EXHIBIT "A"
LA ENTRADA SPECIFIC PLAN
FINAL ENVIRONMENT IMPACT REPORT
SCH# 2012071061

STATEMENT OF FACTS AND FINDINGS

1.0 INTRODUCTION

The California Environmental Quality Act ("CEQA") in Public Resources Code Section 21081 provides in part that:

"[N]o public agency shall approve or carry out a Project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the Project is approved or carried out unless both of the following occur:

(a) The public agency makes one or more of the following findings with respect to each significant effect:

(1) Changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment.

(2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

(3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the Project outweigh the significant effects on the environment."

The City of Coachella (City) Development Services Department circulated a Notice of Preparation (NOP) for a 30-day public review period commencing July 18, 2012 to August 18, 2012, and held one public scoping meeting on August 28, 2012. The Development Services Department prepared a Draft EIR (State Clearinghouse No. 2012071061) to address "the Project." 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 Project summary slide for this presentation was also presented 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 (refer to Appendix A, Draft EIR Noticing). This began the 45-day public review period, which ended on August 26, 2013 according to the State Clearinghouse. Public comments were received by the City of Coachella Development Services Department and have been responded to by the City in accordance with CEQA requirements.

The City of Coachella City Council determines that the Final EIR composed of the Draft EIR, comments received from the public and interested agencies, the Responses to Comments prepared by the City, Errata, and all attachments and documents incorporated by reference is complete and adequate, and has been prepared in accordance with CEQA, the State CEQA

Guidelines, and the City's local CEQA Guidelines. There is no recirculation required of the Draf EIR, pursuant to CEQA Guidelines Section 15088.5 (also refer to Response 9b).

Section 15126.2(b) of the CEQA Guidelines requires an EIR to "Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." Chapter 4.0, *Existing Environmental Setting, Environmental Analysis, Impacts and Mitigation Measures,* of the Draft EIR analyzes the potential environmental impacts of the proposed Project. The Draft EIR identified significant and unavoidable impacts as discussed further below and in Attachment A, *Statement of Overriding Considerations.* As the Final EIR concludes that implementation of the Project (and the Project alternatives) would result in significant impacts, it is required under the State CEQA Guidelines to make certain findings with respect to these impacts (CEQA Guidelines Section 15091).

2.0 DESCRIPTION OF PROJECT PROPOSED FOR APPROVAL

The La Entrada Specific Plan (the "Project") consists of a Specific Plan Amendment, General Plan Amendment, Zone Change/Pre-Annexation Zoning, Development Agreement, LAFCO Annexation, and Subdivision Map approval. Various other discretionary approvals will also be required, as described further in the Draft EIR (Section 2, *Project Description*), and in the October 16, 2013 Planning Commission Staff Report.

The following Project Design Features (PDFs) have been incorporated into the La Entrada Specific Plan. These features are considered in each impact section of the EIR and either avoid, reduce, offset, or otherwise minimize identified potential adverse impacts of the Project or provide significant benefit to the community and/or to the physical environment. The PDFs would be identified in the Project's Conditions of Approval to ensure implementation as assumed in this EIR.

Aesthetics

- The La Entrada Specific Plan has been designed to retain the steeper slopes in natural open space.

- Mass-graded areas would be revegetated at the completion of the mass grading process, pursuant to the City's Municipal Code and the Specific Plan.

- The La Entrada Specific Plan contains grading standards and guidelines and landscape guidelines that provide plans and standards for landscape plant palettes, architectural guidelines (including colors and materials), streetscape enhancements, park treatments, perimeter and interior fencing, walls, and other design components.

- The Project entries incorporate palm-themed intersection and gateway treatments consistent with the City's median guidelines.

- Common area landscaping, including enhanced streetscape, private parks, and fuel modification zones, would be maintained by a Homeowner's Association (HOA) or by a Landscape and Lighting Maintenance District (LLMD) that could be formed as part of the Project financing to ensure a uniform level and high standard of maintenance to maintain the long-term appearance of the community.

- The proposed grading plan incorporates contour grading in hillside areas designed to blend the Project's manufactured slopes with existing natural terrain as required by Specific Plan Section 3.2.5, Hillside Design.

- The proposed Specific Plan's open space and parks sites throughout the Project would provide scenic viewpoints.

- The Specific Plan's design and development guidelines include specific requirements and restrictions regarding site lighting, including:

  ○ Architectural lighting and landscape accents that shall be aesthetically pleasing and nonobtrusive; and

  ○ Shielded lights that would be utilized in park lighting to reduce light glare.

Agricultural Resources

- Interim agricultural uses as defined in Section 4.0 of the Specific Plan shall be permitted in any planning area ultimately planned for development uses prior to entitlement for the area's primary permitted uses.

- Agricultural and community garden uses are permitted within park areas of the Specific Plan.

Air Quality

- The Specific Plan development is proposed to be phased, with the initial Phase 1 grading limited to the area necessary to achieve mass balancing and proper drainage of the overall property, leaving the balance of the site in its current condition until such time that the remaining phases begin to develop. This phased development would reduce the overall area being disturbed at any one time and will substantially reduce the overall annual grading emissions.

- The Specific Plan provides for a mix of residential and employment uses as well as nonvehicular circulation (e.g., bike and pedestrian trails) that would serve to reduce VMT and associated air emissions.

Biological Resources

- The Specific Plan development is proposed to be phased, with the initial Phase 1 grading limited to the area necessary to achieve mass balancing and proper drainage of the overall property, leaving the balance of the site in its current condition until such time that the remaining phases begin to develop. This phased development would minimize impacts to biological resources.

- The proposed Specific Plan includes approximately 557 ac of open space, including 175.8 ac of soft-bottomed drainage areas that are available for mitigation, and approximately 344.7 ac of passive and active recreation. Retention basins for drainage and water quality, if required by the CVWD, would be vegetated, and the landscaping of active recreational areas would increase plant cover and trees on site, thereby providing habitat for birds and forage for birds of prey. The northern portion of the regional Special-Use Park is proposed as natural open space to avoid impacts to a jurisdictional drainage in that location.

- The Specific Plan's Conceptual Drainage Plan incorporates drainage and water quality features that would maintain water quality within the on-site drainages and preserve/enhance downstream water quality, thereby indirectly protecting the biological resources and functions of the drainage.

- Specific Plan implementation would result in increased desert vegetative cover on site, including trees and shrubs that could enhance the availability of nesting sites for migratory birds in the Project area.

Cultural and Paleontological Resources

- The La Entrada Specific Plan has been designed to preserve the northeastern and southeastern portions of the Specific Plan site in permanent open space, thereby reducing the potential for disturbance of previously unidentified paleontological and archaeological resources in those areas.

Geology and Soils

- The Specific Plan and associated Tentative Tract Maps have been designed to avoid grading the steeper northern/northeastern and southeastern portions of the site, and also incorporate a setback area to ensure structures are not placed on the identified fault traces within the Alquist-Priolo Earthquake Hazard Zone identified on the Project site.

- The Specific Plan has incorporated areas with identified earthquake fault traces into the open space and park components of the plan.

- School sites have been located on the Specific Plan Land Use Plan to ensure adequate separation from existing fault zones.

- The fully developed Specific Plan would result in substantially reduced wind- and runoff-induced erosion.

- Project development would adhere to all of the seismic requirements incorporated in the 2010 California Residential Code and 2010 (or most current) California Building Code (CBC) and the requirements and standards contained in the applicable chapters of the City of Coachella Municipal Code.

- Project development would include the implementation and maintenance of BMPs to reduce or avoid soil loss due to wind and water erosion.

- Prior to development of any upstream areas of the site, the on-site drainage facilities would be designed to control debris potentially conveyed from the off-site watershed areas.

Global Climate Change

- The Specific Plan development is proposed to be phased, with the initial Phase 1 grading limited to the area necessary to achieve mass balancing and proper drainage of the overall property, leaving the majority of the site in its current condition until such time that the remaining phases begin to develop. This phased development would reduce the overall area being disturbed at any one time and would reduce the overall annual grading emissions.

- The Project's sustainability strategies commit to the use of solar photovoltaic panels on a minimum of 25 percent of homes and businesses, and promoting green building techniques in excess of Title 24 requirements, thereby reducing GHG emissions associated with energy usage.

Hazards and Hazardous Materials

- The Specific Plan proposes low-density residential uses with large lots in the northern portion of the site to allow incorporation of fuel modification zones into lots abutting open space areas and to allow for better compatibility with the existing landforms. Maintenance of fuel modification/management zones would be the responsibility of individual homeowners on private property.

- School sites have been located to ensure adequate separation from existing power lines and the adjacent I-10 freeway.

Hydrology and Water Quality

- The Specific Plan development areas shall conform to all of the requirements imposed by the Riverside County Flood Control and Water Conservation District Hydrology Manual, the requirements of the City of Coachella's adopted Stormwater Management Ordinance (Title 13.16 of the Municipal Code), the requirements of the Whitewater River Watershed Stormwater Management Plan, and the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. If the Project Drainage Master Plan without retention basins is approved by the CVWD, the Municipal Code requirements for 100 percent on-site drainage retention would be modified.

- The Project has incorporated a comprehensive drainage and water quality program into the site, consisting of the surface drainage system and water quality features. This will reduce storm water runoff volume and velocity, improve storm water runoff water quality during storm events and low-flow irrigation volumes, and create biological resource habitat. Key system features are summarized in the Draft La Entrada Specific Plan as well as in the Project's hydrology study and Water Quality Assessment Report that are provided in Appendix I to this EIR.

- The proposed Specific Plan includes up to 175.8 ac of soft-bottomed drainages.

Land Use and Planning

- The entire Specific Plan has been designed in a manner to minimize impacts to the environment, as emphasized in the *Sustainable Community Design Features* section.

Noise

- The Specific Plan is proposed to be developed in phases, which include five mass grading phases and five development phases. The initial Phase 1 grading would be limited to the area necessary to achieve a balanced site and proper drainage, thereby reducing the noise impacts associated with mass grading during the interim implementation phase.

- The Specific Plan will be constructed in compliance with all applicable provisions of the City's Municipal Code, including observing all time limitations on construction noise that exceeds Base Ambient Noise Levels.

- Based on a design-level acoustical study, all residential structures built on the Project site shall incorporate design measures to ensure that interior noise levels for residential development do not exceed 45 A-weighted decibels (dBA) in accordance with Title 25 (California Noise Insulation Standards) and the City's Municipal Code (Title 7).

- During the preparation of construction drawings for Project-specific development, the exact acoustical specifications for window glass in buildings with unshielded first- and second-floor windows shall be determined pursuant to an acoustical study and the requirements of the City's General Plan and Municipal Code.

Mineral Resources

- There are no applicable PDFs related to Mineral Resources.

Public Services and Utilities

- In addition to paying City Fire Facility Impact Fees, the Project proposes to reserve and/or dedicate a site for the construction of a new fire station within the Project site (identified in the Specific Plan in the mixed-use area of Central Village), which is subject to change based on the Fire Department's preference. Reservation of the fire station site would aid toward substantially improving fire services within and beyond the Project site and place additional resources in closer proximity to residential and open space areas, helping to reduce the risk associated with wildfire for the entire community.

- The Specific Plan would include the construction of three aboveground potable water storage tanks with a total storage capacity of approximately 14 million gallons and the installation of water mains, laterals, and hydrants sufficient to provide minimum fire flow at required pressure to all portions of the Project, as well as operational and emergency flows.

- All homes within the proposed Specific Plan would include in-house fire protection sprinkler systems per State regulations, which the City would enforce through its building and occupancy permit process.

- The Specific Plan would be developed in phases over a period of up to approximately 30 years, which would allow the City Fire and Police Departments time to respond to any need for additional facilities, equipment, and/or officers and other personnel that might be required to serve the Project area as funding becomes available. The Specific Plan includes a fire station site in the mixed-use area of Central Village. The Project would pay Police Impact Fees and Fire Impact Fees in addition to all other fees assessed and Project contributions toward General Fund revenue through property tax and sales tax.

- The majority of the residential development within the proposed Specific Plan consists of single-family homes having frontage on public local streets. This type of development provides "eyes on the street," which is the essence of defensible space design.

- In addition to paying prevailing school impact fees at the time of building permit issuance, the Specific Plan addresses the need for additional school facilities created by its development by setting aside sites for three elementary schools and one middle school (totaling approximately 70 ac) to increase available school facilities.

- The Specific Plan development would extend power from the existing substation near Avenue 52. The substation facilitates interconnection with IID's transmission lines and provides for the distribution of electricity to the Project and other sites in the City's northern area.

- As part of the City's standard plan check review and tract map development process, the applicant would make appropriate provision for telecommunication services.

- The Specific Plan intends to use recycled water from the City's plant should recycled water be available from the existing plant in the future.

- All construction on the Project site would comply with the solid waste diversion mandate contained in the California Green Building Standards Code (CALGreen Code).

- The Specific Plan includes provisions requiring the diversion of a minimum of 75 percent solid waste.

Recreation

- The Specific Plan includes park, open space, and recreational uses that total approximately 901.6 ac, or approximately 41 percent of the Project footprint. Developed park facilities may be credited toward part, or all, of the Project's required park facilities fees, which are estimated to be in excess of $56 million.

- The Specific Plan would offer three elementary school sites and one middle school site for dedication to CVUSD. These sites, totaling 69.8 ac, would be located in Planning Areas C14, C25, H13, and H26. If constructed, all sites could potentially provide joint use of playground/field facilities for neighborhood recreational uses pursuant to school district policies.

- The Specific Plan includes community parks in Planning Areas G18, G14, C6, C8, C22, and H21 with combinations of play equipment, play areas, sport courts, shade structures, picnic areas, passive turf play areas, benches, and basic related amenities. The parks would be located along a pedestrian system of walkways and paths in the 27.8 ac Village Paseo.

- The Specific Plan includes neighborhood recreation parks in Planning Areas C17 and H16, ranging in size from 5 ac to 9 ac, to serve the active and passive recreational needs of residents.

- The Specific Plan provides 176.6 ac of larger regional-scale, special-use parks with sports facilities within portions of the Project's fault setback zone, specifically in Planning Areas G2, G1, and G4. These large parks are intended to be used for fields and sports courts, playgrounds, trails, and off-street parking, and can be accessed via pedestrian walkways, the 27.8 ac Village Paseo, or public streets.

- The Specific Plan would include the construction and/or extension of trails adjacent to backbone roads as part of a 27.8 ac Village Paseo that connects the Project's parks and schools, and as part of 81.8 ac of linear parks on the upper edges of the Project drainage ways that connect to natural open space areas located on the northeastern portion of the Project site. These trails would provide connections between the residential communities and the natural open space areas within and adjacent to the Project site.

- The Specific Plan's private parks, trails, and open space areas would be maintained by an LLMD or other similar entity for use by the Project residents and would not impact the City's General Fund.

Traffic and Transportation

- The Specific Plan proposes non-vehicular circulation facilities that would include bicycle lanes, trails, pathways, and sidewalks that promote alternative non-vehicular modes of transportation.

- The Specific Plan proposes mixed-use commercial, recreational, and school facilities that would reduce vehicle trips to the adjacent City and regional street system.

- The Specific Plan incorporates substantial circulation system improvements, including the extensions of Avenues 50 and 52.

- The Specific Plan provides for secondary and emergency access, at the request of City staff, through the extension of Avenue 52.

- The Specific Plan allows and provides for the use of electric low-speed vehicles (LSVs) or NEVs on all internal Project streets. The Specific Plan proposes paseo cross-sections that provide striped dual NEV and bike lanes.

- Sunline Transit District would be consulted, in conjunction with Project development, to coordinate the potential for expanded transit/bus service and vanpools and to discuss and implement potential transit turnout locations within the Project area.

Water Supply

- The Specific Plan includes various water conservation features as set forth in Specific Plan Section 2.3, *Sustainable Community Design Features*, including use of native plants.

3.0 FINDINGS CONCERNING IMPACTS FOUND NOT SIGNIFICANT OR LESS THAN SIGNIFICANT

In evaluating the potential impacts associated with the Project, the Final EIR identified potential impacts that would be not significant. This Section of the Statement of Facts and Findings identifies those impacts that may occur with Project implementation, but were found to be below the threshold of significance. CEQA does not require findings for impacts that are found to be less than significant, and therefore do not require mitigation. Nevertheless, the following information is provided in order to summarize the bases for determinations of non-significance for the potential impacts as presented in the Chapter 4.0, *Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures,* and Chapter 6.0, *Long-Term Implications of the Project*, in the Final EIR.

AESTHETICS, LIGHT, AND GLARE

Finding

Threshold 4.1.1. Project construction and implementation would not result in a substantial adverse effect on a scenic vista.

Facts in Support of Finding

No City-designated scenic vistas are identified in the City of Coachella General Plan. No designated scenic corridors occur within the vicinity of the Project site. However, the Santa Rosa Mountains and Mecca Hills are considered visual resources in the vicinity of the City of Coachella and are visible from all areas on the Project site and from offsite lands in the surrounding area.

Project construction would result in temporary visual changes due to grading and other construction activities, including the presence of construction equipment and materials onsite. With completion of each phase, temporary views of construction activities, materials, or equipment in those areas would cease, and Project Design Features (e.g. revegetating mass graded areas upon completion of grading) would be implemented to further reduce potential effects of such temporary disturbance. The activities associated with short-term construction would therefore not obstruct or significantly affect a scenic vista, and impacts would be less than significant.

As designed, the Project would not create a skyline development silhouette that would be visible from offsite public vantage points. Further, the Project design includes approximately 900 acres of open space and park/recreation uses that would preserve scenic views from the subject site. The EIR analysis of public area vantage points determined that Project development would partially encroach or not encroach into or obstruct existing views to resources off of the Project site, and would therefore not have a significant effect on any designated scenic vistas from such viewpoints. Therefore, no substantial adverse effects to scenic vistas within the existing viewshed would occur, and Project impacts on scenic views would be less than significant.

Reference: Final EIR, pages 4.1-11-4.1-16.

Finding

Threshold 4.1.2. Project construction and implementation would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

Facts in Support of Finding

The Project site is not designated as a scenic resource in the City's General Plan and is not located along a designated State Scenic Highway. No City-designated scenic corridors occur within the Project area, and no scenic rock formations are identified in the General Plan as occurring on the Project site. The Project site is currently undeveloped, and no historic buildings or other aesthetic structures are present onsite. The City's General Plan identifies only mature date palms as scenic plant resources. However, no mature date palms are present on the Project site. Therefore, Project impacts on this type of scenic resource are considered to be less than significant.

Significant visual resources are visible from the Project site and surrounding areas. However, views of these resources do not occur from a designated State Scenic Highway, and the Project would not obstruct any such views. As identified in the General Plan and the adopted McNaughton Specific Plan, the Project site is designated for a mixture of land uses, thereby indicating that the site could be developed in the future and is therefore not considered an aesthetic resource intended for preservation in its current undeveloped state. Any future development would be required to comply with applicable General Plan and Specific Plan policies regulating the design of new structures and protecting the existing visual quality of the

City. Therefore, although the Project would convert vacant land to urban uses, it would not substantially degrade scenic resources in the area. Impacts would be less than significant, and no mitigation measures are required.

Reference: Final EIR, pages 4.1-16 – 4.1-17.

AGRICULTURAL AND FORESTRY RESOURCES

Finding

Threshold 4.2.2. Project construction and implementation would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

Facts in Support of Finding

The Project site is not covered under a Williamson Act Contract. Therefore, the Project would not conflict with any Williamson Act contract. The areas affected by the proposed extension of Avenues 50 and 52 are currently zoned A-T (Agricultural Transitional) and O-S (Open Space). The A-T zone designation permits the continued agricultural use of land suited to eventual development in other uses, pending proper provisions of utilities, major streets, and other facilities so that compact, orderly development will occur. The extension of Avenues 50 and 52 would be considered as the provision of new major streets so that orderly development (e.g., La Entrada Specific Plan) may result. Therefore, the extensions of Avenues 50 and 52 would be consistent with the A-T zoning designation. The Project would not conflict with or result in impacts associated with existing zoning for agricultural uses. No impacts would occur in this regard, and no mitigation is required.

Reference: Final EIR, pages 4.2-10 – 4.2-11.

Finding

Threshold 4.2.3. Project construction and implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

Facts in Support of Finding

The portion of the Project site that is located within the City is currently zoned as C-G (General Commercial), R-M (Residential Multiple Family), R-S (Residential Single Family), O-S (Open Space), and A-T (Agricultural Transitional); the portion of the Project site that is located in the County is zoned O-S (Open Space). Therefore, no portions of the Project site are zoned for timberland or timberland development. As development of the Project would not conflict with existing zoning for forest land or timberland, no impacts to forest land or timberland resources would occur, and no mitigation is required.

Reference: Final EIR, page 4.2-11.

Finding

Threshold 4.2.4. Project construction and implementation would not result in the loss of forest land or conversion of forest land to non-forest use.

Facts in Support of Finding

The California Department of Forestry and Fire Protection maintains Forest and Range Assessments under the Fire and Resource Assessment Program (FRAP). FRAP mapping does not indicate any forest resources within the City. In addition, the City's General Plan does not identify any lands that contain forest or forestry resources within the City limits or its Sphere of Influence. The Project site does not support wilderness, timberlands, or forest land. Therefore, development of the Project would not result in the loss of forest land or conversion of forest land to a non-forest use. No impacts would occur in this regard, and no mitigation is required.

Reference: Final EIR, page 4.2-11.

Finding

Threshold 4.2.5. Project construction and implementation would not involve other changes in the existing environment that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

Facts in Support of Finding

The Land Evaluation and Site Assessment (LESA) score for the proposed Project (30.2 points) does not exceed the threshold that would indicate a significant Project impact on agricultural resources. The type of soils located onsite, combined with the location of the site relative to the amount and quality of agricultural operations within the Zone of Influence (ZOI) for the site and the absence of Protected Resource Land, resulted in low LE and SA subscores. As established by the LESA Model for the proposed Project development area, no significant agricultural resource impacts would result from conversion of the site to non-agricultural uses.

Whether adjacent agricultural land is developed depends on several factors, including market demand, availability of property, profitability of the agricultural use, and the landowner's interest in continuing farming. One factor considered in the LESA Model is the land uses located within each site's ZOI. The amount of agricultural land within the ZOI for the Project site is approximately 17 percent of the land in that ZOI. The condition and use of land adjacent to the Project site was assessed in the LESA Model prepared for the Project. The results of the LESA Model concluded that the conversion of the site to non-agricultural uses would not result in a significant agricultural resource impact. Impacts would therefore be less than significant, and no mitigation is required.

