EXHIBIT B

Initial Study and Notice of Intent to Adopt a Mitigated Negative Declaration

Application for Conditional Use Permit and Architectural Review

Sunridge Self-Storage (Formerly AAA Storage of Coachella, LLC)
86-220 Tyler Lane
Coachella, California

Prepared for Lead Agency:

City of Coachella
Community Development Department
1515 Sixth Street
Coachella, CA 92236

Prepared by:

Coachella Valley Engineers
77-933 Las Montanas Road, Suite 101
Palm Desert, CA 92211

October 5, 2023

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Chapter 1 Introduction

1.1 Environmental Initial/Mitigated Negative Declaration Study Overview

Project Title: Sunridge Self-Storage (Formerly AAA Storage of Coachella, LLC)

Case No: Conditional Use Permit No. 369/Architectural Review No. 23-06/ EA No. 23-05

Lead Agency And Address: City of Coachella
53990 Enterprise Way
Coachella, CA 92236

Contact Person Adrian Moreno
Associate Planner
(760) 398-3102

Sponsor's Name And Address: Sunridge Self- Storage (Formerly AAA Storage of Coachella, LLC)
86-220 Tyler Lane, Coachella, CA 92236

Engineer: Coachella Valley Engineers
77-933 Las Montanas Road, Suite 101, Palm Desert CA, 92211

Project Location: Adjacent to Northeastern end of Tyler Lane, West of Hwy 111, and North of Avenue 54
APN: 763-141-018

Project Description: The applicant, Sunridge Self-Storage (Formerly AAA Storage of Coachella, LLC), is proposing an expansion of their existing RV and Self-Storage facility at Hwy 111 on an adjacent vacant 4.85-acre parcel to the west. Phase I of the Project proposes approximately 34,821 square feet of self-storage units, configured into various sizes, and 60 uncovered RV storage spaces. Phase II of the Project proposed approximately 28,152 square feet of self-storage units for a total of 62,979 square feet of self-storage units, configured into various sizes, and 71 covered RV storage spaces. The Project also includes a 900 square foot office and five parking spaces, all accessed from Tyler Lane.

General Plan Designations: Industrial District

Zoning Classifications: M-S (Manufacturing Service)

Onsite and Surrounding Land Uses Setting: The Project site is a graded flat vacant parcel that was farmed for row crops up to the 1970's/80's. The property is regularly plowed for weed abatement purposes and the site supports no native vegetation. There are no structures or other improvements and there is no business activity taking place. Immediate surrounding properties include vacant land, RV storage, vehicle and piping materials storage and an electrical contractor. South beyond the adjacent vacant parcel is Imperial Western Products, a long-time recycling operation.

1.2 Authority

The City of Coachella is the lead agency for the proposed Project. The City Council is the governing body for the approval of the proposed Project and adoption of the Mitigated Negative Declaration (MND). Because the proposed Project involves a change to the existing site, the City Council's consideration of the Project and its potential environmental effects is a discretionary action that is subject to the California Environmental Quality Act (CEQA). This Initial Study (IS) and its appendices have been prepared in accordance with the CEQA (Statute) and the State's Guidelines for Implementation of CEQA (Guidelines) (as amended, 2018. This IS, when combined with the Notice of Intent (NOI) to Adopt a MND, serves as the environmental document for the proposed Project pursuant to the provisions of CEQA (Public Resources Code 21000 et seq.) and the CEQA Guidelines (California Code of Regulations Section 15000, et seq.).

1.3 Determination

This Initial Study determined that development of the proposed Project would not have significant impacts on the environment, with the implementation of mitigation measures.

1.4 Public Review Process

This IS/MND will be circulated for public review to responsible and trustee agencies and interested parties for a period of 20 days. Following the public review and comment process, the City plans to issue a Mitigated Negative Declaration and prepare and file a Notice of Determination.

1.5 Scope of Environmental Review

The IS evaluates the proposed Project's potential environmental impacts on the following topics:

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

1.6 Impact Assessment Terminology

The Environmental Checklist identifies potential impacts using four levels of significance as follows:

- No Impact. A finding of no impact is made when it is clear from the analysis that the proposed Project would not affect the environment.

- Less than significant. A finding of less than significant is made when it is clear from the analysis that a proposed Project would cause no substantial adverse change in the environment and no mitigation is required.

- Less than significant with mitigation incorporated. A finding of less than significant with mitigation incorporated is made when it is clear from the analysis that a proposed Project would cause no substantial adverse change in the environment when mitigation measures are successfully implemented by the Project proponent.

- Potentially Significant. A finding of potentially significant is made when the analysis concludes that the proposed Project could have a substantially adverse impact on the environment related to one or more of the topics listed in the previous section, *Scope of the Initial Study*.

1.7 Documents Incorporated by Reference

As allowed by CEQA Guidelines Section 15150, a MND may incorporate by reference all or portions of another document that is generally available to the public. The document used must be available for public review for interested parties to access during public review of the IS and NOI to Adopt a Mitigated Negative Declaration for this Project. The following documents are incorporated by reference.

- City of Coachella General Plan 2035.
- City of Coachella General Plan Final EIR.
- City of Coachella Municipal Code (online content January 2023).

These documents are also available for review at the City's Development Services Department, located at 1515 Sixth Street, Coachella, CA 92236. Project specific studies are attached to this report.

Chapter 2 Project Description

2.1 Project Location and Setting

The Target Property is located in the southeast area of the City of Coachella in south-central Riverside County. The Target includes one (1) assessor's parcel totaling 4.85 Acres adjacent to the northeastern end of Tyler Lane west of Hwy 111 and north of Avenue 54. Hwy 111 is a major arterial road traversing the County. The Target Property is vacant land that was farmed for row crops up to the 1970's/80's. There are no structures or other improvements and there is no business activity taking place. Immediate surrounding properties include vacant land, vehicle and piping materials storage and an electrical contractor. South beyond the adjacent vacant parcel is Imperial Western Products, a long-time recycling operation.

Surface and groundwater generally drain to the southeast. The water table is within about 25 to 45 feet of the surface. The Target Property lies at an elevation of 96 feet below sea level. The depth to bedrock is several hundreds of feet. The property lies in the northwestern area of the mid Coachella Valley, between the Santa Rosa Mountains and the Little San Bernardino Mountains. The Valley is seismically active. The San Andreas Fault is active and lies approximately seven miles to the north of the property. The Target Property is a undeveloped vacant land with no improvements and no business activity taking place. There were no visible signs of migration of hazardous substances from off-site.

2.2 Project Description

The applicant, Sunridge Self-Storage (Formerly AAA Storage of Coachella, LLC), is proposing an expansion of their existing RV and Self-Storage facility at Hwy 111 on an adjacent vacant 4.85-acre parcel to the west. Phase I of the Project proposes approximately 34,821 square feet of self-storage units, configured into various sizes, and 60 uncovered RV storage spaces. Phase II of the Project proposed approximately 28,152 square feet of self-storage units for a total of 62,979 square feet of self-storage units, configured into various sizes, and 71 covered RV storage spaces. The Project also includes a 900 square foot office and five parking spaces, all accessed from Tyler Lane.

EXISTING AND PROPOSED GENERAL PLAN AND ZONING

	GENERAL PLAN	ZONING
EXISTING	Industrial District	M-S (Manufacturing Service)

COACHELLA SURROUNDING LAND USES AND ZONING

	GENERAL PLAN	ZONING	CURRENT LAND USE
NORTH	Industrial District	M-S (Manufacturing Service)	Vacant property with pipes and materials storage and an auto

			repair yard
SOUTH	Industrial District	M-H (Heavy Industrial)	Vacant undeveloped industrial property
EAST	Industrial District	M-S (Manufacturing Service)	Self-storage/vehicle storage
WEST	Urban Employment	U-E (Urban Employment)	Electrical contractor facility

Table 1: Land Use and Zoning for Project and Surrounding Area

2.3 Actions and Approvals

Required Entitlements:

- Architectural Review
- Approval of Mitigated Negative Declaration and adoption of the Monitoring Plan

The Lead Agency has primary authority for the approval and supervision of the proposed Project. As such, the City of Coachella is the Lead Agency for this Project pursuant to CEQA. This Initial Study/Mitigated Negative Declaration (IS/MND) is intended to serve as the CEQA document for all necessary discretionary approvals by the Lead Agency and other agencies, including, but not limited to the following:

Government	Agency	Permit/Approval Required
FEDERAL	No federal agencies identified	
STATE	State Water Resources Control Board	Construction Stormwater General Permit
		Notice of Intent to Comply with Section 402 of the Clean Water Act
		Construction Stormwater Pollution Prevention Plan (SWPPP)
REGIONAL	South Coast Air Quality Management District	PM-10 Plan for compliance with Rule 403.1, Dust control in the Coachella Valley
	Regional Water Quality Control Board Region 7	Water Quality Management Plan (WQMP)
	Riverside County Airport Land Use Commission	Review of Project for consistency with the Airport Land Use Compatibility (ALUC) Plan
LOCAL	City of Coachella	Approval of the following entitlements: • Architectural Review • Approval of Mitigated Negative Declaration

Table 2: Agencies and Permit Approvals required for Project

2.4 Utilities and Service Providers

The following agencies and companies will provide service to the project site:

1. Sanitary Sewer: Coachella Sanitary District (CSD)
2. Water: Coachella Water Authority (CWA)
3. Electricity: Imperial Irrigation District (IID)
4. Gas: Southern California Gas Company
5. Telephone: Frontier Communications, Spectrum
6. Trash disposal: Burrtec Waste and Recycling Services

Existing facilities for these utilities occur adjacent to the Project site. All extensions to these facilities occur onsite and existing disturbed right-of-way. Connections will therefore not impact the native environment.

Exhibit 2-1 Regional Context + Regional Topo

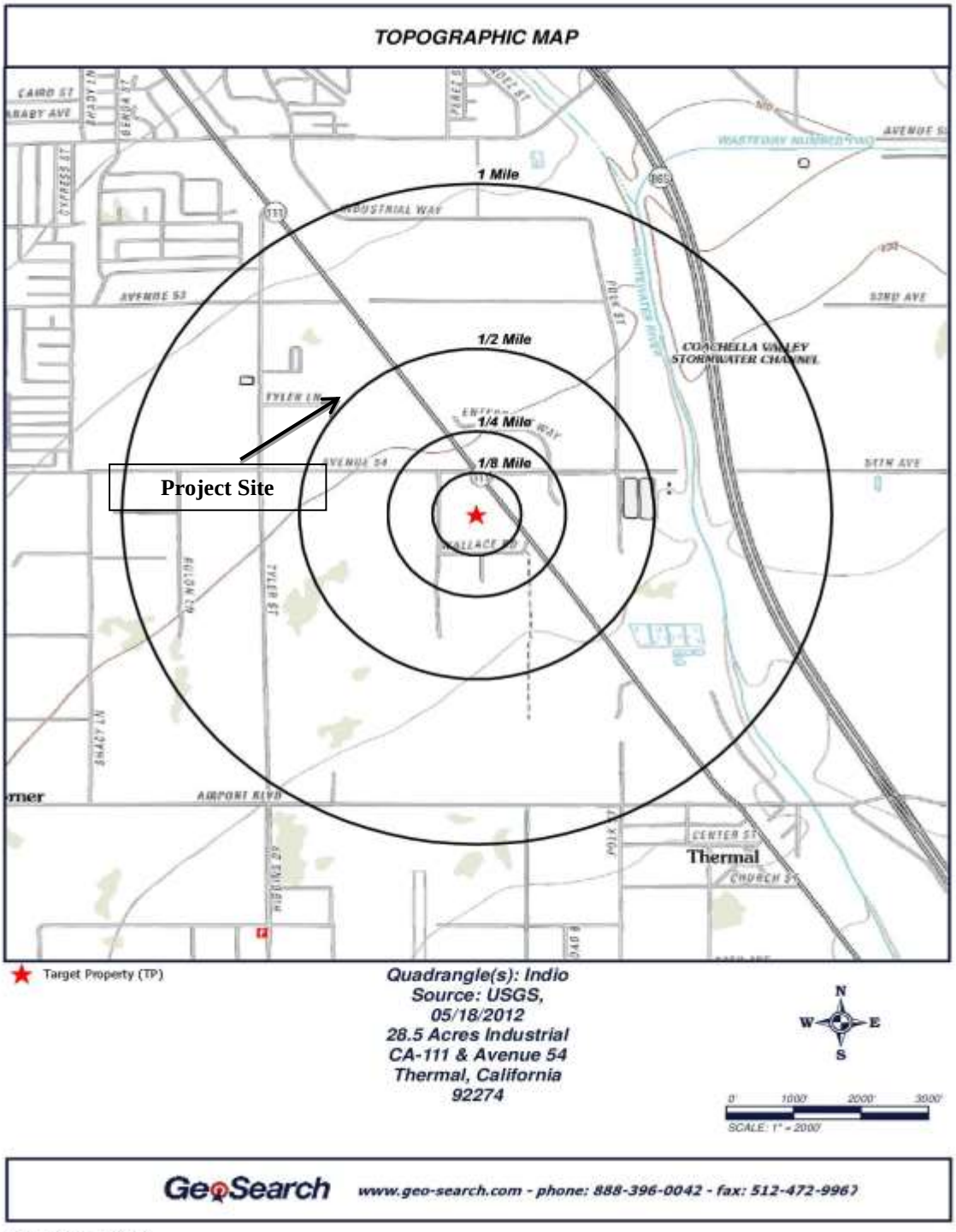

Exhibit 2-2 Topo Map

Exhibit 2-3 Site Aerial

View west from west end Target

View north at west boundary Target

View south on Target

View east along north Target boundary

View east on Target

View east from north side Target

Exhibit 2-4 Site Photos

View north from Target

View south on Target

View south on Target

View west from Target

View on Target

View at southwest corner Target

Exhibit 2-4 Site Photos

Chapter 3 Environmental Evaluation

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (X) would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture Resources	☐	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☐	Geology /Soils	☐	Greenhouse Gases	☐	Hazard/Hazardous Materials
☐	Hydrology/ Water Quality	☐	Land Use Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation/Traffic	☒	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

10/10/23

Signature Date

Gabriel Perez Director Department of Development Services

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., General Plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a Project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

a) the significance criteria or threshold, if any, used to evaluate each question; and

b) the mitigation measure identified, if any, to reduce the impact to less than significant.

3.1 Aesthetics

3.1.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035
- Final EIR for the City of Coachella 2035 General Plan Update

3.1.2 Environmental Setting

The City of Coachella, including the Project site, is located in Coachella Valley, which is a desert valley that extends approximately 45 miles in Riverside County, southeast from the San Bernardino Mountains to the northern shore of the Salton Sea. The Project site occurs in an urban environment in the center of the City of Coachella. The current urban environment includes the existing Sunridge Self-Storage, and other industrial businesses.

The City of Coachella has scenic resource elements of both the natural and the built environment such as open space, areas of native vegetation, mature trees, rural lands, and historic landmarks. The Little San Bernardino and Santa Rosa Mountain ranges and Mecca Hills provide scenic views throughout the City. The Little San Bernardino range extends to the north and northwest of the City. The Mecca Hills are located east of the City, and the Santa Rosa Mountains occur to the west and southwest of the City.

There are no state-designated scenic highways in proximity to the Project site. The project site is an "infill" site, currently vacant and adjacent to the existing Sunridge Self-Storage. The site is also adjacent to industrial uses. Ultimate development of the project site will result in an infill development compatible with the existing "Industrial District" environment.

