



LA ENTRADA

specific plan

Final Environmental Impact Report

SCH NO. 2012071061

Supplement to Responses to Comments

Lead Agency
CITY OF COACHELLA

November 1, 2013

The Supplement to the Responses to Comments document has been provided to clarify, amplify and/or make minor technical corrections to the October 9, 2013 Responses to Comments document (Final EIR Volume IV, presented at the October 16, 2013 Planning Commission hearing).

Response No. 7 (County of Riverside)

Response 7d

It is not clear which four intersections are being referenced in the comment letter. As depicted in DEIR Table 4.16.AG, *Year 2035 with Project Build-out (with Avenue 50 Interchange) Mitigation Requirements*, the following County intersections are impacted by the Project:

- #9 – Calhoun/52nd (included in East-West TUMF)
- #35 – Dillon/Fargo Canyon (included in TUMF)
- #60 – Fillmore/52nd (included in City DIF)
- #61 – Fillmore/53rd (not covered)
- #71 – Pierce/52nd (100% constructed by the Project)
- #79 – Buchanan/62nd (only covered by County DIF)

Based on this, the Project will be providing funding for locations covered by the County TUMF or City DIF. For locations 61 and 79, as noted in Response 7d, there is no legally enforceable mechanism for the Project to pay fees into the County DIF and ensure those fees are used for the impacted location. The County DIF locations are based on General Plan traffic forecasts for the region, and the funding of this DIF is based on County building permits, not City building permits. In addition, it is not feasible for the Project to construct these County improvements, as there is no nexus between the Project's impacts and a requirement that the Project complete 100% these improvements and such a requirement would be disproportionate to the Project's actual impacts (as shown in Draft EIR Appendix L, Table M, these intersections would have the same Level of Service with or without the Project, and as shown in Appendix L Table BO, the Project's share of total buildout impacts including existing conditions and all future cumulative conditions is only 5% at Location 61 and 7% at Location 79). Further, there is no mechanism in place to compensate the Project for excess funding. If a mechanism is in place at the time of building permit issuance, the applicant will pay into appropriate designated fee programs.

Response No. 9 (CA Clean Energy Now)

Response 9e

The anticipated GHG mitigation benefit (20% below BAU) is discussed on DEIR page 4.7-25. Furthermore, Table 1, *Project GHG Emissions Reductions from Mitigation Measures*, identifies the percent reduction associated with each applicable mitigation measure identified in the Draft EIR. The emissions reductions are based on the data and research within the California Air Pollution Control Officers Association guidance document *Quantifying Greenhouse Gas Mitigation Measures* (August 2010). As indicated in Table 1, implementation of the required mitigation measures would result in GHG

reduction ranging from 4 percent to 58 percent. The low range (4 percent) assumes the most conservative reductions, while the high range (58 percent) assumes maximum implementation of each of the identified measures. As demonstrated in Table 1, implementation of the Draft EIR mitigation measures would be able to achieve a 20 percent reduction of GHG emissions from business as usual conditions. It should be noted that the project includes design features (i.e., increase diversity and increase density) that are not included in the mitigation measures. These design features have the potential to reduce mobile source GHG emissions by an additional 9 to 30 percent.