Also refer to Response to Comment No. 11, and discussion below for Threshold 4.2.1, regarding Avenue 50 extension impacts on existing agricultural lands.

Reference: Final EIR, pages 4.2-12 – 4.2-13.

AIR QUALITY

Finding

Threshold 4.3.4. Project construction and implementation would not expose sensitive receptors to substantial pollutant concentrations.

Facts in Support of Finding

The Project site is located in Riverside County, which is not among counties found to have serpentine and ultramafic rock in their soils. Therefore, the potential risk for naturally occurring

asbestos (NOA) to be present during Project construction is limited. Impacts in this regard would be less than significant, and no mitigation is required.

Vehicle trips generated by the anticipated Specific Plan land uses would contribute to congestion at intersections and along road segments in the Project vicinity. Localized air quality effects would occur as a result of vehicle emissions for Project-related traffic. The Project would therefore contribute to increased carbon monoxide (CO) concentrations at intersections in the Project vicinity. However, all intersections analyzed for potential CO impacts were determined to experience 1-hour and 8-hour CO concentrations below the federal and State standards, both without and with the Project. The Project would therefore result in a less than significant impact on local air quality for CO, and no mitigation is required.

Three existing residences are located in the Project vicinity that could potentially be exposed to Project construction-related emissions. During construction of the later Project phases, residents of earlier phases could also be exposed to construction-related emissions. However, due to the size of the areas affected by Project construction, the majority of construction activities would be distanced far away from these sensitive receptors. Therefore, measurable pollutant concentration increases are considered unlikely. Project impacts on sensitive receptors would be below a level of significance, and no mitigation is required.

The Health Risk Assessment (HRA) performed for the Project evaluated the health risks of air toxics associated with diesel trucks traveling on Interstate 10 (I-10) near the Project site. The HRA indicated that the cancer risk threshold of 10 in 1 million and the chronic risk threshold of 1 would not be exceeded at the proposed residences on the Project site. Therefore, there would not be any significant health risks to persons living on the Project site near I-10, and no mitigation is required.

Reference: Final EIR, pages 4.3-22 – 4.3-27.

BIOLOGICAL RESOURCES

Finding

Threshold 4.4.4. Project construction and implementation would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Facts in Support of Finding

The Project site is near three Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) Conservation Areas (i.e., Desert Tortoise & Linkage Conservation Area, Mecca Hills/Orocopia Mountains Conservation Area, and the East Indio Hills Conservation Area). All three Conservation Areas contain biological corridors and linkages between the San Jacinto/Santa Rosa Mountains and the San Bernardino Mountains. Implementation of the Project as designed would not interfere with or disturb these conservation areas. Therefore, the Land Use Adjacency Guidelines established in Section 4.5 of the CVMSHCP would not be applicable to the proposed Project. Project effects related to wildlife movement and habitat fragmentation would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.4-15 - 4.4-18.

Finding

Threshold 4.4.5. Project construction and implementation would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Facts in Support of Finding

The City does not have a tree preservation policy or ordinance preventing or restricting the removal of trees in the City. The City's General Plan Conservation Element contains policies protecting biological resources. The Project would comply with the policies protecting biological resources outlined in the City's General Plan Conservation Element. Therefore, impacts related to potential conflicts with local policies or ordinances and the General Plan Conservation Element regarding protection of biological resources would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.4-18 – 4.4-19.

Finding

Threshold 4.4.6. Project construction and implementation would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Facts in Support of Finding

The Project site is within the planning boundary of the CVMSHCP, but is not within a designated Conservation Area. The Project site is located in proximity to three CVMSHCP Conservation Areas. However, the Project as designed would not result in either direct or indirect impacts on those Conservation Areas because no development is proposed near the Desert Tortoise and Linkage Conservation Area. Therefore, impacts related to potential conflicts with an adopted HCP would be less than significant, and no mitigation is required.

Reference: Final EIR, page 4.4-19.

GEOLOGY AND SOILS

Finding

Threshold 4.6.5. The Project would not result in adverse impacts as a result of soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Facts in Support of Finding

The Project would connect to the existing City sewer system and is not anticipated to use septic or alternative waste systems. As a result, the Project would not result in impacts related to alternative wastewater disposal systems, and no mitigation is required.

Reference: Final EIR, page 4.6-19.

Hazards and Hazardous Materials

Finding

Threshold 4.8.4. Project construction and implementation would not result in impacts related to the Project being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment.

Facts in Support of Finding

The Project site is not included on any hazardous materials sites pursuant to Government Code Section 65962.Therefore, the Project would not create a significant hazard to the public or the environment related to sites listed pursuant to Government Code Section 65952.5. No impact would occur, and no mitigation is required.

Reference: Final EIR, page 4.8-10.

Finding

Threshold 4.8.5. The Project is not located within an airport land use plan or within two miles of a public airport or public use airport.

Facts in Support of Finding

The Project site is located approximately four miles northeast of the Jacqueline Cochran Regional Airport, formally known as the Thermal Airport. Therefore, the site is not located within two miles of a public airport. The Project site is not located within an airport land use plan and would not result in a safety hazard for people residing or working onsite. Based on review of the Jacqueline Cochran Regional Airport "Airspace Plan" and Airport Master Plan, 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. Therefore, the Project would not result in adverse impacts associated with aviation safety and airports, and no mitigation is required.

Reference: Final EIR, page 4.8-10.

Finding

Threshold 4.8.6. The Project would not result in a safety hazard for people residing or working in the vicinity of a private airstrip.

Facts in Support of Finding

The Project site is not within the vicinity of a private airstrip and would not result in a safety hazard for people residing or working onsite. Therefore, the Project would not result in adverse impacts associated with aviation safety and airports, and no mitigation is required.

Reference: Final EIR, page 4.8-10.

Finding

Threshold 4.8.3. Project construction and implementation would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

Facts in Support of Finding

The Project would not produce any hazardous emissions or handle acutely hazardous materials, substances, or waste. Therefore, the schools that would be located on sites identified in the Specific Plan would not be impacted by hazardous emissions or materials. In addition, the Project site and immediate properties do not contain any existing school facilities. Therefore, the Project would not result in adverse impacts associated with hazardous emissions or materials or substances within proximity of an existing or proposed school, and no mitigation is required.

Reference: Final EIR, page 4.8-10.

Finding

Threshold 4.8.7. Project construction and implementation would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Facts in Support of Finding

The Riverside County Emergency Operations Plan (EOP) and the Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP) are applicable to the Project site. The Project would include multiple direct emergency vehicle access routes to and from the site. Project implementation would result in increased traffic on area roadways that could potentially result in substantial delays to the movement of emergency vehicles. However, the Project would accommodate future development of police and fire stations on the Project site and secondary emergency access as part of the Project design that would require review and approval by the City Fire Department. Therefore, Project impacts related to potential delays to emergency vehicles would be reduced to a less than significant level, based on such Project features.

Further, the Project would be consistent with the City's Updated General Plan Safety Element and Fire and Emergency Medical Services Master Plan, which addresses emergency response and evacuation procedures during events such as earthquakes, hazardous materials incidents, floods, national security emergencies, wildfires, and landslides. Therefore, Project effects related to consistency with the General Plan would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.8-10 – 4.8-11.

Finding

Threshold 4.8.8. Project construction and implementation would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Facts in Support of Finding

According to the County of Riverside Eastern Coachella Valley Area Plan, the Project site is located in an area that has a Low to Moderate wildfire hazard potential. The Project would be required to demonstrate compliance with the City's Fire Code for future land uses in the Moderate fire risk zone and design components required by the City's Fire Department that

would reduce the potential risk of wildfires to a less than significant level. Operation of the Project would not increase the potential for wildland fires to occur. Therefore, the Project would not expose people or structures to a significant adverse risk of loss, injury, or death related to wildland fires. Impacts would be considered less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.8-11 – 4.8-12.

HYDROLOGY AND WATER QUALITY

Finding

Threshold 4.9.9. Project construction and implementation would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

Facts in Support of Finding

No portions of the Project site are located within a 100-year flood hazard area. The Project site is not located within the potential flood zone of a dam, as no dams or reservoirs are located upslope of the Project site.

The Coachella Canal levee, located approximately 750 feet from the Project site, may be subject to failure during a seismic event. However, the majority of the Project site is higher in elevation than the Canal. Any flooding resulting in the event of failure of the levee would not adversely affect the Project site. Any flooding from failure of the levee would occur downslope of the Project site within offsite designated open space areas. Therefore, construction and/or operation of the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. No impact would occur, and no mitigation is required.

Reference: Final EIR, page 4.9-21.

Finding

Threshold 4.9.2. Project construction and implementation would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Facts in Support of Finding

Construction

Groundwater at the site is greater than 50 feet below ground surface. Therefore, the groundwater table is not anticipated to be encountered, and dewatering is not anticipated to be required during construction. Project grading and construction would compact soil, which could decrease infiltration during construction. However, Project construction activities would be temporary. Reduced infiltration during construction would not result in a net deficit in aquifer volume or a lowering of the local groundwater table level, and thus, construction impacts would be less than significant.

Operation

The Coachella Water Authority (CWA) would provide water service to the Project. The main source of supply for the proposed Project is the Lower Whitewater River Subbasin. In

accordance with SB 610 and CEQA, the CWA Water Supply Assessment prepared for the Project concluded that the total projected water supplies available to the CWA during normal, single dry year, and multiple dry year periods over a 20-year projection period and beyond would be sufficient to meet the projected demands associated with the Project, in addition to existing and planned future uses in the CWA service area (including agricultural and manufacturing uses). Further, the demands associated with the Project have been specifically accounted for as part of the Coachella Valley Water District's (CVWD's) regional water supply planning efforts and conclusions of water supply sufficiency. Long-term operational impacts would therefore be less than significant.

Construction and operation of the Project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. In fact, the Project design features would facilitate groundwater recharge through Sustainable Community Design Features (Specific Plan Section 2.3) such as water quality basins and natural drainage channels which allow for Project storm flows and irrigation flows to recharge. Impacts would be less than significant, and no mitigation is required.

Reference: Final EIR, page 4.9-16. 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).

Finding

Threshold 4.9.7. Project construction and implementation would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

Facts in Support of Finding

The Project site is within Zone X (areas determined to be outside the 0.2 percent annual chance, 500-year floodplain) and Zone D (areas in which flood hazards are undetermined, but possible). Because the majority of the site is in Zone D, there is a potential for the proposed Project to place housing within a 100-year flood hazard area. The Sustainable Community Design Strategies include implementation of an integrated stormwater collection and a conveyance system designed to provide 100-year flood protection to flood-prone areas, prohibition of development within onsite floodplains, and integration of setbacks/buffers and passive recreational amenities in these areas into the Specific Plan land use plan. Therefore, based on implementation of the Sustainable Community Design Strategies, Project housing would be protected from the 100-year flood. Impacts related to placement of housing within a 100-year flood hazard area would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.9-20 – 4.9-21.

Finding

Threshold 4.9.8. Project construction and implementation would not place within a 100-year flood hazard area structures which would impede or redirect flood flows.

Facts in Support of Finding

As indicated above, the majority of the Project site is in Zone D, and there is a potential for the proposed Project to place structures within a 100-year flood hazard area. The Sustainable

Community Design Strategies include implementation of an integrated stormwater collection and a conveyance system designed to provide 100-year flood protection to flood-prone areas, prohibition of development within onsite floodplains, and integration of setbacks/buffers and passive recreational amenities in these areas into the Specific Plan land use plan. Therefore, based on implementation of the Sustainable Community Design Strategies, Project structures would be protected from the 100-year flood. Impacts related to placement of structures within a 100-year flood hazard area would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.9-20 – 4.9-21.

Finding

Threshold 4.9.10. Project construction and implementation would not result in inundation by seiche, tsunami, or mudflow.

Facts in Support of Finding

No water retention facilities are located within proximity to the Project site. The proposed onsite retention basins would only temporarily detain runoff and therefore do not constitute a body of water. The risk associated with seiche waves is not considered a potential constraint or a potentially significant impact of the Project. Further, the Project site is not located in a designated tsunami inundation zone, and therefore, no impacts related to exposure of people or structures to risk of loss, injury, or death involving flooding as a result of inundation by tsunami would occur.

Geologic mapping of the Project site identified minor onsite debris/mudflows. Due to the minor nature of those debris/mudflows, the risk associated with possible mudflows and mudslides is not considered a potential constraint or a potentially significant impact of the Project. Therefore, the Project would result in less than significant impacts related to the exposure of people or structures to risk of loss, injury, or death involving flooding as a result of inundation by mudflow. No mitigation is required.

Reference: Final EIR, pages 4.9-21 – 4.9-22.

LAND USE AND RELEVANT PLANNING

Finding

Threshold 4.10.1. The Project would not divide any established communities.

Facts in Support of Finding

Development of the Project as designed would occur on approximately 1,600 acres of the site.

The Project site is currently undeveloped Open Space. Implementation of the Project would include Residential, School, Parks/ Recreational, Open Space, and Mixed Uses. Although implementation of the Project would extend Avenues 50 and 52 to connect to the Project site, the proposed Project would not divide established communities in the Project vicinity. Therefore, no impacts to existing development would occur, and no mitigation is required.

Reference: Final EIR, page 4.10-5.

Finding

Threshold 4.10.3. The Project would not conflict with any applicable habitat conservation plan or natural community conservation plan.

Facts in Support of Finding

The Project site is located within the boundaries of the CVMSHCP, which encompasses over 1,000,000 acres in the Coachella Valley. Although the Project site is in the planning area of the CVMSHCP, it is adjacent to, but not located in any of the 27 designated Conservation Areas intended to preserve natural communities in the Coachella Valley. Indirect impacts resulting with implementation of the Project on those adjacent Conservation Areas would be addressed based on compliance with the CVMSHCP Land Use Adjacency Guidelines. Therefore, the Project would not conflict with the CVMSHCP. No impact would occur, and no mitigation is required.

Reference: Final EIR, page 4.10-13.

Finding

Threshold 4.10.2. The Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect.

Facts in Support of Finding

The Project would result in modification of the General Plan existing land use designations on the Project site and would change the designation of the General Plan Land Use Map from the McNaughton Specific Plan to the La Entrada Specific Plan. The Project would extend the Specific Plan boundaries to include an additional 588 acres within the City boundary that are currently located in unincorporated Riverside County. Further, the Project would require a General Plan Amendment (GPA) and Zone Change in support of the proposed Specific Plan land uses. If the Project is approved subsequent to the General Plan update currently underway, the Project would already be incorporated into the General Plan and Zoning Code and would not require a GPA or Zone Change.

The proposed Project would be consistent with the applicable policies in the General Plan Land Use Element. Approval of a GPA and Zone Change would enable the La Entrada Specific Plan to serve as the guiding land use and zoning document for the Project site. Therefore, the Project would be consistent with the City's General Plan.

The Project would also modify the existing zoning designations for the site to allow for the land uses in the proposed Specific Plan. Therefore, a zone change would be required prior to approval of the Project to change the existing zoning on site, with an overall zoning designation of "Specific Plan" for the entire site. Approval of a Zone Change to reflect the specific zoning designations in the La Entrada Specific Plan would ensure that the Project as proposed would be consistent with the City's Zoning Ordinance.

The proposed extension of Avenues 50 and 52 across the Project site would connect to a future proposed interchange at I-10. The proposed Specific Plan development includes housing, commercial, and office uses that would further achievement of the Regional Comprehensive Plan (RCP) jobs/housing balancing objective. The Project as proposed includes future development of multi-purpose trails, neighborhood electric vehicles (NEVs), Class 1 and 2 bike lanes, pedestrian/hiking trails, and equestrian trails. Therefore, the Project would be consistent

with Southern California Association of Governments (SCAG) policies encouraging the use of alternative transportation near new industrial, commercial, and residential development. SCAG, in their August 26, 2013 DEIR comment letter (Comment No. 8), affirmed the Project's overall consistency with SCAG's Regional Transportation Plan and Sustainable Community Strategies (also refer to Response No. 8c).

The Project would be consistent with the majority of goals and policies established by the Local Agency Formation Commission (LAFCO) for annexation. The Project would be inconsistent with LAFCO's policy of encouraging development to be consistent with its surrounding area and encouraging development in areas of annexation to occur within 10 years. The Project would be implemented over a period of 30 years. Because the Project proposes a large-scale master planned community, it would be inconsistent with surrounding areas. Some public services and utilities may not be provided to the Project site in a timely manner. Therefore, the Project would be inconsistent with LAFCO's policy requiring areas of annexation to demonstrate that services and utilities can be provided in a timely manner. However, approval of annexation of the 588-acre parcel to the City by LAFCO would ultimately override and/or mitigate any inconsistencies between the Project and applicable LAFCO policies.

Impacts with regard to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant. No mitigation is required.

Reference: Final EIR, pages 4.10-5 – 4.10-13.

MINERAL RESOURCES

Finding

Threshold 4.11.2. Project construction and implementation would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.

Facts in Support of Finding

The Project site is located within Mineral Resource Zone (MRZ) 3 and contains aggregate mineral deposits, such as sand and gravel. During the construction phase, a substantial amount of sand and gravel that may be suitable for aggregate would be reused onsite and would not be available for other future reuse. During Project operation, access to any sand or gravel resources on the Project site would not be available, as the site would be in a developed state and would not be available for future use. The known sand and gravel materials do not represent unique resources that would qualify them as significantly important. Other known and existing commercial aggregate sources and undeveloped local and regional sources would otherwise adequately meet existing and future needs in the City and the Coachella Valley. No impact would occur, and no mitigation is required.

Reference: Final EIR, pages 4.11-3 – 4.11-4.

Finding

Threshold 4.11.1. Project construction and implementation would not result in the loss of availability of a locally-important mineral resource recovery site delineated in the local general plan, specific plan, or other land use plan.

Facts in Support of Finding

The Project site has not been identified as a locally important mineral resource recovery site in either of the City or County General Plans, the adopted McNaughton Specific Plan, or any other land use plan. Therefore, the Project would not have the potential to result in the loss of availability of a locally-important mineral resource recovery site delineated in an applicable General Plan, Specific Plan, or any other land use plan. No impact would occur, and no mitigation is required.

Reference: Final EIR, page 4.11-4.

NOISE

Finding

Threshold 4.12.2. The Project would not result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels.

Facts in Support of Finding

Construction

Ground-borne noise and vibration generated by Project construction activities would be largely low to moderate, unless pavement breaking and/or sheet pile vibration are used onsite, or when bulldozers or other heavy-tracked equipment are used. Such activities would temporarily impact receptors during the site preparation phase. However, any ground-borne noise and vibration would not be excessive and would not cause any damage to the buildings or impact outdoor activities. No impacts would occur in this regard, and no mitigation is required.

Operation

Ground-borne noise and vibration from vehicular traffic during Project operation would not result in a significant impact because the roads on the Project site would be new roads with smooth pavement, thereby reducing noise and vibration associated with discontinuity on road surfaces (i.e., vehicles crossing over potholes, bumps, expansion joints, etc.). No impacts would occur in this regard, and no mitigation is required.

Reference: Final EIR, pages 4.12-20 – 4.12-21.

Finding

Threshold 4.12.5. The Project would not expose people residing or working in the Project area to excessive noise levels due to public airports.

Facts in Support of Finding

The Project site is not located within the boundaries of an airport land use plan. The closest airport is Jacqueline Cochran Regional Airport (formerly known as Thermal Airport), located approximately four miles southwest of the Project site. Therefore, the Project would not expose people residing or working in the area to excessive noise levels from a public airport. No impacts would occur in this regard, and no mitigation is required.

Reference: Final EIR, pages 4.12-22.

Finding

Threshold 4.12.6. The Project would not expose people residing or working in the Project area to excessive noise levels due to private airstrips.

Facts in Support of Finding

The Project site is not located within the boundaries of an airport land use plan. The closest airport is Jacqueline Cochran Regional Airport (formerly known as Thermal Airport), located approximately four miles southwest of the Project site. Therefore, the Project would not expose people residing or working in the area to excessive noise levels from a private airport. No impacts would occur in this regard, and no mitigation is required.

Reference: Final EIR, page 4.12-22.

POPULATION AND HOUSING

Finding

Threshold 4.13.1. The Project would not induce substantial population growth in an area, either directly or indirectly.

Facts in Support of Finding

Development of the Project as proposed would result in construction of 7,800 dwelling units, which would result in an estimated 35,958 future residents. The approved McNaughton Specific Plan proposed 8,000 dwelling units on 1,877 acres in the City of Coachella, and the City General Plan and zoning designations were amended to reflect that approved development on that parcel. The 35,958 future residents forecast under the La Entrada Specific Plan are accounted for in the SCAG and City projections because the land uses under the approved McNaughton Specific Plan were provided to SCAG as part of the Regional Transportation Plan (RTP) and included future population growth forecasts. As a result, because the La Entrada Specific Plan proposes fewer dwelling units, implementation of the Project would have a less than significant impact related to population growth.

The Project would create construction jobs during each Project phase that would be temporary or seasonal and specific to the variety of construction activities. These short-term jobs are anticipated to be filled by existing workers who, for the most part, reside in the Coachella Valley area. Therefore, construction jobs for the proposed Project would not generate a substantial permanent increase in population within the Project area.

The Project proposes approximately 1.5 million square feet of non-residential uses that would generate up to an estimated 3,355 new jobs. While the place of residence of the persons accepting employment generated by the Project is unknown, due to the City's projected jobs-to-housing ratio, it is reasonable that the majority of these jobs would be filled by persons already living in the City or surrounding areas. Therefore, a significant increase in population in the City or surrounding areas is not anticipated to result from operation of the proposed onsite uses.

Population growth anticipated under the Specific Plan would not induce growth beyond that which the City has already anticipated with respect to utilities and infrastructure. Because the proposed Specific Plan was identified and planned for under the General Plan, and planned infrastructure improvements would not be oversized to serve additional growth beyond that

described in the Specific Plan, the proposed Project would result in less than significant growth-inducing impacts, and no mitigation is required.

Reference: Final EIR, pages 4.13-7 - 4.13-11, and Final EIR Section 6.2, *Growth-inducing Impacts*.

Finding

Threshold 4.13.2 and 4.13.3. The Project will not displace a substantial number of existing housing or people, necessitating the construction of replacement housing elsewhere.

Facts in Support of Finding

The Project site is currently undeveloped and has not historically been used for residential use. Future construction and operation of the Project would not displace existing housing or residents or require the construction of replacement housing elsewhere in the City. Therefore, the proposed Project would not result in impacts related to existing housing, the displacement of residents, or the need for replacement housing. No impact is anticipated, and no mitigation is required.

Reference: Final EIR, pages 4.13-11 – 4.13-12.