3.1.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Aesthetics Would the Project				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion/Analysis

a) Less Than Significant Impact. The Project site has distant and limited views of the Little San Bernardino Mountains to the northwest; the Mecca Hills to the east and southeast; and the Santa Rosa Mountains to the west and southwest. The property is generally located in the southern part of the City of Coachella, within a designated Industrial District that is formed by vacant and developed properties, a majority of which formerly supported agricultural uses.

The Project site is presently characterized as vacant, predominantly flat land with scattered scrub vegetation, lying at approximately 96 feet below mean sea level. Views from the property to west and east are developed.

Prominent structures visible to the west include an electrical contractor's yard and to the east the existing RV and self-storage operation. To the north is a partially vacant site used for pipes and materials storage. South of the Project site is a vacant industrial property with Imperial Western Products recycling facility beyond. These developed properties include mostly outdoor operations and outdoor staging activities within fenced limits. The site is not adjacent or located near any residential uses.

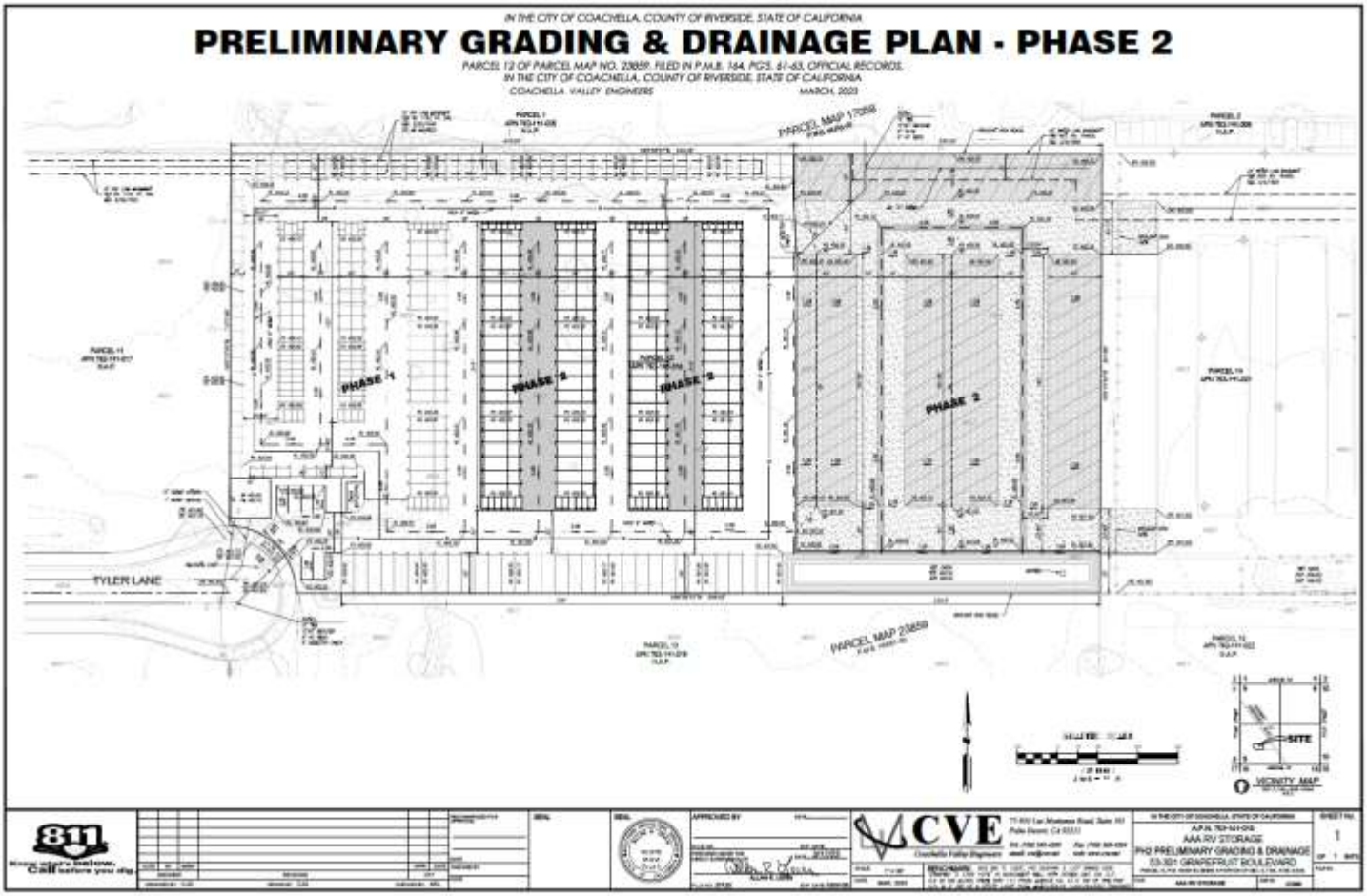

Exhibit 2-5 Site Plan

Project implementation is not expected to result in adverse effects on the local scenic setting. Contrastingly, it will result in the development of a vacant property into an RV and Self-Storage facility that will conform to the City's Zoning and Land Use regulations, as intended for the Industrial District. The three proposed primary buildings and outdoor operations within fenced limits would not be uncharacteristic to the existing local setting and development pattern. Therefore, less than significant impacts are expected to result from Project implementation relative to scenic vistas.

A PM10 Dust Mitigation Plan required during Project grading would also improve aesthetics during Project grading. The design of this proposed storage development will be compatible with the existing environmental and surrounding setting. Project implementation is not expected to result in adverse effects on the local scenic setting. With the construction of the proposed Project, views of most of the foothills, the mid-range and tops of the surrounding mountains will remain, and impacts will be less than significant.

b) No Impact. The 4.85-acre Project site is completely disturbed and does not contain or is located near any scenic resources, such as trees, rock outcroppings, historic buildings or other features that could be damaged by Project implementation. Accordingly, the proposed development will not involve any form of structural demolition. The infill Project is located on Tyler Lane, behind existing RV and Self-Storage and is not connected to any designated County or State scenic highways. The purpose of the State Scenic Highway

Program is to preserve and protect scenic State Highway corridors from change that would diminish the aesthetic value of lands adjacent to highways.
Scenic resources, including trees, rock outcroppings, and scenic highways within the viewsheds of State Scenic Highways provide aesthetic and visual appeal for residents and visitors of the City's Planning Area. Similarly, scenic routes provide valuable visual relief to travelers. The State Scenic Highway Program was established to preserve and enhance the natural beauty of California. It not only adds to the pleasure of the residents, but also encourages the growth of recreation and tourism in the State. The California Department of Transportation (Caltrans) manages the State Scenic Highway Program. To be listed as a Scenic Highway, the road must traverse an area of outstanding scenic quality, containing striking views, flora, geology, or other unique natural attributes. There are three officially designated State Scenic Highways in Riverside County. They include Highway 273, 62 and the closest, Highway 74, which is approximately 14.50 miles northwest of the project site. The northern section Highway 111 (Palm Springs to Palm Desert) and the southern section (Mecca to the Salton Sea) is categorized as an eligible State Scenic Highway, but it is not officially designated.

There are no designated, or eligible, State Scenic Highways within the Planning Area. According to the Coachella General Plan Update Environmental Impact Report (EIR), certain sections of Old Highway 99 (now Dillon Road between Grapefruit Boulevard and Interstate 10), Old Highway 86 (Harrison Street south of Grapefruit Boulevard), Old Highway 111 (Grapefruit Boulevard), and Highway 86-S Expressway (south of Interstate 10) represent visual corridors and serve as an aesthetic resource for the City. The project lies approximately 0.20 miles southwest of the closest City designated visual corridor, Highway 86-S. Due to the distance from the project to Highway 86-S, the project will not obstruct the scenic resources viewed by motorists driving along the roadway.

Conclusively, the proposed project is not located adjacent to a designated Scenic Highway, as identified by Caltrans or the City. Additionally, there are no significant trees, rock outcroppings, or historical buildings due to the cleared and disturbed character of the site. Therefore, the proposed project would not result in adverse impacts to scenic resources adjacent to or near a State Scenic Highway. No impact.

c) No Impact. According to the Coachella General Plan Update Environmental Impact Report (EIR), the City has a unique visual characteristic in its scenic geographical location, agricultural and rancho history, and quality architecture of historic buildings. Although the alteration of the existing landscape is unavoidable due to future development, the views of the mountains, rural, agricultural character should be respected, maintained and preserved.

The Draft EIR presents policies to help preserve the existing visual character of the City where it is deemed valuable, or direct future development to either enhance the existing visual character in the City or create a new, complementary visual character. Specifically, these policies direct new developments to maintain the existing small-town character and cultural diversity of Coachella, preventing development not compatible with the existing character from being constructed. The policies identify specific urban design practices, such as the development of complete neighborhoods, preservation of agriculture and open space, pedestrian-oriented design, and sustainable development practices, as methods of achieving the preservation of this character. Further, the policies specify that the City's natural resources should be retained to help preserve visual character, which will further preserve the existing character. Finally, the policies require high-quality and long-lasting building materials and quality architecture, which will also ensure quality visual character in the community by preventing the construction of bland, poor quality buildings.

The existing visual conditions of the project site and surrounding area are presently defined by industrial uses. Views of the Santa Rosa Mountains, Little San Bernardino Mountains, and Mecca Hills from the Project site are limited. Following the local development standards will ensure that the visual qualities of the proposed development demonstrate positive aesthetics. Project design, including architecture, landscape architecture, and fencing, will require Architectural review approval by the City's Planning Commission. The future development design and construction shall be in full compliance with the design guidelines, community design standards contained in the City General Plan and applicable regulations in the City Zoning Code. No impacts to the existing visual character are expected to result from future project development.

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d) **Less than Significant Impact**. The site is located in an urban environment that includes existing sources of light and glare associated with nearby land uses. Nearby sources of light include exterior lighting on commercial and residential buildings, street lighting on nearby Hwy 111, passing vehicle headlights, and outdoor lighting on surface parking lots and buildings. Currently, there are no existing sources of light on the immediate Project site.

Short-Term (Construction-Related) Impacts

During the construction phase, there would be no need to add security lighting for construction areas or construction staging areas, because nighttime construction is not anticipated. Therefore, impacts related to new sources of light and glare during construction would be less than significant.

Long-Term (Operations-Related) Impacts

At Project buildout, the site can be expected to generate increased levels of light and glare from interior and exterior building lighting, safety and security lighting, landscape lighting, and vehicles accessing the site during the day and nighttime, however, it would not require use of high intensity lighting. Glare can also be expected from building lighting during the day and nighttime. However, lighting and glare levels are not expected to exceed typical levels within the surrounding urban environment with little or no light escaping upward from the site.

Light and glare are determined to have a significant environmental impact if a project would create substantial glare or if the project lighting would exceed the City lighting standards or those typical of the Project vicinity. The proposed development, which includes three primary buildings and outdoor staging areas within fenced limits, will introduce a new source nighttime illumination only to help ensure the safety and security of the proposed RV and self-storage site in accordance with the local development standards. The proposed site design will provide nighttime illumination in the form of post-mounted and/or wall-mounted light fixtures to properly illuminate strategic areas of the Project, including the parking lots, driveways and staging areas for security purposes. The use of exterior, downward facing light fixtures will be made compatible with the architectural style and materials of the buildings. Such lighting is not expected to blink, change color, or have other characteristics deemed not essential for security purposes. Furthermore, the proposed buildings in the Project are not expected to involve construction materials with highly reflective properties that would disrupt day-time views. Less than significant impacts are anticipated.

3.1.4 Cumulative Impacts

None.

3.1.5 Mitigation and Monitoring Measures

None required.

3.2 Agriculture and Forestry Resources

3.2.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035
- Final EIR for the City of Coachella 2035 General Plan Update
- Riverside County Important Farmland 2016 map. California Department of Conservation website http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.
- California Department of Conservation, *Land Conservation Act Maps, Riverside Williamson Act FY 2015/2016.*

3.2 Environmental Setting

As a part of Riverside County, the City of Coachella's agricultural lands are a key aspect of the County and its character. Agricultural land covers approximately 40 percent of the City's General Plan area. Though, most of the agricultural land is located in and around the unincorporated areas of Coachella, with the more centralized areas being converted into or being used for urban or industrial use.

The California Land Conservation Act, also known as the Williamson Act, was adopted in 1965 in order to encourage the preservation of the State's agricultural lands and to prevent its premature conversion to urban uses. The Williamson Act creates an arrangement whereby private landowners' contract with counties and cities to voluntarily restrict land to agricultural and open space uses. Under the Williamson Act, an agricultural preserve must consist of no less than 100 acres, any development on the property must be related to the primary use of the land for agricultural purposes, and development must be in compliance with local uniform rules or ordinances. Williamson Act contracts are estimated to save agricultural landowners from 20 to 75 percent in property taxes each year.

The vehicle for these agreements is a rolling-term, 10-year contract (i.e., unless either party files a "notice of nonrenewal", the contract is automatically renewed annually for an additional year). In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than potential market value (California Department of Conservation, 2006). If a "notice of nonrenewal" is filed by a landowner, a nine-year nonrenewal period commences. Over this period of time, the annual tax assessment gradually increases. At the end of the nine-year nonrenewal period, the contract is terminated. Only the landowner can petition to cancel a Williamson Act contract.

3.2.3 Impacts

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

Discussion/Analysis

a) Less than Significant Impact. Preservation of agriculture is considered integral to the City's future. Agricultural land is one of several predominant land uses within Coachella, covering approximately 29 percent (11,139 acres) of the City's planning area. Approximately 5,112 acres of the total agricultural land within the Planning Area is located within the City's incorporated area. Most of the agricultural land is located in the unincorporated areas (6,058 acres). Of this agricultural land, much of it is Important Farmland as defined by the State.

The project's property land use designation is "Industrial" as determined in the Coachella General Plan 2035. The entire property is disturbed, including clearing and grading. Based on historical aerial imagery, the property operated as farmland prior to 1953. According to the most recent Riverside County Important Farmland Map, the entire property is designated as Farmland of Local Importance. Farmland of Local Importance is defined by the Department of Conservation as farmland that is important to the local economy. In the County of Riverside, Farmland of Local Importance includes (1) land where the soils would be classified as Prime or Statewide Farmland, but lack available irrigation water; (2) lands producing major crops for the County but are not listed as unique crops; (3) dairylands including corrals, pasture, milking facilities, hay and manure storage areas if accompanied with permanent pasture or hayland of 10 acres or more; or (4) lands identified by the city or county ordinance as agricultural zones or contracts.

Although the site is designated as Farmland of Local Importance, the City designated land uses established for the site intends for the development of industrial uses. Additionally, the project site is surrounded by developed uses including industrial uses such as outside storage and recycling. The project is located in Coachella General Plan's Industrial District land uses, which emphasize the development of jobs producing industrial and manufacturing uses. The project is not designated as Prime Farmland, Unique Farmland or Farmland of Statewide Importance by the California Department of Conservation. The project is not in use as Farmland of Local Importance and is not planned for such use in the General Plan. Therefore, impacts are less than significant.

b) No Impact. The Project site is currently designated as "Industrial District" on both the zoning and General Plan land use maps. The Project site is not under a Williamson Act Contract as shown on the 2015/2016 Williamson Act Lands map for Riverside County. Therefore, implementation of the Proposed Project will have no impacts on Agricultural or Forestry Resources.

c) No Impact. The City of Coachella contains no land zoned as forest land. Development of Project will not conflict with the existing zoning or result in the rezoning of forest land, timberland or timberland zoned timberland production. No impacts are anticipated related to this resource.

d) No Impact. The City of Coachella contains no forest land. Development of Project will not result in the loss of forest land or conversion of forest land to non-forest use. No impacts are anticipated related to this resource.

e) No Impact. The proposed Project would not involve changes in the existing environment that would result in conversion of active farmland to non-agricultural use or conversion of forest to non-forest use. The Project site is not zoned for agricultural uses, and it is designated Urban and Built-Up Land under the 2010 Riverside County Important Farmland Map. Therefore, the proposed Project would have no impact on the conversion of agricultural land within the City of Coachella.