**Table 1
Project GHG Emissions Reductions from Mitigation Measures**

Draft EIR Mitigation Measure	Scaled CAPCOA Reduction ^{1,2}	
	Low Range	High Range
<p>Mitigation Measure 4.7.1 Energy Efficiency and Green Building Standards. The proposed project shall exceed the most current Title 24 of the California Code of Regulations (CCR) established by the California Energy Commission (CEC) regarding energy conservation and green buildings standards by 20 percent. Building plans prepared for each Tentative Tract Map shall include the following components:</p> <ul style="list-style-type: none"> • Design to United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED), GreenPoint Rated standard, or better for all new buildings constructed within the La Entrada Specific Plan • Energy-efficient light-emitting diode (LED) lighting and solar photovoltaic lighting fixtures in all common areas of the site • Energy-efficient appliances (ENERGY STAR or equivalent), and high efficiency heating, ventilation, and air conditioning (HVAC) systems in all on-site buildings • Green building techniques that increase building energy efficiency above the minimum requirements of Title 24 • Installation of photovoltaic panels on a minimum of 25 percent of the buildings on site • Utilization of high reflectance materials for paving and roofing materials on residential, commercial, and school buildings 	5% (energy)	15% (energy)
<p>Mitigation Measure 4.7.2 Materials Efficiency. Project plans for each Tentative Tract Map will include the following materials efficiency components:</p> <ul style="list-style-type: none"> • Materials used for buildings, landscape, and infrastructure will be chosen with a preference for the following characteristics: rapidly renewable; increased recycle content (50 percent or greater); locally sourced materials (within the South Coast Air Basin); utilization of sustainable harvesting practices; and materials with low or no volatile organic compounds (VOCs) off-gassing. 	N/A (supporting measure)	N/A (supporting measure)

Draft EIR Mitigation Measure	Scaled CAPCOA Reduction ^{1,2}	
	Low Range	High Range
<p>Mitigation Measure 4.7.3 Water Conservation and Efficiency Features. Project plans for each Tentative Tract Map will include the following water efficiency components:</p> <ul style="list-style-type: none"> • Drought-tolerant landscaping, nonpotable reclaimed, well, or canal water for irrigation purposes • High-efficiency plumbing fixtures and appliances that meet or exceed the most current CALGreen Code in all buildings on site • Efficient (i.e., "Smart") irrigation controls to reduce water demand on landscaped areas throughout the project • Restriction of irrigated turf in parks to those uses dependent upon turf areas, such as playing fields and picnic areas • An integrated storm water collection and conveyance system • Dual plumbing within recreation areas, landscaped medians, common landscaped areas, mixed use/commercial areas, and parks to allow the use of reclaimed water when available 	0% (water)	6.1% (water)
<p>Mitigation Measure 4.7.4 Landscape Design Features. Project plans for each Tentative Tract Map will include the following landscape design components:</p> <ul style="list-style-type: none"> • Community-based food production within the project by planning for community gardens • Native plant species in landscaped areas on the project site • Landscape plant palette that focuses on shading within developed portions of the site and in areas of pedestrian activity • Tree-lined streets to reduce heat island effects • Non-turf throughout the development areas where alternative ground cover can be used, such as artificial turf and/or xeriscaping • Landscape to provide shading of structures within 5 years of building completion 	N/A (supporting measure)	N/A (supporting measure)
<p>Mitigation Measure 4.7.5 Vehicle Priority. Prior to issuance of any Site Development permits, the Director of the City of Coachella (City) Public Works Department, or designee, shall include prioritized parking for electric vehicles, hybrid vehicles, and alternative fuel vehicles.</p>	N/A (supporting measure)	N/A (supporting measure)
<p>Mitigation Measure 4.7.6 Energy Efficient Street Lights and Traffic Signals. The City shall identify energy efficient street lights which are currently available and which, when installed, would provide a 10 percent reduction beyond the 2010 baseline energy use for this infrastructure, and shall require the use of this technology in all new development. All new traffic lights installed within the project site shall use light-emitting diode (LED) technology.</p>	0% (energy)	0.009% (energy)
<p>Mitigation Measure 4.7.7 Construction Waste Management Plan. Prior to issuance of a building permit, the applicant shall submit a Construction Waste Management Plan to the City for review and approval. The plan shall include procedures to recycle and/or salvage at least 75 percent of nonhazardous construction and demolition debris and shall identify materials to be diverted from disposal and whether the materials would be stored on-site or commingled. Excavated soil and landclearing debris do not contribute to this credit. Calculation can be done by weight or volume but must be documented.</p>	N/A (supporting measure)	N/A (supporting measure)