PUBLIC SERVICES AND UTILITIES

Finding

*Threshold 4.14.3. Project construction and implementation of the Project would not result in the need for additional **schools**.*

Facts in Support of Finding

The Project as designed includes four proposed school sites, resulting in future generation of an estimated 5,837 new students. Although the Project would not specifically develop the proposed school facilities, it would accommodate future development by reserving sites for the schools. The Project would include a Project Design Feature requiring the Project to pay school fees at the time of issuance of each grading permit. Payment of these fees would fully mitigate potential long-term impacts to school facilities by providing funds for the future development of schools on the Project site. Because most elementary and middle schools that serve the Project area are currently over capacity, the students generated at each phase of Project development would result in significant interim impacts to existing school facilities until the proposed schools are constructed. Pursuant to Education Code Section 17620, the payment of the School Impact Fees would fully mitigate the impacts of the Project on elementary and middle school facilities to a level of less than significant.

Additionally, the Project would generate approximately 1,575 high school level students that would attend the existing Coachella Valley Union High School. That high school is currently operating above capacity, and therefore, the increased demand at that high school would be an adverse effect of the Project. However, pursuant to Education Code Section 17620, the payment of School Impact Fees would fully mitigate the impacts of the Project on high school facilities to a level of less than significant.

Reference: Final EIR, pages 4.14-17 – 4.14-19.

Finding

Threshold 4.14.5. Project construction and implementation of the Project would not result in the need for new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for ***public transportation****.*

Facts in Support of Finding

Each phase of the Project would accommodate existing Sunline Transit Agency Lines 90 and 91, extending those bus routes into the Project site to loop through "Street A." The Project would also accommodate neighborhood electric vehicles (NEVs) that consist of golf carts and other electronically powered low-speed vehicles. The NEVs would provide alternative modes of transportation and reduce vehicle miles traveled within the Specific Plan area. The Project would also provide bicycle facilities (i.e., lanes and paths) throughout the Specific Plan area. Therefore, Project impacts on public transportation would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.14-20 – 4.14-21.

Finding

Threshold 4.14.6. Project construction and implementation of the Project would not result in the need for new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for ***other public utilities****.*

Facts in Support of Finding

Verizon Wireless and Time Warner Cable would extend their existing facilities to the Project site to meet new demands for telephone, internet, and cable services associated with the Project. The Project would ensure provision of telecommunication services by requiring plan checks and tract map approval during each Project phase. Therefore, because Verizon Wireless and Time Warner Cable would be able to provide adequate telephone, internet, and cable services to the Project, no adverse impact would occur to these services. Impacts would be less than significant, and no mitigation is required.

Reference: Final EIR, page 4.14-21.

Finding

Threshold 4.14.7. Project construction and implementation of the Project would not exceed ***wastewater treatment requirements*** *of the applicable Regional Water Quality Control Board.*

Facts in Support of Finding

Wastewater generated by the Project would be regulated under the Colorado River Basin RWQCB Waste Discharge Requirements (WDR) Order No. R7-2005-0083. Therefore, Project compliance with the WDR Order permit requirements would ensure that wastewater discharges from the Project and treated by the WWTP would not exceed applicable Colorado River Basin RWQCB wastewater treatment discharge requirements. Impacts would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.14-21 – 4.14-22.

Finding

*Threshold 4.14.8. Project construction and implementation of the Project would not require or result in the construction of new **storm water drainage facilities**, or the expansion of existing facilities, the construction of which could cause significant environmental effects.*

Facts in Support of Finding

Stormwater on the Project site would require the construction of new stormwater collection and drainage facilities and the expansion of existing facilities. Regional flows from north of the Project site flow through seven alluvial drainages onsite and are directed toward the East Side Dike at the southwest edge of the Project site and farther south to Wasteway No. 2. Runoff would also flow through storm drains or within streets to: (1) onsite retention basins where it would be held until it percolates the soil if the onsite retention basins are included in the Project; or, (2) directed into water quality basins that would treat runoff before discharging the runoff into the alluvial drainages. The Project includes channelizing these drainages in a soft-bottom condition with side walls. Stormwater on the Project site would flow through backbone streets to a network of storm drains and then onsite drainage channels. All stormwater on the Project site would be accommodated by the stormwater drainage facilities included in the Project.

If the onsite retention basins are constructed with the Project, the Project would retain stormwater runoff onsite and would therefore not contribute runoff water that would exceed the capacity of the downstream storm drain facilities. If the onsite retention basins are determined to not be required, the onsite channels would convey storm water flows to the East Side Dike. As such, the increased runoff from the site would continue to be retained temporarily by the East Side Dike with sufficient freeboard before being discharged to the Whitewater River (Coachella Valley Storm Drain Channel) via Wasteway No. 2. Therefore, the Project without the onsite retention basins would not exceed the capacity of the downstream storm drain system.

CVWD's letter dated August 22, 2013 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).

Project-related impacts to stormwater drainage facilities would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.14-22 – 4.14-23.

Finding

*Threshold 4.14.9. Project construction and implementation of the Project would not result in impacts associated with the provision of new or physically altered **energy transmission facilities** in order to maintain acceptable levels of service.*

Facts in Support of Finding

The Project would generate a total estimated monthly electricity demand of 7,560,220 kilowatt-hours (kWh), which would require the Imperial Irrigation District (IID) to install two new distribution substations on the Project site and to extend the existing 92-kilovolt (kV) transmission lines from the existing substation near Avenue 52 across the canal to the Project site. Further, the IID would be required to relocate and/or rearrange certain segments of the

existing 92 kV overhead transmission lines and some existing 13 kV lines to integrate these facilities with the new onsite electric distribution facilities. Installation of two new substations and the expansion of existing transmission lines would ensure that electricity demands associated with each Project phase would be met.

The Draft EIR addresses potential impacts of new energy transmission facilities. The EIR addresses potential electrical substations and transmission lines, which may be slightly modified to reflect transmission line easements requested by IID and Glorious Land Company (refer to Response No. 5b). 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 and/or electrical transmission lines 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).

The Project would also include energy conservation measures detailed in the Specific Plan. With the proposed improvements, the Project would have a less than significant impact on electricity generation and transmission facilities, and no mitigation is required.

The Project would also generate a monthly demand of 24,512,076 cubic feet of natural gas and would require the Southern California Gas Company to construct a gas regulator station to provide an additional natural gas source to serve the site. With such infrastructure improvements, the Project would receive acceptable levels of service related to natural gas during each Project phase. Therefore, the Project would result in less than significant impacts related to natural gas transmission facilities, and no mitigation is required.

Reference: Final EIR, pages 4.14-23 – 4.14-26, Response to Comment No. 5b.

Finding

Threshold 4.14.12. Project construction and implementation of the Project would not result in impacts due to conflict with any federal, State, and local statues and regulations related to ***solid waste****.*

Facts in Support of Finding

The Project would comply with all federal, State, and local statutes and regulations related to solid waste, including solid waste diversion requirements established by the California Green Building Standards Code (CALGreen Code) and the California Integrated Water Management Act of 1989. The Project would require the diversion of at least 75 percent of solid waste and would adhere to Sustainable Community Design Strategies for materials efficiency that would promote recycling and the reuse of materials within the Project design. Therefore, Project impacts with regard to solid waste would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.14-30 – 4.14-31.

RECREATION

Finding

Threshold 4.15.1. Project construction and implementation of the Project would not result in impacts due to an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Facts in Support of Finding

Development of the Project would increase the City's population by up to an estimated 35,958 people. These residents would generate an increased demand for parks and recreational facilities. The Project would be required to provide approximately 107.9 acres of parkland to meet City requirements of 3.0 acres of parkland per 1,000 residents. The Project design includes approximately 344.7 acres of parkland, 381.1 acres of open space, and 175.8 acres of drainage/wash area. The Project also includes a network of multi-purpose trails and bicycle trails throughout the Project site.

The City currently has a deficit of approximately 36.2 acres of parkland. Although the Project would increase the City's overall population, it would provide sufficient parkland to offset the existing deficit of parkland in the City. Because the Project would result in an overall surplus of nearly 200 acres of parkland in the City, the Project would not adversely affect existing parks or other recreational facilities. Each of the three villages in the Specific Plan includes parks/recreation and open space uses that would be developed as the residential uses in the villages are developed so that residents in each village would have parks/recreation and open space uses available. As no deficiency in parkland with Project implementation and the parks/recreation and open space uses would be developed as the residential uses are developed, it is anticipated that the increase in population associated with the Project would not result in the physical deterioration of existing recreational facilities. Impacts would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.15-8 – 4.15-12.

Finding

Threshold 4.15.2. Project construction and implementation of the Project would not result in impacts due to the construction of or expansion of recreational facilities that might have an adverse physical effect on the environment.

Facts in Support of Finding

Buildout of the Project as designed would result in the provision of approximately 381.1 acres of open space, 175.8 acres of drainage/wash areas, and 344.7 acres of active parkland. The Project would not require the construction or expansion of recreational facilities beyond those already included in the Project as proposed. The Project would therefore not result in adverse physical effects on the environment as a result of the construction or expansion of recreational facilities outside the boundary of the Specific Plan. Impacts would be less than significant, and no mitigation is required.

Reference: Final EIR, page 4.15-12.

TRAFFIC AND CIRCULATION

Finding

Threshold 4.16.3. The Project will not result in a change in air traffic patterns.

Facts in Support of Finding

Two general aviation airports in the vicinity of the Project site provide limited commercial service: Jacqueline Cochran Regional Airport (4.25 miles southwest of the Project site) and Bermuda Dunes Airport (8.5 miles west of the Project site). The Project site is not within an airport land use plan or in the vicinity of a private airstrip. The maximum height of structures on the Project site would be 55 feet, which would not extend into any air traffic control zones above the site or require any modification to existing air traffic control patterns at those airports. The anticipated land uses may result in some demand for travel at those airports by residents or employees. However, any such demand would not be substantial and would not be expected to adversely affect traffic levels at those airports. The Project would therefore not result in an increase in traffic levels or air traffic patterns or any substantial aviation-related safety risks. No impacts would occur, and no mitigation is required.

Reference: Final EIR, page 4.16-18.

Finding

Threshold 4.16.4. The Project will not substantially increase hazards due to a design feature or incompatible uses.

Facts in Support of Finding

Construction

Construction of the Project may result in the need to temporarily restrict or detour vehicular traffic or cause temporary hazards. Project construction activities would be required to include adequate measures to facilitate the passage of people and vehicles through/around road or lane closures or other potential construction effects on vehicular access to/from and around the Project site, as part of an overall construction traffic management plan. Therefore, Project construction would result in a less than significant impact related to road or design hazards, and no mitigation is required.

Operation

Planned roadway improvements with the Project would be designed and constructed consistent with applicable City and California Department of Transportation (Caltrans) design requirements, which would result in safe and efficient traffic flows. Project adherence to the Specific Plan general street alignments, street cross-sections, and other applicable City requirements for the design of streets would ensure the Project does not result in sharp curves, dangerous intersections, or other design hazards. Therefore, the Project would not increase hazards due to design features. Impacts would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.16-18 – 4.16-19.

Finding

Threshold 4.16.5. The Project will not result in inadequate emergency access.

Facts in Support of Finding

Construction

Construction activities may temporarily restrict or delay emergency vehicles on and around the Project site. Project construction activities would be required to implement adequate measures to facilitate the passage of emergency vehicles through/around road or lane closures, or other potential construction effects on emergency vehicle access to/from and around the Project site, as part of an overall construction traffic management plan. As a result, Project construction would result in a less than significant impact related to emergency access. No mitigation is required.

Operation

Adherence to the Specific Plan general street alignments and street cross-sections and other applicable City requirements for the design of Project streets would ensure the Project does not result in conditions that would impede emergency response vehicles. The Project provides for important regional access improvements by connecting Avenues 50 and 52 to Interstate 10 (including new access crossings over the Coachella Canal), by providing a new I-10 interchange at Avenue 50, and by making provision for access to land-locked parcels east of the Project. Therefore, a less than significant impact would occur, and no mitigation is required.

Reference: Final EIR, page 4.16-19.

Finding

Threshold 4.16.6. The Project will not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Facts in Support of Finding

The Project includes a network of on- and off-street non-motorized circulation elements to promote walkability and reduce vehicle miles traveled within the Project site for bicycles and pedestrians as well as allowing for NEVs. Trails would also be provided throughout the Project site. These Project features and components would support the use of non-motorized travel modes. The proposed non-motorized and NEV circulation plan for the Project would not conflict with the policies and goals in the Coachella Valley Association of Governments (CVAG) Non-Motorized Transportation Plan. Therefore, Project impacts regarding conflicts with plans for alternative transportation modes would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.16-19 – 4.16-20.

WATER SUPPLY

Finding

Threshold 4.17.1. The Project will not result in impacts due to the lack of sufficient water supplies available to serve the Project from existing entitlements and resources, or new or expanded entitlements.

Facts in Support of Finding

Construction

Short-term demand for water may occur during demolition, excavation, grading, and construction of the proposed Project. It is estimated that a total of approximately 1,628 acre-feet (af)[1] would be used for construction purposes over buildout of the Project. The Project includes five development phases. Therefore, water usage for construction purposes would be phased in conjunction with the Project development, with an average construction water demand of approximately 325 af per phase.

The Coachella Valley Groundwater Basin, specifically the Lower Whitewater River Subbasin, would serve as the main water source for the Project. The 2010 Coachella Valley Water Management Plan Update (2010 CVWMP Update) and 2011 Subsequent Programmatic Environmental Impact Report (2011 SPEIR, State Clearinghouse No. 2007091099) show that the total projected water supplies available to the Lower Whitewater River Subbasin area during normal, single dry year, and multiple dry year periods through 2045 are sufficient to meet the water needs of existing uses and projected growth, specifically including the future water needs in the City of Coachella and its Sphere of Influence, including the proposed Project.

Overall, construction activities would require minimal water and are not expected to have any adverse impacts on the existing water system or available water supplies. Specific building approvals are not being sought for any phase of the Project at this time. Pursuant to Senate Bill (SB) 221, the approval of any future Tentative Tract Maps for the Project that include subdivisions must be conditioned on obtaining a written verification from the Coachella Water Authority (CWA). Impacts on water supplies associated with construction activities are therefore considered less than significant, and no mitigation is required.

Operation

The CWA would provide water service to the Project. In accordance with SB 610 and CEQA, the CWA Water Supply Assessment prepared for the Project concluded that total projected water supplies available to the CWA during normal, single dry year, and multiple dry year periods over the 20-year projection period for the Project and beyond are sufficient to meet the projected demands associated with the Project, in addition to existing and planned future uses in the CWA service area, including agricultural and manufacturing uses.

As indicated above, CVWD has concluded that the total projected water supplies available to the Lower Whitewater River Subbasin area over the 20-year projection period and beyond are sufficient to meet the water needs of existing uses and projected growth, specifically including the future water needs in the City and its Sphere of Influence. Water demands for the Project have been accounted for as part of the CVWD's regional water supply planning efforts and conclusions of water supply sufficiency.

CVWD's supplemental water supplies and entitlements are specifically available to the CWA to serve the Project, pursuant to the 2009 and 2013 Memoranda of Understanding (MOUs) between the City and CVWD, which provide a mechanism by which the City can finance and acquire supplemental water supplies from CVWD to meet the projected demands of new development projects. The 2013 MOU expressly acknowledges and applies to the proposed La Entrada Specific Plan, and the supplemental water supplies referred to in the 2013 MOU have

[1] One acre-foot is approximately 325,851 gallons (the amount of water represented by one acre of land covered one foot deep in water).

been analyzed by CVWD as part of the 2010 CVWMP Update and the 2011 SPEIR, which concluded that implementing the water supply projects and programs in the 2010 CVWMP Update will have a beneficial effect on groundwater resources. Pursuant to SB 221, the approval of any development agreement or Tentative Tract Map for the Project that includes a subdivision must be conditioned on obtaining a written verification from the CWA. Project impacts related to sufficient water supplies and entitlements would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.17-44 – 4.17-50, and Final EIR Appendix M, *La Entrada Water Supply Assessment* (and related MOUs).

Finding

Threshold 4.17.2. The Project will not result in impacts due to requirements for or construction of new water or wastewater treatment or collection facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Facts in Support of Finding

The 2010 annual production from the City's eight wells was approximately 2,700 million gallons. The Project's projected demand of 5,365.8 af per year equates to approximately 1,748 million gallons annually, which, when added to the current annual production of 2,700 million gallons, is within the production capacity of the City's existing wells (approximately 18 million gallons per day, or 6,570 million gallons annually).

In addition to onsite infrastructure within the Specific Plan boundaries, the Project would supplement City water facilities with two offsite production wells for potable use. The first would be south of 50th Avenue between Polk Street and Fillmore Street, and the second would be north of 52nd Street between Fillmore Street and Pierce Street. The closest existing City well is north of 48th Avenue and east of Tyler Street, approximately ¾ of a mile from the closest proposed well. The Specific Plan indicates that well and booster sites would be located at an off-site location to maintain water quality. Two separate pipelines would be routed from these wells and boosters across the Coachella Canal along Avenue 50 and Avenue 52 to a common booster station on the Project site to serve all three pressure zones. The Conceptual Water Plan (La Entrada Specific Plan Exhibit 2-10 and Figure 4.17.1) indicates two 24-inch water mains would be extended from the City's 150 Zone system to serve the Project site. The 24-inch water main would be extended from Polk Street into the Project area and would be transferred into a booster station for the 450 Zone system.

The Project water infrastructure would be integrated into the City's existing water facilities system. The physical disturbance of undeveloped land associated with the Project has been evaluated in the DEIR. Project impacts with regard to requirements for or construction of new water or wastewater treatment or collection facilities or expansion of existing facilities would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.17-50 - 4.17-52.

Finding

Threshold 4.17.3. The Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Facts in Support of Finding

Construction

Groundwater at the Project site is greater than 50 feet below ground surface, and therefore, it is not anticipated that the groundwater table would be encountered, and dewatering is not anticipated to be required during construction. Project grading and construction would compact soil, which may decrease infiltration during construction. However, construction activities would be temporary. Reduced infiltration during construction would not result in a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, Project construction impacts on groundwater supplies and recharge would be less than significant, and no mitigation is required.

Operation

The CWA would provide water service to the Project. In accordance with SB 610 and CEQA, the CWA *Water Supply Assessment* concludes that the total projected water supplies available to the CWA during normal, single dry year, and multiple dry year periods over the 20-year projection period and beyond are sufficient to meet the projected demands associated with the proposed Project in addition to existing and planned future uses in the CWA service area, including agricultural and manufacturing uses.

Water demands associated with the Project have been specifically accounted for as part of CVWD's regional water supply planning efforts and conclusions of water supply sufficiency (where the Project was previously referred to as the Lomas del Sol Project). CVWD's supplemental water supplies and entitlements are specifically available to CWA to serve the proposed La Entrada Specific Plan pursuant to the 2009 and 2013 MOU between the City and CVWD, which provide a mechanism by which the City can finance and acquire supplemental water supplies from CVWD that are recharged to the groundwater basin to meet the projected demands of new development projects. The 2013 MOU expressly acknowledges and applies to the proposed La Entrada Specific Plan, and the supplemental water supplies referred to in the 2013 MOU were analyzed by the CVWD as part of the 2010 CVWMP Update and the 2011 SPEIR, which concluded that implementing the water supply projects and programs contained in the 2010 CVWMP Update will have a beneficial effect on groundwater resources.

Development of the proposed Project will increase the amount of impervious surfaces on the Project site. However, the site is not used to support regional recharge programs identified in the 2010 CVWMP Update that recharge the Lower Whitewater River Subbasin. The Project would not substantially deplete groundwater or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The Project will provide for groundwater recharge through onsite water quality basins and natural drainage channels. Therefore, Project operational impacts related to groundwater levels would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.17-44 - 4.17-50.

4.0 FINDINGS CONCERNING IMPACTS FOUND TO BE LESS THAN SIGNIFICANT WITH MITIGATION

In evaluating the potential impacts associated with the Project, the Final EIR identified potential impacts that would be less than significant with mitigation. This Section of the Statement of

Facts and Findings identifies those impacts that may occur with Project implementation but were found to be below the threshold of significance with implementation of recommended mitigation measures (refer to Project Resolution Attachment B, Mitigation Monitoring and Reporting Program). Impacts noted below are also offset through existing regulatory programs and Project conditions of approval, as well as Project Design Features listed in the Final EIR Section 3.9 (pages 3-19 to 3-25).

AESTHETICS/LIGHT AND GLARE

Finding

Threshold 4.1.4. Construction and implementation of the Project would not result in impacts to surrounding uses due to light and glare, or expose residential property to unacceptable light levels during construction, with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

During construction, travelers within the Project area will experience views of the site that may include construction fencing, equipment, grading areas, building pads, partially constructed structures, and other related facilities and activities. Such views would be temporary and would not represent a permanent change in views of construction equipment and activities from outside the Project site. Construction activities would not occur during the evening or nighttime hours, and therefore, no night lighting for construction would be required. Limited security lighting will provided at the Site Manager's trailer and at other locations during construction. However, such lighting would comply with City Municipal Code Requirements. Further, construction activities and/or equipment would not generate substantial potential sources of glare. As a result, Project construction activities and/or equipment would result in less than significant temporary impacts related to aesthetics and light and glare.

The Project would result in the introduction of new light sources such as street and parking lot lighting, landscape lighting, illuminated signs, security lighting, exterior lighting on buildings, and vehicle lights (i.e., headlights). Although such sources of light would contribute to the overall light visible in the night sky and the surrounding area, the Project site is in an undeveloped desert area, and no nearby sensitive receptors occur that would be adversely impacted by such lighting. Agricultural uses in the Project vicinity operate during daylight hours and would therefore not be impacted by Project lighting and glare effects, as such uses are not typically sensitive to light and glare. While the Project would add new lighting sources to the Project area, the numbers and types of lighting sources are not anticipated to substantially differ from that commonly utilized at existing developments within the City. However, because the Project site and the immediate surrounding areas are relatively undeveloped with limited or no existing light sources, the Project would introduce a substantial amount of light and glare sources where none previously existed, resulting in a potentially significant impact.

All structural and landscape lighting would be consistent with the design guidelines in the Specific Plan and all applicable City regulations and ordinances pertaining to specific plan developments. Onsite landscaping would be used to screen lighting sources to reduce potential visual impacts from lighting used for buildings and parking lots. Further, Project adherence to the City's Zoning Code would ensure that any building or parking lighting installed would not significantly impact adjacent uses. Mitigation Measure 4.1.1 would be implemented to further

reduce potential light-related impacts of the Project, beyond the requirements of the City's Municipal Code. With adherence to applicable regulations and implementation of Mitigation Measure 4.1.1, Project light and glare impacts would be mitigated to a less than significant level.