3.2.4 Cumulative Impacts

None.

3.2.5 Mitigation and Monitoring Measures

None required.

3.3 Air Quality

3.3.1 Sources

The following sources were utilized to support the conclusions made in this section:

- California Emissions Estimator Model (CalEEMod) Version 2022.4.0 (Appendix B);
- City of Coachella General Plan 2035; and
- Final EIR for the City of Coachella 2035 General Plan.

3.3.2 Environmental Setting

The project is located within the City of Coachella and is within the Salton Sea Air Basin (SSAB). The middle part of Riverside County (between San Gorgonio Pass and Joshua Tree National Monument), belongs in the Salton Sea Air Basin (SSAB), along with Imperial County. Air quality conditions in this portion of the County, although in the SSAB, are also administered by the SCAQMD. The SCAQMD is responsible for the development of the regional Air Quality Management Plan and efforts to regulate pollutant emissions from a variety of sources.

The SSAB portion of Riverside County is separated from the South Coast Air Basin region by the San Jacinto Mountains and from the Mojave Desert Air Basin to the east by the Little San Bernardino Mountains. During the summer, the SSAB is generally influenced by a Pacific Subtropical High Cell that sits off the coast, inhibiting cloud formation and encouraging daytime solar heating. The SSAB is rarely influenced by cold air masses moving south from Canada and Alaska, as these systems are weak and diffuse by the time they reach the desert. Most desert moisture arrives from infrequent warm, moist, and unstable air masses from the south. The SSAB averages between three and seven inches of precipitation per year.

The Coachella Valley is a geographically and meteorologically unique area wholly contained within the Salton Sea Air Basin. The region is currently impacted by significant air pollution levels caused by the transport of pollutants from coastal air basins to the west, primarily ozone, and locally generated PM10. The mountains surrounding the region isolate the Valley from coastal influences and create a hot and dry low-lying desert. As the desert heats up, it draws cooler coastal air through the narrow San Gorgonio Pass, generating strong and sustained winds that cross the fluvial (water caused) and aeolian (wind) erosion zones in the Valley. These strong winds suspend and transport large quantities of sand and dust, reducing visibility, damaging property, and constituting a significant health threat.

The City of Coachella, in relation to other areas in Southern California, has good air quality. In the past few decades, however, noticeable deterioration of air quality has occurred due to increased development and population growth, traffic, construction activity, and various site disturbances. It is apparent that although air pollution is emitted from various sources in the Coachella Valley, substantial degradation of air quality may be attributed primarily to sources outside of the Valley.

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect public health and welfare. Monitoring stations are located in Indio, Palm Springs, and Mecca. To maintain compliance with the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), SCAQMD has adopted a series of Air Quality Management Plans (AQMPs). AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

In December of 2022, SCAQMD released the most current Final Air Quality Management Plan (2022 AQMP), which is a regional blueprint for achieving the federal air quality standards. The 2022 AQMP is the most recently adopted air quality plan, which includes both stationary and mobile source strategies to ensure that the approaching attainment deadlines are met, and public health is protected to the maximum extent feasible. As with every AQMP, a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures is updated with the latest data and methods.

Land use designation adopted by local jurisdictions are important considerations in the AQMP development. The 2022 AQMP provides local guidance for the State Implementation Plans (SIP), which establishes the framework for the air quality basins to achieve attainment of the state and the National Ambient Air Quality Standards (NAAQS).

3.3.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Air Quality Would the Project				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial point source emissions?	☐	☐	☒	☐
d) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Discussion/Analysis

An Air Quality Impact Analysis was conducted by Ganddini utilizing the California Emissions Estimator Model (CalEEMod) Version 2022.1.0 (Appendix B) to project air quality emissions that will be generated by the proposed Project (discussed below). The purpose of this air quality impact analysis was to provide an assessment of the impacts resulting from development of the proposed Project and to identify mitigation measures that may be necessary to reduce those impacts.

a) No Impact. Under CEQA, a significant air quality impact could occur if the project is not consistent with the applicable Air Quality Management Plan (AQMP) or would obstruct the implementation of the policies or hinder reaching the goals of that plan. The Project site is located within the SSAB and will be subject to SCAQMD's 2022 AQMP and the 2003 CV PM10 SIP. The 2022 AQMP is a comprehensive plan that establishes control strategies and guidance on regional emission reductions for air pollutants. The AQMP is based, in part, on the land use plans of the jurisdictions in the region. The project site is designated for "Industrial District" in the General Plan, which allows for residential and commercial development. The proposed Project is consistent with the land use designation and will result in the development of retail storage buildings and RV parking and is therefore compatible with the 2022 AQMP assumptions.

The SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, and cooperates actively with all State and federal government agencies. SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) to comply with the metropolitan planning organization (MPO) requirements under the Sustainable Communities and Climate Protection Act. The Growth Management chapter of the RTP/SCS forms the basis of land use and transportation controls of the AQMP. Projects that are consistent with the projections of population forecasts are considered consistent with the AQMP. The Proposed Project would be implemented in accordance with all applicable rules and regulations contained in those plans in an effort to meet the applicable air quality standards, because the mixed land use was included in the SCAG analysis.

The proposed Project is consistent with the land use designation established for it in the City's General Plan and will marginally increase the amount of industrial development in the City. The proposed RV and self-

storage uses are permitted in the Manufacturing Service zone, so it is expected that the proposed Project will result in emissions consistent with those anticipated in the 2022 AQMP.

Improvements in technology and reductions in emissions associated with improved building standards in the 2019 Building Code will further improve Project-related air quality by imposing stringent standards for the reduction of energy use. The proposed Project will be subject to rules and guidelines set forth in the AQMP. The proposed Project is consistent with the intent of the AQMP and will not conflict with or obstruct implementation of the applicable air quality plan. In conclusion, although the proposed Project would contribute to impacts to air quality, as discussed below, it would not conflict with or obstruct the implementation of an applicable air quality plan because its Industrial District characteristics were included in the development of regional plans. No impact is anticipated.

b) Less Than Significant Impact. A project is considered to have significant impacts if there is a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. As previously stated, the SSAB is currently a non-attainment area for PM10 and ozone. Therefore, if the project's construction and/or operational emissions exceed SCAQMD thresholds for PM10 and ozone precursors, which include carbon monoxide (CO), nitrous oxides (NOx), and volatile/reactive organic compounds (VOC or ROG), then impacts would be cumulatively considerable and significant.

The phases of the construction activities which have been analyzed below for each phase are: (1) site preparation, (2) grading, (3) building construction, (4) paving, and (5) application of architectural coatings. Building construction, paving and painting phases may overlap during construction. Details pertaining to the project's construction timing and the type of equipment modeled for each construction phase are available in the CalEEMod output in Appendix A.

Construction-Related Regional Impacts

The construction-related criteria pollutant emissions for each phase are shown below in Table 3. Table 3 shows that none of the project's emissions will exceed regional thresholds. A less than significant regional air quality impact would occur from construction of the proposed project.

Construction-Related Local Impacts

Construction-related air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Salton Sea portion of the South Coast Air Basin. The proposed project has been analyzed for the potential local air quality impacts created from: construction-related fugitive dust and diesel emissions; from toxic air contaminants; and from construction-related odor impacts.

Local Air Quality Impacts from Construction

The SCAQMD has published a "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" (South Coast Air Quality Management District 2011b). CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. In order to compare CalEEMod reported emissions against the localized significance threshold lookup tables, the CEQA document should contain the following parameters:

(1) The off-road equipment list (including type of equipment, horsepower, and hours of operation) assumed for the day of construction activity with maximum emissions.
(2) The maximum number of acres disturbed on the peak day.
(3) Any emission control devices added onto off-road equipment.
(4) Specific dust suppression techniques used on the day of construction activity with maximum emissions.

The CalEEMod output in Appendix B shows the equipment used for this analysis.

As shown in Table 4, the maximum number of acres disturbed in a day would be 4.85 acres during grading. The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized

Significant Threshold Look-up Tables and the methodology described in Localized Significance Threshold Methodology prepared by SCAQMD (revised July 2008). The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM10, and PM2.5 from the proposed project could result in a significant impact to the local air quality. The emission thresholds were calculated based on the Coachella Valley source receptor area (SRA) 30 and a disturbance value of two acres per day. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. The nearest sensitive receptors are the existing residential dwelling units located approximately 400 feet northwest of the project site; therefore, to be conservative, the SCAQMD Look-up Tables for 25 meters was used. Table 6 shows the on-site emissions from the CalEEMod model for the different construction phases and the LST emissions thresholds.

The data provided in Table 6 shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. A less than significant local air quality impact would occur from construction of the proposed project.

Construction-Related Toxic Air Contaminant Impacts

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. According to the Office of Environmental Health Hazard Assessment (OEHHA) 6 and the SCAQMD *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (August 2003), 7 health effects from TACs are described in terms of individual cancer risk based on a lifetime (i.e., 30-year) resident exposure duration. Given the temporary and mid-term construction schedule (approximately 8 months), the Project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of project construction. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds.

The project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds. Therefore, impacts from TACs during construction would be less than significant.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Due to the short-term in nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the proposed Project. Diesel exhaust and VOCs would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not reach an objectionable level at the nearest sensitive receptors.

Pollutant Emissions (Pounds per Day)	ROG	NOx	CO	SO2	PM10	PM2.5
Total for overlapping phases3	1.63	6.81	7.62	0.01	.59	0.37
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

Source: CalEEMod Version 2022.14

(1) On-site emissions from equipment operated on-site that is not operated on public roads. On-site site preparation and grading PM-10 and PM-2.5 emissions show mitigated values for fugitive dust for compliance with SCAQMD Rule 403.

(2) Off-site emissions from equipment operated on public roads.

(3) Construction, painting and paving phases may overlap.

Table 3 Construction-Related Regional Pollutant Emissions

Activity	Equipment	Number	Acres/8-Hour Day	Total Acres
Site Preparation	Crawler Tractor	3	0.5	4.85
Total for Phase		-	-	4.85
Grading	Rubber Tire Dozer	1	0.5	4.85
	Graders	1	0.5	
	Crawler Tractor	3	0.5	
Total for Phase				4.85

Source: South Coast AQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2011b.
(1) Tractor/loader/backhoe is a suitable surrogate for a crawler tractor per SCAQMD staff.

Table 4 Maximum Number of Acres Disturbed Per Day

Pollutant Emissions (Pounds per Day) Activity	NOx	CO	PM10	PM2.5
Site Preparation	13.7	11.6	.60	.55
Grading	17.5	16.3	0.83	0.77
Building Construction	11.20	11.90	0.46	0.42
Paving	6.44	8.26	0.31	0.29
Architectural Coating	0.91	1.15	0.03	0.03
SCQMD Thresholds	225	1,931	22	7
Exceeds Thresholds?	No	No	No	No

Source: CalEEMod Version 2011.1
(1) On-site emissions from equipment operated on-site that is not operated on public roads. On-site site preparation and grading PM-10 and PM-2.5 emissions show mitigated values for fugitive dust for compliance with SCAQMD Rule 403.
(2) Off-site emissions from equipment operated on public roads.
(3) Construction, painting and paving phases may overlap.

Table 5 Local Construction Emissions at the Nearest Receptors

LONG-TERM OPERATIONAL EMISSIONS

The on-going operation of the proposed Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the project-generated vehicle trips and through operational emissions from the on-going use of the proposed Project. The following section provides an analysis of potential long-term air quality impacts due to regional air quality and local air quality impacts with the ongoing operations of the proposed Project.

Operations-Related Regional Air Quality Impacts

The potential operations-related air emissions have been analyzed below for the criteria pollutants and cumulative impacts.

Operations-Related Criteria Pollutants Analysis

The operations-related criteria air quality impacts created by the proposed Project have been analyzed through the use of the CalEEMod model. The operating emissions were based on the year 2024, which is the anticipated opening year for the proposed Project. The operations daily emissions printouts from the

CalEEMod model are provided in Appendix B. The CalEEMod analyzes operational emissions from area sources, energy usage, and mobile sources, which are discussed below.

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the proposed Project. The vehicle trips associated with the proposed project have been analyzed by inputting the project-generated vehicular trips from the Sunridge Self Storage expansion into the CalEEMod Model. The Traffic Impact Analysis found that the proposed project will generate approximately 15 daily vehicle trips, including a trip generation rate of 0.24 trips per thousand square foot per day for the Sunridge Self Storage units. The program then applies the emission factors for each trip which is provided by the EMFAC2014 model to determine the vehicular traffic pollutant emissions.

Area Sources

Per the CAPCOA Appendix A Calculation Details for CalEEMod, area sources include emissions from consumer products, landscape equipment and architectural coatings. Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers, as well as air compressors, generators, and pumps. As specifics were not known about the landscaping equipment fleet, CalEEMod defaults were used to estimate emissions from landscaping equipment. No changes were made to the default area source parameters. Per SCAQMD Rule 1113 as amended on June 3, 2011, the architectural coatings that would be applied after January 1, 2014 will be limited to an average of 50 grams per liter or less.

Energy Usage

Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters.

Project Impacts

The worst-case summer or winter criteria pollutant emissions created from the proposed project's long-term operations have been calculated and are shown below in Table 6. Table 6 shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds. Therefore, a less than significant regional air quality impact would occur from operation of the proposed project.

Operations-Related Local Air Quality Impacts

Project-related air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Salton Sea Air Basin. The proposed Project has been analyzed for the potential local CO emission impacts from the project-generated vehicular trips and from the potential local air quality impacts from onsite operations. The following analysis analyzes the vehicular CO emissions, local impacts from on-site operations per SCAQMD LST methodology, and odor impacts.

Local CO Emission Impacts from Project-Generated Vehicular Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and Federal CO standards which were presented above in Section 2.

To determine if the proposed Project could cause emission levels in excess of the CO standards discussed above in Section 2, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with a Level of Service E or worse.

The Traffic Impact Analysis showed that the proposed Project would generate a maximum of approximately 142 daily vehicle trips. Primary access would be off Tyler Lane with the nearest intersection at Tyler Street (a regional arterial) with secondary access from the existing RV and self-storage facility via Hwy 111. Project PM peak hour volume is negligible. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection which has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. Therefore, as both the intersection and ADT volumes fall far short of 100,000 vehicles per day, no CO "hot spot" modeling was performed, and no significant long-term air quality impact is anticipated to local air quality due to the on-going use of the proposed Project.

Local Air Quality Impacts from On-Site Operations

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, onsite usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the State and Federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Salton Sea portion of the South Coast Air Basin. The nearest sensitive receptors to the project site include the existing single-family and mobile home residential dwelling units located approximately 400 feet northwest of the Project site.