Draft EIR Mitigation Measure	Scaled CAPCOA Reduction ^{1, 2}		
	Low Range	High Range	
Mitigation Measure 4.7.8 Vehicle Idling Limits. All commercial and retail development shall be required to post signs and limit idling time for commercial vehicles, including delivery trucks, to no more than 5 minutes. This condition shall be included on future site development plans for review and approval by the City of Coachella Director of Development Services.	N/A (supporting measure)	N/A (supporting measure)	
Mitigation Measure 4.3.7 Project Operations. Prior to the issuance of any construction permits, the project applicant shall submit for review and approval by the City of Coachella Public Works Director, building plans that incorporate measures such as, but not limited to, the following:	N/A (supporting measure)	N/A (supporting measure)	
Operational Mitigation Measures (Transportation)			
<ul style="list-style-type: none"> Provide one electric car charging station for every 10 highdensity residences and provisions for electric car charging stations in the garages of all medium-, low-, and ultra-lowdensity housing. Provide at least two designated parking spots for parking of zero emission vehicles (ZEVs) for car-sharing programs in all employee/worker parking areas. 	0.44% (mobile)	11% (mobile)	
<ul style="list-style-type: none"> Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices at local events, and/or other incentives. 	0.26% (mobile)	17.5% (mobile)	
<ul style="list-style-type: none"> Implement a rideshare program for employees at retail/commercial sites. 	0.88% (mobile)	13% (mobile)	
<ul style="list-style-type: none"> Create local "light vehicle" networks, such as neighborhood electric vehicle (NEV) systems. 	0.44% (mobile)	11% (mobile)	
<ul style="list-style-type: none"> Require the use of 2010 model year emissions-compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail, and vendor supply delivery trucks) at commercial/retail sites upon project build out. If this is not feasible, consider other measures such as incentives, and phase-in schedules for clean trucks, etc. 	N/A (supporting measure)	N/A (supporting measure)	
Operational Mitigation Measures (Energy Efficiency)			
<ul style="list-style-type: none"> Design all structures to use passive heating, natural cooling, and reduced pavement to the extent feasible. All residences shall use either high-efficiency or solar hot water systems. Limit the hours of operation of outdoor lighting in publicly accessible areas. Install light-colored "cool" roofs on all structures and cool pavements throughout the project site. Require the use of electric/energy-efficient appliances (e.g., stoves) in all residences. 	1.46% (energy)	3.65% (energy)	
Total Percent Reduction		4%	58%
Notes:			
<ol style="list-style-type: none"> Reductions are presented in percentage ranges for specific sectors (i.e., mobile, energy, waste, water, and area sources). Each sector's reduction percentages are scaled proportionally to their sector of the project-generated emissions. For example, energy emissions account for 9.12 percent of the total emissions, and a 6.5 percent reduction (low range) would apply to energy related emissions. Therefore, the reduction is calculated by multiplying 0.0912 by 0.065 for a scaled reduction of 0.006 (0.6 percent). This was completed for each sector. The total emissions reduction applied to the project is a sum of the scaled sector reduction percentages (4 percent [low range] to 58 percent [high range]). Reductions based on the California Air Pollution Control Officers Association, <i>Quantifying Greenhouse Gas Mitigation Measures</i>, August 2010. 			

Response 9f

As discussed in the footnotes to this response, actual land area required for a renewable energy facility such as solar PV, CST or wind farms varies widely based upon site-specific factors. In this case, it would be more accurate to say that “much” (not “the majority of”) the Project’s open space areas would be required for a renewable energy facility. In any case, the land area available is not suitable for renewable facilities as the available open space includes steeper topography, flood control washes, seismic setback areas for fault zones, and perimeter buffer zones for adjacent uses.

Response 9l

To clarify, the Project already commits to exceeding Title 24 energy efficiency requirements by 20%. The commenter’s estimated solar PV costs are artificially low, as the NHSP incentive relied upon in the commenter’s estimate requires that the home exceed Title 24 requirements by at least 15%. The cost to exceed Title 24 requirements to qualify for this NHSP incentive is not included in the actual solar PV cost, as noted in the comment itself. Refer to Response 9bb regarding the commenter’s request to exceed Title 24 by 30%.

