftop solar panels is cheaper and it avoids the air quality impacts and climate change impacts of fossil-fired generation. California Energy Commission data shows that rooftop solar systems retrofitted to existing residences now cost on average $6.10 per watt.

Rooftop solar installed as a part of a tract construction involves economies of scale due to the large size of the project that reduce materials costs. Production tract developers employ a streamlined installation processes on an open and accessible wood frame that considerably reduces labor costs. Production builders do not incur the overhead costs, separate permitting and design costs, and customer acquisition costs that attend a typical residential solar retrofit. For these reasons the $6.10 per watt price for retrofitted solar exceeds the cost a production builder would incur to install rooftop solar.

Using the $6.10 per watt figure, a 3 kilowatt AC system would cost $12,810 in California after federal tax credits.

Installed Price 3 kW Solar System	
Installed Price per Watt	$6.10
System Size (Watts AC)	3000
Installed Cost	$18,300
30% Tax Credit (IRC 48C)	-$5,490
After Tax Installed System Cost	$12,810

9j

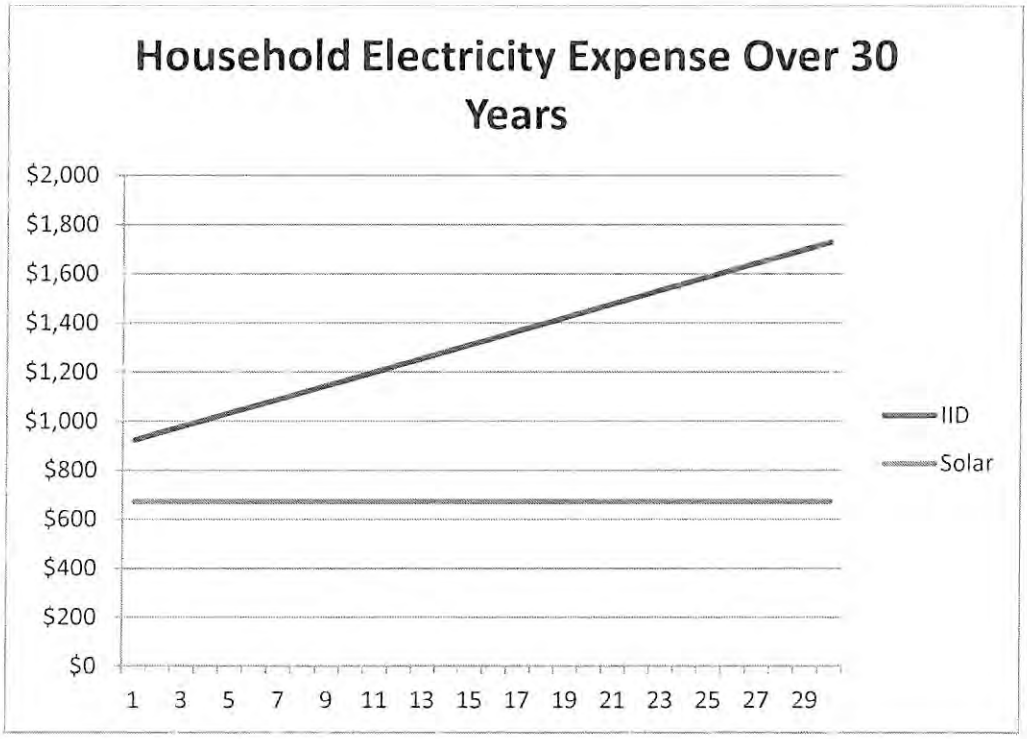
Such a system installed in Coachella produces electricity at a cost of approximately 8 cents per kWh.

Per kWh Price of Residential Solar Power	
After Tax Installed System Cost (3 kWac)	$12,810.00
Operation and Maintenance	$1,500.00
Annual Output (kWh)	6016
System Lifetime (yrs.)	30
Lifetime Output (kWh)	180,480
Cost per kWh	$0.08

Using IID grid-sourced, brown power at $0.11 per kWh is wasteful by comparison. A typical household using 700 kWh per month would save $252 in year one.

Annual Household Savings in 2013			
	kWh per Year	Electricity Rate	Annual Bill
Brown Power	8400	0.11	$924
Rooftop Solar	8400	0.08	$672
Savings			$252

Utility rates are tied to volatile energy markets and have historically increased over time. Rooftop solar is a fixed cost so the savings for the homeowner increase over time. Assuming straight-line 3 percent per year growth in utility electricity rates over a 30-year system lifetime, rooftop solar produces considerable and growing financial savings for households and business, reaching more than $1000 per household per year.



9j cont.

For commercial buildings and multi-family, the cost savings from rooftop solar is considerably greater. Rooftop solar PV on commercial buildings is approximately 10 percent less per kW of installed generation. Commercial buildings could achieve a $0.07 per kWh. Solar canopies in parking lots should be used to avoid wasting solar power that may not be required for building operation by selling the electricity to IID under its feed-in-tariff program or via the renewable auction mechanism.

The project involves over 7000 residential units, 135 acres of mixed uses including 720 dwelling units, and four schools. (DEIR 3-1.) The electrical demand is estimated at 7,560,220 kWh per month. Residential electricity rates for the Imperial Irrigation District are currently $0.1108 per kWh.[6] The annual savings to consumers and businesses from solar would be approximately $85 million over 30 years.

Consumer Cost Savings Assuming IID Rates Do Not Increase for 30 Years

	Annual Usage (kWh)	Rate per kWh	Electricity Cost
Imperial Irrigation District	90,722,640	$0.1108	$10,052,069
Rooftop Solar	90,722,640	$0.0793	$7,194,305
Annual Savings			$2,857,763
Savings Over 30 Years			**$85,732,895**

9j cont.

These savings are in fact understated. This analysis assumes that IID will continue to charge $0.11 per kWh for the next 30 years which will obviously not happen. Further, the price for rooftop solar is based on the rate to install retrofits on individual homes which considerably overstates the price of solar for production housing and for commercial scale installations.

If these savings are provided to local households, schools and businesses in Coachella, they can help encourage local economic growth and create needed local jobs. The $85 million saved could be refunded to ratepayers or invested in jobs-creating renewable

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[6] Per phone conversation with IID on August 5, 2013, residential flat rate consists of $0.784 for energy consumption plus $0.0324 for energy cost adjustment. The total residential electricity charge is increased for the public benefits charge and $0.00029 per kWh is added for the California Energy Surcharge.

energy projects such as district energy, anaerobic digestion, transit operations that could further reduce energy costs. 9j cont.

The proposed project involves a potentially significant impact to energy conservation and the EIR should be revised and recirculated to fully discuss the impact on energy conservation. The significant air quality and climate impacts of the project should be mitigated by the installation of rooftop solar on all residential and commercial structures and over parking areas for commercial and multi-family structures to fully offset or exceed the requirement for grid-sourced electricity. 9k

5. New Homes Solar Partnership

Solar PV becomes more economical by qualifying for and participating in the New Homes Solar Partnership. The NHSP partnership currently has $64 million of funding available.

Residential projects that exceed Title 24 by 15 percent can qualify for a $1.50 per watt incentive for the installation of solar. When a project exceeds Title 24 by 30 percent, the incentive is $1.75 per watt. This reduces the installed system price for a 3 kW system to $8,310—

NHSP Installed Price 3 kW Solar System	
Installed Price per Watt	$6.10
System Size (Watts AC)	3000
Installed Cost	$18,300
30% Tax Credit (IRC 48C)	-$5,490
NHSP Reduction ($1.50 per watt)	-$4,500
After Tax Installed System Cost	$8,310

9l

The cost of increasing Title 24 compliance by 15 percent or 30 percent would be in addition to this cost.

NHSP Per kWh Price of Residential Solar Power	
After Tax Installed System Cost (3 kWac)	$8,310.00
Operation and Maintenance	$1,500.00
Annual Output (kWh)	6016
System Lifetime (yrs.)	30
Lifetime Output (kWh)	180,480
Cost per kWh	$0.05

9l cont.

6. Preempting Future Energy Conservation

The EIR should discuss how failing to implement efficient renewable generation and energy conservation as a part of initial design and construction would pre-empt future clean energy development. By failing to incorporate renewable energy when the project is built, project occupants become subject to administrative and financial obstacles as well as additional construction costs associated with retrofitting renewable generation.

9m

7. Solar Water Heating

Based on estimates from solar water heater experts, a homeowner who retrofits an existing residence with solar water heating (SWH) can expect a total installed system price in area of $7500. This price would typically be reduced by a federal tax credit of 30 percent and a California Solar Initiative (CSI) cash rebate.

When a SWH is installed routinely by the original developer as a part of new home construction, system costs fall dramatically. Materials are purchased in quantity. Labor costs fall because all the trades—plumbers, framers, electricians, and roofers—are already on site and install the related components on a mass production basis. Permits have been pulled. Work proceeds on an open and accessible wood frame. The additional labor expense for the developer to integrate a SWH into residential construction would be less than $500 per home.[7]

9n

[7] Two skilled tradespersons costing the developer $30 per hour could work for a full 8-hour day less than $500.

The cost of SWH on new homes is reduced by the California Solar Initiative cash rebates for solar water heater installations. For tract construction, the developer submits a separate application for each house. A typical homeowner receives a rebate of about $2200.[8] The size of the rebate depends, among other things, on the size of the panels and the storage. There must be a gas-fired hot water heater as a back-up per the CPUC.

Solar Water Heater New Construction Cost	
SWH Materials	$2,600
Sales Tax (8%)	$208
Installation Labor	$500
30 Percent Tax Credit (IRC 25D)	-$842
CSI Rebate	-$2,200
Total Cost After Tax Credit	$266
Per Year Cost of Construction Over 20 Years	$13

9n cont.

The cost of an installed SWH system is about one dollar per month. In a solar rich environment like Coachella, system performance would be considerably better than average and the system cost would be lower as a result.

A typical California family pays approximately $15 per month for natural gas water heating in summer or a total of $180 per year. Winter natural gas usage would be somewhat higher due to lower ambient temperatures.

Based on the CEC projections, there will be 78.9% increase in natural gas prices over a 12 year period on a mid-demand scenario. This would amount to a 6.58 percent increase per year through 2024. We confirmed projected natural gas price increases with one expert who stated that the best forecasts for wholesale natural gas prices is that they will rebound by up to 50% between now and 2020 due to an expected demand surge in the power sector, and then continue upwards on a slower trajectory. That would amount to about 7 percent per year through 2020.

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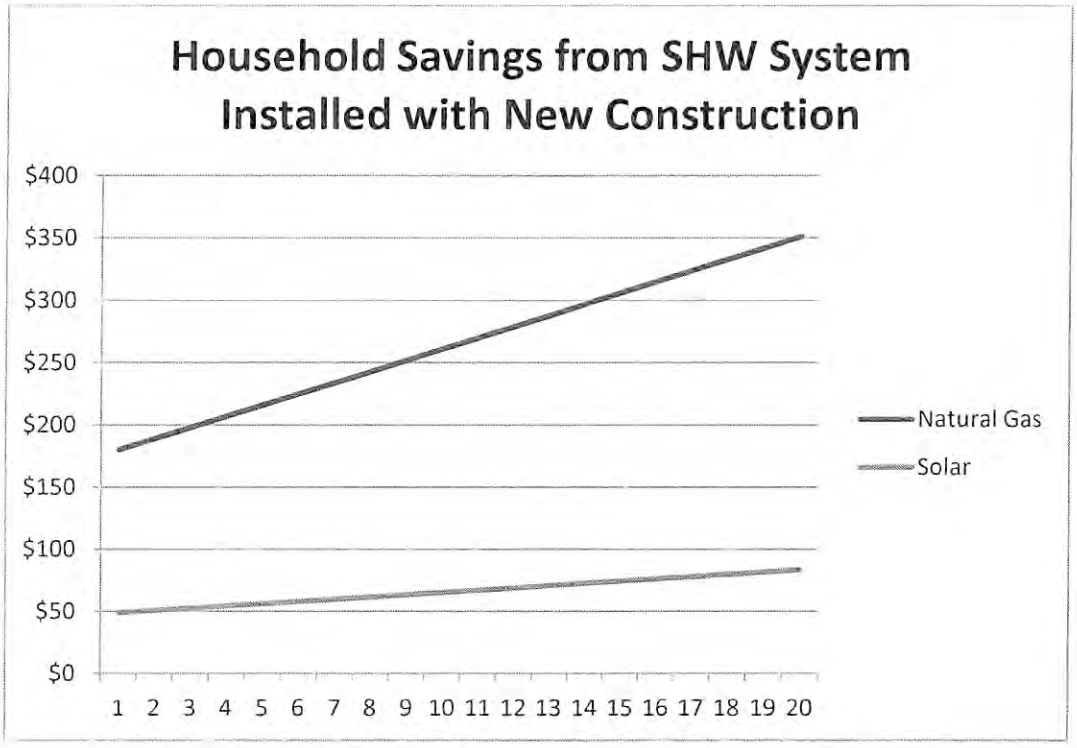
[8] http://www.gosolarcalifornia.org/solarwater/

We adopt a 5 percent per year linear increase in natural gas prices which means that the annual water heating bill for the typical Coachella household will rise from $180 per year to $351 per year over the next 20 years. The U.S. Department of Energy shows that the today the typical U.S. household pays on average $400 to $600 per year for water heating alone.

On average a SWH system will reduce water heating bills by 50 to 80 percent according to the U.S. DOE. Given the solar characteristics of Coachella, we use an 80 percent reduction in natural gas costs for solar water heating. An 80 percent reduction in the current $180 per year water heating bill results in a $36 per year natural gas bill for backup water heating. The cost of the SWH is $13 per month so the total bill for SWH installed as part of new home construction is $49 per year. The typical household saves $131 in the first year.

The typical useful life of a SWH according to the Department of Energy is 20 years. In the 20th year the solar system's natural gas usage for back-up water heating results in the overall annual cost of SWH to rise to $83. Consequently, residential savings from a SWH are $268 per year in the 20th year.

9n cont.



The total net savings for a typical household over the lifetime of a SWH system installed in a new home would be $3,988. The Legislature has declared that it is in the interest of California to promote solar water heating systems to protect consumers from rising energy costs and reduce the demand for natural gas. (Pub. Util. Code § 2862.) The EIR should analyze the savings from SWH and adopt SWH as feasible mitigation for the climate and air quality impacts of the project. The failure to install SWH systems is a wasteful practice that constitutes a significant impact to energy. The EIR needs to be revised and recirculated.

9n cont.

9o

8. District Energy

The EIR should evaluate the potential cost savings achieved by using a district energy system to chill and store water using concentrated solar thermal technology, absorption chilling, and thermal storage. Back-up services are provided by natural gas boilers and centrifugal chillers. District energy should be installed during initial project development due to substantially lower costs. District energy reduces the construction costs of individual homes and commercial buildings which avoid the cost of a packaged HVAC system and greatly reduces the amount of duct work required. Revenues from cap and trade sales can be used to pay for the cooling plant or to reduce costs to rate-payers. Effective use of absorption chillers and thermal storage could reduce energy costs connected with air conditioning from the entire project dramatically.

9p

As noted, the annual electricity bill for the project as a whole would exceed $10 million. The reduction in electricity used for air conditioning would be available to pay for a district energy system in addition to the savings of approximately $28 million of upfront costs in avoided for the 7080 residential HVAC units.[9]

A district energy facility would also allow for the sale of cap-and-trade allowances based on the reduced electrical usage which would help to fund a district energy system. Consumers would avoid the cost of periodic air conditioner maintenance and replacement. No refrigerants would be used avoiding the ongoing release of high-global-warming-potential refrigerant into the atmosphere. The EIR should evaluate district energy as mitigation for the significant climate, air quality, and energy impacts of the project.

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[9] $4,000 * 7000 homes - $28 million.

9. Air Quality Mitigation

Mitigation Measure 4.3.7 (DEIR 4.3-29) that building plans should provide measures such as electric vehicle charging stations in multi-family and single-family parking garages. The provision of electric vehicle charging facilities should be required as project mitigation.

Multi-family residences should be pre-wired so that every dwelling has an EV charging facility. The cost and complexity and administrative obstacles to retrofitting EV charging to multi-family dwellings is considerable while providing facilities during project design for EV charging is not expensive. **9q**

Off-site mitigation for climate and air quality impacts should include funding of city-wide program to prepare for and implement EV charging infrastructure. This could include contributing to a city or IID fund that offers a $100 inventive to homeowners who make hard-wired electrical modifications to their homes for the purpose of charging electric vehicles or creating a fund for EV charging locations.

The mitigation requires that plans provide incentives for employees and the public to use public transportation such as discounted transit passes and other incentives. Such a provision is not an enforceable. The provision of a specified quantity of incentives for employees and the public to use transit should be required as mitigation. **9r**

A transportation management district should be established in cooperation with Sunline Transit District and funded by the project applicant to implement transit-supportive mitigation. **9s**

Transit mitigation should extend beyond the project site to include promoting transit use within the city in order to mitigate air quality, climate, and transportation impacts. Specific mitigation should be identified in the EIR and adopted by the City Council. The project should fund free or discount transit passes in Coachella to encourage less driving and to reduce impacts. **9t**

The implementation of a ride share program should be required and the contents of the rideshare plan specified. Establishing an on-going ride share program requires the establishment of a transportation management district which should be funded by the project. **9u**

The requirement that building plans specify that structures use passive heating, natural cooling, and reduced pavement to the extent feasible is too vague to be enforceable. **9v**

The requirement that plans specify electric/energy-efficient appliances is too vague. The mitigation should specify that each appliance provided by the builder must be Energy Star-labeled if Energy Star is applicable to that appliance. 9w

Providing that the covenants, conditions, and restrictions (CCRs) mandate the use of electric lawn mowers and leaf blowers is not a feasible item to include in the CCRs. The city should pass an ordinance covering the project and the project should fund a public information campaign and for enforcement. 9x

The mitigation requiring either high-efficiency or solar hot water systems is vague and ineffective. Solar hot water systems would not be installed under this provision because of the perceived cost, and high-efficiency water heaters are undefined and would not produce an equivalent reduction in emissions. 9y

10. Energy Star Lighting

The EIR should evaluate the typical energy efficiency of the lighting for homes such as would be built in the project. Impacts to air quality and to climate change should be mitigated by including an Energy Star Advanced Lighting package as a standard feature in all homes. 9z

11. Transportation Energy Impacts

The project will result in 115,399 daily vehicle miles travelled. (DEIR 3-42.) This is a potentially significant impact to transportation energy usage and should be evaluated to determine whether it constitutes a significant energy impact. The fact that transit exists in the area is not determinative of transportation energy efficiency. 9aa

12. Exceeding Title 24

The project should be designed to exceed Title 24, Part 6, by 30 percent in order to mitigate for climate impacts and air quality impacts. 9bb

13. Human Health Impacts

Temperatures in Coachella can exceed 120 Fahrenheit and average 108 in July. High temperatures for outdoor workers can be life-threatening. In California heat waves claim more lives than all other disaster events combined. Extreme heat events are expected to 9cc

increase in frequency, intensity, and duration. The EIR should consider the health and mortality impacts of bringing large numbers of people into an area that will be subject to greater temperature extremes as a result of climate disruption. **9cc cont.**

Vegetation and trees provide natural cooling through shading and the evaporation of water from soil and leaves. Heat islands are the result of replacing natural land cover with buildings, pavement, and other infrastructure. Heat islands also receive waste heat from air conditioning systems and vehicles that further increases temperatures. The U.S. EPA reports that many cities have temperatures that are up to 10 degrees higher than the surrounding natural land cover. **9dd**

Heat islands affect public health by amplifying the effects of hot weather especially on vulnerable populations such as the elderly. Heat islands require energy use and air conditioning that some cannot afford. They accelerate the formation of smog. The EIR should evaluate the heat island effect of the project and provide mitigation.