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site, such as industrial warehouse/transfer facilities. The proposed project is for commercial use and does not include such uses. Therefore, due to the lack of stationary source emissions, no long-term localized significance threshold analysis is warranted.

Operations-Related Odor Impacts

Potential sources that may emit odors during the on-going operations of the proposed Project would include odor emissions from diesel vehicle emissions and trash storage areas. The project consists of RV and self-storage use and will not attract a significant amount of heavy-duty truck traffic. Due to the distance of the nearest receptors from the Project site and through compliance with SCAQMD's Rule 402, no significant impact related to odors would occur during the on-going operations of the proposed project. This Project will create no objectionable odor levels at the nearest sensitive receptors.

Pollutant Emissions (Pounds per Day) Activity	ROG	NOx	CO	SO2	PM10	PM2.5
Area Sources	1.65	0.02	2.30	<0.05	<0.05	<0.05
Energy Usage	0.01	0.27	0.23	<0.05	0.02	0.02
Mobile Sources	0.42	0.45	4.58	0.01	0.32	0.06
Total Emissions	2.08	0.74	7.11	0.01	0.34	0.09
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

Source: CalEEMod Version 2022.4; the higher of either summer or winter emissions.
(1) Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
(2) Energy usage consists of emissions from generation of electricity and on-site natural gas usage.
(3) Mobile sources consist of emissions from vehicles and road dust.

Table 6 Regional Operational Pollutant Emissions

CUMULATIVE AIR QUALITY IMPACTS

There are a number of cumulative projects in the Project area that have not yet been built or are currently under construction. Since the timing or sequencing of the cumulative projects is unknown, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. Further, cumulative projects include local development as well as general growth within

the Project area. However, as with most developments, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area. The SCAQMD recommends using two different methodologies: (1) that Project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality; and (2) that a project's consistency with the current AQMP be used to determine its potential cumulative impacts.

Project Specific Impacts

The Project area is out of attainment for ozone and in 2018 was out of attainment for PM10. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the Salton Sea portion of the South Coast Air Basin. The greatest cumulative impact on the quality of regional air cell will be the incremental addition of pollutants mainly from increased traffic volumes from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant.

Project operations would generate emissions of NOx, ROG, CO, PM10, and PM2.5, which would not exceed the SCAQMD regional or local thresholds and would not be expected to result in ground level concentrations that exceed the NAAQS or CAAQS. Since the Project would not introduce any substantial stationary sources of emissions, CO is the benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. As indicated earlier, no violations of the state and federal CO standards are projected to occur for the Project, based on the magnitude of traffic the Project is anticipated to create. Therefore, operation of the Project would not result in a cumulatively considerable net increase for nonattainment of criteria pollutants or ozone precursors. As a result, the Project would result in a less than significant cumulative impact for operational emissions.

Air Quality Compliance

The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed Project includes the SCAQMD Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the proposed Project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed Project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that the proposed Project is inconsistent, the lead agency may consider Project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP". Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

(1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
(2) Whether the project will exceed the assumptions in the AQMP in 2016 or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

Criteria 1 – Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis contained in this Air Analysis, short-term construction impacts will not result in significant impacts based on the SCAQMD regional and local thresholds of significance. This Air Analysis also found that long-term operation impacts will not result in significant impacts based on the SCAQMD local and regional thresholds of significance.

Therefore, the proposed Project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

Criteria 2 – Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed Project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed Project are based on the same forecasts as AQMP. The 2016-2040 Regional Transportation/Sustainable Communities Strategy prepared by SCAG (2016) includes chapters on the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this Project, the City Land Use Plan defines the assumptions that are represented in the AQMP.

The Project site is currently designated as “Industrial District” on the City’s Land use map in the General Plan. The Project proposes to develop the site to a RV and self-storage facility. The proposed Project would not result in an inconsistency with the current land use designation in the City’s General Plan. Therefore, the proposed Project is not anticipated to exceed the AQMP assumptions for the Project site and is found to be consistent with the AQMP for the second criterion. Based on the above, the proposed Project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur.

c) Less Than Significant Impact. The nearest sensitive receptors to the project site include the existing single-family residential dwelling units located approximately 400 feet northwest of the Project site. To determine if the proposed Project has the potential to generate significant adverse localized air quality impacts, the mass rate Localized Significance Threshold (LST) Look-Up Table was used. Based on the Project’s size and proximity to existing housing, overall, the impacts will be less than significant.

<u>Health Impacts</u>

As shown in Tables 3, 4, 5, and 6, construction and operation of the proposed Project will result in criteria emissions that are below the SCAQMD significance thresholds, and neither would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

With today’s technology, it is not scientifically possible to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact an individual’s health. There are several factors that make predicting a Project-specific numerical impact difficult:

- Not all individuals will be affected equally due to medical history. Some may have medical pre-dispositions and diet and exercise levels tend to vary across a population.
- Due to the dispersing nature of pollutants, it is difficult to locate and identify which group of individuals will be impacted, either directly or indirectly.
- There are currently no approved methodologies or studies to base assumptions on, such as baseline health levels or emission level-to-health risk ratios.

Due to the limitations described above, the extent to which the Project poses a health risk is uncertain but unavoidable. It is anticipated that impacts associated with all criteria pollutants will be less than significant overall, and that health effects will also be less than significant.

d) Less Than Significant Impact. The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the

receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to distress among the public and often generating citizen complaints to local governments and regulatory agencies.

The SCAQMD identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, transfer stations, and fiberglass molding. The proposed Project will be developed with RV and self-storage land uses and is not expected to generate objectionable odors during any phase of construction or at Project buildout. Short term odors associated with paving and construction activities could be generated; however, any such odors would be quickly dispersed below detectable levels as distance from the construction site increases. At completion, the Project will generate typical odors, including truck odors, but will not generate objectionable odors. Therefore, impacts from objectionable odors are expected to be less than significant.

3.3.4 Cumulative Impacts

None.

3.3.5 Mitigation and Monitoring Measures

None required.

3.4 Biological Resources

3.4.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan Update;
- "Coachella Valley Multiple Species Habitat Conservation Plan," 2007; and
- "Biological Resources Survey Report," Vincent N. Scheidt Biological Consultant 2022.

3.4.2 Environmental Setting

The Coachella Valley is located within the Sonoran Desert which is a subdivision of the Colorado Desert. The Sonoran Desert contains a wide range of biological resources that are highly specialized and endemic to the region. According to the Coachella Valley Association of Governments (CVAG), vegetation communities in the City range from active desert dunes to urban environments. The Project site is currently vacant, having been previously farmed and contains only very sparse invasive vegetation. The proposed Project is within the boundaries of and subject to the provisions of the Coachella Valley Multiple Species Conservation Plan (CVMSHCP). The CVMSHCP is a comprehensive regional plan that balances growth in the Coachella Valley with the requirements of federal and State endangered species laws. The Project site is not located within or adjacent to a CVMSHCP Conservation Area.

Coachella Valley Engineers analyzed potential impacts to biological resources associated with the proposed development and are discussed below.

3.4.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Biological Resources Would the Project				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

Discussion/Analysis

a) Less Than Significant Impact with Mitigation Incorporated. Development of the Project site, as currently proposed, will result in measurable losses of biological resource values found in association with this property. These losses would be a direct result of site development and related activities. All anticipated losses would be associated with the conversion of vacant land to RV and self-storage uses, including grading to construct storage areas and any City-required infrastructure. No offsite improvements are proposed at this time. Impacts are assessed at a level which is either "significant" or "less than significant" as defined by CEQA. Also, an assessment is made as to whether or not Project-related impacts are fully mitigable, and whether the Project is consistent with the goals and objectives of the CVMSHCP. In this instance, all anticipated Project impacts are considered "less than significant", requiring no mitigation, and the Project is consistent with the CVMSHCP, assuming the adoption of specific wildlife avoidance measures detailed subsequently in this report.

With respect to biological resources, the Project as proposed will result in the following less than significant impacts:

1. A loss of approximately 4.85 acres of Disturbed Habitat vegetation; and
2. A loss of habitat for the various common native and non-native plants and animals presently occurring on the Project site.

However, in order to avoid potential impacts to native wildlife that could nest on the Project site, seasonal restriction is recommended. To further protect biological resources that may be encountered during Project construction, the Project biologist recommended standard seasonal restrictions on clearing and grading should be implemented as detailed in Mitigation BIO-MM1. Implementation of this mitigation measure will ensure that any potential impact to potential wildlife nursery sites remains less than significant.

b) No Impact. No riparian, sensitive, or undisturbed native habitats were documented within the Project site as outlined in Table 7 *Project Site Vegetation Community Impacts*. The Project site is characterized as 4.85-acres of vacant and previously farmed land. Therefore, the proposed Project would not cause impacts on any riparian habitat or other sensitive natural community. No impacts would occur.

Vegetative Community	**Total Acres**	**Permanent/Temporary Impact Acres**
Developed	0	0
Vacant/Previously Developed No Native Vegetation	4.85	4.85
Total	4.85	**4.85**

Table 7 Project Site Vegetation Community Impacts

c) No Impact. No wetlands or jurisdictional resources regulated by the USACE, CDFW, or RWQCB were documented within the Project site. No wetlands are located within the Project site and therefore the proposed Project would have no impact on wetlands.

d) Less Than Significant Impact. The Project site is not located within or adjacent to a CVMSHCP designated conservation area, biological corridor, or linkage area. The Project site is vacant previously farmed land and does not represent a wildlife movement corridor or route between extensive open space habitats. The lands adjacent to the Project site are primarily characterized as industrial development.

e) **No Impact.** The City of Coachella has not established a policy or ordinance for the protection of tree species on private properties. Therefore, no mitigation is required or proposed.

f) Less Than Significant Impact with Mitigation Incorporated. The Project site is located within the CVMSHCP planning boundary/fee area and outside of a designated conservation area, biological corridor, or linkage area. The Project applicant shall pay a local development mitigation fee established by the City of Coachella Development Services Department (BIOMM 2).

3.4.4 Cumulative Impacts: The direct and/or indirect impacts of the Project would not result in significant cumulative impacts (CEQA Section 15310) to environmental resources within the region of the Project site. Cumulative impacts refer to incremental effects of an individual project when assessed with the effects of past, current, and proposed projects. The proposed action is a redevelopment of existing developed lands and the CVMSHCP was developed to address the comprehensive regional planning effort and anticipated growth in the City of Coachella. The proposed Project has been designed and mitigated to remain in compliance with all CVMSHCP conservation goals and guidelines and therefore will not result in an adverse cumulative impact.

Mitigation Measures: Following

3.4.5 Mitigation and Monitoring Measures

BIO-MM 1 Restrictions on Site Clearing

In order to avoid impacts to potential wildlife nursery sites, standard seasonal restrictions on clearing and grading should be implemented. Therefore, site brushing, grading, and/or the removal of vegetation within 300 feet of any potential migratory songbird nesting location, including nesting locations for ground-nesting birds, should not be permitted during the spring/summer migratory songbird breeding season, defined as from 15 February to 31 August of each year. This is required in order to ensure compliance with Sections 3503, 3503.5, 3511, and 3513 of the California Fish and Game Code and the federal Migratory Bird Treaty Act. Limiting activities to the non-breeding season will minimize chances for the incidental take of migratory songbirds or raptors. Should it be necessary to conduct brushing, grading, or other site activities during the songbird breeding season, a preconstruction nesting survey of all areas affected by the proposed activity should be required. The results of the survey should be provided in a report to the Director of the City of Coachella Planning Department, for concurrence with the report's conclusions and recommendations.

BIO-MM 2 CVMSHCP Local Development Mitigation Fee

The Project applicant shall pay CVMSHCP Local Development Mitigation fees as established and implemented by the City of Coachella Development Services Department. The CPI for the Riverside-San Bernardino-Ontario metropolitan area rose by 2.1% for calendar year 2020. The LDMF based on the size of the Project is thus $31,075. This is based on a categorization of Commercial/Industrial and a fee of $6,215 per acre as of 1 July 2021.

Mitigation Monitoring:

BIO-MM A Prior to the issuance of any permit to allow ground disturbance on the site, the Project applicant is to:

1. Conduct ground clearing activities outside of the songbird breeding season; or

2. Conduct a preconstruction nesting survey of the site.

BIO-MM B Prior to the issuance of any permit to allow ground disturbance on the site, the Project applicant shall pay CVMSHCP Local Development Mitigation fees as established and implemented by the City of Coachella Development Services Department.

Responsible Parties: Project applicant, Project biologist, Planning Department, City Engineer.

3.4.5 Level of Significance After Mitigation

Implementation of Mitigation Measures BIO-MM1 and BIO-MM2 would reduce all potential significant unavoidable impacts on biological resources below a level of significance.

3.5 Cultural Resources

3.5.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan; and
- Cultural Resources Survey, Laguna Mountain Environmental, Inc. April, 2022.

3.5.2 Environmental Setting

The City of Coachella sits on the shoreline of ancient Lake Cahuilla, a large intermittent freshwater lake created by the Colorado River. Its shorelines continually changed as the lake was filled and emptied by the river, and when it was full, it attracted human settlement with its plentiful resources. Settlement along the lakeshore in the Coachella Valley was particularly intensive, with evidence of large-scale, multi-seasonal occupation. The first known human inhabitants of the Coachella Valley included the Cahuilla Indians, whose

occupancy spread from the Banning Pass to the Salton Sea. Anthropologists divided the Cahuilla into three groups based on their geographic setting: (1) the Pass Cahuilla of the San Gorgonio Pass-Palm Springs area; (2) the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains; and (3) the Cahuilla Valley, and the Desert Cahuilla of the eastern Coachella Valley. The Cahuilla Indians developed a seasonal mobility system, which utilized the lake when it was full and benefited from the available terrestrial resources once the lake desiccated. They also migrated to higher elevations to utilize the resources and cooler temperatures.
The City of Coachella contains a significant amount of archeological resources due to its rich cultural history and historical settlements within its boundaries. It was once the site of Native Americans tribal land, and some tribal land still exists there. While having a rich Native American historical background, the Native American population is still present in Coachella. Due to its historical, cultural, and archaeological resources, most of the City is designated as "medium sensitivity to historical resource sensitivity" (Coachella 2035 General Plan Final EIR, Figure 4.4-2).

The Project property occupies approximately 4.85 acres of disturbed, vacant infill land north of Avenue 54 and west and Hwy 111. The site is surrounded by Industrial uses and vacant industrial land on all sides of the Project site. The site previously operated as agricultural land, and has been subject to grading, clearing, and harvesting since at least the 1950's, according to historical aerial imagery. The Project is currently zoned for Manufacturing Services. The applicant, Sunridge Self- Storage (Formerly AAA Storage of Coachella, LLC) is proposing an expansion of their existing RV and Self-Storage facility at Hwy 111 on an adjacent east vacant 4.85 acre parcel. The project proposes approximately 60,627 square feet of self-storage units configured into various sizes and 71 RV storage spaces. The project also includes a 900 square foot office and six parking spaces all accessed from Tyler Lane.

A standard Cultural Resources Survey was completed by Laguna Mountain Environmental, Inc. April 2022. The cultural resource survey did not identify any cultural resources that impact cultural resources eligible for the California Register of Historic Resources and significant under the CEQA. No significant impacts to cultural resources are anticipated to result from this project. Because Project impacts are limited to shallow grading and excavation, impacts to potentially buried cultural resources are not anticipated to occur. No further cultural resources work was recommended. However, Native American consultation and archaeological monitoring is recommended due to sensitivity of the Project location for subsurface cultural remains of prehistoric origin. P

3.5.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Cultural Resources Would the Project				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations, Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Discussion/Analysis

a) No Impact. Historic Resources Section 15064.5 of the CEQA Guidelines generally define a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to

Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code).