Response 9p

There are a wide variety of “District Energy” systems in commercial development and/or various stages of research, which utilize different types of heat sources.¹ These systems are often employed in large campus environments such as hospitals, schools and commercial/industrial facilities. This comment is specifically predicated upon the feasibility of implementing a “District Energy” concept for the Project using CST. As discussed in Response 9p, CST is not feasible for the Project due to inadequate land area. The relatively small GHG benefit (less than 13% of GHG emissions are from non-vehicular sources) does not justify the extraordinary cost – there is insufficient nexus to require such a mitigation measure. The commenter references use of the cap and trade market to defray District Energy system costs, but there is no specific proposal set forth and it remains unclear what the commenter intended. In addition, as noted in Response 9g, purchase of electricity from IID is already mitigated, since IID’s RPS complies with AB32 and Executive Order S-14-08. Response 9i summarizes the extensive array of GHG mitigation strategies being applied to the Project. Future commercial and/or residential buildings are not precluded from using additional GHG reduction measures, and such may be required through future California Building Code revisions.

Response 9v

The Specific Plan, Section 2.3, Sustainable Community Strategies, provided additional discussion regarding passive heating, natural paving and reduced pavement. These are “Project Design Features” which are incorporated into the Project and will be reflected in Conditions of Approval.

¹ http://files.eesi.org/district_energy_factsheet_092311.pdf (accessed October 28, 2013).

Response 9bb

The Project already commits to exceeding current Title 24 requirements by at least 20% (the new 2013 Title 24 standards which become effective January 1, 2014 are estimated themselves to reduce energy demand by approximately 25% compared to current 2008 Title 24 requirements.). Response 9i summarizes the extensive array of GHG mitigation strategies being applied to the Project. Future commercial and/or residential buildings are not precluded from using additional GHG reduction measures, and such may be required through future California Building Code revisions. The relatively small GHG benefit that would accrue from requiring the Project to exceed Title 24 by 30% (less than 13% of GHG emissions are from non-vehicular sources) does not justify the disproportionate additional cost of exceeding Title 24 by 30% or more - there is insufficient nexus to require such a mitigation measure. In addition, as noted in Response 9g, purchase of electricity from IID is already mitigated, since IID's RPS complies with AB32 and Executive Order S-14-08.

Response 9ff

To clarify, the Project is providing a variety of commuter benefits including:

- Rideshare program
- Public transportation incentives
- Transit connectivity
- EV charging stations
- Parking incentives

The commenter does not explain how its proposed commuter benefits would differ from the Project's proposed commuter benefits. In addition, contrary to the comment, while a commuter benefits program may encourage rideshare and use of public transit, it would not reduce transportation demand, as commuter benefits do not reduce the number of persons commuting to and from their places of employment.

Response 11b

Avoidance of Avenue 50 extension agricultural resource impacts is not feasible. It is not possible to avoid agricultural land use impacts with the Avenue 50 extension, as agricultural land exists on both sides of Avenue 50 the length of the corridor, including the proposed Canal crossing area. The current Avenue 50 pavement width requires substantial widening to meet General Plan Circulation and Mobility Element requirements of a 130-foot wide cross section. Therefore, even if the Avenue 50 extension followed the existing alignment and crossed the Canal in an east-west direction at an angle (rather than southwest to northeast to create a 90 degree crossing), there would still be agricultural land loss, and the reduced land impact north of Avenue 50 would be shifted to land south of Avenue 50. For the reasons noted in Responses 11a and 11d, the proposed alignment was selected in order to reduce the bridge length (a 90 degree crossing has the shortest bridge span), transect the high power lines at a high

point to avoid potential conflict with drooping lines, and avoidance of steeper topography south of the proposed Canal crossing.

Attachments to Response 9

The entire Responses to Comments packet, including attachments to Comment Letter 9, are available on the City website, the project website, as well as at the City Planning counter.

Supplement to Errata to Draft EIR

Mitigation Measure 4.5.3

- Should significant resources be discovered, avoidance shall be considered first and then, if not feasible to avoid the significant resource(s), appropriate mitigation consistent with the PRIMP shall be implemented. ²

² This clarification has been made to reflect the priority for significant cultural resource impacts as avoidance and then, if infeasible to avoid, mitigation for significant resources.