All Project lighting (other than street lighting) would be shielded to minimize illumination of adjacent properties and to reduce the potential for glare. Lighting for the ball field would be in the form of tall fixtures placed to illuminate the field and would incorporate low-glare, shielded lighting to minimize glare impacts on surrounding areas. Mitigation Measure 4.1.1 would be implemented to further reduce potential ball field light-related impacts o beyond the requirements of the City's Municipal Code.

New traffic signals are proposed for internal roads on the Project site. Any Project-related traffic signals would be shielded to direct light toward a specific lane, while blocking views of the vehicles in lanes moving in other directions. Due to the lower intensity of the lights used in traffic signals and the use of shielding, potential light impacts of traffic signals installed with the Project would be less than significant.

Exterior surfaces of Project structures would be finished with a combination of architectural coatings, trim, and/or other building materials such as stucco, wood, concrete, and brushed metal. With implementation of such measures, and with consideration for the nature of the type of uses proposed, the Project is not anticipated to contribute to a substantial increase the amount of daytime glare in the area.

Reference: Final EIR, pages 4.1-19 – 4.1-23.

AIR QUALITY

Finding

Threshold 4.3.5. Project construction and implementation would not create objectionable odors affecting a substantial number of people.

Facts in Supporting Finding

The operation of heavy-duty equipment on the Project site during the construction phase would emit odors. While these odors could be objectionable near the equipment, the Project-related construction activities in the early phases would be a sufficient distance from existing sensitive receptors and, during later phases of development, future sensitive receptors, and the natural dissipation in the air over the distance between the equipment and the sensitive receptors would substantially reduce the potential for objectionable odors at the sensitive receptors. No other sources of objectionable odors are anticipated during Project construction. Impacts would be less than significant, and no mitigation is required.

The anticipated residential, commercial, and/or mixed uses on the Project site do not include recognized sources of long-term objectionable odors. The proposed drainage system for the Specific Plan includes up to five retention basins and earthen drainage channels on the Project site. These water features have the potential to cause odors from bacteria generated by still or slow moving water and/or decaying plant materials. Implementation of Mitigation Measure 4.9.2 would require preparation and adherence to a maintenance plan for these water features to minimize potential odors caused by standing or retained water. Therefore, potential impacts resulting with Project operations would be reduced to a level of less than significant.

Reference: Final EIR, page 4.3-27.

BIOLOGICAL RESOURCES

Finding

Threshold 4.4.1. The Project would not have a substantial adverse effect, either directly or indirectly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

The impact of the Project on biological resources would be less than significant due to compliance with existing laws, regulatory programs, and General Plan policies currently in place. Further, implementation of Mitigation Measures 4.4-1 to 4.4-5 would reduce impacts on special-interest plant communities; non-listed special-interest species; threatened and endangered species; and, burrowing owl and migratory birds to a less than significant level. Any future development within the Project site would be subject to the requirements of the EIR and applicable regulatory programs, and would require site-specific CEQA analysis to ensure that all impacts on any species identified as a candidate, sensitive, or special status species would be reduced to less than significant. The Project also includes design features to minimize impacts to biological resources, including setting aside natural open space areas, and maintaining portions of the existing desert wash in its natural condition (DEIR, pages 4.4-10 and 4.4-11). These include the following:

- The Specific Plan development is proposed to be phased, with the initial Phase 1 grading limited to the area necessary to achieve mass balancing and proper drainage of the overall property, leaving the balance of the site in its current condition until such time the remaining phases begin to develop. This phased development would minimize impacts to biological resources.

- The proposed Specific Plan includes approximately 557 ac of open space, including 175.8 ac of soft-bottomed drainage areas available for mitigation and approximately 344.7 ac of passive and active recreation. Retention basins for drainage and water quality, if required by the Coachella Valley Water District (CVWD), would be vegetated, and the landscaping of active recreational areas would increase plant cover and trees on site, providing habitat for birds and forage for birds of prey.1 The northern portion of the regional Special Use Park is proposed as natural open space to avoid impacts to a jurisdictional drainage in that location.

- The Specific Plan's Conceptual Drainage Plan (provided in Appendix I and shown on Figure 3.10 in the Project Description) incorporates drainage and water quality features that would maintain water quality within the on-site drainages and preserve/enhance downstream water quality, indirectly protecting the biological resources and functions of the drainage.

- Specific Plan implementation would result in increased desert vegetative cover on site, including trees and shrubs that could enhance the availability of nesting sites for migratory birds in the Project area.

Reference: Final EIR, pages 4.4-11– 4.4-14.

Finding

Threshold 4.4.2. The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

The impact of the Project on biological resources would be less than significant due to compliance with existing laws, regulatory programs, and General Plan policies currently in place, in addition to implementation of Mitigation Measure 4.4-5. Of the approximately 218.13 acres of CDFW jurisdiction on the Project site, approximately 10.0 acres are considered CDFW vegetated streambed, and 6.6 acres of desert dry wash woodland are considered CDFW jurisdictional vegetation. The Project is anticipated to impact approximately 191.60 acres of CDFW jurisdictional area (123.49 acres permanent, 68.11 acres temporary). As a result, a CDFW 1602 Agreement would be required prior to any construction in jurisdictional areas. Implementation of Mitigation Measure 4.4.5 would ensure that Project impacts related to CDFW jurisdictional waters are reduced to a less than significant level.

Reference: Final EIR, page 4.4-14.

Finding

Threshold 4.4.3. The Project would not have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the Clean Water Act with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Based on an analysis of onsite hydrologic conditions, the relevant reaches were determined to have insubstantial or speculative effect on the chemical, physical, or biological significant nexus to the Whitewater River and Salton Sea. No United States Army Corps of Engineers (ACOE) jurisdictional waters/wetlands have been identified on the Project site, and ACOE jurisdiction is therefore absent because the onsite drainages lack a significant nexus to the Salton Sea. An Approved Determination will be required to verify the preliminary results of ACOE jurisdiction, as required in Mitigation Measure 4.4.6. If the ACOE concurs, a Permit would not be required. However, the Regional Water Quality Control Board (RWQCB) may require a Report of Waste Discharge under the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act) and issue Waste Discharge Requirements. If the ACOE asserts jurisdiction, an Individual Permit would likely be required, and RWQCB regulation would be through Section 401. Compliance

with existing laws, regulatory programs, and General Plan policies currently in place, in addition to Mitigation Measure 4.4-6, would reduce Project impacts to a level of less than significant.

Reference: Final EIR, page 4.4-14 – 4.4-15.

CULTURAL AND PALEONTOLOGICAL RESOURCES

Finding

Threshold 4.5.1. Project construction and implementation would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

The Project site has been the subject of several past cultural resource assessments, which have only identified the Coachella Canal as a historic resource (see Draft EIR Table 4.5.A, page 4.5-2). The Coachella Canal in the vicinity of Avenues 50 and 52 west of the Project site was determined to be eligible for the National Register of Historic Places (National Register) and is also designated as Site 33-005705 in the California Historical Resources Inventory. A crossing over the Coachella Canal as part of Phase 1 development is required to extend Avenues 50 and 52 onto the Project site. At that crossing, one or more reinforced concrete box culverts would be constructed. Although the drainage culverts would involve changes to the Coachella Canal during Phase 1 construction, these changes would not impact the historical significance of the Coachella Canal. Therefore, impacts to historical resources are considered less than significant.

Phases 2 through 5 of the Project are not expected to adversely impact historic resources. However, a site-specific field survey of the parts of the Specific Plan site outside the Phase 1 area was not conducted as part of the current cultural resources evaluation, which covered only the Phase 1 area on the Specific Plan site. Mitigation Measure 4.5.5, prescribed in Section 4.5.11, of the Program EIR requires the Project applicant to conduct site surveys and records searches and prepare Cultural Resources Survey Reports for areas on the Specific Plan site outside the Phase 1 area, prior to the submittal of Tentative Tract Maps for those areas. Those reports will describe whether there are any historic resources on the portions of the Specific Plan site outside the Phase 1 area and, if so, if the proposed development in a Tentative Tract Map would affect those resources and the measures required to address those effects. As a result, it is expected that the impacts of the Specific Plan related to historic resources would be less than significant after mitigation.

Reference: Final EIR, pages 4.5-20 – 4.6-21.

Finding

Threshold 4.5.2. Construction of the Project would not cause a substantial adverse change in the significance of an archaeological resource with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

The Project as designed could facilitate future development that has the potential to disturb or destroy archaeological resources, and therefore, the Project could indirectly result in impacts to these resources. Two historic trail segments and one historic prospecting locale occur on the Project site. In previous recommendations at the trail sites, they were not recommended as significant archeological resources under CEQA because the segments are highly-fragmented, non-contiguous, disjointed foot paths. Further, the prospecting site was not recommended as a significant resource under CEQA because little additional research potential exists and the site has already been recorded. No other significant cultural resources were found on site during the prior 2006 cultural resource surveys.

Although the Project site is not considered sensitive for archeological resources, precautionary mitigation would be implemented to protect archaeological resources in the event of discovery during ground-disturbing construction activities. The City of Coachella complies with procedures and regulations codified in the State CEQA Guidelines and the Traditional Tribal Cultural Places Law ("Senate Bill 18") as defined in California Government Code 65352 governing the identification and treatment of archaeological resources. Mitigation Measures 4.5.1 to 4.5.2 and 4.5.4 to 4.5.5 provide protection to these resources. With the mitigation listed above, the City's development review process, mandatory CEQA statutes, compliance with "Senate Bill 18", and other regulation identified above, future implementing projects allowed pursuant to the Project are anticipated to result in less than significant impacts.

Reference: Final EIR, pages 4.5-21 – 4.5-22.

Finding

Threshold 4.5.3. Construction of the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Portions of the Project site are located on sediments mapped as having high sensitivity for paleontological resources. There are no known localities on the Project site. However, there are sensitive sediments that may contain fossil remains in the Project area and there is the potential to encounter paleontological resources during all ground-disturbing activities. Mitigation is required to reduce potential adverse impacts to unknown (buried) paleontological resources. Further, the Project would be required to comply with existing policies and regulations intended to protect the integrity of paleontological resources. These policies and regulations correspond to policies contained in the City's General Plan and would be applied to all future development occurring with the Project. Additionally, implementation of Mitigation Measure 4.5.3 would ensure impacts are reduced to a less than significant level.

Reference: Final EIR, pages 4.5-22 – 4.5-23.

Finding

Threshold 4.5.4. Construction of the Project would not disturb any human remains, including those interned outside of formal cemeteries with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Although no human remains are known to be on site or are anticipated to be discovered, precautionary mitigation is required. Ground-disturbing activities in the Project area such as grading or excavation would have the potential to disturb as yet unidentified human remains. If human remains are found, those remains would require proper treatment in accordance with applicable laws. State of California Public Resources Health and Safety Code Section 7050.5-7055 describes the general provisions for treatment of human remains. Specifically, HSC Section 7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. As required by State law, the procedures set forth in PRC Section 5087.98 would be implemented, including evaluation by the County Coroner and notification of the Native American Heritage Commission. Compliance with State regulations would ensure that impacts in this regard would be less than significant. Additionally, adherence to Mitigation Measure 4.5.4 would ensure that impacts remain less than significant. It should also be noted that, consistent with the requirements of a EIR, future site-specific implementing projects proposed within the Project area would require additional site-specific CEQA analysis at a later date.

Reference: Final EIR, pages 4.5-23 – 4.5-24.

GEOLOGY AND SOILS

Finding

Threshold 4.6.1.ii. Project construction and implementation would not expose people or structures to potential substantial adverse effects from strong seismic ground shaking with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Small-scale inactive faults occur within the bedrock units underlying the Project site. These fractures are associated with major earthquakes along the San Andreas Fault, which runs along the western boundary of the Project site. Evidence from the fault investigation indicates that fractures have the potential to develop anywhere on the Project site as the result of an earthquake associated with active faults on site. In addition, the Project site contains several faults that are capable of strong ground motion. These faults are associated with the San Andreas and Painted Canyon Fault Zones.

Due to the presence of the San Andreas Fault and other active faults on and near the Project site, potential adverse impacts resulting from strong seismic shaking cannot be ruled out and are considered potentially significant. All future development would be subject to the provisions of the California Building Standards Code in Title 24, which provides regulations for structural

design and construction with regard to seismic safety, as well as local regulations, ordinances, General Plan policies, standard conditions or requirements, and recommendations from the geotechnical report. Further, Mitigation Measure 4.6.1 requires a final geotechnical report to delineate the precise locations of all active faults within each planning area and to determine and refine any restricted use zones with known active and potentially active faults. Project conformance with such requirements would be adequate to ensure that potential impacts from the effects of ground shaking on any habitable structure, critical facility, or other infrastructure are reduced to less than significant. This analysis is consistent with the requirements of a EIR, and future site-specific implementing projects proposed within the Project area will require site-specific CEQA analysis at a later date.

Reference: Final EIR, pages 4.6-13 – 4.6-14.

Finding

Threshold 4.6.1.iii. Project construction and implementation would not expose people or structures to potential substantial adverse effects from seismic-related ground failure, including liquefaction, with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

The geotechnical investigation determined that if saturated, the Palm Spring Formation is prone to liquefaction and lateral spreading deformation during strong ground shaking. Future development of the Project site could therefore introduce large volumes of water into the subsoils, which could lead to localized perched water conditions within units that could become susceptible to localized liquefaction during strong ground motion.

Although implementation of the Project would potentially increase exposure of future development associated with implementing projects within the Project area to damage caused by secondary seismic impacts such as ground failure, including liquefaction, during an earthquake event, all future development would be subject to the provisions of the California Building Standards Code in Title 24, which provides regulations for structural design and construction with regard to seismic safety, as well as local regulations, ordinances, General Plan policies, standard conditions or requirements. Further, Mitigation Measure 4.6.1, which requires compliance with the recommendations in required future geotechnical studies, would reduce impacts on the Project site related to liquefaction to a less than significant level. Such conformance would be adequate to ensure that potential impacts from the effects of seismic-related ground failure, including liquefaction, would be reduced to less than significant. This analysis is consistent with the requirements of a EIR, and future site-specific development projects proposed within the Project area will require site-specific CEQA analysis at a later date.

Reference: Final EIR, pages 4.6-14 – 4.6-15.

Finding

Threshold 4.6.1.iv. Project construction and implementation would not expose people or structures to potential substantial adverse effects from landslides with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Although landslides may occur as the result of seismic activity or other natural processes, the potential for such events can also be increased as the result of human activities such as grading or manufactured slope construction. The Palm Spring Formation is susceptible to landslides and block failures because of its abundant clay members, localized folding, and preexisting faults. Grading on the Project site could potentially decrease slope stability in some areas. Additionally, cobbles and boulders located on the tops of ridges and slopes onsite could potentially come loose during ground shaking associated with earthquakes on or near the Project site. Landsliding and rockfall could therefore be a potentially significant impact, particularly on the southwestern part of the Project site and in hillside areas.

All future development within the Project area would be required to comply with the requirements of the California Building Standards Code in Title 24. In areas where steep slopes occur that are susceptible to landslide hazards, a site-specific geologic and geotechnical investigation will be required to identify potential impacts and provide recommendations as to slope stability and design requirements to reduce potential hazards resulting from landslides to a less than significant level (Mitigation Measure 4.6.3).

Reference: Final EIR, page 4.6-15.

Finding

Threshold 4.6.2. Project construction and implementation would not result in substantial soil erosion or the loss of topsoil.

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

As lands within the Project area are developed in the future, an increase in the disturbance of existing land surfaces from grading, development, or removal of existing vegetation/topsoil would potentially occur. As a result, the potential for erosion caused by wind and/or water would increase. During a storm event, there is a potential for soil erosion to occur on and in the vicinity of the Project site at an accelerated rate. The required Storm Water Pollution Prevention Plan (SWPPP) will identify specific Construction Best Management Practices (BMPs) to be implemented as part of the Project to minimize water quality impacts during construction, including those impacts associated with soil erosion.

The proposed Project would consist of large-scale grading and excavation activities that would alter existing slopes and established drainage paths, thus potentially leading to erosion. The Project design would incorporate erosion control devices, such as street gutters, storm drains, culverts, and detention basins to control runoff and prevent erosion to reduce or avoid soil loss on the site due to wind and water erosion. The potential for wind- and runoff-related erosion would be substantially reduced when the Project site is fully developed with structures, landscaping, and other erosion control devices (e.g. BMPs). Further, implementation of Mitigation Measures 4.6.1 and 4.9.1 will reduce potential erosion impacts to a less than significant level.

As applicable, future development will be required to comply with National Pollutant Discharge Elimination System (NPDES) requirements and BMPs to reduce potential effects on downstream water bodies, as the result of erosion. Future development within the Project area will be required to include erosion and sediment control measures as part of the grading plan in order to minimize land modification and potential erosional effects. Specific design measures would be implemented on a Project-specific basis, thereby reducing potential impacts caused by erosion and/or the loss of topsoil to less than significant.

Reference: Final EIR, pages 4.6-15 – 4.6-16.

Finding

Threshold 4.6.3. Project construction and implementation would not result in a geologic unit or soil becoming unstable as a result of the Project, resulting in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Slope Stability. Project grading activities could potentially affect the stability of onsite slopes in certain areas. An analysis of proposed cut-and-fill slopes determined that slope stability would meet or exceed minimum requirements for slope stability. Site-specific geotechnical studies will be completed to identify the potential for landslides and unstable slope conditions within each planning area as Tentative Tract Maps are submitted, as required in Mitigation Measure 4.6.3. Implementation of Mitigation Measures 4.6.3 and 4.6.1, which require incorporation of recommended geotechnical measures into the final design plans, would reduce impacts associated with landslides and slope stability to a less than significant level.

Subsidence. Compressible and collapsible materials are expected to be found in the near-surface parts of the slopewash, landslide deposits, and alluvial deposits on the Project site. Removal of these materials would be required prior to placement of fill in those areas. Complete removal of all slopewash and shallow landslide deposits and removal of only the upper several feet of loose soils within alluvial units onsite are anticipated. As individual development lots would be underlain by soil and bedrock materials with variable expansion potentials, the final foundation design recommendations will be developed from the Project geotechnical studies on a lot-by-lot basis based on the actual expansion, soil, and bedrock characteristics underlying each lot. Implementation of Mitigation Measure 4.6.4 requiring site-specific geotechnical investigations, and adherence to the recommendations of those geotechnical investigations, would reduce the potential for subsidence impacts onsite to a less than significant level.

Lateral Spreading. Field observations indicated that, if saturated, the Palm Spring Formation is susceptible to liquefaction and lateral spreading during strong ground shaking. However, current geological conditions are much different, and the Palm Spring material is semi-consolidated and of greater density. Groundwater now also occurs at greater depths below the ground surface (over 50 feet). Therefore the potential for lateral spreading onsite is considered to be low. The potential for lateral spreading may increase within future cut slopes graded on the site, and therefore, proper drainage of irrigation and stormwater runoff to avoid saturation of the underlying Palm Spring Formation would minimize the potential for lateral spreading on the Project site. Implementation of Mitigation Measure 4.6.1 would further reduce impacts associated with lateral spreading to a less than significant level.

Liquefaction or Collapse. As stated, if saturated, the Palm Spring Formation is prone to liquefaction and lateral spreading deformation during strong ground shaking. Future development of the Project site could therefore introduce large volumes of water into the subsoils, which could lead to localized perched water conditions within units that could become susceptible to localized liquefaction during strong ground motion. Implementation of Mitigation Measure 4.6.1, which requires compliance with the recommendations in the final geotechnical studies, would reduce potential impacts related to liquefaction to a less than significant level.

Although implementation of the Project would potentially increase exposure of future development within the Project area to damage caused by hazards such as landslide, lateral spreading, subsidence, liquefaction, or collapse during an earthquake, all future development would be required to comply with the requirements of the California Building Standards Code in Title 24, as well as local regulations, ordinances, General Plan policies, standard conditions or requirements, and proposed mitigation, which are intended to reduce damage to structures and loss of life caused by an hazards associated with an earthquake event. Such conformance would be adequate to ensure that potential impacts from theses hazards on any habitable structure, critical facility, or other infrastructure would be reduced to less than significant with mitigation. This analysis is consistent with the requirements of a EIR and future site-specific projects proposed within the Project area will require site-specific CEQA analysis at a later date.

Reference: Final EIR, pages 4.6-16 – 4.6-19.

Finding

Threshold 4.6.4. Project construction and implementation would not result in impacts with regard to expansive soils, as defined in Table 18-1-B of the Uniform California Building Code (1994), creating substantial risk to life or property with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Expansive soils are found on the Project site within the Palm Spring Formation. Expansive soils may result in cracked walls, foundations, decks, sidewalks, garage floors, and/or driveways. Mitigation Measure 4.6.5 requires soil testing for expansive soils prior to construction and prescribes measures to be incorporated in the Project design where expansive soils are identified in areas proposed for development. Impacts would therefore be reduced to a level of less than significant.

Reference: Final EIR, page 4.6-19.

HAZARDS AND HAZARDOUS MATERIALS

Finding

Threshold 4.8.1. Project construction and implementation would not create a significant hazard to the public or the environment with the implementation of mitigation measures as a result of routine transport, use or disposal of hazardous materials (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Project construction would involve the routine use of hazardous materials, including fuels, paints, and solvents. However, the amounts of these materials used during construction would be limited and regulated and would not pose a significant threat or be considered a significant environmental hazard. The construction contractor would implement BMPs related to hazardous materials storage and use during construction to reduce any potential release of a hazardous material to a less than significant level. Mitigation Measure 4.8.1 requires the development of a Hazardous Materials Contingency Plan to address potential impacts associated with contaminated groundwater during subsurface soil disturbance and groundwater activities and the potential to encounter onsite unknown hazards or hazardous substances during construction. Mitigation Measure 4.8.2 requires the development of a Health and Safety Plan for soil and groundwater disturbance that would address potential risks to construction workers during construction.

Based on the Phase I Environmental Site Assessment (ESA), impacts associated with asbestos-containing materials (ACMs), lead-based paints (LBPs), and polychlorinated biphenyls (PCB) containing fixtures would not occur because there are no existing buildings or structures on the Project site, and the Project does not include any utility relocation.

Operation

Operation of the Project would involve the use and storage of hazardous materials typically associated with residential, commercial, retail, public facility, and park uses such as solvents, cleaning agents, paints, and pesticides. This would result in a less than significant hazard to residents, employees, or visitors based on compliance with existing regulations regarding the transport, use, and disposal of hazardous materials.