14. Transportation

The EIR should discuss and recommend mitigation to reduce air quality and transportation impacts by unbundling parking and accelerating electric vehicle adoption. Where on-site mitigation is infeasible, the EIR should recommend feasible off-site mitigation. **9ee**

A commuter benefits program provides alternatives and incentives that encourage commuting by more sustainable modes such as transit, rail, biking, van pools, and carpooling. Commuter benefits programs are based on a traffic mitigation plan that includes public outreach to commuters through various media including workplace promotion, social media, on-line ride matching, signage, on-site transit pass sales, on-site transit information, discounted transit passes, and coordination with transit agencies. New residents should be provided with a free one-year transit pass to encourage their use of transit. **9ff**

Such a program could be operated by a transportation management association under the joint administration of the City of Coachella and the Sunline Transit District using an incentive-driven, private contractor. It could be funded through mitigation fees potentially leveraged by other transit funds or by a Mello-Roos district. Parking fees from metered public lots serving on-site businesses could fund a transportation management association.

Reductions in transportation demand achieved by a transportation management association would reduce the cost to developers of new transportation infrastructure and parking thus providing a financial boost for developers while reducing impacts.

9ff cont.

All employers owning or leasing buildings in the project site should be required to offer parking cash-out to employees. Parking cash out requires employers to offer employees the option to choose cash in lieu of any parking subsidy offered. Implementation of parking cash-out by individual employers can be used to reduce impacts.

9gg

The project should adopt shared parking through either a parking district or public parking in lieu of minimum parking requirements. Employers should be allowed to reduce the number of shared parking spaces they construct or lease based upon (i) the likelihood that multiple facilities will not all require maximum parking at the same time and (ii) the extent to which individual facilities can implement cash-out parking. This reduces costs to employers and moderates single-occupant vehicle demand.

9hh

The supply of free or inexpensive parking at the final destination is a key decision factor cited for choosing to drive a personal auto rather than taking a bus or a bike, walking, or carpooling. Requiring that parking spaces be leased or sold separately ("unbundled") from the rent or sale prices (residential and commercial) gives a financial incentive inducing individuals to drive less or own fewer cars, or encouraging companies to increase transit commute rates among their employees. Overall, this serves to reduce parking demand and shift peak-hour commute trips to non-SOV modes. Including the price of parking in an overall lease can increase costs by as much as 25% – whether or not the tenant has a car – but be perceived as an "invisible" cost by the customer.

Shared parking should be required for commercial space and supplied by dedicated public parking lots so that each store is not required to pay the cost of building and maintaining a parking lot sufficiently large to meet its discrete peak parking demand and so that parking will be metered. Shared public parking increases the pedestrian ambiance of retail centers and helps to avoid driving between different stores. ZEVs, NEVs and PHEVs can be incentivized by allowing them free parking and charging for a limited time.

9ii

Use of shared public parking allows employers to either buy monthly passes or refund an equivalent sum to employees who use sustainable modes thus incentivizing reduced impacts. Employers who own their parking cannot reduce their parking costs on an incremental basis. Shared parking simplifies employer compliance with California's parking cash out law. (Health & Safety Code § 43845.)

On-street parking should be eliminated from the project and replaced with bike lanes to avoid competition with metered parking lots and to provide a more human-scale and pedestrian-oriented community and to reduce the amount of unused paved areas that the developer is required to build and to reduce heat island effect. 9jj

Respectfully submitted,

Eugene S. Wilson

Enclosures

California Clean Energy Committee | 3502 Tanager Avenue, Davis, CA 95616-7531
Voice: 530-756-6141 | Facsimile: 530-756-5930

APPENDIX

Appendix 1	The World Bank, Turn Down the Heat: Whay a 4° Warmer World Must be Avoided (Nov. 2012).
Appendix 2	New York Times, Carbon Dioxide Level Passes Long-Feard Milestone (May 10, 2013).
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Appendix 8	California Natural Resources Agency, 2009 California Climate Adaptation Strategy.
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Petition for Energy Efficient Design
La Entrada Draft EIR

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We, the undersigned, support the effort of the California Clean Energy Committee that the City of Coachella require robust energy conservation and environmental stewardship in the La Entrada Specific Plan project:

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California Clean Energy Committee

Petition for Energy Efficient Design
La Entrada Draft EIR

Page _____ of _____

We, the undersigned, support the effort of the California Clean Energy Committee that the City of Coachella require robust energy conservation and environmental stewardship in the La Entrada Specific Plan project:

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[illegible signature] Date:	13780 Ave. 48 #409 Indio, CA 92201	
8/10/13 Date: Jessica Lanis	Thermal, CA 92274 64-100 Fillmore	
8/10/13 Date: Guadalupe Lanis	Thermal, CA 92274 64-100 Fillmore	
8/10/13 Date: [illegible]	Thermal CA 92274 Ave 55	
Jessica Archuleta Date: 8-10-13	50443 S Balboa Coachella, CA	
Claudina Tijerina Date: 8 10 13	85055 Maple Lane - Coachella	
Evangelina [illegible] Date: 8/10/13	1016 6th St Mecca CA 92254	

Petition for Energy Efficient Design
La Entrada Draft EIR

Page _____ of _____

We, the undersigned, support the effort of the California Clean Energy Committee that the City of Coachella require robust energy conservation and environmental stewardship in the La Entrada Specific Plan project:

Name	Address	Email
Trinidad A. Lopez Date: 8/10/13	1466 First st COACHELLA CA	
Marina Soto Date: 8/10/13	85225 [illegible] Coachella	
Guadalupe Glenn Date: 8/10/13	49561 Reyes St. Coachella, CA 92236	
Cristina Hernandez Date: 8/10/13	PO BOX 103 Coachella CA 92236	
Hilda Hernandez Date: 8/10/13	P.O. BOX 1173 Coachella CA 92236	
Ernesto Ramirez Date: 8/10/13	81 Balboa Thermal CA	
Lorraine Franco Date: 8 10 13	51361 Tijsseling Ct Apt A Coachella	
Jose Adurar 8-10-13 Date:	86141 Coachella CA. 92236	

Appendices 1 through 117

of Comment Letter 9

are available for review at the City of Coachella and on the Project website,

www.laentradacoachella.com.

COMMENT LETTER NO. 10

August 19, 2013

Mr. Luis Lopez, Director of Development Services
City of Coachella, Development Services Department
1515 Sixth Street
Coachella, CA 92236

Subject: La Entrada Specific Plan Draft EIR, SCH No. 2012071061

Dear Mr. Lopez,

The La Entrada Specific Plan has proposed to develop a master-planned residential community within the City of Coachella as well as on unincorporated Riverside County lands that would be annexed into the City. Along the USGS Section lines in this area, the County and City hold unimproved easements for future roads and utilities including Avenue 52 and Buchanan Street.

Glorious Land Company has been in discussions with both the Riverside County and the Imperial Irrigation District regarding the feasibility of construction and operation of a power line to serve the Paradise Valley Specific Plan project. The power line alignment would extend from the Coachella Substation at Avenue 52 and Pierce Street, east and north within the County's right-of-ways along the unimproved alignments of Avenue 52 and Buchanan Street in the area of and crossing through the La Entrada Specific Plan project.

According to the Land Use Plan for the La Entrada Specific Plan, it appears that the Specific Plan would develop a mix of residential, school and park uses over the Avenue 52 right-of-way between the Coachella Canal and Buchanan Street, as well as the Buchanan Street right-of-way between Avenue 52 and Avenue 50, which would necessitate abandonment of the right-of-way by the City of Coachella and the County of Riverside.

Glorious Land Company has engaged the Applicant for the La Entrada Specific Plan directly. Additionally, we request that the City of Coachella not support abandonment of the Avenue 52 and Buchanan Street right-of-ways until a feasible alternative power line alignment through the La Entrada Specific Plan property is defined. We appreciate the opportunity to comment during the public comment period and are available to discuss this issue with City.

10a

Sincerely,

Glorious Land Company

Glorious Land Company, LLC
556 N. Diamond Bar Blvd. Suite 212
Diamond Bar, California 91765
909/860.3107 tel 909/860.7180 fax

COMMENT LETTER NO. 11

July 30, 2013

Luis Lopez,
Community Development Director
Development Services Department
1515 6th Street,
Coachella, California 92236

Re: La Entrada Specific Plan

Dear Mr. Lopez:

As the agent for the owners of the property that would be impacted by the proposed realignment of Avenue 50 at the Canal crossing, I am writing to express the concern that, despite the potential high costs to the city of this re-alignment, there does not seem to have been a process for comparing the costs of the proposed re-alignment (including land acquisition costs) vs maintaining the existing roadway and aligning Avenue 50 towards the new interchange at the canal or in the open space within the La Entrada plan area. Maximizing usage of existing right-of-way and La Entrada open space for the canal crossing and roadway should reduce costs to shareholders in this project. **11a**

The planned realignment would divide the existing 42 acre vineyard into two pieces and effectively ruin the existing field for agricultural production, which is one of the earliest and most productive vineyards in the Coachella Valley. Construction along the right of way would eliminate the well that serves the property, and the city would be responsible for replacement of this water source. Moreover, the construction of a bridge would make the surrounding land undesirable for residential development. The costs to the Coachella taxpayer for this loss would be considerable. **11b** **11c** **11d** **11e**

If there has been a trade study of the relative costs of the proposed Avenue 50 re-alignment, can you make the study available for examination? **11f**

Feel free to contact me with any questions about these comments. **11g**

Sincerely,

Dolly Hwang

Dolly Hwang
35 Lucille, Suite B
Arcadia CA 91006
dollyhwang@gmail.com

enclosure

2.0 COMMENTS AND RESPONSES

Comment No. 1
Mr. Scott Morgan, Director
State Clearinghouse, State Office of Planning and Research

1a – This is a transmittal letter from the State Clearinghouse to the City of Coachella, simply indicating that the City has complied with CEQA notification procedures relative to State Agencies. Only one State agency commented on the Draft EIR (see Comment No. 2, below). No further response is required.

Comment No. 2
Mr. Dave Singleton, Program Analyst
Native American Heritage Commission

2a – These are introductory statements that do not require a response.

2b – The EIR includes a Cultural Resources section and technical studies that were completed in compliance with CEQA. Additionally, a complete Cultural Resources Survey was conducted and the impacts on cultural resources are explained in detail in Section 4.5, *Cultural and Paleontological Resources*, of the Draft EIR. Draft EIR Appendix F contains the June 2013 Cultural Resource Survey – Phase I Project Area, conducted by LSA. Contrary to the commenter's statement, this survey did include a NAHC Sacred Lands File search (see Appendix A to Draft EIR Appendix F, which is on file at the City of Coachella), as well as SB18 consultation with Native Americans (see Appendix C to Draft EIR Appendix F). Draft EIR Section 4.5 indicates that, in addition to the June 2013 LSA report, several prior studies were reviewed that encompassed the entire Specific Plan (see Table 4.5.A on page 4.5-2 of the Draft EIR). Additionally, a records search was conducted on August 1, 2012 to identify previously recorded or otherwise known cultural resources and studies for the Project site and area vicinity. This records search is discussed in the EIR Section 4.5, *Cultural and Paleontological Resources*, page 4.5-1.

2c – The City conducted appropriate SB18 consultation, as reflected in Draft EIR Appendix F (Appendix C, on file at the City of Coachella). Draft EIR Appendix C indicates that all NAHC recommended tribal consultations were conducted. The City followed up with this initial consultation, including various emails, and a meeting with the Agua Caliente Band of Cahuilla Indians on July 30, 2013.

Comment No. 3
Ms. Jennifer Henke, M.S., Environmental Biologist
Coachella Valley Mosquito and Vector Control District

3a – This comment letter provides general background information on the District and its goals, identifies various anticipated concerns, and generally states concurrence with the Draft EIR discussion. No specific Draft EIR issues were identified. No further response is required.

Comment No. 4

Mr. Steve Bigley, Director of Environmental Services
Coachella Valley Water District

4a – This is an introductory comment and does not require a response.

4b – The requested revision to the Draft EIR will be made (see Section 3, *Errata*). This revision will not change the significance conclusions in the Draft EIR because this request is a clarification on how the City will comply with the Coachella Valley Water Management Plan and work with Coachella Valley Water District to develop water acquisition strategies to meet projected water demand.

4c – The requested revision to the Draft EIR will be made (see Section 3, *Errata*). This request is a clarification of off-site infrastructure connections, locations and pipe diameters. This revision will not change the significance conclusions in the Draft EIR because no water delivery/demand volumes will be modified.

4d – This comment is presented in a letter dated August 22, 2013 and indicates CVWD's conceptual and conditional approval of the concept of the existing-condition hydrology and Project-related impacts to the existing CVWD facilities. This conceptual and conditional approval is based on RBF Consulting's report entitled "*La Entrada Specific Plan Development: Drainage Master Plan, City of Coachella and County of Riverside, California, Final Report, June 2013*" (refer to Draft EIR Appendix I). CVWD indicated that this comment now supersedes the first paragraph in a prior comment letter from CVWD dated March 6, 2013 (provided as an attachment to this comment letter), because the developer has now provided a determination of flood hazards in accordance with CVWD, County of Riverside Ordinance 458, California Drainage Law, and FEMA regulations and standards. No further response is required.

4e – The Project area is located within Zone X and Zone D. Zone X is identified as areas determined to be outside the 0.2 percent annual chance (500-year) floodplain (Draft EIR p. 4.9-3). This comment indicates the site's flood hazard designation as Zone D. Zone X and Zone D floodplain hazard designations are discussed and analyzed in section 4.9 of the Draft EIR. This comment correctly indicates that one of the sites flood hazard designations is Zone D, no further response is required.

4f – The Draft EIR will be revised to reflect more detail regarding California Drainage Law compliance, noticing requirements, compliance with CVWD requests prior to issuance of grading permits, and compliance with CVWD requests prior to occupancy. These revisions to the Draft EIR will not alter the significance conclusions in the EIR because the revision only provides more detail regarding CVWD requirements (see Section 3, *Errata*).

4g – The City will coordinate with CVWD as requested in regards to coordination efforts for all improvements proposed within or immediately adjacent to the Coachella Canal and associated levee rights-of-way. The City understands that approvals will be required from the U.S. Bureau of Reclamation for right-of-way impacts and encroachment along the Coachella Canal.

4h – This response is referring to the attachment(s) provided with CVWD's comment letter, which are not bracketed as 4h, as attachments are typically not bracketed:

CVWD also provided various attachments to their comment letter, referenced in the comments above, including their August 15, 2012 NOP comment letter (also contained in Draft EIR Appendix A and addressed in the Draft EIR's text (Draft EIR p. 4-17-11 and p. 4.9-15)), their previous March 6, 2012 comment letter (of which paragraph 1 has been superseded per Comment 4d), and the referenced MOU (also refer to Draft EIR section 4.17, *Water Supply*; Draft EIR Appendix M, *La Entrada Water Supply Assessment, Memorandum of Understanding 2009, and Memorandum of Understanding 2013*; and Water Supply Assessment (Appendix B and C). Prior to grading permit issuance, stormwater facility plans will be submitted to CVWD for review to verify consistency with CVWD's requirements for Dike 2 and portions of the All American Canal (Draft EIR p. 4.9-15). Non-potable water facilities will likewise be discussed with CVWD as more detailed subdivision maps will be designed and submitted to determine if any easements need to be deeded to CVWD and to determine what additional facilities, if any, may be required to serve the Project (refer to Draft EIR p. 4.17-40 through 4.17-44). The Program EIR addresses potential impacts of anticipated water and wastewater facilities needed to serve the Project, based on available information, and considering the programmatic nature of the Project. As is typical for large master-planned communities, as each construction-level tract map is submitted for City review and approval, City staff and CVWD will review the tract map (or commercial site plan) for consistency with the Program EIR and Specific Plan. Relevant Project facilities will be subject to further CVWD review and compliance requirements, such as the comments provided in the August 22, 2013, August 15, 2012, and May 6, 2012 letters.

Comment No. 5

Mr. Donald Vargas, Environmental Analyst
Imperial Irrigation District

5a – This is an introductory comment and does not require a response.

5b –The applicant has been in contact with IID, and has also met with representatives from Glorious Land Company (the Paradise Valley project team). While no utility alignments or agreements have been finalized, or reached, the applicant will continue to coordinate, as and when necessary, with IID and Glorious Land Company in determining the appropriate locations for the electrical transmission line alignment(s) and electrical substations. The conceptual alignments shown in the Draft EIR are preliminary, subject to modification during final design. A large parcel map (Map No. 36494) is being submitted concurrently with the Specific Plan for approval; however this large parcel map is intended for finance and conveyance purposes only and does not show details regarding utility alignments. Subsequent subdivision maps, through coordination required with IID and Glorious Land Company, will detail final utility alignments for the Project. Because the Draft EIR is a Program EIR, and specific Project design elements are conceptual at this time, it is infeasible and premature to "pin point" exact locations of relevant Project facilities, easements, and right-of-way until such time specific Project electrical loading can be assessed by IID, as part of the utility service provision process through the City's subdivision map act review and processing.

The EIR has addressed electrical facility construction impacts at a programmatic level. As the Project moves through various construction-level processes including Subdivision Map Act approvals of future tentative and final tract maps, and improvement plans required to be

submitted for review and approval by the City and with IID, as is the case of major electrical transmission facilities, major electrical facilities may be modified from conceptual locations and alignments discussed in the EIR.

The EIR addresses potential electrical substations, which may be slightly modified to reflect transmission line modifications requested by IID and Glorious Land Company. As shown in Exhibit 4.14.2, the substations are conceptually planned within the Specific Plan area, in areas permitted for utility facilities, including development areas and open space. Utility facility siting, construction and operation will comply with applicable EIR mitigation measures, as well as other applicable standard design and construction practices and regulations of IID and other agencies such as the California Public Utilities Commission. These substations would be constructed by IID, within parcels to be improved by the developer as part of final engineering and design. Substation construction would be subject to CPUC and IID review and approval, which is anticipated to rely upon this EIR for CEQA clearance (at least at a programmatic level).