The archaeological inventory includes archival and other background studies conducted prior to performing the field survey of the Project. The archival research consisted of a literature and records search at the regional archaeological repository. This information was used to identify previous studies associated with the property and previously recorded resources. A one-mile radius of the Project was requested in the record search to determine the types of resources that might occur in the survey vicinity.

The records and literature search for the project was requested from the Eastern Information Center (EIC) at the University of California, Riverside on February 23, 2022. The records search results indicate that the Project area has not been previously surveyed and that no cultural resources have previously been recorded in the current Project area. At least 32 cultural investigations have been documented within a one-mile radius of the Project area. Nine cultural resources have been recorded within one mile of the Project as a result of this investigation. These cultural resources consist of four historic structures, a historic railway, a historic stormwater channel, a historic sewage treatment plant, a prehistoric habitation site, and a prehistoric isolate artifact.

Historic research included an examination of a variety of resources. The current listings of the National Register of Historic Places were checked through the National Register of Historic Places website. The California Inventory of Historic Resources (State of California 1976) and the California Historical Landmarks (State of California 1992) were also checked for historic resources.

There are no officially listed historic sites or features in the vicinity of the project site as indicated in the General Plan EIR, Figure 4.4-1. Therefore, there are no recognizable potential historical resources as defined in Section 15064.5 of the CEQA Guidelines that would be adversely affected by future development. No impacts are anticipated relative to the proposed Project.

b) Less Than Significant Impact. The City of Coachella defines an archeological resource as places where human activity has measurably altered the earth or left deposits of physical remains and may be either prehistoric-era (before European contact) or historic-era (after European contact). Archaeological resources are important for scientific historic, and/or religious reasons to cultures, groups, or individuals. Given the sheer number of recorded resources and Native American or EuroAmerican locations throughout the Coachella Valley, the City of Coachella can be considered sensitive for archaeological resources (2035 Coachella General Plan EIR).

Based on the cultural resource analysis prepared for the Project, potential impacts to archaeological resources are expected to be less than significant. However, the potential exists for resources to be buried on-site which could be uncovered by Project grading activities. To further protect cultural resources that may be encountered during Project construction, standard archaeological monitoring is recommended as detailed in Mitigation CUL-MM1. Implementation of this mitigation measure will ensure that any potential impact on buried archaeological resources remains less than significant.

Mitigation Measures: Below

c) Less Than Significant Impact. The Project site does not contain any known human remains. The Project's mass grading and excavation activities would disturb the entire site and there is a remote potential that human remains may be unearthed during the Project's ground-disturbing construction activities. This same potential for the discovery of human remains occurs on nearly every construction site that disturbs an undeveloped ground surface. If human remains are found on the site, the developer/permit holder or any successor in interest is required by law to comply with State Health and Safety Code Section 7050.5. Compliance with State Health and Safety Code Section 7050.5, as required by law, would reduce impacts to human remains to less than significant levels. Nonetheless, Mitigation Measure CUL MM-2 is provided to further ensure compliance with the mandatory regulatory requirements.

3.5.4 Cumulative Impacts

None.

3.5.5 Mitigation and Monitoring Measures

CUL-MM 1 Grading Monitoring Program

For monitoring of the Sunridge Self-Storage Project (formerly AAA Storage of Coachella, LLC) during ground-disturbing activities, if buried archaeological deposits are discovered, Mitigation Measure CUL-MM 1 will require all work to be halted or diverted within 50 feet of the discovery until a qualified archaeologist can evaluate the nature and significance of the find(s).

Grading Monitoring Program

A Grading Monitoring Program to mitigate potential impacts to undiscovered buried archaeological resources within the Sunridge Self-Storage Project shall be implemented to the satisfaction of the lead agency. This program shall include, but not be limited to, the following actions:

1) Prior to issuance of a grading permit, the applicant shall provide written verification that a certified archaeologist has been retained to implement the monitoring program. This verification shall be presented in a letter from the project archaeologist to the lead agency.

2) The certified archaeologist/historian shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.

3) During the original cutting of previously undisturbed deposits, the archaeological monitor(s) shall be on-site full time to perform periodic inspections of the excavations. The frequency of inspections will depend on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features.

4) Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.

5) In the event that previously unidentified cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground-disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the lead agency at the time of discovery. The archaeologist, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods. If any human bones are discovered, the County coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the most likely descendant, as identified by the National American Heritage Commission (NAHC), shall be contacted in order to determine proper treatment and deposition of the remains.

6) Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered via a “non-invasive” analysis on artifacts discovered. The Tribal resources Monitor is to concur with the archaeological monitor’s determination of the amount of material to be recovered for an adequate artifact sample for analysis.

7) All cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.

8) A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.

CUL-2 MM: If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the NAHC shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant". The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

Mitigation Monitoring:

CUL-MM A Prior to the issuance of a grading permit for the site, the applicant shall provide a fully executed monitoring agreement to the City.

Responsible Parties: Project applicant, Project Archaeologist, Tribal Monitor, Planning Department.

CUL-MM B Within 30 days of the completion of ground disturbing activities on the Project site, a report of findings shall be filed with the City. The report will summarize the methods and results of the monitoring program, including an itemized inventory and a detailed analysis of recovered artifacts, upon completion of the field and laboratory work. The report should include an interpretation of the cultural activities represented by the artifacts and a discussion of the significance of all archaeological finds.

CUL MM-C: Monitoring shall be required if human remains are found pursuant to California Public Resources Code Section 5097.98.

Responsible Parties: Project applicant, Project archaeologist, Tribal monitor, Planning Department, City Engineer.

3.5.5 Level of Significance after Mitigation

With incorporation of Mitigation Measures CUL- MM 1 and CUL-MM 2, impacts to cultural resources would be reduced to less than significant.

3.6 Energy

3.6.1 Sources

The following sources were utilized to support the conclusions made in this section:

- California Emissions Estimator Model (CalEEMod) Version 2022.4.0 (Appendix B);
- City of Coachella General Plan 2035; and
- Final EIR for the City of Coachella 2035.

3.6.2 Environmental Setting

California is one of the nation's leading energy-producing states, and California per capita energy use is among the nation's most efficient. Nuclear energy, fossil fuels (oil, coal, and natural gas) and renewable sources like wind, solar, geothermal and hydropower are various sources of energy. Given the nature of the proposed Project, the remainder of this discussion will focus on the three sources of energy that are most

relevant to the project—namely, electricity and natural gas for building uses, and transportation fuel for vehicle trips associated with the proposed Project.

According to the City of Coachella's Climate Action Plan (CAP), energy is used for heating and cooling, transportation, manufacturing, and producing food. The most common sources of energy include fossil fuels like oil, gasoline, natural gas, and coal. The consumption of these energy sources leads to the production of greenhouse gas (GHG) emissions. In 2010, total GHG emissions in Coachella were approximately 382,787 metric tons (MTCO2e), a 22 percent increase over 2005 emissions of 312,628 MTCO2e. This number accounts for direct emissions from the on-site combustion of fuels and the combustion of fuel in vehicles, as well as indirect emissions associated with community electricity consumption, and emissions from solid waste generated, crop management and water consumed by Coachella. The residential sector was the third largest producer of GHG emissions within the City, after transportation and commercial/industrial. The City of Coachella established various methods to reduce energy related GHG emissions produced by the City in their CAP.

Electricity

Electricity would be provided to the project by the Imperial Irrigation District (IID). The IID energy service territory covers 6,471 square miles, including all Imperial County along with parts of Riverside and San Diego counties. IID derives electricity from varied energy resources including fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, and solar power generation. IID also purchases from independent power producers and utilities, including out-of-state suppliers. The 2018 IID Power Mix has renewable energy at 29 percent of the overall energy resources, of which biomass and waste is at 10 percent, geothermal is at 4 percent, eligible hydroelectric is at 4 percent, solar energy is at 11 percent, and wind power is at zero percent; other energy sources include coal at zero percent, natural gas at 27 percent, nuclear at 3 percent and unspecified sources at 37 percent.

IID is the sixth-largest utility in California, serving more than 150,000 customers and controlling more than 1,100 megawatts (MW) of energy. Electricity is delivered through high voltage transmission and low voltage distribution power lines. Distribution power lines transport anywhere from 4 kV to 69 kV, while transmission lines can transport 69 kV to 765 kV of electricity. Transmission and distribution power poles are located on the western boundary of the project at Tyler Lane.

Natural Gas

Natural gas would be provided to the project by Southern California Gas (SoCalGas). The following summary of natural gas resources and service providers, delivery systems, and associated regulation is excerpted from information provided by the California Public Utilities Commission (CPUC). The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller investor-owned natural gas utilities. The CPUC also regulates independent storage operators Lodi Gas Storage, Wild Goose Storage, Central Valley Storage and Gill Ranch Storage. The vast majority of California's natural gas customers are residential and small commercial customers, referred to as "core" customers, who accounted for approximately 32 percent of the natural gas delivered by California utilities in 2012. Large consumers, like electric generators and industrial customers, referred to as "noncore" customers, accounted for approximately 68 percent of the natural gas delivered by California utilities in 2012.

The PUC regulates the California utilities' natural gas rates and natural gas services, including in-state transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering, and billing. Most of the natural gas used in California comes from out-of-state natural gas basins. In 2012, California customers received 35 percent of their natural gas supply from basins located in the Southwest, 16 percent from Canada, 40 percent from the Rocky Mountains, and 9 percent from basins located within California. California gas utilities may soon also begin receiving biogas into their pipeline systems."

The closest high-pressure distribution lines provided by the Gas Company are located adjacent west of the project site in Tyler Lane. High pressure distribution pipelines operate at pressures above 60 psi and deliver

gas in smaller volumes to the lower pressure distribution system. Energy consumption of the Project is analyzed in this Energy discussion. The Project is expected to consume energy in the form of electricity, natural gas, and petroleum during project construction and operation. The latest version of CalEEMod v2016.3.2 was utilized to calculate construction-source and operational-source energy use for the future development. The discussion of the findings is provided below.

Transportation Energy Resources

The Project would attract additional vehicle trips with resulting consumption of energy resources, predominantly gasoline and diesel fuel. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets. The most recent data available (2016) shows the transportation sector emits 41 percent of the total GHG in the state and about 84 percent of smog-forming oxides of nitrogen (NOx). Petroleum comprises about 92 percent of all transportation energy use, excluding fuel consumed for aviation and most marine vessels.

3.6.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Energy Would the Project				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Discussion/Analysis

Construction Energy Demands

The construction schedule is anticipated to occur between May 2024 and the end of December 2024 and be completed in two (2) phases. Staging of construction vehicles and equipment will occur on-site. The approximately seven-month schedule is relatively short owing to the type of storage buildings and the project site is relatively small at approximately 4.85 acres.

Construction Equipment Electricity Usage Estimates

As stated previously, Electrical service will be provided by IID. The focus within this section is the energy implications of the construction process, specifically the power cost from on-site electricity consumption during construction of the proposed Project. Based on the 2021 National Construction Estimator, the typical power cost per 1,000 square feet of building construction per month is estimated to be $3.32. The Project plans to develop the site with 62,979 square feet of new buildings over the course of approximately seven months. The total power cost of the on-site electricity usage during the construction of the proposed Project is estimated to be approximately $1,255.00.

Construction Equipment Fuel Estimates

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Fuel consumed by construction equipment was evaluated with the following assumptions:

- Construction schedule of 7 months.
- All construction equipment was assumed to run on diesel fuel.
- Typical daily use of 8 hours, with some equipment operating anywhere from 6 to 7 hours.
- Aggregate fuel consumption rate for all equipment was estimated at 18.5 hp-hr/day.

- Diesel fuel would be the responsibility of the equipment operators/contractors and would be sourced within the region.
- Project construction represents a “single event” for diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources during long term operation.

Average aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr-gal. Project construction activities would consume an estimated 36,195 gallons of diesel fuel. As stated previously, Project construction would represent a “single event” diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose.

Construction Worker Fuel Estimates

It is assumed that all construction worker trips are from light duty autos (LDA) along area roadways. With respect to estimated VMT, the construction worker trips would generate an estimated 41,069 VMT. Vehicle fuel efficiencies for construction workers were estimated in the air quality and greenhouse gas analyses using information generated using CARB’s EMFAC model. An aggregate fuel efficiency of 28.57 miles per gallon (mpg) was used to calculate vehicle miles traveled for construction worker trips. An estimated 1,437 gallons of fuel would be consumed for construction worker trips.

Operational Energy Demands

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

Transportation Fuel Consumption

Using the CalEEMod output from the air quality and greenhouse gas analyses, it is assumed that an average trip for autos and light trucks was assumed to be 12.5 miles and 3-4-axle trucks were assumed to travel an average of 5.4 miles. To present a worst-case scenario, it was assumed that vehicles would operate 365 days per year rather than the more likely 253 days (excluding weekends and up to 8 holidays). The proposed Project would generate approximately 146 trips per day. The vehicle fleet mix was used from the CalEEMod output. An estimated 1,482 gallons of fuel would be consumed per year for the operation of the proposed Project.

Facility Energy Demands (Electricity and Natural Gas)

Building operation and site maintenance (including landscape maintenance) would result in the consumption of electricity (provided by IID) and natural gas (provided by SoCalGas). The annual natural gas and electricity demands were provided per the CalEEMod output from the air quality and greenhouse gas analyses. Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as plug-in appliances. In California, the California Building Standards Code Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or “plug-in” energy use can be further subdivided by specific end-use (refrigeration, cooking, appliances, etc.).

RENEWABLE ENERGY AND ENERGY EFFICIENCY PLAN CONSISTENCY

Regarding federal transportation regulations, the Project site is located in an already developed area. Access to/from the Project site is from existing roads. These roads are already in place so the Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA because SCAG is not planning for intermodal facilities in the Project area.

Regarding the State’s Energy Plan and compliance with Title 24 CCR energy efficiency standards, the applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by IID and SoCalGas.

Regarding Pavley (AB 1493) regulations, an individual project does not have the ability to comply or conflict with these regulations because they are intended for agencies and their adoption of procedures and protocols for reporting and certifying GHG emission reductions from mobile sources.

Regarding the State's Renewable Energy Portfolio Standards, the Project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CalGreen Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.

Also, demonstrated in the Greenhouse Gas Section of the report and this study, the proposed Project is consistent with the applicable strategies of the City of Coachella CAP.

CONCLUSIONS

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. Notwithstanding, the proposed Project use will not have any long-term effects on an energy provider's future energy development or future energy conservation strategies.

a) Less Than Significant Impact. The proposed Project consists of the construction and operation of 11 new buildings totaling 62,979 square feet and 71 RV storage spaces for RV and self-storage facility. The proposed buildings would be built to current Building Code standards, including the installation of insulation and high efficiency HVAC systems.

During construction, there would be a temporary consumption of energy resources for operation of construction equipment and the manufacturing of construction materials. However, the duration is limited due to the small scale of the Project. Compliance with local, state, and federal regulations (e.g., limit engine idling times, require the recycling of construction debris, etc.) would reduce short-term energy demand during Project construction to the extent feasible, and Project construction would not result in wasteful or inefficient use of energy.

During operation of the RV and self-storage facility, there are no unusual Project characteristics or processes that would require the use of equipment that would be more energy intensive than is used for comparable activities, or the use of equipment that would not conform to current emissions standards and related fuel efficiencies.