Further, operation of the Project would not produce hazardous emissions or handle hazardous materials, substances, or waste beyond the typical household and commercial materials described above. Therefore, the Project would not create significant hazards to the public or to the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

All construction and operations from future development within the Project area would be subject to applicable federal, State, and local regulations, ordinances, General Plan policies, and standard conditions and mitigation (Mitigation Measures 4.8.1 and 4.8.2) which are aimed at reducing the potential for release of hazardous materials and providing necessary information and guidance to effectively respond to or address a release of hazardous materials, thereby ensuring a limited impact on the environment. Such conformance would be adequate to ensure that potential impacts from the effects of a release of hazardous materials on any habitable structure, critical facility, or other infrastructure would be reduced to less than significant.

Reference: Final EIR, pages 4.8-8 – 4.8-9.

Finding

Threshold 4.8.2. Project construction and implementation would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions

involving the release of hazardous materials into the environment with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Construction of the Project would involve routine use of hazardous materials which may include fuels, paints, and solvents. However, the amount of these materials used during construction would be limited and regulated, and therefore, would not pose a significant threat or be considered a significant environmental hazard. In addition, the City is required to implement BMPs related to hazardous materials storage and use during construction activities. Implementation of Mitigation Measure 4.8.1 is also proposed to reduce potential impacts relative to a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operation

Project operation would involve the use of potential hazardous materials (i.e., solvents, cleaning agents, paints, and pesticides) typical of residential, commercial, retail, public facility, and park uses. However, when used correctly, these materials would not result in a significant hazard to employees or community members. Operation of the Project would not produce hazardous emissions or handle hazardous materials, substances, or waste beyond the typical household and commercial materials. Therefore, the Project would not create significant hazards to the public or to the environment through reasonably foreseeable upset and accident conditions involving the release of materials into the environment since no acutely hazardous materials would be handled onsite. Compliance with existing laws and regulations, in conjunction with implementation of Mitigation Measures 4.8.1 and 4.8.2, would reduce potential impacts to less than significant levels.

Reference: Final EIR, page 4.8-9.

HYDROLOGY AND WATER QUALITY

Finding

Threshold 4.9.1. Project construction and implementation would not violate any water quality standards or waste discharge requirements with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Pollutants of concern during construction include sediments, trash, petroleum products, dry and wet concrete waste, sanitary waste, chemicals, and other materials which have the potential to be spilled or leaked or transported via stormwater runoff into downstream water bodies (e.g. Whitewater River). During Project construction, exposed excavated soils would increase the potential for soil erosion, compared to existing conditions. Implementation of Mitigation Measure

4.9.1 would require that each phase of construction occur in compliance with the requirements of the Construction General Permit, including preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and construction BMPs identified in the SWPPP to minimize erosion, prevent spills, and retain sediment and other pollutants onsite to avoid pollution to downstream receiving waters. This measure would reduce potential impacts related to potential violation of water quality standards or waste discharge requirements and degradation of water quality to a less than significant level.

Operation

Pollutants of concern during Project operation may include sediment, nutrients, organic compounds, trash and debris, oxygen-demanding substances, bacteria and viruses, oil and grease, pesticides, metals, and other materials. The Project would result in a permanent increase in impervious surface area on the site, which would increase the volume of stormwater runoff and would more effectively transport pollutants to receiving waters. Mitigation Measure 4.9.2 would require preparation and implementation of a Water Quality Management Plan (WQMP) for each phase of the Project. Site Design, Source Control, and Treatment BMPs specified in the WQMPs would be incorporated in the Project design to treat stormwater runoff prior to discharge to the storm drain system. Further, Mitigation Measure 4.9.3 would require the preparation and implementation of a Maintenance and Management Program to ensure the ongoing functionality of the stormwater facility BMPs. The WQMP, BMPs, and Maintenance and Management Program for each Project phase would reduce potential operational impacts related to violation of water quality standards or waste discharge requirements and degradation of water quality to less than significant levels.

The Specific Plan allows for the provision of retention basins in open space areas on the Project site to provide flood control and water quality benefits as required by the City's Municipal Code. However, the Drainage Master Plan for the Project shows that retention basins are not anticipated to be required because they would be redundant with the existing East Side Dike downstream of the Project site. The Drainage Master Plan and associated hydrology are under review by the Coachella Valley Water District (CVWD). The Drainage Master Plan shows, subject to CVWD acceptance, that the existing East Side Dike would provide adequate flood control for the Project site and that no retention basins would be required. If the retention basins are not required for flood control, the water quality and sediment control functions of those retention basins would be met through water quality basins and other BMP features on the site, which would be developed in the WQMPs prepared for each Project phase. If approved by CVWD, the drainage plan without onsite regional retention basins as included in the Specific Plan would modify the Coachella Municipal Code requirements for 100 percent onsite retention.

If required by the CVWD, the onsite retention basins could provide habitat for larval mosquitoes. The location of the Project site downwind from agricultural areas may result in the increased need for fly and eye gnat control. Irrigation on the Project site could also increase the suitability of the site for red imported fire ants. Mitigation Measure 4.9.4 would require implementation of a vector control program to address the control of mosquitos, flies, eye gnats, and red imported fire ants. With implementation of Mitigation Measures 4.9.3 and 4.9.4, potential impacts related to vectors would be reduced to less than significant levels.

Reference: Final EIR, pages 4.9-13 – 4.9-16.

Finding

Threshold 4.9.6. Project implementation would not otherwise substantially degrade water quality with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Refer to the Finding of Facts, above, relative to violation of water quality standards or waste discharge requirements. Implementation of Mitigation Measure 4.9.1 would require that each phase of construction occur in compliance with the requirements of the Construction General Permit, including preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and construction BMPs identified in the SWPPP to minimize erosion, prevent spills, and retain sediment and other pollutants onsite to avoid pollution to downstream receiving waters. This measure would reduce potential impacts related to potential violation of water quality standards or waste discharge requirements and degradation of water quality to a less than significant level.

Operation

Refer to the Finding of Facts, above, relative to violation of water quality standards or waste discharge requirements. Implementation of Mitigation Measure 4.9.2 and 4.9.3 and the WQMP, BMPs, and Maintenance and Management Program for each Project phase would reduce potential operational impacts related to violation of water quality standards or waste discharge requirements and degradation of water quality to less than significant levels.

The Specific Plan allows for the provision of retention basins in open space areas on the Project site to provide flood control and water quality benefits as required by the City's Municipal Code. However, the Drainage Master Plan for the Project shows that retention basins may not be required because they would be redundant with the existing East Side Dike downstream of the site. If retention basins are not required for flood control, the water quality and sediment control functions of the retention basins would be met through water quality basins and other BMP features onsite, which would be developed in the WQMPs prepared for each Project phase.

If required by the CVWD, the onsite retention basins could provide habitat for larval mosquitoes, and may result in the increased need for fly and eye gnat control. Project irrigation could also increase suitability of the site for red imported fire ants. With implementation of Mitigation Measures 4.9.3 and 4.9.4, potential impacts related to vectors would be reduced to less than significant levels.

Reference: Final EIR, pages 4.9-13 – 4.9-16.

Finding

Threshold 4.9.3 and 4.9.4. Project implementation would not substantially alter the existing drainage pattern of the site or area with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Grading and excavation activities would expose soil during construction, increasing potential for soil erosion compared to existing conditions. During a storm event, soil erosion and sedimentation could be accelerated. Further, Project grading and construction activities would compact soil, and construction of structures would increase onsite impervious area, which could increase stormwater runoff. Implementation of Mitigation Measure 4.9.1 would require preparation and implementation of a SWPPP and Construction BMPs for each Project phase to reduce water quality impacts during construction, including impacts associated with soil erosion and increased runoff. Such mitigation, which also requires compliance with the requirements of the General Construction Permit, would reduce potential construction impacts relative to erosion, siltation, and flooding to less than significant levels.

Operation

Development of the Project site would alter existing onsite drainage patterns and potentially increase stormwater runoff by increasing impervious surfaces onsite. The Project would include a comprehensive drainage system to collect and convey onsite storm flows. Mitigation Measure 4.9.5 requires preparation of a hydrology study for each Project phase to ensure that onsite stormwater collection and drainage facilities are appropriately sized to prevent onsite or offsite flooding. Treatment BMPs, including bioswales and retention basins, would be incorporated in each Project phase as required in Mitigation Measure 4.9.2. These BMPs would be designed to convey stormwater and minimize onsite erosion and siltation.

Further, the Specific Plan allows for retention basins in the onsite open space areas to retain 100 percent of the 100-year, 24-hour storm event onsite and would not result in substantial erosion, siltation, or flooding offsite. Subject to CVWD acceptance, the existing East Side Dike would provide adequate flood control for the Project site and land uses, and the retention basins would not be required. Runoff from the site would continue to be retained temporarily by the East Side Dike, then be discharged to the Whitewater River (Coachella Valley Storm Drain Channel) via Wasteway No. 2. The Project site is located on the east side of the East Side Dike flood control embankment. As a result, the Project would not substantially alter existing regional flows that create ponding adjacent to the East Side Dike during a major event.

As discussed in the Drainage Master Plan, the proposed Project would increase runoff volume from the site by 296 acre-feet (af) for a one percent annual chance 24-hour storm event and by 196 af for the Standard Project Flood, which would increase the water surface elevation in the East Side Dike. Compared to existing conditions, the change in velocity of flows leaving the Project site would be minimal and is not anticipated to result in erosion. Changes to the flow conditions (peak flow, volume, and concentration) at the East Side Dike would be minor compared to existing conditions and are not anticipated to result in erosion of the dike. The proposed Project would reduce overland flows that currently inundate the Project site during large storm events. The flood limits and runoff velocities on the Project site would be substantially reduced in the with-Project condition. As a result, the Project would not substantially alter the existing drainage pattern in a manner that would result in substantial erosion, siltation, or flooding offsite. Implementation of Mitigation Measures 4.9.2 and 4.9.5 would reduce potential impacts to a less than significant level.

Reference: Final EIR, pages 4.9-17 – 4.9-19.

Finding

Threshold 4.9.5. Project implementation would not create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

Construction of the Project would potentially introduce pollutants into the stormwater drainage system as a result of erosion, siltation, and accidental spills. Further, Project grading and construction would compact soil and development of the site would increase the impervious areas, potentially increasing stormwater runoff during construction. Mitigation Measure 4.9.1 requires preparation and implementation of a SWPPP and Construction BMPs to reduce potential impacts to water quality. With implementation of Mitigation Measure 4.9.1, which also requires compliance with the Construction General Permit and implementation of BMPs during construction, construction impacts related to exceeding the capacity limits of, and providing additional sources of polluted runoff to, stormwater drainage systems would be reduced to less than significant levels.

Operation

Each phase of the Project would include a comprehensive drainage system to collect and convey onsite storm flows. A hydrology study would be prepared for each phase, as required in Mitigation Measure 4.9.5, to ensure that the onsite storm drain facilities are appropriately sized to prevent onsite flooding. If onsite retention basins are constructed as part of the Project, stormwater runoff would be retained onsite and, therefore, would not contribute runoff water that would exceed the capacity of the downstream storm drain facilities. If onsite retention basins are determined to not be required, the increased runoff from the site would continue to be retained temporarily by the East Side Dike with sufficient freeboard before being discharged to the Whitewater River (Coachella Valley Storm Drain Channel) via Wasteway No. 2. Therefore, operation of the Project would not exceed the capacity of the downstream storm drain system.

As required in Mitigation Measure 4.9.2, the Project, with or without the onsite retention basins, would include Site Design, Source Control, and Treatment BMPs to target pollutants of concern in runoff from the Project site. Therefore, the Project would not provide substantial additional sources of polluted runoff. With implementation of Mitigation Measures 4.9.2 and 4.9.5, operational impacts related to exceeding the capacity limits of, and providing additional sources of polluted runoff to, stormwater drainage systems would be reduced to a less than significant level.

Reference: Final EIR, page 4.9-20.

NOISE

Finding

Threshold 4.12.1. Project construction would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise

ordinance, or applicable standards of other agencies, with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Construction

The Project would expose residences constructed in the earlier Project phases within 100 feet of construction areas in later phases to construction noise levels up to 85 dBA Lmax (maximum noise level measured in A-weighted decibels) during site preparation. This noise is associated with the transport of construction equipment and materials, excavation, grading, and construction activities. Implementation of Mitigation Measure 4.12.1 would ensure that noise generated during Project construction would comply with the City's Municipal Code. Through such measures, noise impacts would be reduced to a less than significant level.

Operation

Noise Reduction at Planning Areas G6, G7, G9, G10, G11 and G12 along Avenue 50. Residences in the proposed Medium Density Residential area in Planning Area G12 that are within 256 feet of the Avenue 50 centerline would be exposed to traffic noise exceeding the exterior noise standards for residential uses (over a 24-hour period). To reduce exterior noise levels to 60 dBA CNEL (Community Noise Equivalent level measured in A-weighted decibels) or lower, Mitigation Measures 4.12.2 and 4.12.3 would be implemented to require preparation of site-specific noise analyses for sensitive receptors and, as applicable, to require construction of sound walls for residences with outdoor living areas (backyard, patio, balcony, or deck). Uses proposed in the Mixed-Use Planning Areas include retail commercial, office commercial, high-density residential, and community/public facilities (Planning Areas G6, G7, G8, G9, G10, and G11) along Avenue 50. If residences are proposed in Planning Areas G9, G10, and G11 that are within the noise impact zones, sound walls and/or interior upgrade requirements would be required. Additionally, depending on the location of the proposed recreational facility within the proposed parks/recreation zone, sound walls and/or interior upgrades may be required if they are located within the 65 dBA CNEL impact areas.

Even with construction of the recommended sound walls, proposed residences along Avenue 50 would be exposed to traffic noise exceeding 57 dBA CNEL. With the windows open, rooms exposed to traffic noise higher than 57 dBA CNEL would not meet the 45 dBA CNEL interior noise standard. To ensure that windows can remain closed for prolonged periods of time, a mechanical ventilation system, such as an air-conditioning system, would be required to achieve the interior noise standard of 45 dBA CNEL at those residences.

Noise Reduction at Planning Areas G5, G8, G19, and G20 along I-10. Residences in Planning Areas G5 (High Density Residential), G8 (High Density Residential), G19 (Medium Density Residential), and G20 (Low Density Residential) within 2,100 feet, 975 feet, and 453 feet of the I-10 centerline, respectively, would be exposed to traffic noise exceeding the exterior residential noise standards. To reduce exterior noise levels, Mitigation Measure 4.12.4 would be implemented to require preparation of site-specific noise analyses for sensitive receptors and, as applicable, to require construction of sound walls for residential units with outdoor living areas (backyard, patio, balcony, or deck) along the segments of I-10 adjacent to those zones. Because it is not known at this time what specific types of mixed uses would be developed in

Mixed-Use Planning Areas G6 and G7 along I-10, it is not feasible to identify location-specific sound reduction mitigation measures for the future land uses directly adjacent to I-10.

Even with recommended sound walls implemented, residences along I-10 would be exposed to traffic noise exceeding 57 dBA CNEL. Because all the frontline residences along I-10 are expected to be exposed to traffic noise higher than 57 dBA CNEL, an air-conditioning system is required for residences directly adjacent to I-10.

Implementation of Mitigation Measures 4.12.1 to 4.12.4 would reduce Project noise impacts during construction and operation to a less than significant level.

Reference: Final EIR pages 4.12-13 – 4.12-20.

Finding

Threshold 4.12.3. Project implementation would not result in a permanent increase in ambient noise levels above levels existing without the Project with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Development of the Project would increase traffic noise levels on several roadway segments in the Project vicinity. However, there are either no existing noise-sensitive land uses or no noise-sensitive outdoor living areas that would be exposed to the traffic noise along these roads. Therefore, no significant offsite traffic noise impacts would occur as a result of the Project, and no mitigation measures would be required for offsite sensitive land uses.

Mitigation Measures 4.12.2 and 4.12.3 would be implemented for future proposed onsite uses that could be impacted by traffic noise to reduce this impact to less than significant levels. The construction of sound walls is recommended to reduce traffic noise levels in the outdoor active use areas to 60 dBA CNEL or lower to meet the City's exterior noise standard of 60 dBA CNEL. To achieve the interior noise level standard, building facade enhancements and mechanical ventilation (air conditioning) were identified to reduce the exterior noise inside the dwelling units to meet the 45 dBA CNEL interior noise standard. All measures specified are typically the minimum that would be required to meet established noise standards, and therefore, reduce noise to a level that is less than significant.

Reference: Final EIR, page 4.12-21.

Finding

Threshold 4.12.4. Project implementation would not result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessen the significant environmental effect as identified in the Final EIR.

Facts in Support of Finding

Project construction would result in a temporary increase in ambient noise levels above existing levels without the Project. The greatest increase in noise levels would occur during site preparation caused by earthmoving equipment for each of the Specific Plan phases. However, such effects would be short-term because site preparation during each phase is assumed to last seven months, or five percent of the total time required for construction. Other construction activities such as building erection would generate lower noise levels, and the majority of the construction activity would occur more than 100 feet from the nearest receptors.

Project construction activities would be required to comply with time periods for construction as specified in the City's Municipal Code, and as listed in Mitigation Measure 4.12.1, which does not allow construction at nighttime. Compliance with the City's construction hour restrictions would reduce Project construction noise impacts to a less than significant level. Implementation of Mitigation Measure 4.12.1 would further reduce construction noise exposure for receivers adjacent to the Project site by requiring all construction equipment to be equipped with properly operating and maintained mufflers, placing all stationary equipment so that noise is directed away from noise-sensitive receptors and locating equipment staging areas to create the greatest distance between construction-related noise sources and noise-sensitive receptors. The temporary increase in ambient noise levels as a result of construction is not considered substantial and would be reduced to a less than significant level with mitigation incorporated.

Reference: Final EIR, pages 4.12-21 – 4.12-22.

5.0 FINDINGS CONCERNING IMPACTS FOUND TO BE SIGNIFICANT WITH MITIGATION ("Unavoidable Significant Impacts")

In evaluating the potential impacts associated with the Project, the Final EIR identified twenty potential impacts that were determined to be significant and unavoidable. This Section of the Statement of Facts and Findings identifies those impacts that may occur with Project implementation that were found to be significant even with the implementation of mitigation. The unavoidable significant impacts noted below are mitigated to the extent reasonable and feasible as described below, in the Mitigation Monitoring and Reporting Program, through Project Design Features noted in Section 2 above, and through Project Conditions of Approval and existing regulatory requirements and standard practices.

The following findings regarding significant environmental impacts that cannot be avoided are made consistent with CEQA Guidelines Section 15126(b) and 15126.2(b), and are also discussed in the Final EIR Section 6.3.

The Final EIR also discusses, pursuant to CEQA Guidelines Section 15126(c) and 15126.2(c), significant irreversible environmental changes, as set forth in Final EIR Section 6.1. Page 6-2 states that "*the commitment of limited, slowly renewable, and nonrenewable resources required for construction and operation of the proposed project would limit the availability of these resources for future generations or for other uses during the life of the project. However, the use of such resources for the project would be consistent with regional and local plans and projected growth in the area*."

Pursuant to CEQA Guidelines Section 15126(d) and 15126.2(d), the Final EIR also discusses growth-inducing impacts of the proposed Project. Page 6-4 states that "*the project would*

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

AESTHETICS, LIGHT, AND GLARE

Finding

Threshold 4.1.3. Project construction and implementation would substantially degrade the existing visual character of the site and its surroundings.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to degradation of the existing visual character of the site and its surroundings. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR.

Complete mitigation is not possible to avoid the significant adverse Project impacts related to degradation of the existing visual character of the site and its surroundings.

Facts in Support of Finding

The proposed Project would permanently alter the existing visual character and quality of the site. The existing undeveloped desert terrain would be developed into a master-planned community with a mixture of residential, mixed-use, school, park/recreation, and open space uses that would permanently change the visual appearance of the affected lands. The Project includes extensions of Avenues 50 and 52 east from their present termini over the Coachella Canal, providing access into the Project site. Therefore, the existing visual character of the Canal would be altered, as there are currently no crossings of the Canal immediately adjacent to the Project site.

The Project design proposes open space areas and retention of the natural drainage courses onsite. However, development of the 2,200-acre site and the extension of arterial roads into and through the property would permanently alter the visual conditions of the land. Such changes may potentially degrade the visual character or quality of the site and its surroundings, or the views of surrounding areas, resulting in a significant impact. Project-related changes to the existing visual character of the site will be partially mitigated based on compliance with Standard Condition 4.1.1 which would require the applicant to provide detailed Project plans for architectural review by the City with the Tentative Tract Map submittal; the design requirements in the Specific Plan; the Project Design Features, including retention of the northern steeper slopes in natural open space; and, the hillside development guidelines in the Specific Plan. However, there are no additional feasible mitigation measures that can be implemented to reduce potential impacts to such permanent changes in the visual character to a less than significant level. Project-related impacts on visual character and quality would therefore be significant and unavoidable, even with Project compliance with Standard Condition 4.1.1 and applicable requirements of the Specific Plan.

Reference: Final EIR, pages 4.1-17 – 4.1-19.

AGRICULTURAL AND FORESTRY RESOURCES

Finding

Threshold 4.2.1. Project implementation would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses.

(1) Existing programs, ordinances and General Plan policies or other considerations, including alternatives identified in the Final EIR will avoid or substantially lessen the significant environmental effects with regards conversion of farmland. However, despite such measures, impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Facts in Support of Finding

Approximately 0.025 acres of the Project site is designated as Prime Farmland, and 9.535 acres are designated as Unique Farmland. These designated farmlands would be converted to non-agricultural uses with implementation of the Project. The conversion of the 0.025 acre of Prime Farmland would be 0.00075 percent of the total loss of Prime Farmland in the County during the 2008–2010 period, and the conversion of the 9.535 acre of Unique Farmland would be 0.54 percent of the total loss of Unique Farmland in the County during the same period. As Prime and Unique Farmlands are finite and irreplaceable resources, the conversion of these lands on the Project site to non-agricultural uses is a significant adverse impact. 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. Avoidance of agricultural land loss is also not feasible, as discussed in Response 11b (including the November 1 Supplement to Responses to Comments). There are no other feasible mitigation measures for this Project impact, and impacts would remain significant and unavoidable.

Reference: Final EIR, pages 4.2-9 – 4.2-10, Response 11b.

AIR QUALITY

Finding

Threshold 4.3.1. Implementation of the Project would conflict with or obstruct implementation of the applicable air quality plan with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to conflict with or obstruction of the applicable air quality plan. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to conflict with or obstruction of the applicable air quality plan.