A modified alignment is anticipated to be provided for a 92kV transmission line easement, in response to IID and Glorious Land Company requests. Subject to further site-specific discussions as part of tract map and improvement plan review, the new 92kV alignment within the Specific Plan area is anticipated to generally run from the southwest Project corner northeasterly to the northeast corner, allowing for a future extension to serve Glorious Land Company's Paradise Valley Project (the actual alignment may vary). Although the Project is providing for an easement for this potential future development (Paradise Valley), provision of an easement for a potential future power transmission line for a potential future development project is not in itself (provision of the easement) considered a cumulative impact associated with the La Entrada Project, as no facilities are being constructed, and the electrical transmission facility alignment could be accommodated with or without the Project (refer to Section 3, *Errata*, for a discussion of the Paradise Valley project). The Draft EIR evaluates, at a program-level, the potential future impacts of electrical transmission and distribution lines, including aboveground lines, as will be the case with the 92kV line (Draft EIR p. 4.14-8 and p. 4.14-23-24). The relocation of the transmission lines will not cause any additional environmental impacts, because a 13kV line and 92kV easement are addressed in the EIR (page 4.14-24), and the new 92kV easement would not actually involve facility construction, just an easement for facility construction by others. The Project's open space areas allow for utility uses. The Paradise Valley Project will require a separate CEQA review process by the County of Riverside.

IID has also indicated a potential future 500kV transmission line parallel to the Coachella Canal and the existing 230kV lines. IID has indicated the potential to add a future 500kV transmission line parallel to the Coachella Canal and IID's existing 230kV transmission lines. IID's proposed 500kV line is not planned in the Specific Plan Area and is, therefore, not anticipated to be affected by the proposed Specific Plan.

5c – Comment noted. The City appreciates the District's comments and looks forward to working with the District as this and other projects in the City move forward.

5d – The comment letter attachments (letter from IID dated January 23, 2013 and Proposed Power Line Route map dated August 15, 2013) have been reviewed by the City, and will be incorporated into

subsequent subdivision map and improvement plan review and approval processes. The on-going coordination with IID will address IID comments regarding, electrical demand, transmission line easements/alignments, permits, potential substations, and location of facilities within the Project area. The Project will not require any increase in total Project electricity demand as discussed in the Draft EIR (Draft EIR p. 4.14-23 and Table 4.14.E), and impacts are still considered less than significant in this regard.

Comment No. 6

Mr. John Guerin, Principal Planner
Riverside County Airport Land Use Commission

6a – This comment indicates the lack of Project impacts relative to ALUC purview. No further response is required.

6b – Based on review of the Jacqueline Cochran Regional Airport "Airspace Plan" and Airport Master Plan,[1] which shows FAA FAR Part 77 notification surfaces, the Project is not within any applicable FAA airspace notification surface. The nearest site boundary is approximately 19,500 feet from the nearest runway terminus, although the site is northeast of the north-south runway and not in a flight path. The runway approach pattern is at 866 feet above mean sea level (msl), which is well above the site's maximum elevation of 700 feet, which occurs in the distant eastern portions more than 4 miles from the nearest runway terminus.

Comment No. 7

Ms. Farah Khorashadi, P.E., Engineering Division Manager
Riverside County TLMA Transportation Department

7a – This is an introductory comment and does not require a response.

7b – The Specific Plan accommodates access to the 3.28 acre subject parcel (APN 763-190-006), as shown on Draft EIR Figure 3.6. The parcel No. 763-190-006 currently does not have access. The Project circulation is conceptually designed so that the parcel would be able to take access from an existing easement at a section line for a legal point of connection through a two lane collector roadway, illustrated in the southern portion of the Specific Plan between Planning Areas H26 and H27, once the Hillside Village area is developed (Draft EIR Figure 3.3, 3.6, and 3.7). Because roadway alignments are conceptual at this time, future alignments and access issues will be addressed during final design and submittal of subsequent subdivision maps and improvement plans (see Section 3.6 of the Draft EIR). It should also be noted that the Project provides access to the land-locked area east of Coachella Canal and south of the Specific Plan, in a manner consistent with the City's General Plan Circulation Element. These currently land-locked areas are provided an improved access road that terminates at the Specific Plan's southern boundary. In coordination with other parcels in this area, the subject parcel could also obtain access in this manner.

[1] http://www.rcaluc.org/plan_new.asp (retrieved September 18, 2013).

7c – Refer to Response No. 5b above. The conceptual alignments are preliminary, subject to modification during final design and submittal of subsequent subdivision maps. Alignments along Interstate 10 or Buchanan Street will be addressed during final design and submittal of subsequent subdivision maps, and in coordination with IID. A finance and conveyance map will be submitted that will show the existing Buchanan Street right-of-way on the Project site as abandoned. The Project will improve overall access in the Project vicinity. DEIR Figure 3.7 shows two collector roads from the Specific Plan to County lands northeast of the Project. In addition to areas for utility corridors within Caltrans right-of-way in Interstate 10, the Project includes setbacks along the I-10 frontage that are expected to be sufficient for future utility corridors. The City's General Plan Circulation Element does not show Buchanan Street crossing the Coachella Canal into the Project site. Rather, these areas east of the Coachella Canal are served by the Avenue 50 and 52 extensions, which the Project is providing as part of Specific Plan implementation. As discussed above, the land-locked parcels north of Buchanan Street terminus and east of the Coachella Canal could obtain access through coordinated circulation among several parcels taking access off of the collector roads terminating at the Project's southern and eastern boundary.

7d – Draft EIR Table 4.16.AG, *Year 2035 With Project Buildout Mitigation Requirements*, provides a detailed listing of each impacted intersection, including those in County jurisdiction. The four intersections that are significantly impacted with Existing Plus Phase 1 – 4 (no interchange) and Existing Plus Buildout (with interchange) are Calhoun / 52nd Ave., Van Buren St. / 52nd Ave., Fillmore St. / 52nd Ave., and Pierce St. / 52nd Ave. The table indicates the funding source for each impacted intersection, and the Project's contribution toward improvements. Table 4.16.AG indicates that the Project has a 25% contribution toward the two improvements on Avenue 50, and 100% contribution for the Pierce/52 improvement, which will be constructed by the Project. As discussed in the Draft EIR, there is no mechanism for the Project to pay into the County DIF program as to the Calhoun / 52nd Ave. improvement identified above, because that intersection is not included in a legally enforceable fair share program that is in place within the City of Coachella (there is no mechanism in place for City projects to pay into County DIF fee programs, and ensure that those City fee payments are used for the specific County improvements). If a legally enforceable fair share mechanism is put in place at time of building permit issuance, then the Project would pay into that program pursuant to City requirements.

Van Buren St. / 52nd Ave. and Fillmore St. / 52nd Ave. are in County and City of Coachella jurisdiction, so a portion of the improvement (a fair share contribution) could come from the applicant's payment into the City of Coachella DIF, as currently stipulated in the EIR. The Project will also pay into County TUMF fees, which will fund a portion of the Project's County intersection mitigation. Furthermore, the County's DIF program is intended to fund County intersection improvements, based upon projected building permit fees for unincorporated County areas, as opposed to collection of fees from incorporated areas.

It should also be noted that the Project will be providing extensive traffic improvements as part of Project implementation, is taking a lead role in the implementation of several regional transportation system improvements including the new I-10 interchange and Avenue 50 and 52 corridor improvements, as well as paying into City DIF and County TUMF fee programs as appropriate (refer to EIR Section 4.16, *Traffic and Circulation,* page 4.16-14 and Table 4.16.AG, Year 2035 with Project Build-out (with Avenue 50 Interchange) Mitigation Requirements. Additionally,

the Project is consistent with the City General Plan and regional traffic modeling, and as such the Project-related traffic should already be factored into circulation system planning in neighboring jurisdictions including unincorporated Riverside County, which has its own DIF for traffic improvements (refer to Draft EIR, Section 4.16, *Traffic and Circulation*, Table 4.16.M, General Plan Consistency, page 4.16-53).

Any improvements in County jurisdiction will be coordinated with appropriate County agencies including Riverside County TLMA Transportation Department.

7e – The requested revision to the Draft EIR will be made (see Section 3, *Errata*).

Comment No. 8

Mr. Jonathan Nadier, Manager, Compliance and Performance Assessment
Southern California Association of Governments

8a – This is an introductory comment and does not require a response.

8b – This comment generally indicates that the Draft EIR supports the goals of the 2012-2035 RTP/SCS and that the analysis of the Draft EIR is based on the growth forecasts contained in the 2012-2035 RTP/SCS . No further response is required.

8c – SCAG indicates that the Project generally supports goals of the 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The SCAG comment provides a brief summary of Project consistency with the indicated goals. The Specific Plan and EIR specifically address the other ideas noted in the comment, including:

- Active transportation infrastructure
- NEV infrastructure
- Clean fuel strategies
- Public transit
- Complete streets
- Housing density
- Water conservation
- Energy efficiency

These and other concepts are addressed in the Specific Plan, particularly in Specific Plan Section 2.3, *Sustainable Community Design Strategies* and in the EIR Section 4.16.5, *Project Design Features*. The following table provides a brief summary of the Project's conformance with the RTP/SCS goals and policies.

Sustainable Communities Strategy
"The SCS demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by the ARB. The SCS outlines our plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. *The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for*

transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures."

Section 2.3, Sustainable Community Design Strategies, of the La Entrada Specific Plan provides a detailed description of the intended sustainable design measures that will be implemented with the project. The main purpose of these strategies is to:

- Provide guidance and feedback for future development of the La Entrada Specific Plan that promotes efficient and sensible use of the available resources at the time development occurs; and,
- Allow future residents to enjoy a high quality development that minimizes physical impacts to the natural environment and maximizes economic utility and social cohesion to the greatest extent practicable.

Based on this, the approach to sustainable community design within the La Entrada Specific Plan is focused on the following areas:

- Site Planning/Neighborhood Design
- Energy Efficiency
- Materials Efficiency
- Water Efficiency
- Occupant Health and Safety
- Landscape Design/ Low Impact Development

Section 2.3 of the La Entrada Specific Plan for a detailed discussion of each of the above areas and project-specific measures that will be implemented to achieve the sustainable strategies identified. These measures are intended to be implemented in support of the RTP/SCS to reduce the overall environmental impact of future development within the region by guiding growth towards a more sustainable pattern over the long-term.

Goals and Policies	Project Conformance	EIR References
RTP/SCS Goals		
G1: Align the plan investments and policies with improving regional economic development and competitiveness.	The project would contribute to improving regional economic development and competitiveness through design and development of a master-planned residential community that would consist of a mixture of land uses that would contribute to improved regional economic development and competitiveness. Project construction would generate a number of design, engineering, and construction-related jobs over a 20-30 year period, thereby increasing economic activity. Employees/residents generated by the project may seek shopping, entertainment, auto maintenance, and/or 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 encourage creation of new business and/or expansion of existing businesses that address these economic needs. In addition, the project includes approximately 1.5 million square feet of mixed-use commercial uses, which would meet demands of the proposed project, as well as serve as a regional commercial center. The proposed new interchange on I-10 at Avenue 50, along with upgrading Avenue 50 to a Major Street Corridor, would also provide a number of benefits to the regional and local transportation system and would allow for access to commercial uses in the City, providing an economic benefit to the City that would, in turn, benefit the residents of the City.	Sections 3.0, Project Description; 4.13, Population and Housing; 6.0, Long Term Implications
G2: Maximize mobility and accessibility for all people and goods in the region.	The project would result in development of a master-planned community that incorporates fundamentals of great neighborhood design by balancing land uses and providing for vehicular and pedestrian mobility. A variety of residential uses would be provided throughout the development, with high- and medium-density uses located in proximity to transit and mixed-use activity nodes/community cores. Further, the project would distribute commercial uses in intensified core areas throughout the site to promote the ability to access retail services through non-vehicular	Sections 3.0, Project Description; 4.10, Land Use and Planning; and, 4.16, Traffic and Circulation

Goals and Policies	Project Conformance	EIR References
	modes of travel and to deemphasize an auto-centric orientation. The project would implement a circulation plan that enhances connectivity with existing General Plan Circulation Element roadways, promotes connections to existing downtown Coachella via Avenues 50 and 52, and provides the opportunity for a future freeway interchange with I-10 at Avenue 50. Additionally, the project as designed would provide a network of non-vehicular, multi-purpose pathways through the development that promotes connectivity to schools, commercial areas, and recreation facilities, and allows for greater mobility for residents.	
G3: Ensure travel safety and reliability for all people and goods in the region.	All circulation improvements designed and constructed with the project would be consistent with State and local roadway design requirements, and as stated in the La Entrada Specific Plan, to ensure that safe and efficient travel is maintained. Design and mitigation measures would be implemented to reduce potential effects of the development on the existing roadway and public transit system and to ensure that efficient circulation patterns and adequate access are maintained over the long-term, both locally and regionally.	Sections 3.0, Project Description; 4.10, Land Use and Planning; and, 4.16, Traffic and Circulation
G4: Preserve and ensure a sustainable regional transportation system.	As stated above, the project would provide a circulation plan that enhances connectivity with existing General Plan Circulation Element roadways, promotes connections to existing downtown Coachella via Avenues 50 and 52, and provides the opportunity for a future freeway interchange with I-10 at Avenue 50. The proposed land use pattern would allow for the concentration of residential uses within proximity to access to retail services through non-vehicular modes of travel and to deemphasize an auto-centric orientation. Further, opportunities for the use of more sustainable means of transit would be encouraged through provision of an extensive onsite trail system of pathways and sidewalks; designing development to provide an attractive pedestrian environment (i.e., storefronts set back from street, facades with large windows fronting the street, street furniture, and orienting parking to the side or back of buildings); and, allowing public uses to be within walking distance of residential neighborhoods. In addition, the proposed project would be integrated with existing public transportation infrastructure, including bicycle paths and storage facilities to encourage non-vehicular modes of travel.	Sections 3.0, Project Description; 4.3, Air Quality; 4.7, Global Climate Change; 4.10, Land Use and Planning; and, 4.16, Traffic and Circulation
G5: Maximize the productivity of our transportation system.	Refer to Goal G4, above. The project has been designed to offer a variety of residential uses throughout the development, with high- and medium-density uses located in proximity to transit and mixed-use activity nodes/community cores. In addition, the proposed project would encourage non-vehicular transportation by providing a variety of pedestrian, bicycle, and NEV pathways throughout the site. By allowing for ease of access to the existing transportation system and encouraging measures by which project traffic generation and resulting demands on the existing circulation system could be reduced, the project would contribute to enhanced productivity and efficiency of the regional transportation system.	Sections 3.0, Project Description; and, 4.16, Traffic and Circulation
G6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	Refer to Goals G2 and G4, above. The Specific Plan provides for a mixture of residential and employment uses, as well as non-vehicular circulation such as bike and pedestrian trails, serving to reduce vehicle miles traveled (VMT) and associated air emissions. The proposed project would implement Walkability/Mobility and Land Use Sustainability Features, which provide for non-vehicular modes of transportation; prioritized parking for electric, hybrid, and alternative fuel vehicles; limitations on delivery truck idling; and, non-GHG emitting public and individual transportation alternatives. The proposed project would further reduce	Sections 3.0, Project Description; 4.3, Air Quality; 4.7, Global Climate Change; 4.10, Land Use and Planning; and, 4.16, Traffic and Circulation

Goals and Policies	Project Conformance	EIR References
	transportation-related emissions by integrating the proposed project with existing public transportation infrastructure, including bicycle paths and storage facilities, to encourage non-vehicular modes of travel.	
G7: Actively encourage and create incentives for energy efficiency, where possible.	Energy efficiency would be encouraged through integration of project design measures 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 lighting, energy-efficient appliances, and solar/photovoltaic systems on 25 percent of the residences/businesses within the site.	Sections 3.0, Project Description; 4.7, Global Climate Changes; 4.10, Land Use and Planning; 4.16, Traffic and Circulation; and, 4.14, Public Services and Utilities
G8: Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Design of the project would concentrate development in lower elevation areas of the project site in an effort to minimize grading and reduce energy to supply infrastructure services in these regions while allowing areas of higher elevations to remain as open space areas. In addition, the proposed project would encourage non-vehicular transportation by providing a variety of pedestrian, bicycle, and NEV pathways throughout the site. The proposed project would also work with site constraints by prohibiting development within floodplains and allowing these areas to serve as buffers and passive recreational areas. Areas suitable for development would be maximized by allowing for multigenerational and/or secondary housing units and mixed-use development. The proposed project would encourage walkability/mobility by providing wide pedestrian pathways and sidewalks, designing development to provide an attractive pedestrian environment (i.e., storefronts set back from street, facades with large windows fronting the street, street furniture, and orienting parking to the side or back of buildings), and allowing public uses to be within walking distance of residential neighborhoods. In addition, the proposed project would reduce transportation-related greenhouse gas (GHG) emissions by integrating the proposed project with existing public transportation infrastructure, including bicycle paths and storage facilities to encourage non-vehicular modes of travel.	Sections 3.0, Project Description; 4.7, Global Climate Change; 4.10, Land Use and Planning; and, 4.16, Traffic and Circulation
G9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	The proposed circulation system (e.g. streets, intersections, trails, bikeways, etc.) would not result in or interfere with efforts to maintain the security of the regional transportation system. Design and/or mitigation measures are proposed to reduce potential adverse effects of the project on the local and regional transportation system. Adherence to the Specific Plan general street alignments and street cross-sections and other applicable City requirements for the construction of streets would ensure that the proposed project would not result in any design hazards that might otherwise impede the movement of emergency response vehicles. Adequate emergency access would be provided during all phases of project construction and operation.	Sections 3.0, Project Description; 4.10, Land Use and Planning; and, 4.16, Traffic and Circulation
RTP/SCS Policies		
P1: Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	The adopted Performance Indicators upon which the RTP/SCS goals are measured include Mobility/Accessibility; Reliability; Location Efficiency; Productivity; Safety and health; Economic Well-Being; Cost Effectiveness; System Sustainability; and, Environmental Quality. The proposed project includes design features in consistent with the established goals, as described for G1 to G9 above, and in support of long-term maintenance and enhancement of the transportation system.	Sections 3.0, Project Description; 4.10, Land Use and Planning; and, 4.16, Traffic and Circulation
P2: Ensuring safety, adequate maintenance, and efficiency of	The project as designed is intended to support and encourage a safe environment for residents and visitors by improving access to the area and to alternative means of transportation. The project would result in	Sections 3.0, Project Description; 4.10, Land Use and Planning; and,