The Project will generate 146 trips per day which will not result in high fuel consumption. Furthermore, through compliance with applicable requirements, including the California Code of Regulations Title 24, Part 6–Energy Efficiency Standards, as well as the City's Climate Action Plan (CAP) discussed below, individual Project elements (e.g., building design, HVAC equipment, etc.) would be consistent with state and local energy reduction policies and strategies, and would not consume energy resources in a wasteful or inefficient manner. Therefore, impacts will be less than significant.

b) No Impact. State and local agencies regulate the use and consumption of energy through various methods and programs (e.g. Assembly Bill 32 (AB 32)), California Code of Regulations Title 24, Part 6–Energy Efficiency Standards, and the California Code of Regulations Title 24, Part 11– California Green Building Standards (CALGreen). Per the latest CALGreen (2019) requirements for non-residential construction, the Project buildings will be constructed to be ready for zero-net-energy (ZNE) by 2030.

At the local level, the City's Building & Zoning Compliance Departments enforces the applicable requirements of the Energy Efficiency Standards and Green Building Standards in Title 24. In addition, the City's General Plan 2035 identifies specific strategies and measures for the conservation of the energy within the City. The Project would be required to comply with City policies and programs. No impact related to compliance with

applicable energy standards would result because the proposed Project would not conflict with or obstruct State or local plans for renewable energy or energy efficiency.

3.6.4 Cumulative Impacts

None.

3.6.5 Mitigation and Monitoring Measures

The Project was found to have a less than significant impact on Energy Resources. Therefore, no mitigation is required.

3.7 Geology and Soils

3.7.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan; and
- Geotechnical Investigation AAA Storage Facility, Sladden Engineering, March, 2022.

3.7.2 Environmental Setting

Coachella defines its city as highly diverse both physically and geologically. The multiple faults that traverse the area and climate help define the Coachella Valley region as a low and relatively flat desert basin bounded by mountainous terrain. The surrounding mountain ranges specifically include the Little San Bernardino Mountains to the northeast, the Santa Rosa Mountains to the south, and the San Jacinto Mountains to the west. The topographic variety in the Coachella Valley establishes elevations from 1,000 feet in the Mecca Hills to the east, to approximately 160 feet below sea level south of Thermal. Although the elevation varies widely, the City of Coachella is relatively flat, with a gentle slope from northwest to southeast. The project site is located in the southeast portion of the City on previously disturbed and relatively flat land.

The City of Coachella, including the Project site, is located within a northwest-southeast structural depression extending from the Banning Pass to the Gulf of California. This region is designated as the Salton Trough, which was inundated by the Colorado River's water, forming ancient Lake Cahuilla. Since that time, the floor of the Trough has been repeatedly flooded with other "fresh" water lakes, the most recent being the current Salton Sea. The Trough is an internally draining area with no readily available outlet to the Gulf of California portions well below sea level. The sole outlet for these waters is evaporation, leaving behind vast amounts of terrestrial sediment materials.

The Project proposes a "light industrial" development on the 4.85-acre property that consists of self-storage warehouse units and RV parking. Analysis of this project development on geology and soils is provided in this discussion. In 2014 the City of Coachella published a Technical Background Report to the Safety Element Update, which analyzes various hazards that can possibly occur in the City. The various hazards addressed within the Technical Background Report include seismic, geologic, flood, fire, hazardous material, and severe weather hazards. The seismic and geologic hazards sections of the Technical Background Report were consulted for this Geology and Soils Section.

3.7.3 Impacts

Geology and Soils Would the Project	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Discussion/Analysis

ai) No Impact. The City of Coachella recognizes the potential of seismic hazards in the region. 2035 Coachella General Plan Update (CGPU) states that because the San Andreas Fault passes through the northeastern portion of the City, the potential for primary surface fault rupture and strong ground shaking are very high. For this reason, a project's location relative to the Alquist-Priolo Earthquake Fault Zone is evaluated to determine the project's susceptibility to seismically induced rupture. The Alquist-Priolo Earthquake Fault Zone is a northwest-southeast descending zone established in 1971 to reduce losses from surface fault rupture on a statewide basis. The intent of the zone is to ensure public safety by prohibiting the sitting of most structures for human occupancy across traces of active faults that constitute potential hazards to structures from surface faulting or fault creep.

According to the City of Coachella's Technical Background Report, the maximum magnitude recorded from the San Andreas Fault was 7.2, and the Coachella section is the only section of the southern San Andreas Fault that has not produced a major earthquake in historic times. Surface rupture is expected to occur along pre-existing, known active fault traces, however, it could potentially splay or step from the known active faults or rupture along unidentified traces. The Alquist-Priolo Earthquake Fault Zone Map issued by the State Geologist determined that the subject Property lies approximately 3.70 miles southwest of the closest Alquist-Priolo Earthquake Fault Zone.

The City of Coachella's Municipal Code reflects the possible impacts of potential seismic hazards in Chapter 15.66, Seismic Hazards Mitigation. New buildings are required to follow these codes in order to be theoretically stronger and more likely to survive an earthquake, with the main purpose to prevent the collapsing of structures. Therefore, risks to future development associated with fault rupture at the Project site is considered low since the Project site is not located within the Alquist-Priolo Earthquake Fault Zone and will comply with the requirements outlined in the Coachella Municipal Code. No impacts are expected in association with the development of the Project.

aii) Less Than Significant Impact. The Project site is located in a seismically active region where earthquakes originating on local and regional faults can produce severe ground shaking. Like most of the Coachella Valley, the Project site has been subjected to past ground shaking by nearby faults. In order to reduce hazards associated with ground shaking impacts on people and buildings, the City of Coachella implements the latest seismic safety design standards outlined in both the Coachella General Plan Technical Background Report, and the most recent (2019) edition of the updated California Building Code (CBC). The City of Coachella requires new buildings to be constructed in accordance with the most recent edition of the CBC and City Municipal Code. The Coachella Municipal Code provides regulations for collapse-resistant design, which will be enforced during structure design and construction. Remedial grading and construction will work to reduce exposure of people or structures to adverse effects to the greatest extent possible against seismic hazards.

The buildings and structures proposed for the future development will be required to follow all applicable building standards outlined in the CBC and the City's Municipal Code, in order to ensure the safety of the residents. All grading and construction plans will be reviewed by the City. Additionally, the Project will follow the recommendations of the "Geotechnical Investigation AAA RV Storage Facility", prepared by Sladden Engineering regarding soil stability and construction. As a result of these standards, Project related impacts associated with seismic ground shaking will be less than significant.

aiii) Less Than Significant Impact. The General Plan's Technical Background Report addresses the different forms of ground failure that the City of Coachella may be susceptible to after the event of an earthquake, including liquefaction, settlement, and slope failure. Liquefaction, according to the Technical Background Report, typically occurs in saturated, loose, fine- to medium-grained sandy to silty soils in the presence of ground accelerations of 0.2g, and groundwater within 50 feet below the ground surface. In the event of an earthquake, the increase of subsurface water pressure may fill the pores and increase subsurface water pressure, causing the soil to lose strength and behave like a liquid, and potentially compromising the ground. According to the General Plan Seismic Hazard Zones Map in the Technical Background Report (Plate 1.3), the Project site is located in an area with high liquefaction susceptibility due to the youthful, unconsolidated sediments, and historically shallow groundwater within 30 feet of the ground surface.

The Coachella Water Authority and Sanitary District operates and maintains the water distribution system for the Project property and the City of Coachella. According to the California Department of Water Resources Groundwater Information Center, one of the nearest monitored public wells to the Project is identified as State Well 05S08E33D001S, located approximately 2.35 miles northwest of the Project. Based on the most recent monitoring information, reported on May 26, 2020, the depth to groundwater at this well site was approximately 27.2 feet. Additional wells in proximity to the Project include State Well 06S08E22D002S, approximately 1.50 miles southeast of the site, and 06S07E13J003S, approximately 1.90 miles southwest of the site. Groundwater depths at these sites were measured at 18.8 feet below ground surface (measured June 24, 2020), and 58.54 feet below ground surface (measured November 18, 2020), respectively. Due to the shallow groundwater depths in the area, the site is susceptible to seismically induced liquefaction.

Settlement is a potential consequence of seismic activity and liquefaction, where the excess pore pressure generated by ground shaking and leading to liquefaction is associated with the tendency for loosely compacted, saturated soil to rearrange into a denser configuration during shaking. Dissipation of that excess pore pressure will produce volume decreases (termed consolidation or compaction) within the soil that may be manifested at the ground surface as settlement. Unconsolidated young alluvial deposits are especially susceptible to this hazard. Artificial fills may also experience seismically induced settlement. Damage to

structures typically occur as a result of local differential settlements. Plate 2-1a (Geologic Map) in the Technical Background Report indicates that the Project site, and a majority of the City's valley floor is underlain by young, unconsolidated alluvial and lacustrine sediments, locally mantled with wind deposits (map symbols Qg and Ql/Qa). These sediments are susceptible to seismically induced settlement.

Per the Technical Background Report, mitigation for seismically induced settlement is similar to those used for liquefaction. Over-excavation and re-compaction are the most commonly used methods to densify soft soils susceptible to settlement. Deeper over-excavation below final grades, especially at cut/fill, fill/natural, or alluvium/bedrock contracts may be recommended to provide a more uniform subgrade. Over excavation should also be performed so that large differences in fill thickness are not present across individual lots. In some cases, specially designed deep foundations, strengthened foundations, and/or fill compaction to a minimum standard that is higher than that required by the applicable building codes may be recommended. The potential for seismic related ground failure at the Project site is projected to be less than significant with the efforts established in the California Building Code and Coachella Municipal Code.

Seiches can occur in bodies of water both near and far from the earthquake epicenter. Given that there are canals, ponds, and pools in the Coachella area, seiches, as a result of ground shaking, can be expected to occur in the region. The amplitude of these waves cannot be predicted but these are typically less than about 1.6 feet (0.5 meters) high. The amplitude of the seiche waves that could occur in these water bodies cannot be predicted given that several parameters combine to form these waves, although, given the relatively shallow depth of these bodies of water, the seiches are anticipated to be relatively minor. Water in swimming pools is known to slosh during earthquakes, but in most cases, the sloshing does not lead to significant damage, according to the Technical Background Report. Given its distance from the ocean, Coachella does not have a tsunami hazard.

The buildings and structures proposed for the future development will be required to follow all applicable building standards outlined in the CBC and the City's Municipal Code, in order to ensure the safety of the residents. All grading and construction plans will be reviewed by the City. Additionally, the Project will follow the recommendations of the "Geotechnical Investigation AAA RV Storage Facility", prepared by Sladden Engineering regarding soil stability and construction. As a result of these standards, Project related impacts associated with Seismic-related ground failure, including liquefaction will be less than significant.

aiv) No Impact. The City defines landslides as movements of relatively large landmasses, either as nearly intact bedrock blocks, or as jumbled mixes of bedrock blocks, fragments, debris, and soils. The potential for landslides is dependent on various factors including slope height, slope steepness, shear strength, and orientation of various weak layers underground. Strong ground shaking can cause existing slopes to become unstable, which may lead to landslides or rockfalls that can overrun structures, harm people or damage property, sever utility lines, and block roads. According to the City of Coachella's Technical Background Report to the Safety Element Update, the majority of the City has a 0 to 10 percent grade, including the Project site (Plate 2-2). Areas with a 10 percent grade or greater involves the areas along the San Andreas Fault northeast of the Project site. In the Technical Background Report, the City recognizes and maps the various landslide and rockfall hazard areas in Coachella (Plate 1-3). These areas are also located where the percent grade is higher than 10 percent.

Rockfalls and landslides are more likely to occur in the northeastern and eastern portions of the Coachella General Plan area due to the steep slopes located in those regions. Protection from rockfalls or surficial slides can often be achieved by protective devices such as barriers, retaining structures, catchment areas, or a combination of the above. According to Plate 1-3, in the Technical Background Report, the Project property is not located in an area that is susceptible to seismically induced rockfalls, rock slides, soil falls, soil slides, and soil slumps. This is due to the Project's location in a generally developed and urban area, as well as its distance from the nearest sloped areas. The subject site is located on relatively level ground and is not located immediately adjacent to any mountains or hillsides. As such, the site is not susceptible to any forms of slope instability. Therefore, no impacts are anticipated.

b) Less Than Significant Impact. The Coachella Technical Background Report states that climate, topography, soil, and rock types and vegetation are all influential factors of erosion, runoff, and sedimentation

in the Coachella Valley. Human activities, such as grading and construction, are also a large contributor to erosion in the region. The soils most susceptible to erosion include the unconsolidated sediments in the canyon bottoms and valley floor, as well as the granular semi-consolidated sediments forming the hills. Windborne, waterborne, and human-borne erosion are concerns for the City of Coachella, especially because wind-blown sand causes soil loss, dryness and deterioration of soil structure, nutrient and productivity losses, air pollution, sediment transport and deposition, and health problems.

Windborne erosion is a widespread concern in Riverside County, especially in the Coachella Valley. Approximately 20 percent of land area in the County is vulnerable to “high” and “very high” wind erosion. The Coachella Valley floor is highly susceptible to wind erosion due to the high winds funneled from the west (Riverside County 2016 General Plan Figure S-8). As previously stated, windborne erosion not only causes physical and structural damage, but also damages to the public health by causing respiratory problems.

Development of the Project site will require activities such as clearing onsite vegetation, grading, construction, and other ground disturbances by heavy machinery that could result in the loss of some topsoil and generate particulate matter. The City of Coachella requires mitigation of this hazard with the implementation of a Fugitive Dust Control Plan (Coachella Municipal Code Chapter 8.20, Fugitive Dust Control). The Fugitive Dust Control Plan is a document that describes fugitive dust sources at a site and the corresponding control measures. Pursuant to SCAQMD Rules 403 and 403.1, the future development is required to implement the Fugitive Dust Control Plan and the use of best management practices (BMPs) during operations capable of generating fugitive dust in the Coachella Valley.

In addition to windborne erosion, the City of Coachella determines that a majority of the City, including the Project site, is susceptible to water erosion due to the distal fan and lake deposits. According to the Federal Emergency Management Agency (FEMA) Map Panel Number 06065C2270H, revised March 6, 2018, the entire Project is located within the FEMA Flood Zone X, protected by levee. Flood Zone X are areas determined to have moderate to low flood risk, and corresponds to areas of 500-year flood, areas of 100-year flood with average depths of less than one foot or with drainage areas less than one square mile, and areas protected by levees from 100-year flood. North and east of the Project property is the Coachella Valley Stormwater Channel, which FEMA designates as Flood Zone A. This flood zone is defined as an area subject to inundation by the 1-percent-annual-chance flood event and likely to create erosion within the zone.

The mitigation of waterborne erosion at the Project site during future construction activities includes the developer’s compliance with the State’s most current Construction General Permit (CGP) (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). Compliance with the CGP involves the development and implementation of a project-specific Stormwater Pollution Prevention Plan (SWPPP) designed to reduce potential adverse impacts to surface water quality during the period of construction. The required plan will identify the locations and types of construction activities requiring BMPs and other necessary compliance measures to prevent soil erosion and stormwater runoff pollution. The plan will also identify the limits of allowable construction-related disturbance to prevent any exceedances or violations. Waterborne erosion and the City’s Standard Conditions associated with it are thoroughly discussed in the Hydrology and Water Quality Section of this document.