Facts in Support of Finding

The Project would be consistent with the majority of the applicable General Plan policies. However, the Project would exceed several South Coast Air Quality Management District (SCAQMD) emissions thresholds during construction and operation (see Threshold 4.3.2 below). Therefore, the Project would be partially inconsistent with two General Plan policies related to air quality. Because there is no feasible mitigation to reduce all the construction and operation air quality emissions to a less than significant level, there is no way to mitigate the partial inconsistency with the General Plan policies. Impacts related to the two General Plan policies are therefore considered to be significant unavoidable adverse impacts.

The Project has implemented all feasible mitigation measures as discussed further below under Threshold 4.3.2 and 4.7.1. The Project is consistent with relevant SCAG and ARB Scoping Plan strategies for reducing project emissions, as discussed in Response to Comment Nos. 8c and 9e, respectively.

As discussed in Response to Comment No. 9e, the ARB is the most appropriate agency to implement motor vehicle emission reductions. As discussed in Response No. 9f, the IID is implementing regional measures to reduce GHG emissions associated with electricity generation through its RPS, consistent with Executive Order S-14-08.

Reference: Final EIR, pages 4.3-13 – 4.3-14.

Finding

Threshold 4.3.2. Project construction and implementation would violate air quality standards or contribute substantially to an existing or projected air quality violation.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to air quality impacts. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to violation of air quality standards.

Facts in Support of Finding

Construction

Construction activities would produce combustion emissions from various sources such as site grading, utility engines, onsite heavy-duty construction vehicles, asphalt paving, and vehicles transporting materials and construction crews. Buildout of the Specific Plan would occur over five phases. Construction equipment/vehicle emissions of reactive organic gases (ROGs), nitrogen oxides (NOX), and CO would exceed the SCAQMD emissions thresholds for each phase of the Project. Measures to reduce NOX and CO emissions consist principally of the use of Tier 3 and, when available, Tier 4 or greater diesel equipment, as identified in Mitigation Measure 4.3.2. However, even if all the construction equipment conformed to the United States Environmental Protection Agency (EPA) Tier 3 specification, it is not feasible to reduce the significant levels of NOX and CO emissions to less than the SCAQMD daily thresholds. Therefore, Project construction would result in significant unavoidable adverse air quality impacts related to NOX and CO emissions.

Fugitive dust emissions would be generated as a result of land clearing, grading, and other exposure of soils to air/wind during Project construction. The Project would be required to comply with SCAQMD Rule 403 to control fugitive dust that would reduce the fugitive dust emissions during construction of each phase to below the SCAQMD thresholds.

The application of architectural coatings would result in a large amount of ROG emissions as the coatings are sprayed on and curing. Even with the application of architectural coatings using standard application techniques with a 25 percent transfer efficiency, emissions would be substantially more than the SCAQMD ROG threshold of 75 pounds per day (lbs/day). Measures to reduce ROG emissions include methods to increase the efficiency of applying architectural coatings. Even with compliance with Mitigation Measure 4.3.1 and the use of high-volume, low-pressure (HVLP) application techniques, it is not feasible to reduce the ROG emissions to below the 75 lbs/day SCAQMD threshold. There is no feasible mitigation that would reduce this exceedance to below the thresholds. Impacts would remain significant and unavoidable.

Operation

Long-term operational air emissions would be generated by stationary and mobile sources associated with the Project. Area sources may include architectural coatings, consumer

products, and landscaping. Energy sources include natural gas consumption for heating and electricity for lighting in buildings and outdoor areas. Mobile sources include traffic on area roads. The anticipated residential and commercial uses would generate emissions from these types of sources during operation, with peak daily emissions exceeding the SCAQMD daily thresholds for ROGs, NOX, CO, particulate matter (PM) less than 10 microns in diameter (PM10), and PM less than 2.5 microns in diameter (PM2.5).

Mitigation Measure 4.3.3 requires the Project to comply with Title 24 of the California Code of Regulations (CCR) regarding energy conservation and green buildings standards. Although this would help reduce operational emissions, the majority of the emissions causing the exceedances would be from privately-owned vehicles operating as a result of the Project. There are no feasible mitigation measures available to the Project that would reduce the effect on emissions from private vehicles. The Project includes Design Features and other EIR mitigation measures as discussed in Response 9 to further reduce Project-related emissions. As a result, there are no feasible mitigation measures to reduce the operational air quality impacts to a less than significant level. Impacts would remain significant and unavoidable.

Refer to Threshold 4.3.1 above regarding the role of the ARB and IID in reducing Project-related mobile emissions and energy-related emissions.

Reference: Final EIR, pages 4.3-14 – 4.3-22, Response 9 (as supplemented November 1).

GEOLOGY AND SOILS

Finding

Threshold 4.6.1.i. Project implementation would potentially result in exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to geologic impacts from rupture of a known earthquake fault. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to rupture of a known earthquake fault.

Facts in Support of Finding

Portions of the Project site are located in an area with known and potentially active faults, including within a designated Alquist-Priolo Earthquake Fault Zone. The Project site and the surrounding areas are anticipated to experience strong ground shaking due to their proximity to the San Andreas Fault and other known active faults in the region. Several subsidiary faults

located onsite are considered tectonically or potentially active. The Project design avoids development in areas of known fault zones, with the exception of residential structures planned in the Central Village. Mitigation Measure 4.6.1 requires that final geotechnical reports be prepared as each Tentative Tract Map is submitted in order to identify precise locations of onsite faults and requires compliance with the recommendations in the *Updated Geotechnical Fault Investigation Report* (Petra Geotechnical, Inc. 2007) and the *Preliminary Geotechnical Investigation* (Petra Geotechnical, Inc. 2013). Mitigation Measure 4.6.2 requires that all future development comply with the CBC and applicable seismic design standards. However, impacts from rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, cannot be ruled out. Therefore, due to the presence of the San Andreas Fault, even with incorporation of Mitigation Measures 4.6.1 and 4.6.2, the potential for significant unavoidable adverse impacts from fault rupture would still result with Project implementation.

Reference: Final EIR, page 4.6-11 – 4.6-13.

GLOBAL CLIMATE CHANGE

Finding

Threshold 4.7.1. Project implementation would result in an increase in greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to generation of greenhouse gas emissions. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to generation of greenhouse gas emissions.

Facts in Support of Finding

Construction

Project construction would generate greenhouse gases (GHGs) by the operation of construction equipment and from worker and vendor vehicles which typically involves the use of fossil-based fuels. The combustion of fossil-based fuels creates GHGs such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O).

Construction activities produce combustion emissions from various sources such as grading, utility engines, on-site heavy-duty construction vehicles, equipment hauling materials to and from the site, asphalt paving, and motor vehicles transporting the construction crew. Exhaust

emissions from onsite construction activities would vary daily as construction activity levels change. Architectural coatings used in construction of the Project may contain volatile organic compounds (VOCs) that are similar to ROGs and are part of ozone (O_3) precursors. However, there are no significant emissions of GHGs from architectural coatings.

Operations

Long-term operation of the Project would generate GHG emissions from the proposed mix of residential and commercial land uses. Mobile source GHG emissions would include Project-generated vehicle trips associated with onsite facilities (internal and external to the Specific Plan Project site) and visitors to the Project site. Increases in stationary source emissions would also occur at offsite utility providers, as a result of increased demand for electricity, natural gas, and water. The GHG emissions generated by Project operations would exceed the SCAQMD-tiered interim GHG significance criteria for Tier 4. Therefore, even with mitigation, Project impacts related to GHG emissions would be significant and adverse.

The Project has implemented all feasible GHG mitigation measures, as discussed in detail in Response No. 9. As described in the Sustainability Features in Section 4.7.9, the proposed La Entrada Specific Plan encourages or promotes energy efficiency design techniques. These features are required mitigation measures to be incorporated into the design and construction of the project (including specific building projects). 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 renewable energy features such as 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

In addition, Mitigation Measure 4.3.7 described in Section 4.3, Air Quality, would also reduce the project's GHG emissions. The Final EIR includes a modification to GHG Mitigation Measure 4.7.1 to require the applicant to provide educational material to residential and non-residential owners and tenants.

Refer to Threshold 4.3.1 discussion above, and Responses 9e and 9f, regarding the role of ARB and IID in reducing Project-related GHG emissions.

Reference: Final EIR, pages 4.7-19 – 4.7-26, Response 9 (as supplemented on November 1).

Finding

Threshold 4.7.2. Project implementation would result in a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations.

Complete mitigation is not possible to avoid the significant adverse Project impacts related to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Facts in Support of Finding

The Project would result in the generation of GHG emissions that would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. As a result, the Project would be considered to exceed Threshold 4.7.2 regarding conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases resulting in a significant unavoidable impact. In addition, because the Project would conflict with Threshold 4.7.2, Project climate change impacts with regard to GHG emissions would be considered cumulatively significant because they would contribute to GHG emissions that exceed the AB 32 Statewide goals. The implementation of Mitigation Measures 4.7.1 through 4.7.8 and 4.3.7 of the Final EIR would be implemented to reduce Project impacts relative to GHG emissions. The Project is also consistent with SCAG RTP/SCS strategies (see Response No. 8c), and applicable ARB Scoping Plan strategies (see Response 9 and Final EIR Table 4.7.C, pages 4.7-24 and 25). However, impacts would remain significant and unavoidable.

Refer to Threshold 4.3.1 discussion above, and Responses 9e and 9f, regarding the role of ARB and IID in reducing Project-related GHG emissions.

Reference: Final EIR, pages 4.7-26 – 4.7-27, Response 8c.

PUBLIC SERVICES AND UTILITIES

Finding

Threshold 4.14.1. Project implementation would result in impacts to fire protection services.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to fire protection services. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to fire protection services.

Facts in Support of Finding

Project development would result in an estimated future population of approximately 35,958 residents on the Project site, which would increase demand on existing fire facilities and may affect response times. The two existing fire stations expected to serve the Project would not be able to accommodate the total increase in demand for fire services at Project buildout.

The Project design includes three above-ground storage tanks and infrastructure to provide fire flow to all areas of the site. All future residences would be equipped with fire protection sprinkler systems, and the Project applicant would be required to pay Fire Impact Fees to fund future fire facilities to serve the Project. The Project design also provides a site for future development of a fire station. However, construction of the fire station is not part of the Project, nor can the Project guarantee ongoing funds to operate a new fire station.

No feasible mitigation measures are available to reduce Project impacts on fire protection services to a level of less than significant. Therefore, the Project would result in significant adverse unavoidable interim impacts to existing fire services until the proposed fire station is constructed and operational. Subsequent to the opening of the operational fire station, Project impacts related to fire services and facilities would be considered less than significant.

Reference: Final EIR, pages 4.14-15 – 4.14-16.

Finding

Threshold 4.14.2. Project implementation would result in impacts to police protection services.

(1) All feasible changes, alterations and mitigation measures have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to police protection services. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to police protection services.

Facts in Support of Finding

The Project would generate an estimated 35,958 new residents on the Project site at buildout, and therefore, would increase demand on existing police facilities and services and may increase response times. The Project design reserves a site in Phase 2 for the future development of a police station. However, the Project does not include the construction of the station, nor can the Project guarantee ongoing funds to operate a new fire station.

No feasible mitigation measures are available to reduce Project impacts on police protection services to a less than significant level. Therefore, there would be a significant adverse unavoidable interim impact during construction and operation of the Project to existing police protection services until the proposed police station is constructed and operational. Subsequent to the opening of the police station, impacts to police facilities would be considered less than significant.

Reference: Final EIR, pages 4.14-16 – 4.14-17.

Finding

Threshold 4.14.4. Project implementation would result in impacts to library facilities.

(1) All feasible changes or alterations have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to library facilities. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to Project impacts on library facilities.

Facts in Support of Finding

According to City standards for library services, the Project would result in the need for an additional 17,979 square feet of library space and 43,150 library materials (35,958 * 1.2 = 43,150). Therefore, the Project would result in increased demand for library square footage and materials during each phase of construction that would exceed the City's existing library facilities. The applicant would be required to pay Library Impact Fees based on the number of dwelling units proposed in each phase, consistent with requirements in the City's Municipal Code. Such fees would be used for the land acquisition and construction costs of new public

libraries throughout the City. Although the Project would include several design features and would pay Library Impact Fees that would reduce impacts to existing library facilities, the increase in population associated with Project buildout would result in the need for additional library facilities and library materials that would not be accommodated by the Project development. Other revenue from the Project, including direct and indirect revenue associated with sales tax, property tax and other sources, would accrue to the City's General Fund which could be used to provide additional library facilities.

No feasible mitigation measures are available to reduce Project impacts on library facilities to a less than significant level. Therefore, Project impacts would remain significant and unavoidable adverse impacts until future library facilities are constructed.

Reference: Final EIR, page 4.14-20.

Finding

Threshold 4.14.10. Project implementation would result in a determination by the wastewater treatment provider that serves or may serve the Project that it has inadequate capacity to serve the Project's demand in addition to the provider's existing commitment.

(1) All feasible changes, mitigation measures or alterations have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to wastewater treatment services. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to provision of adequate wastewater treatment services.

Facts in Support of Finding

Wastewater generated with Project development would be handled by the Coachella Sanitary District (CSD) and conveyed to the City's WWTP. The Project sewer system would be constructed in phases as each phase of the Project is implemented. The WWTP would require expansion to accommodate the Project before complete buildout of the Specific Plan area. Depending on the progress of other land development in the City and whether/when the capacity of the WWTP has been expanded, the City may need to expand the WWTP or make other changes to its wastewater treatment system to accommodate the Project development that occurs after 60 percent buildout of the Specific Plan. Mitigation Measure 4.14.1 would reduce potential wastewater treatment capacity impacts associated with the later Project phases to a less than significant level. The Specific Plan would also be conditioned to pay all applicable development impact fees related to sewer infrastructure and to construct all associated sewer lines and infrastructure needed to serve the Project site. SPA 88-03, Condition 21 substantially addresses this issue, by requiring a "plan for the expansion of the City's wastewater treatment facility, or provide for project-specific wastewater treatment facilities, as may be required, to address the additional capacity needs generated by the La Entrada development", prior to the first "Master Tentative Map" (a "B-map" for site development). Should any new facilities be required, they are assumed to be within the Project development footprint addressed in this EIR.

No other feasible mitigation measures are available to reduce Project impacts on available wastewater treatment services to a level of less than significant. Therefore, Project impacts would remain significant and unavoidable.

Reference: Final EIR, pages 4.14-26 – 4.14-29.

Finding

Threshold 4.14.11. Project implementation would result in insufficient permitted capacity of a landfill able to accommodate the Project's solid waste disposal needs.

(1) All feasible changes, mitigation measures or alterations have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to solid waste disposal services. However, despite such measures, the impacts will still be significant.

(2) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to provision of solid waste disposal services.

Facts in Support of Finding

At buildout, the Project would generate approximately 91 tons of solid waste per day, which would represent approximately two and three percent of the maximum daily permitted capacity of the Badlands and Lamb Canyon Sanitary Landfills, respectively. These Landfills are anticipated to close prior to Project buildout. Although it is anticipated that solid waste generated by the Project would be routed to these two Landfills prior to their closure, the Riverside Countywide Integrated Waste Management Plan does not identify where solid waste generated in the City of Coachella would go after these Landfills are closed. Therefore, subsequent to the closure of these Landfills, the Project would have a significant adverse impact related to solid waste. However, the County of Riverside is responsible for providing regional solid waste management solutions such as landfills (and is currently in the process of seeking approvals to expand its regional composting facility located just outside the City of Coachella, as noted in the Errata to the Responses to Comments). As no feasible mitigation measures are available to reduce Project impacts to a level of less than significant, such impacts relative to solid waste disposal would remain significant and unavoidable.

Reference: Final EIR, pages 4.14-30 – 4.14-31.

TRAFFIC AND CIRCULATION

Finding

Threshold 4.16.1. Project implementation would conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system.

(1) All feasible changes, mitigation measures or alterations have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant environmental effects with regards to potential conflicts with plans, ordinances, or

policies for measuring performance of the circulation system. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system.

Facts in Support of Finding

Implementation of the proposed Project would result in the generation of traffic that would adversely affect a number of roadways and intersections within the Project vicinity, as specifically identified in Section 4.16, *Traffic and Circulation*, of the Final EIR. Mitigation is proposed to reduce potential impacts of the Project to the extent feasible. However, even with implementation of Mitigation Measures 4.16.1 through 4.16.5, the Project would result in significant unavoidable adverse traffic impacts to intersections outside of the City's jurisdiction. As the City cannot control the timing of improvements that are not fully within its own jurisdiction, such impacts cannot be fully mitigated, and therefore, remain significant and unavoidable. For this reason, local intersection improvements wholly or partly in the City of Indio or Riverside County and local intersection improvements also wholly or partly on State facilities (i.e., State Route 111 [SR-111], State Route 86 [SR-86], and I-10) cannot be controlled by the City. Therefore, there is no feasible mitigation for impacts to the affected intersections and freeway locations identified in Section 4.16.7 of the Final EIR during the Existing Plus Phases 1 through 4; Existing Plus Project Buildout; and, Cumulative Year 2035 Plus Project Buildout scenarios.

Refer to Response No. 7d (as supplemented on November 1) regarding Project mitigation for certain intersections in unincorporated Riverside County, and the County of Riverside's role in mitigating intersections in unincorporated Riverside County.

It should however be noted that the Project is consistent with the City's General Plan. Therefore, the associated land uses have been included in the regional transportation planning efforts conducted by SCAG, Riverside County and CVAG, as well as Citywide transportation planning efforts of the City.

Reference: Final EIR, pages 4.16-10 – 4.16-15, Response 7d.

Finding

<u>Threshold 4.16.2</u>. Project implementation would conflict with an applicable congestion management program established by the county congestion management agency for designated roads or highways.

(1) All feasible changes, mitigation measures or alterations have been required in, or incorporated into the Final EIR that will avoid or substantially lessen the significant

environmental effects with regards to potential conflict with congestion management programs. However, despite such measures, the impacts will still be significant.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted by such other agency.

(3) There are no additional feasible mitigation measures which might avoid or reduce the significant environmental effects of the Project to a level that is less than significant because specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR (refer to Section 6, Findings Regarding Project Alternatives, and to the Statement of Overriding Considerations).

Complete mitigation is not possible to avoid the significant adverse Project impacts related to conflict with congestion management programs.

Facts in Support of Finding

The Congestion Management Program (CMP) uses level of service (LOS) E as the LOS standard. The Project intersection impact analyses were conducted using the more restrictive LOS D standard from the local jurisdiction in which each intersection is located. As result, the analyses in this EIR meet and exceed the CMP LOS standard for intersection analyses, resulting in a less than significant impact. No additional mitigation is required.

The CMP utilizes a LOS standard of LOS E, except for non-exempt locations where the standard is LOS F. The Project intersection impact analysis is based on the more restrictive LOS D. The analysis of freeway mainline lanes and merge/diverge locations is based on the CMP LOS E standard. Thus, this EIR meets and exceeds the CMP LOS standard for intersection analyses and meets the CMP LOS standard for freeway mainline lanes and merge/diverge locations.

Three study area intersections on SR-111, SR-86, or I-10 are forecast to operate at less than the CMP LOS E standard in the existing baseline plus Project conditions. Because the proposed Project causes the LOS to fall below the standard or causes further degradation at these intersections, this is considered to be a Project direct significant impact and mitigation is required. Mitigation Measure 4.16.1 would reduce the significant impacts. However, the City cannot control the timing of when the intersection improvements for the locations on Caltrans facilities (i.e., SR-111, SR-86, and I-10) are implemented. Even with implementation of Mitigation Measure 4.16.1, impacts would remain significant and unavoidable at these locations.

Six study area intersections on SR-111, SR-86, or I-10 are forecast to operate at less than the CMP LOS E standard in the existing baseline plus Project build-out (with the Avenue 50 Interchange) conditions. Because the proposed Project causes the LOS to fall below the standard or causes further degradation at these intersections, this is considered to be a Project direct significant impact and mitigation is required. Mitigation Measure 4.16.2 would reduce the significant impacts. However, the City cannot control the timing of when the intersection improvements for the locations on Caltrans facilities (i.e., SR-111, SR-86, and I-10) are implemented. Even with implementation of Mitigation Measure 4.16.2, impacts would remain significant and unavoidable at these locations.

Three study area freeway mainline lanes are forecast to operate at less than the CMP LOS E standard in existing baseline plus Project buildout (with the Avenue 50 Interchange) conditions. Because the proposed Project causes the LOS to fall below the CMP standard at these freeway

mainline lanes, this is considered to be a Project direct significant impact and mitigation is required. However, there is no feasible mitigation for this significant impact because there is no mechanism for the City to design, fund, and construct improvements on State highways and freeways. All improvements to State highways and freeways are controlled by Caltrans. Impacts would remain significant and unavoidable at these locations.

Four study area freeway ramp merge/diverge locations are forecast to operate at less than the CMP LOS E standard (the same standard used in Threshold 4.16.1 for freeway mainline lanes and merge/diverge locations) in existing baseline plus Project build-out (with the Avenue 50 Interchange) conditions. Because the proposed Project causes the LOS to fall below the standard at these freeway merge/diverge locations, this is considered to be a Project direct significant impact and mitigation is required. However, there is no feasible mitigation for this significant impact because there is no mechanism for the City to design, fund, and construct improvements on State highways and freeways. Impacts would remain significant and unavoidable at these locations.

There are 18 study area intersections that are forecast to operate at less than the CMP LOS E standard with Year 2035 plus Project traffic. However, the forecast intersection LOS deficiencies are caused by future traffic volume growth from the combination of traffic volume increases projected by the traffic model that are attributable to other cumulative projects and the traffic volume increases from the proposed Project. For this reason, these impacts represent a significant cumulative impact, and mitigation is required. Mitigation Measures 4.16.3 and 4.16.4 would reduce the significant impacts by requiring the Project's fair share contribution in the form of Development Impact Fee (DIF) and Transportation Uniform Mitigation Fee (TUMF) payments towards the future intersection improvements. However, the City cannot control the timing of when the intersection improvements for the locations on Caltrans facilities (i.e., SR-111, SR-86, and I-10) are implemented. Even with implementation of Mitigation Measures 4.16.3 and 4.16.4, cumulative impacts would remain significant and unavoidable at these locations.

There are 22 study area freeway mainline lanes forecast to operate at less than the CMP LOS E standard with Year 2035 plus Project traffic. However, the forecast freeway mainline LOS deficiencies are caused by future traffic volume growth from the combination of traffic volume increases projected by the traffic model that are attributable to other cumulative projects and the traffic volume increases from the proposed Project. These impacts represent a significant cumulative impact, and mitigation is required. However, there is no feasible mitigation for this significant impact because there is no mechanism for the City to design, fund, and construct improvements on State highways and freeways. All improvements to State highways and freeways are controlled by Caltrans. Impacts would remain significant and unavoidable at these locations.