Goals and Policies	Project Conformance	EIR References
operations on the existing multi-modal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.	new roadway construction and improvements to the existing circulation system, as well as enabling access to and encouraging use of a variety of transportation modes including use of electric, hybrid, and alternative fuel vehicles, walking, and biking.	4.16, Traffic and Circulation
P3: RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	The project would support RTP/SCS land use and growth strategies through development of a master-planned community that incorporates fundamentals of great neighborhood design by balancing land uses, providing for vehicular and pedestrian mobility, providing for the preservation/enhancement of recreation and open spaces, and reducing the impacts of the previous development approvals. The proposed land use plan locates active uses, community-serving elements, higher densities and mixed-use designations within activity nodes ("Community Cores"). A variety of residential uses throughout the development, with high- and medium-density uses located in proximity to transit and mixed-use activity nodes/community cores would further support smart growth initiatives.	Sections 3.0, Project Description; 4.3, Air Quality; 4.7, Global Climate Change; 4.10, Land Use and Planning; 4.16, Traffic and Circulation; and, 6.0, Long Term Implications
P4: Transportation demand management (TDM) and non-motorized transportation will be focus areas, subject to Policy 1.	As discussed in Section 4.16, Traffic and Circulation, the project would result in significant impacts on a number of area roadways, and therefore, mitigation measures are proposed to reduce project impacts and demands on the circulation system to the extent feasible. To further reduce project impacts, the project would encourage the use of non-motorized transportation by providing wide pedestrian pathways and sidewalks, designing development to provide an attractive pedestrian environment and allowing public uses to be within walking distance of residential neighborhoods. In addition, the proposed project would be integrated with existing public transportation infrastructure (e.g. bicycle paths and storage facilities, prioritized parking for electric, hybrid, and alternative fuel vehicles, etc.) to encourage non-vehicular modes of travel.	Sections 3.0, Project Description; 4.3, Air Quality; 4.7, Global Climate Change; 4.10, Land Use and Planning; and, 4.16, Traffic and Circulation
P5: HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	Mitigation measures are proposed to reduce potential project impacts to the extent feasible on area highways to which the project would contribute to an increase in traffic volumes over the long-term. The contribution of fair share funding would assist the State in securing improvements in support of HOV lanes that would increase transit and rideshare usage. The project has been designed to provide opportunities for a variety of residential uses throughout the development, with high- and medium-density uses located in proximity to transit and mixed-use activity nodes/community cores, thereby encouraging the use of transit and rideshare programs. Further, the project applicant will coordinate with Sunline Transit District to identify opportunities for expanded transit/bus service and vanpools and to discuss and implement potential transit turnout locations within the project area.	Sections 3.0, Project Description; and, 4.16, Traffic and Circulation
P6: Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component	The project applicant will continue to coordinate with the City and other affected agencies to ensure that the project is designed and implemented consistent with anticipated local and regional land use and growth patterns.	Sections 3.0, Project Description; 4.3, Air Quality; 4.7, Global Climate Change; 4.10, Land Use and Planning; 4.16, Traffic and Circulation; and, 6.0, Long Term Implications

Goals and Policies	Project Conformance	EIR References
of the Plan.		

8d – This comment indicates that the EIR is consistent with current SCAG growth forecasts. No further response is required.

8e – In preparing this response, the RTP/SCS was reviewed and applicable mitigation measures have been incorporated into the Project as design features or into the EIR as mitigation measures. The RTP Growth Forecast was specifically incorporated into the EIR, as noted in DEIR Section 9, *References*. No specific additional mitigation measures were recommended by SCAG in this comment.

Comment No. 9

Mr. Eugene S. Wilson
California Clean Energy Committee

9a – These are introductory comments that do not raise any specific issues regarding the Draft EIR. The commenter references an attached flash drive, containing 117 appendices. These appendices provide general background information regarding energy, climate change and related topics. Occasionally, the commenter cites these appendices, in which case a response is provided where relevant. As requested, the commenter has been added to the Project's CEQA notification list. Refer to specific comments and responses below.

9b – This is a statement of opinion that provides no evidence, much less substantial evidence, in support of the conclusions. As discussed further below and in the required CEQA Findings, the City of Coachella finds that the La Entrada Specific Plan Final EIR, as modified through Errata in Section 3 of this Comments and Responses document, fully analyzes the proposed Project's potential environmental effects, mitigates all potentially significant impacts to the fullest extent feasible, and does not warrant recirculation under CEQA. Pursuant to CEQA Guidelines §15088.5 and Public Resources Code Section 21092.1., recirculation is only required when "significant new information" is added to an EIR following Draft EIR circulation. Section 15088.5(1)-(4) further clarifies four specific recirculation triggers, none of which apply to the La Entrada Specific Plan EIR, as discussed below:

(1) "*New significant environmental impact*." No new significant environmental impacts have been identified in this or other comment letters. Rather, this comment letter expands upon various EIR topical areas (such as air quality, energy, climate change, and transportation), and suggests additional mitigation measures, which are addressed individually, below. Various modifications to mitigation measures are identified in Section 3, *Errata*, although none of these mitigation changes represent "new significant environmental impacts." These are also discussed further below.

(2) "Substantial increase in the severity of an environmental impact." As discussed in this Comments and Responses document, the City has not identified any "substantial increase" in the severity of an environmental impact. Rather, this comment letter clarifies or contests various impact determinations, which are specifically addressed in responses below.

(3) The applicant rejects a feasible alternative or mitigation measure. As discussed in this Comments and Responses document, there are no new feasible alternatives identified, and no feasible mitigation measures that have been rejected. Refer to specific discussions below.
(4) The Draft EIR is "so fundamentally and basically inadequate and conclusory" such that "meaningful public review" is precluded. As discussed throughout these Comments and Responses, no such situation exists, as the Draft EIR was adequate, and required only minor modifications or technical corrections, as reflected in Section 3, *Errata*.

9c – This comment provides background information on "Global Warming" (more conventionally referred to as 'Global Climate Change'). Much of that information is provided without citation. This information does not raise any specific objection to or make any specific comments on the Draft EIR or the Project's potential environmental impacts. Background information on Global Climate Change can also be found in the Draft EIR, page. 4.7-4 through 4.7-16, including the rate of warming, description of primary greenhouse gases ("GHGs") that contribute to Global Climate Change, the latest information on global, national, California, and local GHG emissions inventories. The Draft EIR also identifies and describes the federal, state, and local and regional plans and policies addressing Global Climate Changes and GHG emissions. Given the general nature of the comments, no further response is required. (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* [1986] 181 Cal.App.3d 852 [Where a general comment is made, a general response is sufficient.].)

9d – Consistent with CEQA's requirement, and State CEQA Guidelines Appendices F and G, Sect. VII, the Draft EIR considers the potential impacts of the Project's GHG emissions on the global climate. However, to suggest that an individual project such as La Entrada, or even a group of development projects, "will result" in significant global climate change impacts, is contrary to current scientific understanding on this issue, which confirms that global climate change is a cumulative condition caused by many projects across many nations.[2] The Draft EIR's climate change analysis properly analyzes estimated GHG emissions associated with short-term construction and long-term operation of the Project. The analysis was prepared based on the Riverside County Guidelines and the thresholds of significance included in CEQA's Appendix G (Draft EIR, page 4.7-1).

Contrary to the commenter's statement, the Draft EIR's reference to climate change as "the prevailing political/scientific opinion" is not "materially misleading." California's Legislature (an elected political body) has recognized the existence of the greenhouse effect and its contribution to global climate change through legislation such as Assembly Bill 32 (2006) and Senate Bill 375

[2] "*The historical management of ozone nonattainment issues in urbanized air districts is somewhat analogous to today's concerns with greenhouse gas emissions in that regional ozone concentrations are a cumulative air quality problem caused by relatively small amounts of NOx and ROG emissions from thousands of individual sources, none of which emits enough by themselves to cause elevated ozone concentrations. Those same conditions apply to global climate change where the environmental problem is caused by emissions from a countless number of individual sources, none of which is large enough by itself to cause the problem.*"

- California Air Pollution Control Officers Association, CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, 2008, pg. 45.

(2008). (See also discussion at Draft EIR pp. 4.7-11 et seq.) Furthermore, and as the commenter himself states, the scientific community has generally confirmed the existence of the greenhouse effect and of global climate change. Accordingly, the EIR correctly identifies that – from both a political and scientific perspective – greenhouse gases may contribute to global climate change (Draft EIR p. 4.7-5.)

Furthermore, and again contrary to the commenter's statement, the EIR (on the page cited by the commenter – Draft EIR p. 4.7-4) discloses to the public that:

> Changes to the global climate system, ecosystems, and the environment of California could include higher sea levels, drier or wetter weather, changes in ocean salinity, and changes in wind patterns or more energetic aspects of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and increased intensity of tropical cyclones. Specific effects in California might include a decline in the Sierra Nevada snowpack, erosion of California's coastline, and seawater intrusion in the Sacramento-Delta.

Ultimately, CEQA requires that EIRs analyze a project's GHG emissions, and as such, the Draft EIR considers: 1) whether the Project generates GHG emissions, either directly or indirectly, that may have a significant impact on the environment (Draft EIR, pages 4.7-19 through 4.7-26); and 2) whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions (Draft EIR, pages 4.7-26 through 4.7-27). As a result, and consistent with this commenter's concerns, the Draft EIR determined that the Project may in fact result in significant and unavoidable impacts related to GHG emissions and climate change (Draft EIR, page 4.7-20, 4.7-26.) Mitigation measures were identified to reduce these impacts, albeit not to a less than significant level (Draft EIR pages 4.7-27 through 4.7-29.)

It is not possible to directly correlate a single project's GHG emissions with specific potential impacts associated with global climate change (ie, current modeling capabilities are challenging even on a global scale, let alone attempting to translate Project-specific GHG emissions into specific climate change impacts such as sea level rise, precipitation, severe weather events, or other climate-related phenomena) (Draft EIR page 4.7-30).

9e – The commenter requests that the EIR consider whether the Project is consistent with Executive Order S-03-05. Executive Order S-03-05 is described in detail on page 4.7-14 of the Draft EIR, along with all other relevant State plans and policies. The Project was analyzed for consistency with Executive Order S-03-05 on Page 4.7-26 of the Draft EIR, under Threshold 4.7.2, considering whether the Project will conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The Draft EIR's analysis found that, although the Project generates significant GHG emissions, the Project's emissions "are not likely to result in GHG emission levels that will substantially conflict with implementation of the GHG reduction goals under AB32 or other State regulations." This is because the State's AB32 goals are aggregate goals across all industries and project types, and do not necessarily apply to an individual land development project. The majority of GHG emissions are from the power production industry and mobile-source emissions, which are in turn regulated by CARB. AB32 resulted in preparation of a Scoping Plan to identify strategies to achieve AB32 goals. The Project's consistency with Scoping

Plan strategies is addressed in Table 4.7.C (Draft EIR pages 4.7-24 and 25). The specific measures identified in the table are aimed at achieving Project compliance with GHG emission reduction strategies and would further reduce the Project's potential to contribute to climate change impacts. Therefore, such measures are in support of, and consistent with, Executive Order S-3-05 aimed at achieving a reduction in GHG emissions to 1990 levels by 2020 and to 80 percent below 1990 levels by 2050. All development within the Specific Plan area would be required to adhere to and implement such measures to contribute to efforts by the Project applicant and other developers to achieve an overall, cumulative reduction in GHG emissions over future decades.

It should however be noted that the Draft EIR did find a significant and unavoidable impact under Threshold 4.7.2 due to the Project's exceeding Tier 4 Performance Targets under the SCAQMD draft interim GHG significance criteria. The EIR provides specific quantitative analysis of Project GHG emissions and Project consistency with SCAQMD Project-specific GHG thresholds (Draft EIR 4.7-19 to 4.7-27).

As noted in Section 4.7.8 (Thresholds of Significance) of the Draft EIR, there are no formally adopted significance thresholds for GHG emissions in the Project area. The thresholds used in the Draft EIR were based on the South Coast Air Quality Management District's (SCAQMD) draft interim method for determining significance of GHG emissions.

The GHG emissions modeling conducted for the Draft EIR indicates that 490,000 metric tons of CO_2 equivalent ($MTCO_2eq$) of the Project's emissions would occur from mobile (vehicular) sources. This represents 87.5 percent of the Project's overall emissions. The remaining 70,000 $MTCO_2eq$ (12.5 percent) would occur from area, energy (electricity), waste, and water conveyance sources.

The proposed Project has incorporated numerous design features and mitigation measures to reduce GHG emissions from all sectors, including mobile sources. For example, Mitigation Measure 4.3.7 requires a rideshare program for employees at retail/commercial sites, installation of electric vehicle charging facilities, and incentives for employees and the public to use public transportation, such as discounted transit passes, reduced ticket prices at local events, and/or other incentives. Mitigation Measure 4.7.5 requires prioritized parking for electric vehicles, hybrid vehicles, and alternative fuel vehicles. The traffic Mitigation Measures 4.16.1 and 4.16.2 include improvements to 32 offsite intersections near the Project site to reduce traffic congestion, which would also reduce potential vehicle GHG emissions. When combined, these features and measures would reduce the potential amount of GHG emissions from Project construction and operation.

Additionally, the La Entrada Specific Plan includes various design features to reduce transportation demand. These features include walkability, non-motorized circulation, neighborhood electric vehicles (NEVs), traffic calming measures, and an extension of the existing public transportation network. As described above, the Project would extend the existing Sunline Transit Agency bus routes to allow for public transit connection of the high density residential uses, mixed use areas, parks and schools with the existing community. The La Entrada circulation and trail plans allow for the use of NEVs on the off-street trails provided on Avenues 50 and 52 and Street "A", as well as the trails within the Village Paseo. The use of NEVs within La Entrada is intended to provide alternate modes of transportation and reduce vehicle miles traveled within the community. These measures represent feasible options to reduce Project related trips and vehicle miles traveled.

Project Design Features, in combination with EIR mitigation measures, will reduce Project GHG emissions to below "Business as Usual" emission levels (see additional discussion below).

It should be noted that regulations affecting vehicular emissions standards are beyond the control of the local agency, as these emissions are specifically regulated by the U.S. EPA, Corporate Average Fuel Economy (CAFE) standards, and CARB. Additionally, California Assembly Bill 1493 (Pavley regulations) regulates GHG emissions in new passenger vehicles. The Pavley regulations were estimated to reduce GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs.[5] However, this Project's design features and mitigation measures coupled with the mandated regulatory emissions reductions would reduce mobile source emissions from what is depicted in Table 4.7.B of the Draft EIR.

As indicated above, the Project has a limited ability to reduce vehicle emissions, and has the greatest ability to mitigate area-wide sources of air pollution. For example, Mitigation Measure 4.7.1 requires the Project to exceed Title 24 standards by 20 percent. Mitigation Measure 4.3.7 requires all structures to use passive heating, natural cooling, and reduced pavement to the extent feasible. This coincides with the Specific Plan design feature that would design the site layout to allow for the most advantageous solar orientation for all development. Mitigation Measure 4.3.7 also requires energy efficient appliances in all residences. This mitigation measure would be implemented in conjunction with Mitigation Measure 4.7.1, which requires exceedance of California Code of Regulations Title 24 and requires the use of Energy Star (or equivalent) appliances. The US EPA Energy Star standard serves as the performance standard for this mitigation measure. Mitigation Measure 4.7.1 also requires implementation of energy efficiency and green building standards and the use of energy-efficient light-emitting diode (LED) lighting and solar photovoltaic lighting fixtures in all common areas of the site including street lights and traffic signals. Although the extensive project design features and mitigation measures noted above would reduce area-wide source emissions, their influence is overshadowed as mobile source emissions make up 87.5 percent of the Project's overall GHG emissions.

The Tier 5 threshold requires implementation of all feasible on-site design features and mitigation measures to reduce this significant impact. As described above, the Project includes numerous Project Design Features listed in Draft EIR Section 4.7.7, Sustainability Features listed in Draft EIR Section 4.7.9, Mitigation Measure 4.3.7, Mitigation Measures 4.16.1 and 4.16.2, and Mitigation Measures 4.7.1 through 4.7.8.

The SCAQMD notes that if a project is unable to implement offsite GHG reduction mitigation measures to reduce GHG emission impacts to less than the screening level, then GHG emissions from the project would be considered significant. Since it is currently uncertain how offsite mitigation measures, including purchased offsets, interact with future AB 32 Scoping Plan measures, the SCAQMD would allow substitution of mitigation measures that include an

[5] California Air Resources Board, *Clean Car Standards – Pavley, Assembly Bill 1492*, Accessed October 1, 2013. http://www.arb.ca.gov/cc/ccms/ccms.htm

enforceable commitment to provide mitigation prior to the occurrence of emissions. The intent of this provision is to prevent mitigating the same emissions twice.

As discussed in the Draft EIR, the City is preparing a Climate Action Plan ("CAP") as part of the General Plan Update. The CAP would essentially include strategies and measures to reduce GHG emissions from development, infrastructure projects and mobile sources within the City. Individual development proposals under the Specific Plan would be required to be consistent with the City's CAP, when approved, and/or the specifications of the sustainability features and mitigation measures contained herein to reduce GHG emissions, whichever is more stringent. Therefore, ultimately, the project would be consistent with the Tier 2 threshold.

Draft EIR recirculation is therefore not necessary, as further discussed above in Response 9b.

9f – The commenter requests that the EIR evaluate the economic viability of renewable energy strategies that could reduce energy demand from the Project, compare efficiencies of different technologies, and evaluate strategies for reducing reliance on fossil fuels and increasing reliance on renewable resources. The commenter also requests a discussion of the environmental and health impacts that will result from the Project's energy use.

The Draft EIR does evaluate renewable energy strategies and strategies for reducing reliance on fossil fuels. The energy conservation analysis in the Draft EIR was prepared in accordance with Public Resources Code Section 21100(b)(3) and Appendix F of the *CEQA Guidelines*, which requires a description (where relevant) of any "wasteful, inefficient, and unnecessary consumption of energy caused by a project." The Specific Plan design guidelines and other Project Design Features encourage sustainable design solutions that reduce energy consumption (refer to Specific Plan Section 2.3, *Sustainable Community Design Strategies*, EIR Section 4.14 (energy conservation discussion on pages 4.14-23 – 4.14-24), and EIR Section 4.7, *Global Climate Change*). In addition, air quality impacts, and resultant health impacts associated with the Project's air quality emissions (resulting from, for example, the consumption of fossil fuels by transportation) were considered in the Draft EIR (Draft EIR Table 4.3.B, page 4.3-5).

Relying solely on renewable energy to meet the Project's energy demands is not reasonable or feasible (refer to responses below). Electric power providers are already required under AB 32 and SBX1-2 to achieve a renewable energy portfolio of 33% - this is what is necessary for AB 32 consistency. AB 32 does not require individual projects to be powered solely by renewable energy, nor does any other legislation. The physical environmental impact of such a proposal would itself be significant, due to the physical footprint of a solar PV farm onsite or offsite large enough to power the Project, and/or other renewable energy sources such as wind power. PV Solar and wind generation are not always on line nor reliable generation sources due to inclement weather, low wind periods, extending dark periods (night time), short and long term maintenance. Accordingly the project would still need to be connected to IID's grid for a reliable source of power 24 hours a day.