To reduce the amount of soil erosion created, future development shall provide adherence to SCAQMD Rule 403.1 including implementing a Fugitive Dust Control Plan, a SWPPP, and best management practices, which are required not only by Coachella but also by the Riverside County. Impacts would be less than significant.

c) Less Than Significant Impact. The proposed Project site is located on the southeastern side of the City, on previously disturbed land. The majority of the City has a grade of 0 to 10 percent, meaning that Coachella is relatively flat. Per the Coachella’s General Plan Technical Background Report, Quaternary River channel deposits (Qg), alluvial fan and stream deposits (Qa), and interbedded lake and distal fan deposits (Ql/Qa) sediments are cohesionless and loose in the upper sections, and thus susceptible to liquefaction. According to Figure 4.5-7 in the Coachella General Plan Draft EIR, Soils Classification, the surficial sediments at the Project site includes lake and distal deposits (Ql/Qa). These sediments are fine-grained sand, silt, and clay of the valley floor. The various soil components are vital to the stability of the Project site specifically regarding landslides, lateral spreading, subsidence, liquefaction, or collapse.

As previously stated in discussion 3.7.3 .a.iii, above, the Project site is located in an area susceptible to liquefaction due to the youthful, unconsolidated sediments, and historically shallow groundwater. Since the site is potentially susceptible to liquefaction, it may also be susceptible to lateral spreading, which also requires a shallow water table or proximity to a water source that could cause inundation of onsite soils. However, ground improvement (such as over-excavation and re-compaction of low-density soils) and foundation design can mitigate the potential effects of liquefaction, lateral spread, and settlement. The site is not susceptible to landslides due to its relatively flat terrain and distance from mountainous slopes and, although tectonic subsidence has been documented in the Coachella Valley, it is not known to occur in the Project vicinity.

Settlement or collapsible soils, as the Safety Element of the Coachella GPU states, typically occur in recently deposited sediments that accumulated in arid or semi-arid environments. Collapsible soils do not appear to be widespread in the planning area, but most likely do occur in localized areas, especially in those with distal fan and lake deposits. However, settlement resulting from the anticipated foundation loads should be minimal, provided that foundation design and construction complies with the applicable California Building Code and the Coachella Municipal Code standards. No impacts are expected associated with the Conditional Use Permit (CUP). Overall, no impacts of liquefaction, lateral spread, landslides and rockfall, settlement, or collapsible soils to the Project site are anticipated relative to the proposed CUP.

When the Project site is developed, grading will be conducted in compliance with City's standards. All grading and construction plans will be reviewed by the City. Additionally, the Project will follow the recommendations of the "Geotechnical Investigation AAA RV Storage Facility", prepared by Sladden Engineering regarding soil stability and construction. Recommendations provide for the excavation of the site prior to construction, including moisture conditioning and recompaction. These recommendations will be integrated into grading and building plans that the City will review and approve prior to the issuance of grading and building permits, which will assure that impacts associated with the soils remain less than significant.

d) No Impact. Expansive soils typically contain large amounts of clay that expand when water is absorbed and shrink when they dry. As described in Section 3.7.3 a.iii, above, the site's underlying soil consists of silty sand and sand, which has low shrink-swell potential. Therefore, no impact associated with expansive soils will occur.

e) No Impact. Currently, the site is vacant and located in an area served by existing sewage infrastructure. The Project's wastewater demand would be accommodated by connections to existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

f) Less Than Significant Impact. Coachella Valley Engineers reviewed recent Paleontological Studies for the area in addition to City of Coachella General Plan 2035 and Final EIR for the City of Coachella 2035 General Plan. A review of maps, reports on other sites in the vicinity and published literature was also conducted. A paleontological sensitivity map generated by the Riverside County Land Information System in March of 2020 ranks the subject property as having a "High (High A)" paleontological sensitivity by the Riverside County Land Information System. The category "High A" indicates that fossils are likely to be encountered at the surface and may be impacted during excavation by construction activities. Areas mapped as young alluvial valley deposits in the vicinity of the Project are indicated as having a High Potential/Sensitivity to yield nonrenewable paleontological resources (*i.e.,* fossils).

According to Riverside County's paleontological sensitivity map, while most of the western and southern portion of the Coachella Planning Area is located within a high sensitivity area for paleontological resources, the proposed Project site has an undetermined sensitivity for paleontological resources.

The proposed Project site is predominately underlain by Gilman fine sandy loam and Indio fine sandy loam (Sladden, 2022). According to the Geologic Map of the Palm Desert & Coachella 15-minute quadrangles (Sladden, 2022), the project area is underlain by surficial sediments of the Holocene period (alluvial sand and clay, alluvial sand and gravel, and clay with some miscellaneous silt), which are generally too young to contain fossilized material. In addition, Project Grading is expected to reach a maximum depth of six feet below the

ground surface and is, therefore, not expected to reach depths where sensitive paleontological resources would be expected to occur. As a result, the potential for encountering fossil resources during project excavation, trenchless installation, or ground disturbance is low and impacts on paleontological resources would be less than significant.

3.7.4 Cumulative Impacts

None.

Mitigation Measures:

None.

3.8 Greenhouse Gas Emissions

3.8.1 Sources

The following sources were utilized to support the conclusions made in this section:

- California Emissions Estimator Model (CalEEMod) Version 2022.4.0 (Appendix B);
- City of Coachella General Plan 2035; and
- Final EIR for the City of Coachella 2035 General Plan.

3.8.2 Environmental Setting

Greenhouse gases (GHG) are a group of gases that trap solar energy in the Earth's atmosphere, preventing it from becoming too cold and uninhabitable. Common greenhouse gases in the Earth's atmosphere include water vapor, carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), ozone, and chlorofluorocarbons to a lesser extent. Carbon dioxide is the main GHG thought to contribute to climate change. Carbon dioxide reflects solar radiation back to Earth, thereby trapping solar energy and heat within the lower atmosphere. Human activities (such as burning carbon-based fossil fuels) create water vapor and CO2 as byproducts, thereby impacting the levels of GHG in the atmosphere. Carbon dioxide equivalent (CO2e) is a metric used to compare emissions of various GHG. It is the mass of carbon dioxide that would produce the same estimated radiative forcing as a given mass of another GHG. CO2 equivalents are computed by multiplying the mass of the gas emitted by its global warming potential. Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. GCC is currently one of the most controversial environmental issues in the United States, and much debate exists within the scientific community about whether or not GCC is occurring naturally or as a result of human activity.

To address the long-term adverse impacts associated with GCC, California's Global Warming Solutions Act of 2006 (AB 32) requires California Air Resource Board (CARB) to reduce statewide emissions of GHG to 1990 levels by 2020. In 2016, Governor Jerry Brown signed Senate Bill 32 (SB32) that requires California to reduce GHG emissions to 40 percent below 1990 levels by 2030. With the passage of the California Global Warming Solutions Act of 2006 (Assembly Bill 32) in California, environmental documents for projects pursuant to CEQA are required to analyze GHG and assess the potential significance and impacts of GHG emissions. On July 11, 2018, CARB announced in a press release (No. 18-37) that GHG pollution in California fell below 1990 levels for the first time since emissions peaked in 2004, an achievement roughly equal to taking 12 million cars off the road or saving 6 billion gallons of gasoline a year. Moreover, according to the CARB report on California GHG Emissions for 2000 to 2016, which tracks the trends of GHG emissions, California's GHG emissions have followed a declining trend between 2007 and 2016. The largest reductions are attributed to the electricity sector, which continues to see decreases as a result of the State's climate policies.

GHG Thresholds

On December 5, 2008, the SCAQMD formally adopted a GHG significance threshold of 10,000 MTCO2e/yr that only applies to industrial uses' stationary sources where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document that also recommended a threshold for all projects using a tiered approach.

It was recommended by SCAQMD staff that a project's GHG emissions would be considered significant if it could not comply with at least one of the following "tiered" tests:

- Tier 1: Is there an applicable exemption?
- Tier 2: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
- Tier 3: Is the project below an absolute threshold (10,000 MTCO2e/year for industrial projects; 3,000 MTCO2e/year for residential and commercial projects)?
- Tier 4: Is the project below a (yet to be set) performance threshold?
- Tier 5: Would the project achieve a screening level with off-site mitigation?

3.8.3 Impacts

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

Discussion/Analysis

a) Less Than Significant Impact. CalEEMod Version 2022.4.0 was used to quantify GHG emissions associated with the Project. As previously mentioned, this software was developed in conjunction with the California Air Pollution Control Officers Association (CAPCOA) to estimate air emissions, including GHGs. CalEEMod utilizes widely accepted methodologies for estimating emissions combined with default data that can be used when site-specific information is not available. Sources of these methodologies and default data include but are not limited to the United States Environmental Protection Agency (USEPA) AP-42 emission factors, California Air Resources Board (CARB) vehicle emission models, studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle.

The Project's total building area and parking lot uses were factored into the model to evaluate whether the estimated criteria pollutants and GHG emissions would exceed the established thresholds and therefore conflict with the plans and efforts of reducing the emissions of GHG. Construction-related GHG emissions were amortized over a 30-year period and added to the Project's annual operational GHG emissions.

Construction

Construction activities will result in short-term GHG emissions associated with operation of construction equipment, employee commute, material hauling, and other ground disturbing activities. As shown in Table 8, the Project will generate 245 CO2e metric tons during the 8-month construction period. There is currently no construction related GHG emission thresholds for projects of this nature. To determine if construction emissions will result in a cumulative considerable impact, buildout GHG emissions were amortized over a 30-

year period and added to annual operational emissions to be compared to applicable GHG thresholds (see Table 8, below).

Operation

At buildout, there are five emission source categories that will be contributing either directly or indirectly to operational GHG emissions, including energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), and mobile sources. The proposed Project is an industrial development and comparable to the Tier 3SCAQMD's industrial thresholds of 10,000 MTCO2e/yr. Table 8 provides a summary of the projected short-term construction and annual operational GHG generation associated with buildout of the proposed Project.

The operational GHG emissions can be attributed to the following sources:

Area Sources: Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the developed site.

Energy Sources: GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels, these emissions are considered to be indirect emissions.

Mobile Sources: GHG emissions will also result from mobile sources associated with the Project, which include the typical daily operation of motor vehicles by employees and visitors. Project mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations in the local vicinity.

Solid Wastes: The proposed land uses will result in the generation and disposal of solid waste. A large percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed project were calculated by the CalEEMod model using default parameters.

Water Supply, Treatment and Distribution: Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water.

The proposed Project will generate GHG emissions during both construction and operation. The GHG emissions have been calculated based on the parameters described above. A summary of the results is shown below in Table 8 and the CalEEMod Model run for the proposed Project is provided in Appendix B.

Phase	**CO2e (MT/YR)**
Construction (2024)	
Construction Total	245
Construction: 30 years amortized	8.16
Operation (2024)	
Annual Operation	627

Total Operation	627
SCAQMD Threshold	10,000
Threshold Exceeded?	**No**

Notes: Source: CalEEMod Version 2016.3.2 for Opening Year 2022.
(1) Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment.
(2) Energy usage consist of GHG emissions from electricity and natural gas usage (mitigated values used to show compliance with 2019 Title 24 Standards).
(3) Mobile sources consist of GHG emissions from vehicles.
(4) Solid waste includes the CO_2 and CH_4 emissions created from the solid waste placed in landfills (mitigated values used to show compliance with AB 341).
(5) Water includes GHG emissions from electricity used for transport of water and processing of wastewater (mitigated values used to show compliance with CalGreen requirements).
(6) Construction GHG emissions CO2e based on a 30 year amortization rate.
(7) CO2 sequestration from the planting of ~45 trees (31.86/20 years [trees' lifetime])

Table 8 Project-Related Greenhouse Gas Emissions

As shown in the table above, the Project complies with the Tier 3 threshold because emissions will not exceed the SCAQMD threshold. Per the 2019 California Green Building Standards Coded (Title 24 of California Code of Regulations), the Project will be constructed to be zero-net-energy ready by 2030. As shown in Table 8 resulting from the CalEEMod calculations, future construction is expected to generate approximately 635.16 MTCO2e per year from construction, area, energy, stationary, waste, and water usage sources. As such, future development GHG emissions would not exceed the threshold of significance set at 10,000 MTCO2e per year. Having been evaluated against the regionally accepted thresholds, which are part of the State's regulations aimed at addressing climate change, future development is not expected to interfere with the plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Project impacts will be less than significant.

b) Less Than Significant Impact: The City of Coachella has prepared and adopted Climate Action Plan (CAP) in conjunction with a General Plan Update as a roadmap for achieving community wide GHG emission reductions. The CAP builds on the 2013 General Plan Update, quantifying emissions from the build-out of the proposed plan and includes additional policies and implementation actions to help Coachella further reduce emissions. It also includes strategies to protect public health and make the community more resilient to climate change. Coachella's CAP is designed to provide clear policy guidance to the City staff and decision-makers on how to reduce GHG emissions. It identifies a pathway to reduce emissions within a range of voluntary, state-level emissions reduction targets. This path includes strategies for improving connectivity and land use patterns, transportation modes and systems, incorporating energy efficiency standards, increasing the City's renewable energy supply, and reducing waste and consumption. By providing an emissions inventory, emissions targets, and strategies for reducing GHG emissions, the City of Coachella has established a framework evaluating and mitigating GHG emissions. Part of these emission reductions will need to be achieved through better environmental performance of new development.

As previously discussed, future development on the Project property may result in GHG emissions totaling 635.16. As such, the proposed RV and self-storage development is not expected to conflict with the applicable plan for the purposes of reducing GHG emissions. Project impacts will be less than significant.

3.8.4 Cumulative Impacts

None.

3.8.5 Mitigation and Monitoring Measures

No mitigation measures are required.

3.9 Hazards and Hazardous Materials

3.9.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035; and
- Final EIR for the City of Coachella 2035 General Plan Update.
- *Phase I Environmental Site Assessment AAA Storage*, Coachella, CA 92201 Coachella Valley Engineers, November 2021.

3.9.1 Environmental Setting

The proper management of hazardous materials is a common concern for all communities including the City of Coachella. Beginning in the 1970s, governments at the federal, state, and local levels became increasingly concerned about the effects of hazardous materials on human health and the environment. Numerous laws and regulations were developed to investigate and mitigate these effects. As a result, the storage, use, generation, transport, and disposal of hazardous materials are highly regulated by federal, state, and local laws and regulations.

In the City of Coachella, there are only a few identified hazardous/toxic material generators associated with commercial, quasi-industrial, and medical operations which have the potential to be associated with accidental spills, purposeful illegal dumping, air emissions, and other uncontrolled discharges into the environment. Currently, there are several potentially hazardous waste users that are generally restricted to the "small quantity generators." These include medical clinics and facilities, gasoline service stations, equipment and fuel storage yards, and waste haulers. The City of Coachella is responsible for coordinating with the appropriate agencies in the identification of hazardous material sites, and the active regulation of their timely cleanup.