There are 22 study area freeway merge/diverge locations forecast to operate at less than the CMP LOS E standard with Year 2035 plus Project traffic. However, the forecast freeway ramp merge/diverge location LOS deficiencies are caused by future traffic volume growth from the combination of traffic volume increases projected by the traffic model that are attributable to other cumulative projects and the traffic volume increases from the proposed Project. These impacts represent a significant cumulative impact, and mitigation is required. However, there is no feasible mitigation for this significant impact because there is no mechanism for the City to design, fund, and construct improvements on State highways and freeways. All improvements to State highways and freeways are controlled by Caltrans. Impacts would remain significant and unavoidable at these locations.

Refer to Response No. 7d regarding the County of Riverside's role in mitigating intersections in unincorporated Riverside County.

Reference: Final EIR, pages 4.16-16 – 4.14-18.

6.0 FINDINGS REGARDING CUMULATIVE IMPACTS

As determined in Section 4.0, *Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures*, of the Final EIR, the Project would result in a "cumulatively considerable" contribution to cumulative impacts with regards to aesthetics, air quality, agricultural resources, geology and soils, global climate change, public services and utilities, and traffic impacts. The remaining environmental issues areas would not result in a "cumulatively considerable" contribution to cumulative impacts as summarized further below.

AESTHETICS

Finding

Project implementation would result in cumulative impacts to aesthetics. There are no additional feasible mitigation measures to reduce impacts associated with a change in visual character to a less than significant impact.

Facts in Supporting Finding

As illustrated by Figures 4.1.6 through 4.1.9 on pages 4.1-34 through 4.1-41 of the DEIR, the Project site would change from a largely undeveloped condition characterized by vacant desert terrain to a master-planned community. The overall visual character of the Project site would be substantially altered with development of the Project site. While the existing character of the Project site would be substantially changed compared to existing conditions, the site design (including grading), landscaping, open space preservation, and architectural design would adhere to design guidelines established in the La Entrada Specific Plan which are intended to avoid, reduce, offset, or otherwise minimize identified potential adverse impacts of the proposed Project or provide significant benefit to the community and/or to the physical environment. In addition, Standard Condition 4.1.1 requires architectural review of Project plans as each Tentative Tract Map and/or Site Plan is submitted. Despite incorporation of Project Design Features, the Specific Plan grading plans, and adherence to Standard Condition 4.1.1, impacts related to the change in visual character would be significant and unavoidable as no feasible mitigation is available to reduce impacts to visual character. Compliance with the Hillside Development Guidelines, if adopted in the future by the City, would not be sufficient to reduce those significant and unavoidable impacts related to visual character.

Although the Project would result in a cumulatively considerable contribution to nighttime lighting conditions given that the Project site and surrounding areas do not currently emit substantial amounts of nighttime light, there are no adjacent sensitive land uses that would be adversely impacted by the introduction of those new light sources and glare. Therefore, the proposed Project would not contribute to a cumulatively significant impact to viewsheds, visual character, or lighting and glare.

The Project is generally consistent with the City and County General Plan EIRs from an overall land use plan, type and density basis, and as such the cumulative impacts of the Project have been factored into the City and County General Plan EIRs. The City and County General Plan

EIRs are a more appropriate tool for addressing and mitigating cumulative impacts to aesthetics.

Reference: Final EIR, pages 4.1-23 and 4.1-24.

AGRICULTURAL AND FORESTRY RESOURCES

Finding

Project construction and implementation would result in cumulative impacts to agricultural resources. There are no feasible mitigation measures to reduce impacts associated with permanent conversion of agricultural land.

Facts in Supporting Finding

In 2011, Riverside County generated approximately $1.28 billion of revenue value associated with agricultural operations and products[2]. In addition, the City has identified agriculture as a valuable resource on which the local economy is dependent. Even with City policies aimed at discouraging the conversion of farmland, as the area continues to develop and populate in the future, the development pressure on agricultural lands is anticipated to increase. Although the loss of approximately 9.5 acres is relatively small (less than 1/100 of a percent) compared to the total agricultural land in the City (21,840 ac), the loss would be permanent and would contribute to an overall loss of agricultural resources in the City. Since there is no feasible mitigation for this loss (refer to Threshold 4.2.1 above), the proposed Project's contribution to the cumulative loss of valued agricultural lands countywide is considered an unavoidable and significant impact on a cumulative basis.

The Project is generally consistent with the City and County General Plan EIRs from an overall land use plan, type and density basis, and as such the cumulative impacts of the Project have been factored into the City and County General Plan EIRs. The City and County General Plan EIRs are a more appropriate tool for addressing and mitigating cumulative impacts to agricultural resources.

Reference: Final EIR, Section 4.2 pages 15 - 16

AIR QUALITY

Finding

Project construction and implementation would result in a cumulatively considerable net increase of any criteria pollutant with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program, and Threshold 4.3.2 above).

Facts in Support of Finding

Construction

During construction, the proposed Project would temporarily contribute criteria pollutants to the area above the SCAQMD thresholds. Other projects in the area may be under construction at

[2] *Total Valuation – F.O.B.,* Riverside County Agricultural Production Report, Riverside County Agricultural Commissioner's Office, 2011.

the same time as the proposed Project. Each Project would be required to comply with the SCAQMD's standard construction measures required in Rule 403. However, because the proposed Project itself would result in a significant adverse air quality impact during construction related to ROG, NOX, and CO that cannot be mitigated to below a level of significance, it would also potentially contribute to a significant short-term cumulative adverse air quality impact in the Project area. Because there is no feasible mitigation available to reduce the construction-related ROG, NOX, and CO impacts of the Project to below a level of significance, there is no mitigation that would reduce the Project contribution to cumulative short-term adverse air quality impacts to below a level of significance. Therefore, construction air quality impacts are considered cumulatively significant.

Operation

As stated in Section 4.16, Traffic and Circulation, of the DEIR, the traffic analysis for the Project is a cumulative impacts assessment because the traffic model forecasts total traffic based on known cumulative projects and the City's General Plan. Because this air quality impact analysis uses this same cumulative traffic data, it also assesses cumulative impacts. As stated in Section 4.3.6 of the DEIR, operation of the proposed Project would result in emissions of ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$ that exceed SCAQMD daily thresholds. Even with implementation of Mitigation Measures 4.3.1 through 4.3.8, impacts would remain significant and unavoidable. Therefore, operational air quality impacts are considered cumulatively significant.

As noted in Threshold 4.3.2, the ARB and IID are responsible for implementing cumulative air quality mitigation.

Reference: Final EIR, pages 4.3-28 through 4.3-32.

BIOLOGICAL RESOURCES

Finding

Project construction and implementation would not result in cumulative impacts to biological resources with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Because the proposed Project and the cumulative projects in the Coachella Valley are required to comply with the Coachella Valley MSHCP, and the Coachella MSHCP and its associated EIR/EIS[3] have analyzed cumulative impacts within the region of the proposed Project under CEQA, NEPA, CESA, and FESA, cumulative impacts to biological resources associated with the proposed Project have been previously considered and analyzed. It was determined in the EIR/EIS that cumulative impacts to biological resources would be less than significant through the implementation of the Coachella Valley MSHCP. The proposed Project and any other future public or private projects are subject to Coachella Valley MSHCP compliance including the payment of fees, which helps cover the cost of acquiring habitat and implementing the Coachella Valley MSHCP and, therefore, any cumulative impacts on biological resources are less than significant.

[3] Final Recirculated Coachella Valley MSHCP Environmental Impact Report/Statement, prepared by Coachella Valley Association of Governments, September 2007.

Additionally, implementation of Mitigation Measures 4.4.1 through 4.4.7 would reduce Project level impacts to a less than significant level.

Reference: Final EIR, page 4.4-19 through 4.4-25.

CULTURAL AND PALEONTOLOGICAL RESOURCES

Finding

Project construction would not result in cumulative impacts to cultural and paleontological resources with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Future development in the City could include excavation and grading that could potentially impact archaeological and paleontological resources and human remains. The cumulative effect of the proposed Project is the continued loss of these resources. The proposed Project, in conjunction with other development in the City, has the potential to cumulatively impact archaeological and paleontological resources. However, each development proposal received by the City undergoes environmental review pursuant to CEQA. If there is a potential for significant impacts to archaeological or paleontological resources, an investigation is required to determine the nature and extent of the resources and identify appropriate mitigation measures.

Projects are required to comply with the City's General Plan policies as appropriate to reduce the effects of additional development within the City. Mitigation Measures 4.5.1 through 4.5.4 would be implemented during construction of Phase 1 of the La Entrada Specific Plan Project to reduce potential Project impacts by ensuring avoidance, evaluation, and, as applicable, scientific recovery and study of any resources encountered.

Mitigation Measure 4.5.5 would be implemented, in addition to Measures 4.5.1 through 4.5.4, for all Project construction after Phase 1 on the rest of the Specific Plan site. Therefore, with implementation of Mitigation Measures 4.5.1 through 4.5.5, the contribution of the Specific Plan to the cumulative loss of known and unknown cultural resources throughout the City would be reduced to below a level of significance.

Reference: Final EIR, pages 4.5-23 through 4.5-29.

GEOLOGY AND SOILS

Finding

Project construction would not result in cumulative impacts with regards to geology, soils and seismicity with the implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

The Project site is located within an Alquist-Priolo Earthquake Fault Hazard Zone and contains several potentially active faults. Additionally, the Project site contains areas of potentially expansive soils and is located on a geologic formation that is susceptible to both landslides and lateral spreading. As such, the proposed Project would be required to implement Mitigation Measures 4.6.1 through 4.6.5 and comply with applicable State and local requirements,

including but not limited to the City of Coachella Building Code and the CBC. Seismic impacts are a regional issue, and all projects must adhere to applicable seismic codes and design standards. The proposed Project's individual impacts related to geotechnical constraints are considered significant even after mitigation from fault rupture. Therefore, the Project's contribution to regional cumulative impacts regarding fault rupture is considered potentially significant. However, implementation of the recommended Project-level mitigation, plus standard mitigation imposed by the City and County on future development in the surrounding area, would result in less than significant cumulative impacts related to geotechnical and soil constraints.

Reference: Final EIR, page 4.6-24.

GLOBAL CLIMATE CHANGE

Finding

Project construction would result in cumulative impacts to global climate change with the implementation of mitigation measures (refer to Project Resolution Attachment "B", Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

While the proposed Project includes Project Design Features and Sustainability Features, it would still generate significant amounts of GHG emissions. Mitigation Measures 4.7.1 through 4.7.8 are prescribed to further reduce the proposed Project's GHG emissions. However, estimated GHG emissions with mitigation reductions would remain above the Tier 4 targets. As a result of the significant amount of GHG emissions, the proposed Project would conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. As a result, the Project's climate change impacts with regard to GHG emissions would be considered cumulatively significant because they would contribute to GHG emissions that exceed the AB 32 statewide goals.

As noted in Threshold 4.3.2, the ARB and IID are responsible for implementing cumulative GHG mitigation.

Reference: Final EIR, pages 4.7-29 through 4.7-31.

HAZARDS AND HAZARDOUS MATERIALS

Finding

Project construction and implementation would not result in cumulative impacts associated with hazards and hazardous materials with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Project construction would involve the routine use of hazardous materials, including fuels, paints, and solvents. However, the amount of these materials during construction would be limited and regulated. Mitigation Measures 4.8.1 and 4.8.2 address the potential encounter to onsite unknown hazards or hazardous substances during Project construction. Therefore, impacts related to hazardous materials in soils, groundwater, and use of hazardous materials on site would be regulated through implementation of both Mitigation Measures 4.8.1 and 4.8.2.

Therefore, the proposed Project's contribution to hazards and hazardous materials cumulative impacts would be less than significant with the implementation of these mitigation measures.

The proposed Project, when considered with other cumulative projects, may be subject to risks associated with wildland fires as a result of the natural open space. It is anticipated that future development will comply with the City Wildland Fire Plan, and the City and County Fire Code, both of which address fire prevention, and would be applicable to wildland fires. In addition, in the event of an emergency, the County and the City maintain Emergency Operations Plan to respond to any emergencies. As a result, the proposed Project's contribution to cumulative impacts associated with exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires would not be considered cumulatively considerable, and the impact would be less than significant.

Reference: Final EIR, pages 4.8-13 through 4.8-14.

HYDROLOGY AND WATER QUALITY

Finding

Project implementation would not result in cumulative impacts associated with hydrology or water quality impacts with the implementation of mitigation (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Each of the cumulative projects, individually and cumulatively, could potentially increase the volume of storm water runoff and contribute to pollutant loading in storm water runoff reaching both the City's storm drain system and the Whitewater River, resulting in cumulative impacts to hydrology and surface water quality. However, as with the proposed Project, each of the cumulative projects would also be subject to NPDES and MS4 Permit requirements for both construction and operation. Each Project would be required to develop a SWPPP and WQMPs and would be evaluated individually to determine appropriate BMPs to minimize impacts to surface water quality. In addition, the City Department of Public Works reviews all development projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Thus, the Project's contribution to cumulative impacts to hydrology and water quality would be less than significant.

Reference: Final EIR, page 4.9-24.

LAND USE AND PLANNING

Finding

Implementation of the Project would not result in cumulative land use impacts.

Facts in Support of Finding

Implementation of the proposed Project, when considered in conjunction with other existing and planned developments in the Project area, would result in the development of a currently vacant and undeveloped site. The cumulative study area analyzed for potential land use impacts is the City of Coachella and the City's SOI.

The 1,612 ac portion of the Project site located in the City is currently designated as "Specific Plan," which allows for Low-Density Residential (R-L), Entertainment Commercial (C-E), General Commercial (C-G), and Open Space (O-S) uses, and the 588 ac portion located within the City's SOI and General Plan planning area is pre-designated for Low-Density Residential (RDL) and Open Space (O-S). However, because this portion of the Project site is also located in an unincorporated area of the County, this area is currently designated for Agricultural (A-G) use on the County's General Plan Land Use Map. Development of the proposed Project would be consistent with the City's General Plan land use designations due to the fact that the proposed Project would be incorporated into the City's General Plan as part of the current General Plan update process. However, in the event that the proposed Project is approved before the General Plan is updated, a GPA and Zone Change would be required to include the La Entrada Specific Plan boundaries and proposed land uses on the City's General Plan Land Use Diagram and Zoning Map, thus making the proposed Project consistent with the City's General Plan and Zoning Map. Approval of the proposed Project would ensure that the La

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

Reference: Final EIR, pages 4.10-13 through 4.10-14.

MINERAL RESOURCES

Finding

Project implementation would not result in cumulative impacts to known mineral resource that would be of value to the region and the residents of the State.

Facts in Support of Finding

The Project site is located within MRZ-3, which indicates that the Project site contains aggregate mineral resources. Although implementation of the proposed Project would result in minor impacts associated with the loss of availability of sand and gravel resources on the Project site, sand and gravel resources are available elsewhere in the Coachella Valley and Southern California. In addition, the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site. Therefore, because the proposed Project is not anticipated to contribute to a significant cumulative impact to a mineral resource that is located within a designated MRZ or other known mineral resources in the area.

Reference: Final EIR, page 4.11-4.

NOISE

Finding

Construction and Project implementation would result in cumulative impacts associated with noise impacts with the implementation of mitigation (refer to Project Resolution Attachment "B" Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Construction-related noise impacts would be mitigated through implementation of Mitigation Measures 4.12.1, compliance with standard noise reductions and adherence to the City's

specified construction hours. Since every Project within the City's limits is required to comply with the Municipal Code Chapter 7.04 noise control ordinance requirements, including the construction hours restrictions, the proposed Project design features would ensure that Project-related construction activities comply with these requirements and therefore would reduce the potential construction noise impacts to a less than significant level.

Potential noise generated by the Project components during operation such as machinery associated with commercial facilities would be managed through implantation of Project design features that comply with City noise standards in addition to Mitigation Measures 4.12-2 and 4.12-3. Sound walls are recommended to reduce the traffic noise levels in the outdoor active use areas to 60 dBA CNEL or lower to meet the City's exterior noise standard of 60 dBA CNEL. To achieve the interior noise level standard, building facade enhancements and mechanical ventilation (air conditioning) were identified to reduce the exterior noise inside the dwelling units to meet the 45 dBA CNEL interior noise standard. All measures specified are typically the minimum that would be required to meet these noise standards and therefore reduce noise to a level that is less than significant. With more building upgrades, the interior noise would be reduced even more. However, the associated cost would also be greater. Therefore, the proposed Project's contribution to cumulative noise impacts would be considered less than significant.

Reference: Final EIR, pages 4.12-24 and 4.12-25.

POPULATION AND HOUSING

Finding

Project implementation would not result in cumulative impacts to population and housing.

Facts in Support of Finding

SCAG projects the City population to increase to 128,700 persons by 2035. Similarly, SCAG projects City employment to increase to 27,900 jobs by 2035 and the County employment to increase to 1,243,000 jobs by 2035. The Project includes development of a variety of uses including residential, commercial, and office uses and would potentially increase employment in the City by 3,355 employees and its population by 35,958 people. The proposed Project together with other commercial and residential developments within the City will serve an existing demand for employment, while also meeting the cumulative demand of employment that will result from the City's projected future population. These increases for population, housing, and employment would be within the total projected growth forecasts for 2035. In addition, implementation of the proposed Project would be consistent with the City's vision of the Project site because the existing General Plan designation for the site is "Specific Plan." Implementation of the proposed Project would not result in a cumulatively significant population or housing impact and the proposed Specific Plan land uses would not significantly induce growth in areas where growth was not previously anticipated.

Reference: Final EIR, page 4.13-12.

PUBLIC SERVICES AND UTILITIES

Finding

Project implementation would result in long- and short-term cumulative impacts to public services and utilities.

(1) Changes or alterations have been required in, or incorporated into, the Project which substantially lessens the significant environmental effect as identified in the Final EIR, however, impacts with regards to solid waste and wastewater would remain significant.

Facts in Support of Finding

Fire Protection. RCFD anticipates cumulative demand in order to plan for overall service. Although the RCFD is currently meeting its response time objectives, it is anticipated that there would be an overall increased demand for fire protection services as a result of Project build out. Therefore, the proposed Project would result in a need for new fire facilities. The proposed Project would reserve a site within the Central Village that would accommodate the future development of a fire station. Therefore, development of this fire station would reduce the proposed Project's cumulative impact on fire facilities to less than significant levels. Furthermore, payment of Fire Facility Impact Fees would reduce long-term impacts to fire facilities to less than significant levels. However, even with the development of the proposed fire station and payment of impact fees, the Project impacts to fire services would temporarily be cumulatively considerable.

Police Protection. The CPD currently contracts with the RCSD to provide service to the City. RCSD anticipates cumulative demand in order to plan for overall service. Neither the CPD nor the RCSD are currently meeting their staffing objectives. Accordingly, the proposed Project has been designed to provide a site for a future police station during Phase 2. Development of the proposed police station would reduce the proposed Project's impact on police services to a less than significant level. In addition, payment of the Police Impact Fees would reduce the proposed Project's long-term impacts to a less than significant level. However, even with the development of the proposed police station and payment of Police Impact Fees, the proposed Project's contribution to cumulative impacts would temporarily be cumulatively considerable.

Public Schools. As indicated by the CVUSD, schools within the CVUSD are currently over capacity. In addition, the proposed Project would result in a substantial population increase that would generate approximately 5,837 new students. The proposed Project has been designed to provide sites for the development of three elementary schools and one middle school that would accommodate Project-related increases in student enrollment. Until these schools are built in Phases 2 and 3, the proposed Project would result in an increased demand on existing school facilities within the CVUSD. In addition, the proposed Project would not include the development of a high school to accommodate the 1,575 high school students generated at Project build out. Therefore, Project development would lead to an increased demand on existing high school educational facilities. However, although payment of School Impact Fees, which would provide for the future development of school facilities and the development of the proposed schools, would mitigate long-term impacts related to school facilities, the proposed Project would result in cumulatively considerable short-term impacts to school facilities until the new schools are constructed and operational.

Library Services. The RCL requires 0.5 square feet and 1.2 library materials per resident to meet library service demands within the County. The proposed Project would generate additional demand for library services that would exceed the RCL's ability to meet the Project

demand with existing library services. Therefore, because the proposed Project does not plan for the future development of a library, impacts related to library services as a result of Project development are considered significant and adverse. However, the proposed Project would require the payment of Library Impact Fees, which would provide for the future development of library services, the proposed Project's contribution to cumulative impacts to library services would be significant until additional library facilities are constructed and operational.

Public Transportation. Transit services in the vicinity of the Project site are not operating beyond capacity. Based on the scale and size of past, present, and reasonably foreseeable projects that would utilize the same transit services as the proposed Project, these projects are not anticipated to exceed the capacity of those bus services, and no cumulative impacts are anticipated. In addition, the proposed Project would include NEVs and bicycle facilities that would help reduce demands on the existing public transportation system. Therefore, the proposed Project is not expected to have a significant impact on the provision of transit services in the City or the area surrounding the Project site. Any increase that does result from implementation of the proposed Project would be incidental and not cumulatively considerable because transit services would not be adversely impacted by the proposed Project.

Cable, Telephone, and Internet. The geographic area for cumulative analysis of cable, telephone and internet services is defined as the service territory for Time Warner Cable and Verizon. These services are not operating above capacity. However, both Time Warner Cable and Verizon would extend current facilities to meet Project service demands. With these infrastructure improvements, these service providers are anticipated to meet cumulative demands associated with past, present, and future development within the Project area. Therefore, the proposed Project's impacts related to cable, telephone, and internet service would not be cumulatively significant.

Stormwater. The geographic area for the cumulative analysis for storm water drainage impacts includes the City and the Whitewater Watershed. The proposed Project, when considered with each of the cumulative projects, could potentially increase the volume of stormwater runoff and contribute to pollutant loading in runoff reaching the Whitewater River, resulting in potential cumulative hydrology and surface water quality impacts. However, as discussed further in Section 4.9, Hydrology and Water Quality, implementation of mitigation to collect, control, and treat stormwater flows on the Project site would reduce these cumulative impacts to a less than significant level.