For example, the land uses proposed with the Project as designed would require an estimated 10MW for power supply, as shown in Section 4.14, Table 4.14.E of the Draft EIR (unmitigated power demand could be closer to 16MW).[6] A 10MW solar PV farm would require approximately 50-100 acres to meet the Project's 10MW power demand. [7] A 10MW wind farm, at typically 1MW per large wind turbine, would require approximately 25 acres of land and involve turbines typically over 250 feet tall.[8] Single large turbines up to 10MW in capacity are in research and development, and would represent a significant physical impact due to the turbine size. This would still require the project's excess generation to put power into IID's grid during the day and then use IID's grid to power the project at night. The approximate cost of a 10+ MW of generation capacity would be in the $50 million + range. The costs of these facilities are far less reasonable on an individual project level, which is why electric utilities and commercial solar providers are the primary entities constructing large-scale renewable power facilities, rather than individual projects.

Much of the Project's open space is designed as buffer zones for adjacent parcels, or is in steeper hillsides or washes, which are not suitable for siting a solar PV facility. Large-scale renewable facilities would be inconsistent with the Project's land use plan, occupying the majority of the Project's proposed open space areas (potentially 50% or more of the Project's 556.9 acres of open space). Furthermore, the City is not aware of any large-scale master planned community in the State that is 100% renewable energy powered. Another consideration is that photovoltaic solar power and wind generation power are not always being generated on line, nor are they a reliable power generation source due to inclement weather, such as low wind periods, extending dark periods (night time hours), and down time due to shore and long term maintenance. It would be necessary for the Project energy/power consumers to connect to IID's power grid for a reliable source of energy/power twenty four (24) hours a day.

Executive Order S-14-08 mandate to achieve a 33% renewable energy portfolio by 2020– the "Renewable Portfolio Standard", or RPS – falls on the electric utility providers, not individual development projects. As discussed further in Response 9g, the IID RPS is consistent with S-14-08. Therefore, by definition, all of the Project's "grid power" from IID will be consistent with AB32 and Executive Order S-14-08, since the GHG emissions associated with this power generation have at least a 33% renewable energy content.

[6] At 7,560,220 kWh/month (Draft EIR page 4.14-23), this equates to approximately 10MW (kWh/month divided by 30 divided by 24 for kW, then divided by 1,000 for MW).
[7] "NREL determines that a large fixed-tilt solar PV plant requires 2.8 acres per GWh/year of generation. Put another way, a PV plant spanning 32 acres could power 1,000 households," from http://www.renewableenergyworld.com/rea/news/article/2013/08/calculating-solar-energys-land-use-footprint (accessed on October 1, 2013). Therefore, at 7,800 dwelling units, this equates to approximately 250 acres (32 acre/1,000 DU x 7,800 DU). Specific solar PV farms have wide ranges in land requirements and construction cost. A project in Cantil, CA required 34 acres for 8MW costing approximately $44 million (http://www.gizmag.com/clear-skies-solar-photovoltaic-farm/9451/).
[8] Based on an estimated 2.5 acres per MW, from http://www.nrel.gov/docs/fy09osti/45834.pdf (accessed October 1, 2013).

IID is the appropriate entity to institute peak energy demand minimization measures such as changes in rate structures.[9] The Project has implemented reasonable and feasible energy minimization measures, including measures that reduce peak energy demand, as discussed in Specific Plan Section 2.3, *Sustainable Community Design Strategies*, and EIR Section 4.7.

9g – The commenter requests an analysis of the availability of wind, green waste, micro-hydro, and geothermal energy sources and consideration of development of these resources as part of the Project.

The Project has incorporated reasonable and feasible GHG reduction measures, consistent with CEQA, as discussed in Specific Plan Section 2.3, *Sustainable Community Design Strategies*, and EIR Section 4.7, *Global Climate Change* (refer specifically to EIR Section 4.7.9, Sustainability Features, Table 4.7.C, *Project Compliance with Greenhouse Gas Emission Reduction Strategies*, and EIR Mitigation Measures 4.7.1-4.7.8). Large-scale renewable projects may be pursued by the City, IID or other energy providers, and are not precluded by the Project.[10] Wind power has its own significant environmental impacts, particularly visual and avian mortality. Biosolids could be harvested from the Project by a third party if economically viable.

It is not clear to what the commenter is referring to as "micro hydro resources". The City assumes the comment refers to potential hydro-electric power generation using hydraulic head (elevational differences) within the Coachella Canal, which is the only large steady source of surface water flow that has potential for power generation within the area. However, the Coachella Canal is under the purview of the United States Bureau of Reclamation, who is pursing hydropower where it considers it feasible.[11] Small –scale hydropower, such as using elevational differences within onsite water systems, would not be cost-effective given the availability of other power sources, and would also require separate, redundant power generation and distribution systems as this power source would not be sufficient to meet the Project's energy demands. Hydropower generation is outside the purview of this Project, and is also presently being pursued by IID as part of its RPS (see Response 9f above).

IID's RPS is consistent with Executive Order S-14-08, which mandates that electrical utility providers, not individual development projects, achieve a 33 percent renewable energy portfolio by 2020, as discussed above in Response 9f.[12] Geothermal power is being pursued by IID and others at or near the Salton Sea, where geothermal resources have already been identified and are

[9] http://www.iid.com/index.aspx?page=254 (accessed October 1, 2013).
[10] The Project does not preclude IID or other parties from pursuing renewable energy projects off-site to serve the Project or other portions of Coachella Valley. The Project also does not preclude individual land uses (residential, commercial, institutional) from implementing site-specific renewable power generation such as rooftop solar; in fact, the Specific Plan includes development standards and design guidelines that support renewable energy use, and require proper solar orientation, as well as a commitment to a minimum of 25% of residences and businesses being fitted with solar PV panels.
[11] http://www.usbr.gov/power/ (accessed October 1, 2013).
[12] http://www.iid.com/index.aspx?page=385 (accessed September 24, 2013).

actively being pursued.[13] Implementation of this Project does not preclude IID and others from developing geothermal resources in these, or any other, location.

9h – The commenter requests that the EIR discuss the average efficiency achieved by the generation, transmission, and distribution systems and how that efficiency compares to available resources. Refer to Response 9g above regarding renewable energy resources. The Draft EIR addresses the Project's energy consumption, impacts of any required new/modified energy facilities (including power and gas), and recommended mitigation measures (refer to Response 9f above). Impacts of Project energy consumption are discussed in EIR Section 4.14, *Public Services and Utilities*, regarding physical facility construction impacts (further clarified in Response 5). Power consumption impacts are quantified in EIR Sections 4.3 and 4.7 relative to air quality and GHG emissions, respectively. Site-specific impacts of individual off-site energy production facilities are not part of the proposed Project, and therefore, the EIR is not required to analyze them. Further, IID and other electricity and natural gas providers are subject to CPUC CEQA review for facility construction, operation, and maintenance. Neither IID nor The Gas Company indicated that the Project will directly require the construction of new facilities other than those discussed in the EIR, and as further clarified in Response 5 above.

Peak energy demand measures, for example changes in rate structures encouraging consumers to vary energy usage outside of peak times, are implemented by IID, not by individual projects. Other programs, such as feed-in tariffs (wherein eligible renewable electricity generators, including homeowners, business owners, private investors, etc. receive payment at a cost-based price for renewable electricity they supply to the grid, thereby enabling development of a diversity of technologies (wind, solar, etc.) and providing a reasonable return to investors) or net metering (wherein solar panels or other renewable energy generators are connected to a power grid owned by a public utility and surplus power is transferred onto the grid, allowing customers to offset the cost of power drawn from the utility) would also represent feasible options to assist in achieving reduced peak energy usage. However, these and other similar programs would also be implemented by IID, and therefore, cannot be appropriately integrated or required as part of the proposed Project design. Refer also to the above discussion in Response 9f.

9i – The commenter requests that the EIR discuss energy use. The commenter requests that energy consumption load be reported for building lighting, HVAC, etc. The Draft EIR does discuss energy use, and provides energy consumption rates. Refer to Response 9h, above. Draft EIR Table 4.14.E, *Electricity Demand at Project Build Out,* lists the electricity demand for each major land use type, which is sufficient for the EIR's purpose of assessing total Project energy demand and associated physical impacts. Ultimately, CEQA provides that an EIR need not be exhaustive, but that it provides enough information for a meaningful assessment of environmental impacts. The Draft EIR prepared by the City provides just such an analysis. For example, total energy demand is indicated in Table 4.14.E. Energy minimization measures are discussed in the Specific Plan (Section 2.3) and in the EIR (Section 4.7), as discussed above in Response 9f.

[13] http://www.iid.com/index.aspx?page=663 (accessed October 1, 2013).

Further, the Project's commitment to energy minimization is reflected in Specific Plan Section 2.3, Sustainable Community Design Strategies. These strategies are listed in EIR Section 4.7.9, Table 4.7.C, and in EIR Mitigation Measures 4.7-1 – 4.7-8.

Energy minimization measures include:

- Energy Efficiency and Green Building Standards: The Project will exceed the most current Title 24 energy conservation and green building standards by 20 percent, and all new buildings will be designed to LEED GreenPoint Rated standard, or better
- 25% of all structures fitted with solar PV panels
- Drought tolerant landscaping, high-efficiency plumbing, and "smart" landscaping controls are required for all buildings, which will reduce GHG emissions associated with water system energy.
- Requirement that tract maps provide for shading within developed portions of sites and areas of pedestrian activity
- Land Use Design (minimize grading)
- VMT Reduction (walkability, mobility, NEV paths, bike/pedestrian paths, transit provision)
- Priority parking for electric, hybrid, and alternative fuel vehicles
- Solar orientation
- Energy efficient street lighting that provides a 10 percent reduction beyond the 2010 baseline energy use for this infrastructure
- Construction waste management plan (including 75% construction waste diversion)
- Vehicle idling limits
- Low Impact Development principles

Please also refer to Responses 9f and 9h.

9j – This comment provides background information regarding the use of solar photovoltaic (solar PV) as a renewable energy option. The comment asserts various costs of solar PV and compares these to the cost of conventional electricity provided through the grid, via IID. The City does not necessarily accept the cost assertions. In fact, the comment asserts a current IID electricity rate of 0.11/kWh. The comment also asserts an installed solar PV cost of $0.08/kWh. There are several issues with these assertions, including:

- Solar PV is most cost-effectively implemented at the utility/commercial scale, as discussed in Response 9f
- The Project already provides extensive GHG mitigation, including a commitment to 25% solar PV buildings, as noted in Response 9i
- Even with solar PV, the Project would still require conventional grid power as a backup, and due to solar PV not generating power at night or during low solar periods (early morning, late afternoon)
- It is not reasonable to assume the Project or any one user would receive the referenced solar tax incentives as these are competitive with limited funding
- The assumed 30-year lifespan is not consistent with solar PV warranties, which are typically a 20 year duration

- The assumptions do not allow for normal maintenance or redundant (over-powered) systems

9k – The commenter requests that installation of rooftop solar panels be used to mitigate the Project's significant air quality and climate impacts. Refer to Response 9b, 9f, 9h, and 9j which discuss rooftop solar and its infeasibility. The Project includes extensive energy conservation and GHG mitigation measures, and allows for future residential, commercial and other uses to incorporate renewable energy sources such as solar PV. A minimum of 25% of the dwelling units (a minimum of 1,950 dwelling units) within the La Entrada Specific Plan shall include installation of renewable energy facilities including, without limitation solar technology. The following minimums shall be required for each development phase:

a. Phase 1 – 368 units
b. Phase 2 – 348 units
c. Phase 3 – 311 units
d. Phase 4 – 258 units
e. Phase 5 – 665 units

Planning Areas C-10, C-11, G-6, G-7, G-9, G-10, and G-11 shall include the installation of renewable energy facilities including, without limitation, solar technology.

The EIR cites specific project design features related to energy conservation and provision of solar PV, including the requirement that 25 percent of structures be fitted with solar PV panels, new buildings be constructed to LEED GreenPoint standards, and other requirements for provision of shade trees, and efficient building orientation. Refer also to Response 9i above.

9l – This comment provides background information regarding the New Home Solar Partnership (NHSP), and speculates as to the resulting price of a solar system installation and the price per kWh of residential solar power.[14] The City does not necessarily accept the costs as accurate, as there is no data provided to substantiate the assumed installed cost of $0.05/kWh, nor the reasonableness upon which the City (and the EIR) can or should rely upon receiving this incentive. In addition to State and federal solar PV incentives that may exist as the Project builds out over the next 30 years, IID has various energy incentive programs, which may be available for future development phases. However, as with the NHSP, IID program availability depends on funding, market conditions and

[14] "The California Energy Commission's New Solar Homes Partnership (NSHP) is part of the comprehensive statewide solar program, known as the California Solar Initiative. The NSHP provides financial incentives and other support to home builders, encouraging the construction of new, energy efficient solar homes that save homeowners money on their electric bills and protect the environment" (http://www.gosolarcalifornia.org/nshp/faqs.php, accessed October 1, 2013). According to this site, the NHSP has approximately $74 million in funding, with an existing waiting list, and funding will be reduced or eliminated once the target MW goal for the program is reached ("The incentive level will drop when the cumulative MW capacity of applications deemed complete by the Program Administrators equals the MW reserved volume target for that incentive level. The Energy Commission will NOT provide advance notice to inform program participants of a drop in the incentive levels.")

other factors at IID which are outside the control of the City. For example, IID's current Solar Incentive Program is offered on a limited, lottery basis.[15] Further, the Project does not preempt the ability of individuals within the Project from investing in their own additional PV infrastructure, and applying for funding sources that may exist now or in the future. New roof top solar PV installation costs, plus cleaning and maintenance, and system financing (at current mortgage rates) produce energy in the $0.15 to $0.21 kWhr range. This is without including any cross subsidies that may currently be offered, but may not be available in the future.[16]

The proposed Project would be required to comply with State law requiring that all new development shall implement pertinent provisions of Title 24 of the California Government Code which covers the use of energy-efficient building standards, including ventilation, insulation, construction, and the use of energy-saving appliances, conditioning systems, water heating, and lighting measures. Demonstration of Project compliance with Title 24 requirements would be adequate and in accordance with State law. Although the Project's sustainability strategies commit to the use of solar PV panels on 25 percent of homes and businesses, and promote green building techniques in excess of Title 24 requirements, requiring that future development exceed Title 24 compliance standards to achieve a higher energy savings would be infeasible.

9m – This comment requests that the EIR discuss preemption of future renewable energy development. The Project has not preempted future energy conservation or renewable power sources (refer to Response 9g), and the commenter does not explain how or why this would be so. The EIR addresses energy conservation consistent with CEQA (refer to Response 9f) and includes a commitment to the use of solar PV panels on a minimum of 25% of future homes and businesses (refer to Response 9j). Further, the Project concept promotes energy conservation through the integration of green building techniques in excess of Title 24 requirements (thereby reducing GHG emissions associated with energy usage), as well as encourages energy efficiency by designing development in accordance with USGBC Leadership in Energy and Environmental Design, GreenPoint Standards, and installation of light-emitting diode (LED) lighting, energy-efficient lighting, and energy-efficient appliances.

9n – This comment provides various background information regarding solar water heating (SWH), and speculates on potential cost savings in comparison to conventional water heating costs. The City does not necessarily accept the cost comparisons as accurate, nor does it accept the assumption that such a requirement would be reasonable or feasible. For example:

- It is not reasonable to assume that 100% of the homes receive the maximum rebate
- The Project already provides for high-efficiency water heaters
- It is not possible to rely solely on solar water heating due to periods of inadequate solar radiation

The Project does not preclude incorporation of SWH in the future, on an individual consumer basis.

[15] http://www.iid.com/index.aspx?page=582 (accessed September 25, 2013).
[16] Butsko Engineering, October 8, 2013 (communication from Dave Petterson).

9o – This comment requests that the EIR analyze savings from solar water heaters and adopt solar heaters as mitigation. Refer to Responses 9b and 9n.

9p – This comment requests that the EIR analyze the potential cost savings achieved by developing a district energy system using concentrated solar thermal (CST) technology, and evaluate the use of district energy as a mitigation measure.[17] This comment also suggests that revenues from cap and trade sales can be used to pay for a CST system or reduce costs to rate payers.

A CST system of the size needed to power the Project (approximately 10 MW), would require a significant land area on the site due to the nature of the technology.[18] District energy systems using concentrated thermal technology would require additional community infrastructure and pipelines in the streets. Cities that have attempted to operate similar hot water systems had to eventually remove them due to high maintenance costs. SDG&E's steam system in downtown San Diego is one system that has since been shut down due to excessive maintenance and operating costs. The Project does not preclude future purchase of a share in an offsite CST facility. However, this action is not part of the Project as proposed, and therefore, does not require analysis in the EIR. This action, if undertaken, would be more appropriately implemented by IID or a commercial-scale solar developer, similar to solar PV issues noted above.[19]

9q – This comment suggests certain expansions of Draft EIR Mitigation Measure 4.3.7, which requires the installation of electric vehicle charging facilities at medium-, low-, and ultra-low-density housing. The comment requests that each dwelling be required to include an EV charging facility, and funding of city-wide EV programs.

The commenter fails to note that Mitigation Measure 4.3.7 already requires the incorporation of electric vehicle charging stations in hundreds of homes, designated parking spots for zero emission vehicles, incentives for using public transit, rideshare programs, and neighborhood electric vehicle systems. Additionally, the Specific Plan Design Guidelines also include provisions for EV facilities. The Specific Plan will also include electric vehicle charging stations associated with civic and/or commercial uses as well as mixed use areas. Therefore, the Project is already implementing these measures to the greatest extent feasible. Provision of 100% of the Project's dwelling units with NEV charging stations would, therefore, not reduce Project GHG over what Mitigation Measure 4.3.7 already provides, and becomes an issue of diminishing returns. Residents likely to purchase NEVs will have the benefit of being able to select dwelling units with access to charging facilities, and prioritized parking. Providing 100% of units with charging stations is unlikely to result in 100%

[17] "CST" is concentrated solar thermal power, involving solar panels directed to a central tower that is heated to produce steam, which then drives a turbine to produce electricity. See http://www.nrel.gov/learning/re_csp.html for more information.

[18] Land requirements for CST are similar to solar PV, at approximately 5-10 acres/MW. However, as with solar PV, the available within the Project area open space area is not suitable for large solar installations, since they are buffer zones, drainages and steeper hillsides. http://www.seia.org/policy/solar-technology/concentrating-solar-power

[19] http://www.paceglobal.com/10MWCommunityScaleSolarPowerPlant.aspx

of residents purchasing NEVs or using them exclusively. Refer to Response 9e for additional discussion.