Wastewater. The City's WWTP currently has a treatment capacity of 4.9 mgd and is currently processing an average flow of 2.9 mgd, leaving 2.0 mgd of available capacity. The City's General Plan EIR determined that the City's wastewater distribution and treatment system, with implementation of City policies requiring the provision of a wastewater collection and treatment system that supports existing and planned development within the City of Coachella, would be adequate to serve the City. The Project applicant would be conditioned to pay all applicable Development Impact Fees related to sewer infrastructure. All development applications as part of the proposed Specific Plan would be conditioned to construct all associated sewer lines and infrastructure needed to serve the planned development areas. All sewer facilities and connections would be designed and installed consistent with the City's requirements. Nonetheless, the payment of sewer connection fees and installation of sewer connections and facilities would not be sufficient to reduce the Project impacts related to wastewater treatment to below a level of significance if the capacity of the WWTP is not expanded, As a result, if the WWTP is not expanded by the end of Phase 4, buildout of the Specific Plan, when considered with the demand for wastewater treatment by other projects in the CSD service area, could not

contribute to a long-term cumulatively significant impact related to the capacity of the WWTP until the WWTP is expanded.

The Project would not result in significant cumulative impacts to wastewater treatment or wastewater treatment facilities.

Electricity. The proposed Project would increase electrical demand in the area by 7,560,220 kWh per month. Therefore, IID would install two substations and extend transmission lines to include the proposed Project IID's looped transmission system. These infrastructure improvements would ensure that IID has adequate capacity to handle the increase in electrical demand resulting from the proposed Project. In addition, specific energy reduction measures would be incorporated into the proposed Project. The proposed Project's contribution to increased demand for electricity would not be cumulatively considerable natural gas.

The proposed Project would result in a total natural gas demand of 24,512,076 cubic feet per month at Project buildout. SCG would build a gas rectangular station near an existing transmission line to provide a natural gas source to serve the Project site. Construction of this gas rectangular station would ensure sufficient gas supplies to serve the Project site. Therefore, the proposed Project's contribution to increased demand for natural gas would not be cumulatively considerable.

Solid Waste. The proposed Project would generate approximately 98.7 tons per day of solid waste at Project build out. Therefore, the proposed Project in combination with other past, present, and reasonably foreseeable projects within the County, would result in increased demand on landfills and solid waste services in the County. Based on their current capacities, the Lamb Canyon and Badlands Sanitary Landfills are scheduled to close in 2021 and 2024, respectively. Although the proposed Project would comply with solid waste diversion regulations, because the landfills serving the proposed Project would close prior to Project build out of the Specific Plan land uses, the proposed Project's contribution to cumulative impacts related to solid waste would be significant and adverse.

The Project is generally consistent with the City and County General Plan EIRs from an overall land use plan, type and density basis, and as such the cumulative impacts of the Project have been factored into the City and County General Plan EIRs. The City and County General Plan EIRs are a more appropriate tool for addressing and mitigating cumulative impacts to public services and utilities.

Reference: Final EIR, pages 4.14-32 through 4.14-35.

RECREATION RESOURCES

Finding

Implementation of the Project would not result in cumulative recreational resources impacts with implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

The proposed Project would contribute to a cumulative growth in population (refer to Section 4.13 of the Draft EIR). However, because the proposed Project includes approximately 344.7 acres of park/recreational areas, 381 acres of open space, and 176 acres of drainage/wash

area that exceeds the minimum requirements of the City, implementation of the proposed Project would not have a significant cumulative contribution to increased uses and physical deterioration of existing parks and recreational facilities. Additionally, the proposed Project would not only meet the parkland needs for the anticipated growth in population associated with Project implementation, but it would eliminate the existing citywide deficit of parkland in the City.

Implementation of the proposed Project in combination with cumulative projects in the area would increase use of existing parks and recreation facilities. However, as future residential development is proposed, the City would require developers to provide the appropriate amount of parkland or pay the in-lieu fees, which would contribute to future recreational facilities. Payment of these fees and/or implementation of new parks on a Project-by-Project basis would offset cumulative parkland impacts by providing funding for new and/or renovated parks equipment and facilities, or new parks. Measure 4.15.1 is provided to document the commitment in the Specific Plan for the provision of 344.7 acres of parkland. Therefore, the Project's cumulative contribution impacts to parks and recreation resources would be less than significant, and no mitigation is required.

Reference: Final EIR, pages 4.15-12 through 4.15-13.

TRAFFIC

Finding

Implementation of the Project would result in cumulative recreational resources impacts with implementation of mitigation measures (refer to Project Resolution Attachment "B," Mitigation Monitoring and Reporting Program).

Facts in Support of Finding

Under Year 2035 plus Project buildout (with Avenue 50 Interchange) conditions, the proposed Project contributes to a cumulative impact at the 64 intersections. Impacts to these intersections would be fully mitigated to a less than significant level through implementation of Mitigation Measures 4.16.1 through 4.16.4. However, there are 42 intersections that are under the jurisdiction of other agencies (Caltrans, Indio, and Riverside County) and outside of the City's jurisdiction (including one intersection that is both outside of the City's jurisdiction and cannot be improved to the LOS standard).

There is no existing mechanism for the proposed Project to pay into the local Indio or County DIF program and Caltrans does not have a DIF program. In addition, the City cannot guarantee delivery of improvements at jointly controlled locations at jurisdictional boundaries. An additional two intersections cannot be improved to the LOS standard even with mitigation due to physical constraints. For this reason, Year 2035 cumulative impacts from the proposed Project would remain significant and unavoidable at these 44 intersections.

With respect to the cumulative impacts to State facilities identified in the DEIR for the Existing Plus Project Build-out and 2035 Plus Project Build-out time horizons, the City does not control the implementation of freeway improvements. For this reason, the City cannot ensure that the identified freeway mainline lane and merge/diverge location improvements would be constructed prior to that time the LOS is forecast to fall below identified performance standards.

On the local level, the City through its Circulation Element contained within its General Plan, maintains policies whereby the City commits to work closely with regional infrastructure planning entities and to continue to identify new circulation and roadway improvements.

The Project's cumulative contributions to traffic on I-10 and SR-86 under long-range 2035 conditions are considered to be significant and unavoidable.

The Project is generally consistent with the City and County General Plan EIRs from an overall land use plan, type and density basis, and as such the cumulative impacts of the Project have been factored into the City and County General Plan EIRs. The City and County General Plan EIRs are a more appropriate tool for addressing and mitigating cumulative impacts to traffic and circulation.

Reference: Final EIR, pages 4.16-27 through 4.16-29.

WATER SUPPLY

Finding

Implementation of the Project would result in cumulative water supply impacts.

Facts in Support of Finding

The planned future uses within the City and CVWD over the next 20-year period have decreased due to economic slowdown and related market factors. Thus, the water demand associated with those uses is much less than the forecasted demand associated with projected growth rates in population as set forth in CVWD's 2010 planning documents and in regional and County forecasts. The Project's WSA evaluated potential water supply impacts of the proposed Project against a greater long-term water demand than is required by SB 610 and CEQA.

Based on the conclusions documented in the La Entrada WSA, the total projected water supplies available to the City during normal, single-dry, and multiple-dry water years during a 20-year projection are sufficient to meet the projected water demand associated with the proposed La Entrada Project, in addition to the City's existing and planned future uses, including agricultural and manufacturing uses. In addition, CVWD has concluded in its 2010 CVWMP that the total projected water supplies available to the Lower Whitewater River Subbasin area during normal, single-dry and multiple-dry periods throughout the year 2045 are sufficient to meet the water needs of existing uses and projected growth throughout CVWD, specifically including the future water needs within the City and its sphere of influence.

Further, the proposed La Entrada Project is identified in the 2010 CVWMP (referred to then as the Lomas del Sol Project), and the demands associated with the proposed Project have been accounted for as part of CVWD's regional water supply planning efforts and conclusions of water supply sufficiency through the year 2045.

The proposed Project's contribution to water demand in the City would not be cumulatively considerable.

Reference: Final EIR, pages 4.17-54 and 4.17-55.

7.0 FINDINGS REGARDING PROJECT ALTERNATIVES

Pursuant to Public Resources Code Section 21002 and the CEQA Guidelines Section 15126.6(a), an EIR must assess a reasonable range of alternatives to the Project action or location.

(a) Section 15126.6(a) places emphasis on focusing the discussion on alternatives which provide opportunities for eliminating any significant adverse environmental impacts, or reducing them to a level of insignificance, even if these alternative would impede to some degree the attainment of the Project objectives, or would be more costly. In this regard, the EIR must identify an environmentally superior alternative among the other alternatives.
(b) As with cumulative impacts, the discussion of alternatives is governed by the "rule of reason."
(c) The EIR need not consider an alternative whose effect cannot be reasonably ascertained, or does not contribute to an informed decision-making and public participation process.

The range of alternatives is defined by those alternatives, which could feasibly attain the objectives of the Project.

As directed in CEQA Guidelines Section 15126.6(c), an EIR shall include alternatives to the Project that could feasibly accomplish most of the basic objectives of the Project. The primary objectives of the Project, as stated within the Final EIR, are to:

- Develop 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;
- Establish a land use plan that locates active uses, community-serving elements, higher densities, and mixed-use designations within activity nodes ("Community Cores");
- Create central activity nodes with reduced development intensity along the site's periphery;
- Identify opportunities for a variety of residential land uses through the development, with high- and medium-density uses located in proximity to transit and mixed-use activity nodes/community cores;
- Provide a full range of residential, commercial, recreational, and business activities and services to the City;
- Distribute commercial uses in intensified core areas throughout the site to promote the ability to access retail services through non-vehicular modes of travel and deemphasize an auto-centric orientation;
- 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;
- Create a network of non-vehicular multipurpose pathways through the development that promotes connectivity to schools, commercial areas, and recreation facilities, and allows for greater mobility for residents;
- Provide a variety of recreational opportunities, incorporating a comprehensive trail system, parks, and recreation areas;

- Develop a land use plan that is responsive to the topography and reduces hillside grading where possible, preserving select natural features in their original state and concentrating higher-density residential uses in areas with more gently sloping topography;
- Retain the existing drainages on site to use as open space connections for pedestrian and non-motorized mobility along their edges and for storm flow conveyance;
- Create a land use concept that avoids development within areas of known geologic hazards through the use of appropriate recreational uses, setbacks, and restricted use areas;
- Implement green building practices and sustainable development methods throughout the Project; and,
- Implement community design and landscaping elements that complement and are responsive to the Coachella Valley desert environment.

As directed in CEQA Guidelines Section 15126.6(c), an EIR shall include alternatives to the Project that could avoid or substantially reduce one or more of the significant effects

Typically, where a Project causes significant impacts and an EIR is prepared, the findings must discuss not only how mitigation can address the potentially significant impacts but whether Project alternatives can address potentially significant impacts. But where all significant impacts can be substantially lessened, in this case to a less-than-significant level, solely by adoption of mitigation measures, the lead agency, in drafting its findings, has no obligation to consider the feasibility that Project alternatives might reduce an impact, even if the alternative would mitigate the impact to a greater degree than the proposed Project, as mitigated.

Because not all significant effects can be substantially reduced to a less-than-significant level either by adoption of mitigation measures or by standard conditions of approval, the following section considers the feasibility of the Project alternatives as compared to the proposed Project.

As explained below, these findings describe and reject, for reasons documented in the Final EIR and summarized below, each one of the Project alternatives. The evidence supporting these findings is presented in Section 5 of the Draft EIR.

ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

An EIR should identify alternatives that were considered by the lead agency but were rejected as infeasible. Factors to be considered when addressing the feasibility of an alternative include the ability to meet most of the basic Project objectives and the ability to avoid or substantially lessen significant environmental impacts. Other factors to be considered include site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional and regulatory limitations, and whether the Project proponent can reasonably acquire, control, or otherwise have access to an alternative site. An EIR need not consider an alternative that would result in effects that cannot be reasonably ascertained and for which implementation is remote and speculative.

In determining an appropriate range of alternatives to be evaluated in the EIR, a number of possible alternatives were initially considered by the City and, for a variety of reasons, rejected. Alternatives were rejected because they could not accomplish most of the basic objectives of the Project, would not have resulted in a reduction of potentially significant impacts of the

proposed Project, or were considered infeasible. The reasons for not selecting the rejected alternatives are discussed below.

Alternative Location. Locating the proposed Project on another site within the City could achieve the objectives of the proposed Project, which include providing a diverse range of residential product types and housing densities; providing for the orderly and master-planned development of land uses in the Project area to ensure that an economically viable Project can be developed; recognizing the unique environmental qualities of the site by retaining portions of the site for open space and recreational uses; creating a high-quality community to meet the needs of individuals and families seeking affordable or move-up housing complemented by open space areas; adding jobs to the local economy; and, generating additional sales tax revenues for the City.

The specific alternative location sites considered and rejected for the proposed Project are briefly described below:

- *Desert Lakes Property.* This alternative site (Figure 5.1, Alternative Site Locations, of the DEIR) would still need infrastructure to be brought up through the Project site to get potable water and sewer flows to the Coachella Waste Water Treatment Plant at Avenue 54 and Polk Street. The Desert Lakes property could be developed in uses similar to the uses in the proposed Project, which would result in similar significant and unavoidable impacts as identified for the proposed Project (e.g., aesthetics, agricultural resources, air quality, geology and soils, GHGs, traffic, and public services/utilities). The Desert Lakes Property would not result in a conversion of designated Farmland because there is no designated Farmland on that property. Although this alternative location site would avoid the significant and unavoidable impact associated with the conversion of designated Farmland, this alternative could result in a new significant and unavoidable impact to biological resources. This alternative location site would not avoid or lessen the overall significant impacts of the proposed Project on the Project site. In addition, the Project site is not owned by the Project proponent. Based on this information and the guidance provided in CEQA Section 15126.6(f)(2)(A), this alternative site was eliminated from further consideration.

- *Shadow View Area.* A 1,200 ac alternative site consisting of the 750-acre Shadow View Specific Plan property and land adjacent to that property was considered (Figure 5.1, Alternative Site Locations, of the Final EIR). The total amount of farmland (442 acres) that would be converted to urban uses with the development of the Shadow View area would be substantially more than the amount of farmland that would be converted under the proposed Project (9.5 acres). Unlike the proposed Project, the development of the Shadow View area would have substantially greater potential to result in the additional conversion of adjacent farmland to urban uses. There are pending plans for development at this regional commercial destination around the Spotlight 29 Casino. The Twentynine Palms Band of Indians is expanding the Spotlight Casino property to include a 47-acre hotel/resort complex at Dillon Road and Shadow View Boulevard, immediately east of the existing casino property. Additionally, the Cabazon Band of Indians has approximately 30 acres of reservation land, with a long-range plan for commercial uses in the vicinity of Avenue 49 and Tyler Street.

  Based on preliminary information, the Shadow View area alternative site would not avoid or result in a substantial reduction of the significant and unavoidable impacts (e.g.,

aesthetics, agricultural resources, air quality, farmland, geology and soils, GHG, traffic, and public services/utilities) associated with the La Entrada Specific Plan and would only result in similar impacts on a different Project site. This alternative location site would not be able to accommodate all the land uses in the proposed Project because, at approximately 750 acres, it is substantially smaller than the approximately 2,200-acre Project site. The Shadow View Specific Plan site is approximately one-third the size of the La Entrada Specific Plan site. If the same types and densities of land uses proposed for the La Entrada Specific Plan site were assumed at the Shadow View Specific Plan property, the total amount of development would be only about one-third the amount of development proposed for the La Entrada Specific Plan site. In addition, the Project proponent does not own the Shadow View Specific Plan property or land in the immediate vicinity of that property. Based on this information and the guidance provided in CEQA Section 15126.6(f)(2)(A) above, this alternative site was eliminated from further consideration.

EVALUATION OF SELECTED ALTERNATIVES

Alternative 1: No Project/McNaughton Specific Plan Alternative

This alternative evaluates the circumstances under which the proposed Project would not proceed and assumes that the existing General Plan land use designations of Low-Density Residential (LDR), Medium-Density Residential (MDR), Entertainment Commercial (C-E), General Commercial (C-G), and Open Space (O-S) and the zoning of "Specific Plan" would continue to be the regulating land uses for the Project site. For this No Project Alternative, it is assumed that the Project site would be developed as foreseen in the approved McNaughton Specific Plan. The approved McNaughton Specific Plan allows for the development of the 1,788 ac within the City (and no land in unincorporated Riverside County) with up to 8,000 low-, medium-, and high-density residential dwelling units; 2,792,196 square feet of commercial, office, and hotel/hospitality uses; 191 acres of parks or recreational uses; and 257 acres of open space uses (McNaughton Specific Plan 88-3, General Plan Amendment 88-8, EIR 1998).

Because the No Project/McNaughton Specific Plan Alternative assumes the allowable development under the approved McNaughton Specific Plan, the development of a master-planned community with adequate infrastructure to serve it would occur. As a result, residential, commercial, office, and park uses and roads and other infrastructure facilities would be developed on the Project site. Under the approved McNaughton Specific Plan, up to 8,000 residential units and up to 2,792,196 square feet of commercial, office, and hotel/hospitality uses could be constructed. This is more residential units and commercial space than proposed under the La Entrada Specific Plan on 412 fewer acres. The No Project/McNaughton Specific Plan Alternative would fulfill the majority of the basic objectives of the proposed Project.

Under No Project/McNaughton Specific Plan Alternative, significant impacts associated with agricultural resources, and geology and soils would remain the same as those identified for the proposed Project. Operational air quality, GHG, and traffic impacts would be increased due to increased anticipated traffic volumes and would remain significant. The development that could occur under the No Project/McNaughton Specific Plan Alternative would result in similar but incrementally greater significant environmental impacts for aesthetics and public services and utilities than the proposed Project.

Alternative 2: No Project/No Development Alternative

Under the No Project/No Development Alternative, the Project site would remain vacant and undeveloped. This alternative would not include the development of the Project site with the land uses in either the proposed La Entrada Specific Plan or the adopted McNaughton Specific Plan (the latter being consistent with the General Plan land use and zoning). No Project/No Development Alternative allows for a comparison of the effects of the proposed La Entrada Specific Plan with the effects of leaving the Project site in its current undeveloped condition.

In the absence of development on the Project site, no impacts would occur and No Project/No Development Alternative would be the Environmentally Superior Alternative. However, Alternative 2 would not fulfill any of the objectives of the proposed Project. Retention of the Project site in its current vacant and undeveloped condition would not provide for housing with supporting land uses or additional employment opportunities in the City, and would not generate sales tax or increased property tax revenues for the City.

Alternative 3: Retirement Community Alternative

The Retirement Community Alternative would implement a Specific Plan with the same land uses and layout as the proposed Project but with senior housing replacing the single-family housing units in the proposed La Entrada Specific Plan. As shown earlier in Table 5.A, Alternative 3 would include 7,800 age-restricted (senior) dwelling units, 1,510,879 square feet of commercial/office uses, 345 acres of park uses, and 557 acres of open space use. Similar to the proposed Project, Alternative 3 would include the extensions of Avenues 50 and 52 onto the Project site, as well as the other proposed infrastructure facilities.

Alternative 3 would meet most of the Project objectives to develop a residential mixed-use master-planned community. With the Retirement Community Alternative, impacts related to aesthetics, agricultural resources, and geology and soils would be similar to those under the proposed Project. Although reduced in magnitude, air quality construction and operational emissions, GHG emissions, and operational traffic impacts at certain roadway segments and intersections under Alternative 3 would still be significant and unavoidable, similar to the proposed Project. The decrease in household size (i.e., senior citizen households tend to be smaller than the average household) would result in fewer residents on the Specific Plan site than with the proposed Project. As a result, Alternative 3 would have a reduced demand for public services and solid water. However, as with the proposed Project, although the payment of fees and adherence to utility requirements would reduce these impacts, there would still be a need to provide additional fire, police, and library facilities to meet response time requirements. Impacts would, therefore, remain significant and unavoidable until such time that additional facilities are constructed. Because of the reduction in vehicle trips achieved under Alternative 3, impacts to the operation of local roadways and intersections would be proportionate compared to the proposed Project, but would remain significant and unavoidable.

This alternative would have similar or slightly reduced impacts, and would not avoid the Project's unavoidable significant impacts. This alternative would also not be consistent with the Project's goal and City Housing Element goal of providing a diverse range of housing types. There is no evidence suggesting that the City of Coachella could support a demand for this quantity of senior housing. Therefore, this alternative is not under consideration by the City.

Alternative 4: No Annexation Alternative

The No Annexation Alternative would include the proposed Specific Plan land uses on the 1,612-acre portion of the Project site in the City and would exclude the 588-acre area in

unincorporated Riverside County. Alternative 4 would reduce the number of residential units to 6,504 and would eliminate approximately 26 acres of park uses, 207 acres of open space, and one 16-acre school site. Under Alternative 4, it is assumed that some drainage channel improvements would still be required within the County to facilitate stormwater runoff that originates from a large area north of I-10 through the Project site and southwest toward the Coachella Canal. Similar to the proposed Project, Alternative 4 would also include the extensions of Avenues 50 and 52 onto the Project site.

Alternative 4 would meet the majority of the Project objectives to develop a residential mixed-use master-planned community. With the No Annexation Alternative, impacts related to aesthetics, agricultural resources, and geology and soils would be similar to those under the proposed Project. Although reduced in physical size and intensity, short-term air quality construction emissions, long-term air quality operational emissions, GHG emissions, and operational traffic LOS for certain roadway segments and intersections under Alternative 4 would remain significant and unavoidable, similar to the proposed Project. The reduction in development under Alternative 4 would result in a reduction in the total number of residents and employment opportunities on the site, which would result in reduced demand to public services and solid waste. Although the payment of fees and adherence to utility requirements would reduce these impacts, there would still be a need to provide additional fire, police, and library facilities in order to meet response time requirements. Similar to the proposed Project, public service impacts under Alternative 4 would remain significant and unavoidable until such time as facilities are constructed. Because of the reduction in vehicle trips achieved under Alternative 4, impacts to the operation of local roadways and intersections would be proportionally reduced from the proposed Project, but would remain significant and unavoidable.

This alternative, the "Environmentally Superior Alternative", would result in similar or slightly reduced impacts than the Project. However, it would result in less housing and other Project-related uses. Reduction in Project density would affect the Project's flexibility in providing onsite and offsite amenities and improvements due to economies of scale. More importantly, this alternative does not preclude the potential for the annexation area to be developed at a later date, and future development separate from the La Entrada Specific Plan would likely result in a less cohesive land use plan and less effective provision of regional infrastructure improvements such as Avenue 50 and 52 extensions. Furthermore, exclusion of the annexation area would require revision and reconfiguration of the Specific Plan, as the annexation area is an integral part of the overall land use plan (as shown in Final EIR Figure 3.6). Eliminating the annexation area would essentially bisect the Hillside Village portion of the Project, and would require reconfiguration or elimination of school and park sites, internal circulation, Avenue 52 extension, water quality basins, the Vista Park, and a recreational center. For these reasons, this alternative has been rejected by the City of Coachella.