9r – This comment questions the enforceability of Draft EIR Mitigation Measure 4.3.7, which requires incentives for employees and the public to use public transportation, such as discounted transit passes, reduced ticket prices at local events, and/or other incentives. Also, Mitigation Measure 4.3.7 requires a rideshare program for employees at retail/commercial sites. This and other EIR measures are enforced through the Project's Mitigation Monitoring and Reporting Program and Conditions of Approval, which includes City staff review of tract maps, site plans, and building permits for consistency with the MMRP and overall Project Conditions of Approval. The Project design as proposed includes the incorporation of design features, as noted in Specific Plan Section 2.3, that encourage the use of public transit and/or alternative transportation modes through the concentration of certain land uses and provision of higher-density residential uses within proximity of mixed-use areas, parks, and schools, thereby supporting walkability/mobility (e.g. pedestrian trails, bicycle paths) and accessibility to efficient public transit and discouraging individual vehicle use. Refer to Response 9e for additional discussion.

The La Entrada Specific Plan will also facilitate public transit use by extending existing Sunline Transit Agency bus routes along the Avenue 50 and 52 corridors and looping within the Project on Street "A." An extension of the existing Sunline Transit Agency bus routes will allow for public transit connection of the high-density residential uses, mixed use areas, parks and schools with the existing community.

9s – This comment requests that a transportation management district be established. Refer to Responses 9e and 9r, above, and 9t below. There is no data to suggest that formation of a transportation management district would reduce GHG emissions substantially more than the VMT reduction measures already reflected in the Specific Plan and EIR. The La Entrada Specific plan does include various design features to reduce transportation demand. These features include walkability, non-motorized circulation, neighborhood electric vehicles (NEVs), traffic calming measures, and an extension of the existing public transportation network. As described above, the Project will extend the existing Sunline Transit Agency bus routes to allow for public transit connection of the high density residential uses, mixed use areas, parks and schools with the existing community. The La Entrada circulation and trail plans allow for the use of NEVs on the off-street trails provided on Avenues 50 and 52 and Street "A", as well as the trails within the Village Paseo. The use of NEVs within La Entrada is intended to provide alternate modes of transportation and reduce vehicle miles traveled within the community.

9t – This comment requests that transit mitigation extend beyond the Project site, in order to mitigate air quality, climate, and/or transportation impacts. As described in Responses 9r and 9s, above, the La Entrada Specific Plan and Draft EIR include various design features and mitigation measures to reduce the transportation-related emissions associated with the proposed Project. For example, Mitigation Measure 4.3.7 requires incentives for employees and the public to use public transportation, such as discounted transit passes that will enable and encourage riders to access and/or connect to existing local and regional public transit systems, reduced ticket prices at local events, and/or other incentives. These mitigation measures will be included and enforced through implementation of the mitigation monitoring program per CEQA Guidelines Section 15097. The

Project also includes regional transportation improvements that will further serve to reduce GHG emissions. The proposed mitigation measures and regional transportation improvements will serve to reduce overall effects with regard to Project-generated transit impacts. Such measures are not aimed at reducing impacts generated by ridership of the larger City population or any inadequacies in the existing public transit system. Therefore, "funding free or discount transit passes in Coachella to encourage less driving" is not appropriate. Refer also to Response 9e for additional discussion.

9u – This comment requests implementation of a rideshare program. Refer to Response 9r, above. Mitigation Measure 4.3.7 requires a rideshare program for employees at retail/commercial sites.

9v – This comment questions the enforceability of Draft EIR Mitigation Measure 4.3.7, which requires all structures to use passive heating, natural cooling, and reduced pavement to the extent feasible. This coincides with the Specific Plan design feature that will design the site layout to allow for the most advantageous solar orientation for all development. The proposed Project will promote building orientation that will maximize exposure to daylight, shade south-facing windows to reduce heat gain into buildings, minimize east- and west-facing windows unless shaded, and place landscaping to provide shading and wind protection. This and other EIR measures would be enforced through the Project's Mitigation Monitoring and Reporting Program, which includes City staff review of tract maps, site plans, and building permits for consistency with the MMRP and overall Project Conditions of Approval.

9w – This comment states that Mitigation Measure 4.3.7, which requires energy efficient appliances in all residences is too vague and requests that measure require Energy Star appliances. The Draft EIR does require Energy Star appliances, or their equivalent. Mitigation Measure 4.3.7 will be implemented in conjunction with Mitigation Measure 4.7.1, which requires exceedance of California Code of Regulations Title 24 and requires the use of Energy Star (or equivalent) appliances. The US EPA Energy Star standard serves as the performance standard for this mitigation measure.

9x – This comment requests that the City pass an ordinance that requires electric lawn mowers and leaf blowers. Mitigation Measure 4.3.7 requires the use of electric equipment for both residential use as well as for grounds maintenance contractors within the Project. These measures will be feasible to include in the CCRs, and the mitigation also requires each residence to have outdoor electrical outlets for the equipment. CCRs are enforceable through all title transactions including sale of homes and commercial parcels, and are conveyed (obligated) to the owner through the map recordation and real estate transaction process. CCRs are enforced by the City. Both the City and IID periodically implement energy conservation awareness and incentive programs, which will include the Project area. Additionally, the Conditions of Approval for the Project will include a provision for HOA or resident/tenant educational materials and/or programs pertaining to energy conservation methods to further enhance awareness and encourage such activities.

9y – This comment states that Mitigation Measure 4.3.7 (Project Operations - Operational Mitigation Measures (Energy Efficiency) requiring either high-efficiency or solar hot water systems is vague and ineffective. This and other EIR measures are enforced through the Project's Mitigation Monitoring and Reporting Program, which includes City staff review of tract maps, site plans, and

building permits for consistency with the MMRP and overall Project Conditions of Approval. Refer to Response 9n, above.

9z – This comment requests that the EIR evaluate Energy Star Lighting as a mitigation measure. However, Mitigation Measure 4.7.1 requires implementation of energy efficiency and green building standards. Part of this mitigation measure requires the use of energy-efficient light-emitting diode (LED) lighting and solar photovoltaic lighting fixtures in all common areas of the site. The mitigation measure requires exceeding by 20 percent Title 24 of the California Code of Regulations, which requires use of Energy Star lighting. Mitigation Measure 4.7.9 also requires energy efficient street lights and traffic signals.

9aa – This comment is concerned with the energy consumption associated with trips generated by the Project. The EIR addressed emissions from generated trips (Draft EIR Section 4.3 and 4.7, including Table 4.7.B for mobile emissions). For example, Threshold 4.7.1 addresses the generation of GHG emissions which will in part be reduced through implementation of Mitigation Measure 4.7.5 requiring that, prior to issuance of any Site Development permits, the Director of the City of Coachella (City) Public Works Department, or designee, shall include prioritized parking for electric vehicles, hybrid vehicles, and alternative fuel vehicles. Project compliance with GHG emission reduction strategies will also require that vehicles that are purchased and used within the Project site demonstrate compliance with any vehicle and fuel standards that the ARB has adopted at the time of manufacture (see Table 4.7.C). The EIR also addressed energy usage consistent with CEQA with regard to the various types of land uses proposed (Draft EIR Section 4.14, including Table 4.14.E for electricity demand). Refer also to Response 9f. The Project provides a variety of energy conservation and VMT reduction measures as set forth in the Specific Plan's "Sustainable Community Design Strategies" and in EIR Section 4.7.9, Sustainability Features. Such strategies include encouraging non-vehicular transportation by providing a variety of pedestrian, bicycle, and NEV pathways throughout the site; encouraging walkability/mobility by providing pedestrian pathways and sidewalks and designing development to provide an attractive pedestrian environment; and, allowing public uses to be within walking distance of residential neighborhoods. In addition, the Project design allows for the integration of existing public transportation infrastructure, including bicycle paths and storage facilities to encourage non-vehicular modes of travel.

9bb – This comment requests that Mitigation Measure 4.7.1, which requires the Project to exceed Title 24 standards by 20 percent, be revised to require an exceedence of 30 percent. Implementation of the proposed mitigation measure will be enforced by the City, per CEQA Guidelines Section 15097. There is no regulatory requirement necessitating a 30 percent reduction beyond Title 24 standards, and the Project as proposed will comply with (and exceed) applicable Title 24 standards. The Draft EIR identifies a significant and unavoidable impact under Threshold 4.7.2 due to the Project's exceeding Tier 5 Performance Targets under the SCAQMD draft interim GHG significance criteria. The Tier 5 threshold requires implementation of all feasible on-site design features and mitigation measures to reduce this significant impact. As described above, the Project includes numerous Project Design Features listed in Draft EIR Section 4.7.7, Sustainability Features listed in Draft EIR Section 4.7.9, Mitigation Measure 4.3.7, Mitigation Measures 4.16.1 and 4.16.2, and Mitigation Measures 4.7.1 through 4.7.8.

As indicated above, the Project has a limited ability to reduce vehicle emissions, and has the greatest ability to mitigate stationary source emissions. For example, Mitigation Measure 4.7.1 requires the Project to exceed Title 24 standards by 20 percent. Mitigation Measure 4.3.7 requires all structures to use passive heating, natural cooling, and reduced pavement to the extent feasible. This coincides with the Specific Plan design feature that would design the site layout to allow for the most advantageous solar orientation for all development. Mitigation Measure 4.3.7 also requires energy efficient appliances in all residences. This mitigation measure would be implemented in conjunction with Mitigation Measure 4.7.1, which requires exceedance of California Code of Regulations Title 24 and requires the use of Energy Star (or equivalent) appliances. The US EPA Energy Star standard serves as the performance standard for this mitigation measure. Mitigation Measure 4.7.1 also requires implementation of energy efficiency and green building standards and the use of energy-efficient light-emitting diode (LED) lighting and solar photovoltaic lighting fixtures in all common areas of the site including street lights and traffic signals. Although the extensive project design features and mitigation measures noted above would reduce stationary source emissions, their influence is overshadowed as mobile source emissions make up 87.5 percent of the Project's overall GHG emissions.

Further, as discussed in the Draft EIR, the City is preparing a Climate Action Plan ("CAP") as part of the General Plan Update. The CAP would essentially include strategies and measures to reduce GHG emissions from development, infrastructure projects and mobile sources within the City. Individual development proposals under the Specific Plan would be required to be consistent with the City's CAP, when approved, and/or the specifications of the sustainability features and mitigation measures contained herein to reduce GHG emissions, whichever is more stringent. Therefore, ultimately, the Project would be consistent with the Tier 2 threshold.

As such, the Project will implement numerous measures aimed at the reduction of GHG emissions over the lifetime of the Project. The Project as proposed will comply with (and exceeds by 20%) applicable Title 24 standards.

9cc – This comment requests that the EIR analyze health and mortality impacts associated with development in an area of the State with high temperatures. The commenter's statements confirm that high temperatures already occur in the Coachella Valley as result of the desert environment. Hence, those high temperatures are part of the existing baseline conditions under CEQA. CEQA requires analysis of a Project's impacts on the physical environment, and impacts are determined based on any change in that environment as compared to the baseline conditions. Here, the commenter does not allege or show that the Project will result in any change as compared to those existing baseline conditions. CEQA does not require analysis of the environment's impacts on a Project or on individuals. (See *Ballona Wetlands Land Trust et al. v. City of Los Angeles* (2011) 201 Cal.App.4th 455.)

Regardless, the proposed Project includes various design features such as solar orientation of buildings, increased shading, and the minimization of impervious surfaces. According to the Design Guidelines in the Specific Plan, the proper solar orientation of buildings will maximize northern and southern building exposure for daylighting purposes, ensure south facing windows are properly shaded to reduce heat gain into building interiors, minimize east and west facing windows unless shaded, and place landscaping within appropriate locations to provide adequate shading and wind

protection (depending on prevailing wind conditions and solar orientation). Additionally, metal furnishings for use by people and pets for resting, such as benches, are to be excluded due to excessive heat gain in high summer temperatures. Implementation of the design features within the Specific Plan will reduce human exposure to excessive heat and prevent health impacts from heat. These and other similar measures are described in Specific Plan Section 2.3, *Sustainable Community Design Strategies,* and in Sections 3.5.3, 4.3, and 4.7.9 of the EIR.

9dd – This comment is requests that the EIR address heat island effect. This is addressed on pages 4.7-19 and 4.7-26 of the Draft EIR. The Project will reduce the heat island effect through the minimization of impervious surfaces and incorporation of landscaping within the development that provides adequate shading of developed areas within five years of occupancy. For example, the plant palette proposed for the Specific Plan identifies appropriate plant types that have low water requirements, minimize turf, and provide shade, and which reduce the urban heat island effect. The Specific Plan will also increase shading within the development to promote greater walkability and reduce the urban heat island effect. These design features are described in Section 2.3 (*Sustainable Community Design Strategies*) of the Specific Plan. With these measures, the heat island effect is not considered significant, as any microclimate effects would be mostly contained within the Project boundaries. The Project has also eliminated the two golf courses that are included in the currently approved Specific Plan for the property, further reducing local microclimate effects by reducing irrigated area, increasing natural open space, using native vegetation, and incorporating passive solar measures such as shading.

9ee – This comment requests that the EIR discuss unbundling of parking requirements and ways to accelerate electric vehicle adoption. As described in Response 9q, above, Draft EIR Mitigation Measure 4.3.7 requires the installation of electric vehicle charging facilities at medium-, low-, and ultra-low-density housing. However, the proposed Project does not propose unbundling parking costs. Generally, all parking within the La Entrada Specific Plan will comply with Chapter 17.54 of the City of Coachella Zoning Ordinance (as discussed in Specific Plan Section 4.10, *Parking*).. These standards have been established as appropriate for the provision of adequate parking and to avoid impacts from parking shortages or from spillover onto adjacent land uses. The EIR provides reasonable and feasible mitigation to encourage non-vehicular transportation. As described above, the Project includes various other transportation reduction mitigation measures and incentives for use of alternative means of transportation and fuel-efficient vehicles, as well as project design features that allow for a concentration of land uses, walkability, and access to public transit, trails, and bikeways. Through such measures, the Project discourages the use of the individual automobile, thereby decreasing the overall anticipated demand for parking. However, appropriate levels of parking will be provided with each land use type, rather than unbundling such parking and renting or selling parking spaces separately from the land use, in order to ensure that overall parking demands of the Project are met as development occurs and that no adverse effects on adjacent land uses are generated.

9ff – This comment suggests that a commuter benefits program be operated in the City. However, such an action is not part of the proposed Project, and therefore, does not require analysis in the EIR. Refer also to Response 9r and 9s, above. Mitigation Measure 4.3.7 requires a rideshare program for employees at retail/commercial sites, installation of electric vehicle charging facilities, and incentives for employees and the public to use public transportation, such as discounted transit passes, reduced ticket prices at local events, and/or other incentives. The Project also includes

various design features to reduce transportation demand, such as walkability, non-motorized circulation, NEVs, traffic calming measures, and an extension of the existing public transportation network.

9gg –This comment requests a "parking cash out" system be a requirement of the Project. As described in Response 9r, above, Draft EIR Mitigation Measure 4.3.7 requires incentives for employees and the public to use public transportation, such as discounted transit passes, reduced ticket prices at local events, and/or other incentives. Although the Project does not specifically mention a parking cash-out program, such a program could potentially be included as one of the incentives to encourage public transportation use as development of the Project occurs with each phase. Although identifying a specific requirement or mitigation measure to implement such a program is infeasible at this time, such alternatives will be considered at the time when appropriate and when feasible incentive programs are identified and actively implemented.

9hh – This comment requests adoption of a shared parking project. The Specific Plan includes provisions for shared or joint use parking facilities, either on- or off-site within a Mixed Use Community Core (Specific Plan Section 4.10.3, *Shared and Offsite Parking*). Shared parking may be approved in conjunction with and as part of the Site Approval by the Planning Commission, as documented by a traffic engineer.

9ii – This comment requests unbundling parking fees and use of shared parking. Refer to Response 9hh, above. Generally, parking within the La Entrada Specific Plan will comply with Chapter 17.54 of the City of Coachella Zoning Ordinance (as discussed in Specific Plan Section 4.10, *Parking*) as identified below. The City has established such standards to ensure that appropriate parking is provided for each land use type in order to avoid parking shortages and/or adverse impacts on adjoining land uses.

- Commercial/Office: 1 Space/250 square feet of gross floor area
- Single-Family Residential: 2 spaces per dwelling unit within an enclosed garage
- Attached/Multi-family:
  - Studio-1 bedroom: 1 space per DU covered or within a garage; 0.66 spaces per unit open parking
  - 2 or more bedrooms: 1 space per DU, covered or within a garage; 1.33 spaces per unit of open parking
- Auditoriums, Churches, Theaters: 1 space per 3 seats or 1 space per 21 square feet where there are no fixed seats

Refer also to Response 9ee, above, with regard to unbundling parking. The unbundling of parking would allow for parking to be bought or leased separately from a land use, such as a residence or office. However, charging separately for parking would also have the potential for tenants or owners to find alternative locations to park their cars in order to avoid the parking charge. This could result in spillover effects, particularly if on-street parking or nearby off-street lots are free of cost and/or are unregulated, thereby adversely affecting adjacent land uses. Therefore, as stated above, an appropriate level of parking will be provided within the Specific Plan area to ensure that parking demands are met and that adverse effects do not result. Additionally, the Specific Plan includes the option for shared parking within the mixed use areas. Shared parking may be

approved in conjunction with and as part of the Site Approval by the Planning Commission, as documented by a traffic engineer. The EIR also notes other Project Design Features that serve to reduce VMT and promote non-vehicular travel and/or reduced vehicle emissions, as noted in Specific Plan Section 2.3*, Sustainable Community Design Strategies*, and as further described in Sections 4.3 and 4.7 of the EIR. Also refer to Responses 9ee and 9ff.

9jj – This comment requests replacing all on-street parking with bicycle lanes. The Project will provide off-street parking pursuant to the requirements of Chapter 17.54 of the City of Coachella Zoning Ordinance. However, on-street parking will be provided in residential areas to encourage traffic calming, narrower streets, and other pedestrian friendly measures. The Specific Plan provides for an extensive network of non-vehicular transportation paths including bikeways, as shown in Specific Plan. Refer to Chapter 2.0, Plan Elements; Chapter 3.0, Design Guidelines; and, Exhibits 2-2 to 2-4 and Exhibit 2-13, Parks, Trails, and Open Space, which illustrate the circulation system proposed within the Project design.

The commenter has attached 117 appendices to the comment letter. Although the vast majority are not cited in the comment letter, and no explanation has been given as to their relevance to the comment letter and the Project, the City has nonetheless reviewed those attachments and has assumed that those attachments are incorporated into the comment letter.

Enclosures:

All one hundred seventeen (117) enclosures (attachments to Response 9) have been reviewed and it is determined that the information presented in each enclosure regarding climate change, greenhouse gas, energy resources, mortgage rates, green development, air quality, traffic congestion, and electric vehicles/alternative transportation do not provide specific comments on the DEIR and will not change any significance conclusions or mitigation specified in the EIR. Below is a summary of table of each individual enclosure. All 117 enclosures are hereby incorporated into the Final Environmental Impact Report, and are available for review at the City of Coachella and on the Project website www.laentradacoachella.com . No further response is required.

APPENDIX	**TITLE/DESCRIPTION**	**GENERAL CATEGORY/ISSUE**
Appendix 1	Turn Down the Heat – Why a 4 Four Degree Celsius Warmer World Must be Avoided	Global Climate Change/Global Warming
Appendix 2	Heat-Trapping Gas Passes Milestone, Raising Fears	Global Climate Change/Global Warming
Appendix 3	Goodbye, Miami	Global Climate Change/Global Warming
Appendix 4	Managing the Risks of Extreme Events and Disasters to Advance Climate Change Adaptation, A Summary for Policymakers	Global Climate Change/Global Warming

APPENDIX	TITLE/DESCRIPTION	GENERAL CATEGORY/ISSUE
Appendix 5	Global Warming, Union of Concerned Scientists	Global Climate Change/Global Warming
Appendix 6	Our Changing Climate – Assessing the Risks to California	Climate Change; California
Appendix 7	16-Inch Sea Level Rise by Mid-Century San Francisco Bay Area	Global Climate Change/Global Warming
Appendix 8	2009 California Climate Adaptation Strategy	Climate Change; California
Appendix 9	EXECUTIVE ORDER S-3-05 by the Governor of the State of California, California Department of Transportation	Climate Change; California
Appendix 10	We're Already Topping Dust Bowl Temperatures – Imagine What'll Happened if we Fail to Stop 10 Degree F Warming – The Next Dust Bowl	Global Climate Change/Global Warming
Appendix 11	California Environmental Protection Agency, Press Release: Climate Change Report Documents Growing Impacts on California's Environment	Climate Change; California
Appendix 12	Office of Environmental Health Hazard Assessment, Indicators of Climate Change in California (characterizes the multiple facets of climate change in California; tracks trends in GHG levels that influence climate; changes in the State's climate; and, impacts of climate change on California's environment and people)	Climate Change; California
Appendix 13	An Illustrated Guide to the Science of Global Warming Impacts: How We Know Inaction is the Gravest Threat Humanity Faces	Global Climate Change/Global Warming
Appendix 14	Wikipedia – Coachella, California	General Information on City of Coachella
Appendix 15	Reducing Urban Heat Islands: Compendium of Strategies, Urban Heat Island Basics	Urban Heat Island Effect
Appendix 16	Wikipedia – 2003 European Heat Wave	Temperature Increase/Heat Wave
Appendix 17	Wikipedia – Heat Wave	Definition of Heat Wave
Appendix 18	California Natural Resources Agency, 2009 California Climate Adaptation Strategy	Climate Change; California

APPENDIX	TITLE/DESCRIPTION	GENERAL CATEGORY/ISSUE
Appendix 19	California Department of Public Health and the Public Health Institute, Public Health Impacts of Climate Change in California: Community Vulnerability Assessments and Adaptation Strategies	Climate Change and Health Impacts; California
Appendix 20	California AB 296 Assembly Bill (urban heat island effect)	Urban Heat Island Effect
Appendix 21	U.S. Environmental Protection Agency, 40 CFR Chapter I: Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act; Final Rule	Climate Change and Health Impacts
Appendix 22	California Energy Commission and California Environmental Protection Agency, Public Health-Related Impacts of Climate Change in California	Climate Change and Health Impacts; California
Appendix 23	California Energy Commission and California Environmental Protection Agency, The Effect of Temperature on Hospital Admissions in Nine California Counties	Climate Change and Health Impacts; California
Appendix 24	Go Solar California, California Solar Initiative – Thermal: Program Handbook	Solar Energy Systems; Public Utilities
Appendix 25	Solar Energy Industries Association, Solar Heating and Cooling (informational pamphlet)	Solar Energy Systems; Solar Heating and Cooling
Appendix 26	ICLEI, City Planners' Energy Action Resource Guide: Greenhouse Gas Reduction Measures for New Development (California)	Energy Conservation; Greenhouse Gas Emission Reduction (California)
Appendix 27	U.S. Department of Energy, Estimating the Cost and Energy Efficiency of a Solar Water Heater	Energy Efficiency; Solar Water Heating
Appendix 28	Wikipedia – Solar Water Heating	Solar Water Heating
Appendix 29	Johnson Controls, Inc., Solar Thermal Energy: The Time Has Come	Solar Water Heating
Appendix 30	U.S. Department of Energy, Sizing a New Water Heater	Energy Efficiency; Water Heating
Appendix 31	Southern California Gas Company, Solar Water Heating: California Solar Initiative – Thermal Program Rebates	Solar Water Heating; CSI-Thermal Program

APPENDIX	TITLE/DESCRIPTION	GENERAL CATEGORY/ISSUE
Appendix 32	Go Solar California, California Solar Initiative – Thermal: Program Handbook (Same as Appendix 24, above)	Solar Energy Systems; Public Utilities
Appendix 33	Go Solar California, California Solar Initiative (CSI) Thermal Program (rebates for solar water heating systems on single-family homes)	Solar Water Heating; CSI-Thermal Program
Appendix 34	SunEarth Inc., Invoice for Solar PV System Components; City of Davis Renewable Energy Ordinance	Solar PV Systems; Invoice for Components
Appendix 35	Sun & Wind Energy, Information on Market Shares of Collector Manufacturers	Solar PV Systems - Manufacturing
Appendix 36	SunEarth Inc., Background and Fact Sheet (Solar Thermal Product Manufacturer)	Solar PV Systems - Manufacturing
Appendix 37	Wikipedia – Chilled Water	Chillers/Chilled Water
Appendix 38	District Energy St. Paul (District Cooling – Chilled Water Service)	Chillers/Chilled Water
Appendix 39	District Energy St. Paul (Thermal Storage)	District Energy Systems; Thermal Storage
Appendix 40	York (Johnson Controls), Application Opportunities for Absorption Chillers	Chillers/Chilled Water
Appendix 41	PM Engineer, Article: How Low Can You Go? Near-Net Zero Facility Generates Savings for California Community College	Green Building (ZNE); California
Appendix 42	Energy Design Resources, Design Brief: Chiller Plant Efficiency	Chillers/Chilled Water
Appendix 43	York (Johnson Controls), Water-to-Water Heat Pumps: Improve your HVAC-energy utilization	Energy Efficiency; Heat Pumps
Appendix 44	International District Energy Association, Community Energy: Planning, Development and Delivery	District Energy Systems; Thermal Energy
Appendix 45	Wikipedia – District Heating	District Energy Systems; District Heating

APPENDIX	TITLE/DESCRIPTION	GENERAL CATEGORY/ISSUE
Appendix 46	Vancouver Green Capital, Neighbourhood Energy Utility	District Energy Systems; District Heating and Waste Heat Recovery
Appendix 47	District Energy St. Paul (Solar Thermal)	District Energy Systems; District Heating and Solar Thermal
Appendix 48	District Energy St. Paul (District Heating)	District Energy Systems; District Heating
Appendix 49	District Energy St. Paul (District Cooling)	District Energy Systems; District Cooling
Appendix 50	District Energy St. Paul (Customers)	District Energy Systems; District Heating and Cooling
Appendix 51	District Energy St. Paul (History)	District Energy Systems (History)
Appendix 52	U.S. Department of Energy, Sacramento Department of General Services Central Plant: District Energy System	District Energy Systems; District Heating and Cooling
Appendix 53	CalTech Sustainability (Description of CalTech's energy portfolio)	Green Building; Renewable Energy Systems
Appendix 54	NRG Energy Center, San Diego System Profile	District Energy Systems; District Cooling
Appendix 55	NRG Energy Center, San Francisco	District Energy Systems; District Heating
Appendix 56	Portland Sustainability Institute, District Energy in Portland: Possibilities for the South Waterfront District	District Energy Systems (Portland)
Appendix 57	Jacoby, James, Cool Business Districts	District Energy Systems; District Cooling
Appendix 58	Chu, Terri and Yee, Sandra, How District Energy Systems can be Used to Reduce Infrastructure Costs and Environmental Burdens	District Energy Systems
Appendix 59	City of Portland, Oregon, Neighborhood-Scale Development for Planning and Sustainability	District Energy Systems (Portland)

APPENDIX	TITLE/DESCRIPTION	GENERAL CATEGORY/ISSUE
Appendix 60	National Renewable Energy Laboratory, Zero Energy Communities with Central Solar Plants using Liquid Desiccants and Local Storage	Green Building (ZNE)
Appendix 61	ARUP; Pacific Gas & Electric Company, The Technical Feasibility of Zero Net Energy Buildings in California	Green Building (ZNE); California
Appendix 62	Heschong Mahone Group, Inc.; Pacific Gas & Electric Company, The Road to ZNE: Mapping Pathways to ZNE Buildings in California	Green Building (ZNE); California
Appendix 63	Union of Concerned Scientists, Global Warming Infographic: Western Wildfires and Climate Change	Global Climate Change (California)_
Appendix 64	United States Environmental Protection Agency, ENERGY STAR® and Other Climate Protection Partnerships, 2011 Annual Report	Green Building; Energy Star
Appendix 65	How a Product Earns the ENERGY STAR Label	Green Building (Energy Star)
Appendix 66	ENERGY STAR Advanced Lighting Package	Green Building (Energy Star)
Appendix 67	United States Environmental Protection Agency, Case Study: D.R. Horton Stays Ahead of the Competition with ENERGY STAR®	Green Building (Energy Star)
Appendix 68	United States Environmental Protection Agency, Case Study: ENERGY STAR® Qualified Lighting Fixtures Light Up the Madera Community	Green Building (Energy Star)
Appendix 69	United States Environmental Protection Agency, Bennett Homes: Moving Ahead of the Competition with ENERGY STAR® Qualified Lighting Fixtures and the Advanced Lighting Package	Green Building (Energy Star)
Appendix 70	United States Environmental Protection Agency, Case Study: Ravenswood Homes Increase Home Sales with ENERGY STAR®	Green Building (Energy Star)
Appendix 71	Imperial Irrigation District, Board Resolution for Residential Service	Utility Service Rates
Appendix 72	Imperial Irrigation District, Power Content Label (shows information about the energy resources used to generate electricity)	Utility Service Provision
Appendix 73	Clean Air Task Force, The Toll from Coal: An Updated Assessment of Death and Disease from America's Dirtiest Energy Source	Energy Sources: Coal

APPENDIX	TITLE/DESCRIPTION	GENERAL CATEGORY/ISSUE
Appendix 74	Sierra Club, San Juan Generating Station: California's Dirty Coal Secret (article opposing continued use of the San Juan Generating Station as an energy source for California's energy suppliers)	Energy Sources: Coal
Appendix 75	Union of Concerned Scientists, Imperial Irrigation District (article on how the Imperial Irrigation District is meeting the RPS goals)	Renewable Energy Sources; RPS Goals (IID, California)
Appendix 76	Go Solar California, New Solar Homes Partnership	Green Building (solar)
Appendix 77	California Energy Commission, New Solar Homes Partnership Guidebook	Green Building (solar)
Appendix 78	Go Solar California, Incentive Levels	Green Building (solar)
Appendix 79	SheaXero, The no electric bill home (pamphlet)	Green Building
Appendix 80	SheaXero, The no electric bill home (website)	Green Building
Appendix 81	SolarCity Energy Explorer (sample calculation of residential energy use)	Green Building
Appendix 82	University of California, Berkeley School of Law, California's Transition to Local Renewable Energy: 12,000 Megawatts by 2020 (report on the Governor's conference on local renewable energy)	Green Building; Renewable Energy Sources
Appendix 83	American Council for an Energy-Efficient Economy, Financing for Multi-Tenant Building Efficiency: Why This Market Is Underserved and What Can Be Done to Reach It	Green Building
Appendix 84	Solar Energy Industries Association, Article: Solar Means Business: Top Commercial Solar Customers in the U.S.	Green Building (solar)
Appendix 85	Go Solar California, California Solar Statistics	Green Building (solar)
Appendix 86	Go Solar California, Clean Power Estimator	Green Building (solar)
Appendix 87	Go Solar California, New Home Builder Information Guide (guide to provide builders, developers and installers with an understanding of what the New Solar Homes Partnership program is, how it works, and to provide access to the resources they need to Go Solar)	Green Building (solar)
Appendix 88	California Energy Commission, California Energy Demand (CED) 2013 Preliminary Electricity and Natural Gas Forecast	Energy Demand
Appendix 89	SolarCity, Description of Services	Green Building (solar)

APPENDIX	TITLE/DESCRIPTION	GENERAL CATEGORY/ISSUE
Appendix 90	SolarCity, Commercial Client Portfolio	Green Building (solar)
Appendix 91	Pacific Gas and Electric Company, California Zero Net Energy Buildings Cost Study	Green Building (ZNE)
Appendix 92	VITEK Mortgage Group, California Housing Finance Platinum Program and Mortgage Rates	Financing; Mortgage Rates
Appendix 93	California Energy Commission, Local Ordinances Exceeding the 2008 Building Energy Efficiency Standards	Green Building (codes/ordinances)
Appendix 94	City of Malibu Local Energy Efficiency Standards Ordinance and Title 24 Building Energy Efficiency Standards	Green Building (codes/ordinances)
Appendix 95	City of Mountain View Application to CEC for Green Building Standards Code Local Amendments	Green Building (codes/ordinances)
Appendix 96	City of Healdsburg Ordinance adopting Municipal Code Chapter 15.16 "Green Building Program"	Green Building (codes/ordinances)
Appendix 97	Map of California Wind Resources – Annual Wind Speed at 100 Meter Elevation	Wind Resources
Appendix 98	Union of Concerned Scientists, Turlock Irrigation District (article on how the Turlock Irrigation District is meeting the RPS goals)	Renewable Energy Sources/RPS (California)_
Appendix 99	Draft Program EIR for Statewide Anaerobic Digester Facilities for the Treatment of Municipal Organic Solid Waste	Bioenergy
Appendix 100	Public Works Magazine, Article: Upgrading to Class A Anaerobic Digestion, Is your biosolids program ready to make the move?	Bioenergy
Appendix 101	2012 Bioenergy Action Plan from the Bioenergy Interagency Working Group (plan outlines the strategies, goals, objectives, and actions that California state agencies will take to increase bioenergy development in California)	Bioenergy
Appendix 102	California Council on Science and Technology, California's Energy Future – The Potential for Biofuels (assessment of the potential for biomass-based fuels to contribute to the energy needs of California, particularly for transportation, in 2050 while attaining the current policy goals for GHG emissions)	Bioenergy
Appendix 103	Google Earth temperature map	General; Global Temperatures

APPENDIX	TITLE/DESCRIPTION	GENERAL CATEGORY/ISSUE
Appendix 104	U.S. Department of Energy, Article: First Google.Org-Funded Geothermal Mapping Report confirms Vast Coast-to-Coast Clean Energy Source	Geothermal Energy Resources
Appendix 105	U.S. Department of Transportation Federal Highway Administration, Mitigating Traffic Congestion: The Role of Demand-Side Strategies	Transportation Management
Appendix 106	Best Practices in Transportation Demand Management from the Seattle Urban Mobility Plan	Transportation Management
Appendix 107	Electric Drive Transportation Association, Electric Drive Vehicle Sales Figures	Electric Vehicles
Appendix 108	The New York Times, Editorial: A Clean-Car Boom	Electric Vehicles
Appendix 109	Burbank Water and Power website, Electric Vehicle $100 Charging Station Rebate Program	Electric Vehicles
Appendix 110	Individualized Marketing Demonstration Program, Individual City Report, Bellingham, WA	Transportation Management
Appendix 111	Individualized Marketing Demonstration Program, Individual City Report, Cleveland, OH	Transportation Management
Appendix 112	Individualized Marketing Demonstration Program, Individual City Report, Durham, NC	Transportation Management
Appendix 113	Individualized Marketing Demonstration Program, Individual City Report, Sacramento, CA	Transportation Management
Appendix 114	Federal Transit Administration's Individualized Marketing Demonstration Program, Final Report (pilot program developed to test the effects of individualized marketing on public transportation ridership trends)	Transportation Management
Appendix 115	Mobility Investment Priorities, Description of Transportation Management Associations	Transportation Management
Appendix 116	Victoria Transport Policy Institute, Description of TDM marketing programs and strategies	Transportation Management
Appendix 117	Victoria Transport Policy Institute, Description of Transportation Management Associations	Transportation Management

Summary of Comment No. 9 Attachments (Appendices)

These appendices are available for review at the City of Coachella and on the Project website, www.laentradacoachella.com.

Appendices 1-13, 18, 63, and 103 provide general background information regarding the effects of global climate change/global warming. None of these are project specific. As discussed in comments above, climate impacts were analyzed in Section 4.7, Global Climate Change. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendix 14 provides general background information on the City of Coachella. This is not project specific. A description of the project setting and existing physical and environmental conditions is provided in Chapter 3.0, Project Description, of the EIR. This appendix does not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR. Appendices 15 and 20 provide background information on the urban heat island effect. This is not project specific. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 16 and 17 provide information on the definition and historic occurrence of heat waves. Neither of these is project specific. As discussed in comments above, climate impacts were analyzed in Section 4.7, Global Climate Change of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 19, 21, 22 and 23 provide information public health-related impacts of climate change. None of these are project specific. As discussed in comments above, climate impacts were analyzed in Section 4.7, Global Climate Change of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 25, 27, 28, and 29 include information on solar energy systems for heating and/or cooling. None of these are project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.
Appendix 26 is a resource guide for local planning officials with information on implementing measures for reducing GHG emissions and energy conservation. This is not project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. This appendix does not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 30 and 43 address energy efficiency and water heating. This is not project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 24, 31, 32, and 33 provide information on the California Solar Initiative-Thermal Program which addresses incentives and discussion of solar water heating systems. This is not project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendix 34 is a quote from SunEarth, Inc., for the installation of solar energy system components in support of the City of Davis Renewable Energy Ordinance. This is not project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. This appendix does not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 35 and 36 provide manufacturing information with regard to solar systems. This is not project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 37, 40, and 42 provide information on chillers/chilled water systems. None of these are project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendix 43 provides information on how to improve HVAC-energy utilization in water-to-water heat pumps (energy efficiency). This is not project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. This appendix does not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 38, 39, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, and 59 provide information on district energy systems. None of these are project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.Appendices 41, 60, 61, 62, and 91 provide information on Net Zero Energy buildings and communities. None of these are project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 64, 65, 66, 67, 68, 69, and 70 provide information on green building issues with regard to the U.S. EPA Energy Star® program, including case studies. None of these are project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public

Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 71 and 72 provide information on the Imperial Irrigation District's residential service policies and energy sources. This is not project specific. These appendices do not provide new information pertaining to the project.
Appendices 73 and 74 provide information on the negative environmental effects of coal as an energy source. This is not project specific. The use of coal as an energy sources does not pertain to the proposed project. These appendices do not provide new information pertaining to the project.

Appendices 75 and 98 provide information on renewable energy and meeting California's RPS goals. This is not project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 76, 77, 78, 84, 85, 86, 87, 89, and 90 provide information on using solar as an energy source. None of these are project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 79 and 80 provide information about SheaXero, the no electric bill home. This is not project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendix 81 shows a sample calculation of residential energy use. This is not project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. This appendix does not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendix 82 is a report on the Governor's Conference on Local Renewable Energy. This is not project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. This appendix does not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendix 83 provides information on energy efficiency and financing for multi-tenant buildings. This is not project specific. As discussed in comments above, energy use and utility systems relative

to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. This appendix does not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendix 88 is the 2013 Preliminary Electricity and Natural Gas Forecast from the California Energy Commission. This is not project specific. This appendix does not provide new information pertaining to the project.

Appendix 92 is information on the California Housing Finance Platinum issue and mortgage rates. This is not project specific. This appendix does not provide new information pertaining to the project.

Appendices 93, 94, 95, and 96 provide information on codes/ordinances related to green building codes/ordinances. None of these are project specific. As discussed in comments above, energy use and utility systems relative to the project are described and/or analyzed in Sections 3.0, Project Description, 4.7, Global Climate Change, and 4.14, Public Services and Utilities, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendix 97 is a map of California wind resources, showing the annual wind speed at an elevation of 100 meters. This is not project specific. The use of wind energy systems is not proposed as part of the project. Therefore, this appendix does not provide new information pertaining to the project.

Appendices 99, 100, 101, and 102 address issues pertaining to bioenergy. This is not project specific.

Appendix 104 is an article regarding significant geothermal resources across the United States. This is not project specific. The use of geothermal resources is not included as part of the proposed project. Therefore, this appendix does not provide new information pertaining to the project.

Appendices 105, 106, 110, 111, 112, 113, 114, 115, 116, and 117 address transportation management issues. None of these are project specific. As discussed in comments above, the project design and objectives are described in Section 3.0, Project Description, of the EIR. Relevant issues with regard to land use design and project traffic generation, as well as relevant mitigation measures, are described and/or analyzed in Section 4.10, Land Use and Planning, and Section 4.16, Traffic and Circulation, of the EIR. These appendices do not provide new information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Appendices 107, 108, and 109 provide information on electric vehicles. None of these are project specific. As discussed in comments above, the project design and objectives are described in Section 3.0, Project Description, of the EIR. Relevant issues were described and/or analyzed in Sections 3.0, Project Description, 4.3, Air Quality, 4.7, Global Climate Change, 4.10, Land Use and Planning, and 4.16, Traffic and Circulation, of the EIR. These appendices do not provide new

information pertaining to the project and/or that substantially differs from what is already described in the EIR.

Comment No. 10
Glorious Land Company

10a – Any existing easements within the proposed Project will be abandoned when the final finance and conveyance map (Map No. 36494) is approved (also see Response 7c). The easements as they exist do not function with the proposed land plan or with the existing and proposed topography. The developer is coordinating with relevant stakeholders to determine an electrical transmission line easement alignment that would function properly with the proposed land plan and topography. This request will be considered by the City during Project deliberations. Refer to Response No. 5b above regarding the commenter's request for provision of a power line alignment through the property.

Comment No. 11
Ms. Dolly Hwang

11a –Avenue 50 would be a 130 ft. wide six-lane Major Arterial roadway that would ultimately connect to a future proposed interchange at I-10 (refer to Figure 3.8 in the EIR). The roadway would be reduced to a 102 ft. right-of-way width by eliminating the median and multipurpose trails at the Canal crossing, which would minimize impacts to the Canal (refer to EIR Figure 3.8, Major Arterial Street Cross Sections). Avenue 50 would be adequate to serve the existing conditions plus any project and impacts, which are considered less than significant because the proposed Project would extend both Avenue 50 and Avenue 52 from their current termini over the Coachella Canal to connect to the Project site, which would adequately serve traffic flow based on the peak-hour bi-directional approach volumes from the intersection analysis included in Appendix L, *Traffic Impact Analysis*, in the Draft EIR (refer to EIR Section 4.16, *Traffic and Circulation*, page 4.16-12).

The applicant and City invested considerable time and resources in reviewing and finalizing the land development and infrastructure concepts for the Project, which are depicted in the Draft EIR Section 3.0, *Project Description*, and involve, but are not limited to, land use, phasing, circulation, infrastructure, grading, and drainage. These concepts were presented in the Notice of Preparation, made available to the public in July 2012. The proposed 130 ft. right-of-way six-lane Major Arterial roadway, "Avenue 50 concept," is consistent with the City's adopted General Plan Circulation and Mobility Element because the Circulation and Mobility Element designates Avenue 50 as a Major Arterial and can have a right-of-way up to 132 ft. with enhanced bicycle facilities (refer to EIR Section 3.0, *Project Description*, Figures 3.7 through 3.9). It is also necessary given the constraints involved in crossing the Coachella Canal and levee, getting the road under the high voltage power lines and traversing higher elevations as the road enters La Entrada (refer to EIR Section 3.0, *Project Description,* Figure 3.3, *Land Use Plan* and Figure 3.7, *Circulation Plan* for roadway alignment details). The current alignment was proposed so the crossing would occur at a 90 degree angle to the canal and levee thereby reducing the span required for the crossing and minimizing any associated impacts (refer to EIR Section 3.0, Project Description, Figures 3.8 and 3.9 for a detailed roadway cross section of Avenue 50 and Avenue 52 at the Canal crossing). In order to cross at a 90 degree angle, the crossing location was set such that a minimum radius for the design speed would be obtained at the connection to Avenue 50 just prior to Fillmore. All roadway design and construction will be required to comply with current City of Coachella's Municipal Code, Title 16 – Subdivisions, Chapter 16.32, Design Standards and Requirements (Draft EIR p. 4.16-18, Threshold

4.16-4). Also, the current connection location is somewhat close to a high voltage power transmission line tower which creates a greater vertical separation between the bridge and the power line (by siting the road crossing near a power line tower), in a location with less power line sag.

The recommended alternative reflects the best alignment (i.e., has the least environmental impact) with respect to the canal, levee and the high voltage power lines, existing Avenue 50 right of way and compatibility with the proposed I-10/Avenue 50 interchange location.

11b – The property, designated as APN 603-370-002, contains approximately 42 acres and is utilized for agriculture purposes, such as vineyards. The extension of Avenue 50 would require approximately 9.525 acres, less than one percent, of this parcel for roadway right-of-way, which would leave approximately 32.5 acres remaining that could continue to be utilized for agricultural use (Draft EIR Section 4.2, *Agricultural and Forestry Resources*, p. 9, Threshold 4.2.1). The development of this site is consistent with the City's General Plan vision of providing housing and jobs to people of all ages and incomes. Inherent in such growth is the impact to the surrounding agricultural lands. The Specific Plan allows for agricultural uses (as well as botanical gardens) in all "special use, community, neighborhood, and linear parks in the Specific Plan area" (Specific Plan Section 4.8.1). These parks are located throughout the Project as shown on Exhibit 2-10, Parks, Open Space, and Trails Plan. Agricultural uses are also permitting on an interim basis in all development areas (Specific Plan Section 4.3.12). The City is not aware of any legally enforceable mechanisms for in lieu fee payments or agricultural banks within Coachella Valley. Furthermore, arrangements with private parties (easements or Williamson Act contracts) cannot be guaranteed as adequate mitigation in the absence of a program to monitor and enforce such agreements. . The City does not have a long-term General Plan land use designation for agricultural use, as the City General Plan anticipates the loss of some agricultural land in relation to long term growth of the region, and has determined that while mitigation measures do exist, none of them are feasible

The Draft EIR evaluates the impacts, including issues with agricultural land loss and potentially necessary property acquisition (refer to EIR Section 4.2, *Agricultural and Forestry Resources*, page 10). Because Prime Farmland and Unique Farmland are considered to be a finite and irreplaceable resource, the conversion to a non-agricultural use for the extension of Avenue 50 is considered a significant impact to agricultural resources. Potential mitigation measures exist that would reduce the impact related to loss of agricultural resources within the City and are listed in the Draft EIR Section 4.2, *Agricultural and Forestry Resources*, p. 14. These measures may not be feasible because Williamson Act contracts are entered into voluntarily by property owners, and the City cannot force owners to participate in this program. Long-term agricultural use within the Specific Plan area would conflict with the Specific Plan land use concept, as agricultural uses would have to be placed either in residential areas (reducing housing anticipated in the General Plan since the Project residential density is consistent with the General Plan), in non-residential development areas (reducing the area available for schools, parks or community mixed uses that reduce VMT and GHG emissions), in open space areas (reducing open space, and siting agricultural uses adjacent to private properties bordering the Project). In addition, inclusion of permanent

agricultural use may conflict with onsite sensitive receptors such as schools, parks and senior housing. The City, in appropriate consultations and discussions with the private property owner(s), will use legally prescribed methods as necessary for determining whether a partial or full parcel acquisition is appropriate and feasible.

11c – As part of right-of-way acquisition process, the City will also include costs for loss of use and/or relocation of existing utilities, including wells. If the property remains in operation, the City would relocate the well to a suitable location within the remaining parcel area. If the well is abandoned, there would not be any impacts to water supply because the well would be capped and would no longer be extracting groundwater, which would add a surplus to the existing groundwater level.

11d – Bridge crossings of the Coachella Canal, and other water-bodies in the area, are relatively common and there are no feasible alternatives other than a bridge because the canal is an existing structure and an alternative such as tunneling underneath the canal would be inefficient and extremely expensive. The proposed crossing is consistent with the City's adopted General Plan EIR because the City's Circulation and Mobility Element shows the extension of numerous roadways that would be required to cross the canal (refer to EIR Section 3.0, Project Description, Figures 3.8 and 3.9 for a detailed roadway cross section of Avenue 50 and Avenue 52 at the Canal crossing). Bridge crossings are essential for property access, emergency vehicle response time, and regional circulation. All roadway design and construction will be required to comply with current City of Coachella's Municipal Code, Title 16 – Subdivisions, Chapter 16.32, Design Standards and Requirements. Roadway improvements in and around the Project site would be designed and constructed to satisfy all City and Caltrans requirements for street widths, corner radii, intersection control as well as incorporate design standards tailored specifically to Project access requirements that would result in the safe and efficient flow of traffic (Draft EIR p. 4.16-18) All bridge design and construction will be required to comply with current California Department of Transportation Bridge Design Specifications. Furthermore, the commenter provides no explanation or evidence showing that the presence of a bridge – particularly given the common occurrence of bridges elsewhere in the area – would make the land "undesirable for residential development." Thus, no further response can be provided. (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* [1986] 181 Cal.App.3d 852 [Where a general comment is made, a general response is sufficient.]).

11e – It is not clear what "this loss" refers to. The Avenue 50 extension is a City-designated roadway project, for which the Project applicant will pay 100% of the cost of the extension from the current Avenue 50 terminus into La Entrada. As noted above, the proposed Avenue 50 extension is consistent with the City's General Plan. Accordingly, no further response is required.

11f – Refer to Response 11a and 11e above.

11g – The City appreciates this offer and will be in contact with the commenter if and when appropriate.

Errata to the Draft EIR

Changes to the Draft EIR are noted below. Underlining indicates additions to the text; striking indicates deletions to the text. The changes to the Draft EIR do not affect the overall conclusions of the environmental document. These errata represent changes to the Draft EIR to provide clarification, corrections, or revisions as needed as a result of public comments on the Draft EIR, or due to additional information received during the public review period. These clarifications and corrections are not considered to result in any new or more severe impacts than identified in the Draft EIR, and are not otherwise deemed to warrant Draft EIR recirculation pursuant to CEQA Guidelines §15088.5. Changes are listed by page and where appropriate by paragraph. Added or modified text is shown by underlining (example) while deleted text is shown by striking (~~example~~).

Draft EIR Page 3-16, Section 3.7.2

"~~The proposed project would rely on groundwater and supplemental water deliveries from the CVWD for primary sources of water supply. In September 2009, a Memorandum of Understanding (MOU) was reached between the City and the CVWD allowing the proposed project to use CVWD as a water supply source. A subsequent MOU was reached in 2013 that further specifies how the City can finance and acquire additional water supplies for the CVWD to meet projected water demands and establishes a process for preparing Water Supply Assessments.~~ The proposed Project will connect to the City of Coachella's domestic water system which relies on groundwater as its source supply. In September 2009, a Memorandum of Understanding (MOU) was reached between the City and CVWD to work cooperatively to implement its provisions, which includes the City complying with the Coachella Valley Water Management Plan and providing for a supplemental source of domestic water for City development projects. A subsequent MOU was reached in 2013 that further specifies how the City can finance and acquire supplemental water supplies to meet projected water demands and establish a process between CVWD and the City for approving Water Supply Assessments."

Draft EIR Page 3-17, Section 3.7.4

"The proposed Project includes off-site infrastructure connections to the Specific Plan Project site, including 24-inch-diameter water lines in the ROW of both the Avenue 50 and Avenue 52 extensions, from the City of Coachella's domestic water system, and a 24-inch-diameter sewer line in the extended Avenue 52 ROW."

Draft EIR Page 4-3, End of First Paragraph

As illustrated by Table 4.A and Figure 4.1, the EIR has addressed all past, present, and probable future projects. The City's General Plan EIR also evaluates cumulative impacts of City buildout, including cumulative impacts of infrastructure improvements consistent with the General Plan, such as future Avenue 50 and Avenue 52 corridor improvements. The County's General Plan EIR similarly addresses buildout of Riverside County.

As set forth in the EIR, and consistent with State CEQA Guidelines § 15125, the baseline conditions used for analysis were established at the time that the Notice of Preparation of the EIR was released in (July

2012). Following publication of the Draft EIR, Riverside County Waste Management released an Environmental Assessment for the proposed expansion of the Coachella Valley Composting Facility, which is located north of the Project, north of Interstate 10, immediately bordering the City limits. The EA for this project addresses project and cumulative impacts of this proposed facility, which are primarily limited to the immediate facility property. Because of the date on which this EA became available, the composting facility was not expressly identified in the list of projects considered in the cumulative impacts analysis for La Entrada. However, no potential significant cumulative impacts are reasonably foreseeable even were the composting facility to be approved at a future date. This is because offsite impacts, such as traffic, are primarily limited to roads north of I-10 that are not impacted by the La Entrada Project, or are generally within the regional traffic forecasts for the I-10 corridor (refer to pages 57-59 of the EA). Thus, because the potential areas of impacts are geographically separated, no significant cumulative impacts will occur.[20]

Comment No. 5 indicated Paradise Valley as a potential future development project. This project was not explicitly identified as a cumulative project, although it is substantially geographically separated from the La Entrada Project, located approximately seven miles to the east of the City of Coachella. According to the 2005 NOP released by the County, "the total [Paradise Valley] project area includes approximately 6,397 acres, of which approximately 3,417 acres, (53% of the site), are planned for natural or improved open space, with a balance of 2,980 acres proposed for development… The Paradise Valley "New Town" community is being planned as a sustainable, self-contained resort-style community. It is designed to balance proposed land use improvements with the preservation of open space, including the Cottonwood Mountains, a substantial portion of the Pinkham Wash and the Mecca Hills. The project provides for a unique community that will maintain the integrity of the environment by preserving natural resources, enhancing built landscapes through the use of native vegetation, and developing a comprehensive project-wide pedestrian and clean vehicle trail system."[21] In addition, although not expressly identified in the DEIR, the DEIR did utilize currently adopted growth forecasts as acknowledged by SCAG, and developed the Project traffic model by using Riverside County's own "RIVTAM" traffic model, which presumably incorporates appropriate assumptions for potential future developments such as Paradise Valley.

Draft EIR Page 4.7-28, Mitigation Measures 4.7-1

"…• Utilization of high reflectance materials for paving and roofing materials on residential, commercial, and school buildings
• Provide owners and occupants of residential and non-residential structures with energy conservation information and available renewable energy programs and incentives"

Draft EIR Page 4.9-24, EIR Mitigation Measure 4.9.5

"**Hydrology Reports**. Prior to issuance of grading permits, the applicant shall submit a final hydrology report for each phase of the Project to the City of Coachella Director of Public Works for review and

[20] http://www.rivcowm.org/opencms/Planning/PDF/CVC-ExpansionEA-CVC2012-01-Aug2013.pdf
[21] http://www.rctlma.org/planning/content/geninfo/nops/sp339_nop.pdf (accessed October 6, 2013).

approval. The hydrology reports shall demonstrate, based on hydrologic calculations, that the Project's on-site storm conveyance and retention facilities are designed in accordance with the requirement of the Riverside County Flood Control and Water Conservation District Hydrology Manual.

a) Flood protection measures shall comply with California Drainage Law and provide that Stormwater flows are received onto and discharged from this property in a manner that is reasonably compatible with pre-development conditions.
b) The developer shall provide written notice to all downstream property owners located within 600 feet of this area of the proposed construction of flood control facilities before commencing construction of any CVWD-approved flood control facilities. Said notice shall include wording that indicates that the Project includes construction of flood control facilities, which may affect downstream properties.
c) Prior to issuance of grading permits, the developer shall:
    a. Provide CVWD with flood control plans that incorporate the required mitigation measures to protect existing CVW facilities, and satisfy all applicable regulations and standards.
    b. Obtain a Conditional Letter of Map Revision (CLOMR) through FEMA.
    c. Execute an agreement with CVWD which shall include provisions outlined in CVWD Ordinance No. 1234.1.
    d. Submit to CVWD a Flood Control Facility Operations and Maintenance Manual for review and approval.
    e. Grant flooding easements over the flood control facilities in a form and content reasonably acceptable to CVWD.
    f. Submit final construction plans for the proposed flood control facilities and a detailed hydrological and hydraulic design report for review and approval.
d) Prior to occupancy, the developer shall:
    a. Obtain a Letter of Map Revision (LOMR) through FEMA.
    b. At completion of the construction of flood control facilities, ubmit 'as built' topography, construction drawings and engineering analysis for CVWD review to verify that the design capacity is adequate."

Draft EIR Page 4.16-9, following "City of Coachella General Plan" paragraph

"**Riverside County General Plan Circulation Element.** This policy document is applicable to unincorporated areas of the County, and indicates the planned regional circulation system for the Coachella Valley. Improvements within unincorporated Riverside County must be consistent with the General Plan and other applicable County policies, and be coordinated through the Riverside County Transportation and Land Management Agency's Transportation Department."