The Phase I Environmental Site Assessment prepared for the Project site accessed "Geo Tracker" among the databases searched. "GeoTracker" is the State Water Resources Control Board's Internet-accessible database system used by the State Board, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. The GeoTracker online database provides access to statewide environmental data and tracks regulatory data for the following types of sites:

1. Leaking Underground Storage Tanks (LUST) cleanup sites;
2. Cleanup Program Sites (CPS, also known as Site Cleanups [SC] and formerly known as Spills, Leaks, Investigations, and Cleanups [SLIC] sites);
3. Military sites (including Military UST sites, Military Privatized sites, and Military Cleanup sites);
4. Land Disposal sites (Landfills, Surface Impoundments, Waste Piles, Land Treatment Units, Mining Units);
5. Permitted Underground Storage Tank (UST) facilities (Note: Permitted UST information is now being maintained by California Environmental Reporting System (CERS) (http://cers.calepa.ca.gov/); information in GeoTracker related to Permitted USTs is no longer current);
6. Composting Operations;
7. Waste Discharge Requirement (WDR) sites;
8. Confined Animal / Concentrated Animal Feed Lots facilities;
9. Irrigated Lands Regulatory Program (ILRP) sites; and
10. Oil and Gas Monitoring sites (Aquifer Exemption, Produced Water Ponds, Underground Injection Control, Well Stimulation Projects).

According to GeoTracker, there is one (1) hazardous materials Cleanup Site within a one-half mile radius of the Project site.

According to the Phase I Environmental Site Assessment prepared for the Project site, the site has no recognized environmental conditions. This includes the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under

conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment." The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the target of an enforcement action if brought to the attention of the appropriate governmental agencies. Coachella Valley Engineers did not consider further environmental study or investigation of the Target Property as necessary.

3.9.3 Impacts

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

Discussion/Analysis

a/b. Less than Significant Impact. The Project site is a vacant infill site and lies adjacent to industrial and vacant industrial land. The site has been farmed since the 1950's and has been vacant for several years. The property is cleared annually for weed abatement. There is one (1) cleanup site located within one-half mile of the Project site (State Water Resources Control Board's online database), however, this site is east of Hwy 111 and would have no impact on the Project site. The proposed Project does not involve sensitive receptors or residential development on the site.

The proposed Project does not involve the use of chemical or petroleum products aside from minor cleaning and similar materials.

The Code of Federal Regulations (CFR Title 40, Part 261) defines hazardous materials based on ignitability, reactivity, corrosivity, and/or toxic properties. The State of California defines hazardous materials as substances that are toxic, ignitable, or flammable, reactive and/or corrosive, which have the capacity of causing harm or a health hazard during normal exposure or an accidental release. As a result, the use and management of hazardous or potentially hazardous substances is regulated under existing state, federal and local laws. Hazardous wastes require special handling and disposal methods to reduce their potential to damage public health and the environment. Manufacturer's specifications also dictate the proper use, handling, and disposal methods for the specific substances.

The construction phase would involve the use of heavy equipment that has a potential of fuel and oil spills due to the usage of fuel, oil, lubricants, and other potential flammable substances. The contractor will be required to identify a staging area for storing these materials, as well as other practices to prevent any hazardous discharge or release into the environment, in their Storm Water Pollution Prevention Plan (SWPPP). The SWPPP requires a list of pollutant sources and the identification of construction areas where additional control measures are necessary to prevent pollutants from being discharged. Best management practices (BMPs) are necessary for proper material delivery and storage, material use, and spill prevention and control. The measures will outline the required physical improvements and procedures to prevent impacts of pollutants and hazardous materials to workers and the environment during construction. For example, all construction materials including paints, solvents, and petroleum products must be stored in controlled areas and according to the manufacturer's specifications. Additionally, perimeter controls (fencing with wind screen), linear sediment barriers (gravel bags, fiber rolls or silt fencing), and access restrictions (gates) would help prevent temporary impact to the public and environment. Impacts would be less than significant.

In addition, State and federal laws (e.g. the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and Title 49 of the Code of Federal Regulations implemented by Title 13 of the California Code of Regulations) also impose strict regulation for the safe transportation of hazardous materials. The Project will be subject to these state, federal, and local laws and regulations during construction and operation. Overall, limited usage and compliance with all applicable laws and regulations during Project construction and operation would reduce the potential impacts associated with the routine transport, use, storage, or disposal of hazardous materials to less than significant levels. No mitigation is required.

c) No Impact. The nearest school is Valley view Elementary High School, located approximately 2,750 feet northwest of the project site in the City of Coachella. The proposed Project will result in the development of RV and self-storage space, which is not expected to emit any hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste to jeopardize schools. During the construction of the Project, proper safety measures will be implemented. These standard operational procedures and protocols as well as the BMPs, will minimize any potential public exposure to hazardous materials. Operation of future residential and commercial property will not include the use, transportation, or storage of hazardous materials in quantities that would pose a significant hazard to schools. The Project property is located more than one-half mile from the closest elementary school and impacts are anticipated.

d) No Impact. The Project site is currently vacant. There are no hazardous materials or waste sites located on or near the site, and the site is not included on a list compiled pursuant to Government Code Section 65962.5. The proposed Project will not create a significant hazard to the public or environment. No impact is anticipated.

e) No Impact. The Jacqueline Cochran Regional Airport is located approximately 1.20 miles south of the Project site. The proposed Project is located within Zone D of the airport's land use compatibility plan. Zone D limits non-residential development (Light Industrial and Warehouse) uses to 100 people per acre. However, airspace review is required for objects greater than 100 feet in height. Additionally, physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations, otherwise referred to as

"Hazards to flight", are prohibited. The Project will not result in safety hazards or excessive noise for people living or working in the area. No impact is anticipated.

f) No Impact. The Project is not within the vicinity of a private airstrip. No impacts are expected related to this issue. No impact is anticipated.

g) No Impact. The City of Coachella's Technical Background Report to the Safety Element Update analyzes various safety hazards within the City. These potential hazards include seismic hazards, geologic hazards, fire hazards, hazardous materials management, and severe weather hazards. The preparation, response and recovery of these hazards are outlined within Chapter 7 of the Technical Background Report. According to Chapter 7, the City of Coachella is a participant member of the Riverside County Operational Area Multi-Jurisdictional Hazard Mitigation Plan (HMP) approved by FEMA in 2005 and ongoing updates to the document.

The Coachella Fire Department Station is located approximately 1.25 miles northwest of the project site, at 1377 6th Street. The closest police station to the project site is the Riverside County Sheriff Department Thermal Station at 86625 Airport Boulevard, approximately 1.2 miles south of the project property. The Police Department typically serves as the lead organization in carrying out evacuations, supported by the Fire Department as appropriate. The Public Works Department typically assists in the identification of the best evacuation routes and in barricading the evacuated areas.

As depicted in Plate 7-2 in the Technical Background Report, major evacuation routes within the City of Coachella include 48th Avenue, 50th Avenue, 52nd Avenue, Route 86, Harrison Street, Grapefruit Boulevard, and Interstate 10 (I-10) freeway. The closest evacuation route to the project property Grapefruit Boulevard (Highway 111) and Avenue 52, lying approximately 0.21 miles east and 0.85 miles north of the proposed Project, respectively.

The proposed Project will not significantly alter the existing circulation pattern in the project area or adversely impact evacuation plans, considering that the site is currently surrounded by industrial development and existing paved improvements. The Project lies within the City's General Plan Industrial land use designation. This land use designation permits the development of industrial and storage uses. As previously discussed, the proposed storage use is on approximately 4.85 acres of disturbed land. Primary ingress and egress will be located along the existing paved roadways, Tyler Street and Tyler Lane. These roadways will also provide emergency access to the Project site. Proposed parking and circulation plans will be reviewed by the Fire and Police Departments to assure that the Project's ingress/egress driveways and roads are adequate for accommodating emergency vehicles. In order to ensure that the Project development does not interfere with emergency access during development, a construction traffic plan may be required to be submitted to the Fire Department for review prior to development. No Project-related impact is expected. The Project will not impact existing evacuation routes.

The Fire and Police Departments will review the proposed parking and circulation plan for the Project to assure that driveways and roads are adequate for emergency vehicles. In addition, construction traffic management plans will be required to assure that the proposed Project will not interfere with an adopted emergency response plan or emergency evacuation plan.

h) No Impact. Large areas of Southern California are susceptible to wildfires all year around due to the region's weather, topography, and vegetation conditions. The Coachella Valley's hot, dry summer with the dry brush vegetation creates ideal conditions to fuel most wildfires. The California Board of Forestry considers wildland as important sources of water, timber, minerals, wildlife, recreation, and forage. Wildland fire protection in California is the responsibility of either the State, local government, or federal government. Local responsibility areas include incorporated cities where fire protection is typically provided by City fire departments, fire protection districts, counties, and by CAL Fire under contract to local government.

The Project site is located in the Coachella General Plan's industrial land use designation. It is located in an urbanized area of the City with existing industrial development and industrial designated vacant land on all sides. The Riverside County General Plan and the CAL Fire Maps for Western Riverside County indicate that

the Project and its surroundings are not located within the Very High Fire Hazard Severity Zone for both State or Federal Responsibility Areas and Local Responsibility Areas. With the foregoing, the Project would not expose people or structures to significant injury, loss, or death due to wildfires. See the Wildfire Section of this Initial Study for further discussion. No impacts are anticipated.

3.9.4 Cumulative Impacts

None.

3.9.5 Mitigation and Monitoring Measures

No mitigation measures are required.

3.10 Hydrology and Water Quality

3.10.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan Update;
- City of Coachella, 2015 Urban Water Management Plan, 2016); and
- Flood Insurance Rate Map #06065C2270H, Federal Emergency Management Agency, March 6, 2018.

3.10.2 Environmental Setting

The Clean Water Act (CWA) of 1972 was enacted to restore and maintain the chemical, physical, and biological integrity of the nation's waters by regulating the discharge of pollutants to waters of the U.S. from point sources. As part of the National Pollutant Discharge Elimination System (NPDES) program, subsequent amendments to the CWA established a framework for regulating non-point source discharges from urban land runoff and other diffuse sources that were also found to contribute to runoff pollution. Under CWA, the Environmental Protection Agency (EPA) authorized the NPDES permit program to various state, tribal, and territorial governments, enabling them to perform many of the permitting, administrative, and enforcement aspects of the program. California is a delegated NPDES state and has authority to administer the NPDES program within its limits.

The Porter-Cologne Act is the principal law governing water quality regulation for surface waters in California. It established a comprehensive program to protect water quality and the beneficial uses of water. Presently in the state of California, the State Water Resources Control Board (SWRCB) and nine California Regional Water Quality Control Boards (RWQCBs) regulate and protect water quality pursuant to NPDES. Their regulations encompass storm water discharges from construction site, municipal separate storm sewer systems (MS4s), and major industrial facilities.

The approved Colorado River Basin Water Quality Control Plan (Basin Plan) identifies the beneficial water uses, describes the water quality which must be maintained to support such uses, and describes the programs, projects, and other actions necessary to achieve the standards and protect water quality. The proposed project is located within the Whitewater River Watershed in the Colorado River Region (Region 7). As a component of Region 7, the Whitewater River Watershed MS4 established a compliance program that covers approximately 1,645 square miles, including the City of Coachella and the proposed project.

The Regional Basin Plan establishes water quality standards for surface waters within the Colorado River region, which include designated beneficial uses of those water bodies and the levels of water quality that must be met and maintained to protect those uses. Based on the project's location and setting, the nearest receiving water to the project is the Coachella Valley Stormwater Channel (CVSC), located north of the project property. CVSC is the primary regional flood control facility in the eastern Coachella Valley and City of Coachella. As an unlined, engineered extension of the Whitewater River, CVSC accepts agricultural irrigation

return water and conveys treated wastewater, urban runoff, and stormwater runoff to the Salton Sea. The project is physically and hydrologically separated from this facility by the existing engineered levee system that is operated and maintained by CVWD.

Water bodies where the assessed water quality does not meet the standards to support the beneficial uses are regionally listed pursuant to Section 303(d) of the CWA. The most current 2014 and 2016 Integrated Report (Clean Water Act Section 303(d) List/305(b) Report) indicates that portions of the CVSC are impaired by DDT (Dichlorodiphenyltrichoroethane), Dieldrin, Indicator Bacteria, PCBs (Polychlorinated Biphenyls), and Toxaphene. These water quality impairments are not known to be associated with or caused by development.

Chapter 13.16 (Water Quality Control) of the Coachella Code of Ordinances serves as the local stormwater management standard, aligning with CWA, NDPES, and MS4 provisions.

3.10.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Hydrology and Water Quality Would the Project				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would:				
i. result in substantial erosion or siltation on- or off site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. 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; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion/Analysis

An Updated Hydrology Report and a preliminary Water Quality Management Plan (WQMP) will be required for the Project site. Implementation of the proposed Project will result in the alteration of the site's use and will introduce structures which will impede percolation of storm water as it travels across the Project site. This will result in the alteration of the existing drainage patterns onsite as well as downstream from the site; the impervious surfaces proposed by the Project will reduce infiltration of rainfall and increase storm water runoff volumes. In the existing condition some offsite would sheet flow into the site.

a) Less Than Significant Impact. The size and nature of the proposed development prompts compliance with the existing regulations pertaining to water quality standards and waste discharge requirements during and after construction. As a result, the project proponent must comply with the State's most current Construction General Permit (CGP), Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-006-DWQ. Compliance with the CGP involves the development and implementation of a project-specific Storm Water Pollution Prevention Plan (SWPPP), designed to prevent potential adverse impacts to surface water quality during the period of construction. The required plan will identify the limits of disturbance during construction, indicating specific locations where activities will require implementation of storm water Best Management Practices (BMPs). Storm water BMPs refer to a schedule of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent, eliminate, or reduce the pollution of water of the receiving waters. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff spillage or leaks. Consistent with Section XIV of the CGP, the required SWPPP will also specify the necessary recordkeeping, relevant good site housekeeping requirements, proper waste management, proper handling and storage within the allowable construction limits.

Based on the Project location and setting, the compliant SWPPP is expected to identify temporary sediment track-out prevention BMPs at each construction entrance/exit point that eventually exits to a public street. This type of BMP will provide temporary stabilization to prevent sediment track-out and fugitive dust emissions from exiting the site. Linear sediment barriers may be warranted along portions of the construction perimeter to prevent soil erosion impacts and sediment impacts. As construction progresses, any on-site catch basin inlets that become operational will require temporary protection to prevent sediment or pollutants from entering the on-site storm drain system. As a standard condition, any ground surface area disturbed by construction activities must be entirely covered by the SWPPP and must be properly re-stabilized to satisfy the City and NPDES requirements. The BMPs will be regulated by the plan review process prior to obtaining a grading permit and will be enforced as part of the agency site inspection protocols during construction.

During construction, future development will also be required to comply with South Coast Air Quality Management District's (SCAQMD) Rule 403 and 403.1 and the City's Fugitive Dust Control policies, which establish the minimum requirement for construction and demolition activities and other specified sources in order to reduce man-made fugitive dust and the corresponding PM10 emissions. Implementation of Fugitive Dust Control Plan primarily pertains to air quality, but also supports water quality protection through the requirement of soil stabilization measures to prevent sediment erosion and track-out. The concurrent implementation of the required SWPPP and Dust Control Plan plans will prevent the potential construction-related impacts to water quality at the site and its surroundings, therefore, resulting in less than significant impact.

The proposed Project will be designed with an on-site stormwater retention system that during the life of the Project will comply with the City's drainage requirements by preventing site discharge and transport of untreated runoff. The proposed storm drain system will include facilities sized to provide sufficient storage for the 100-year controlling storm event. As a standard requirement, the Project development proponent must develop and implement a Project-specific Water Quality Management Plan (WQMP) to comply with the most current standards of the Whitewater River Region Water Quality Management Plan for Urban Runoff and the Whitewater River Watershed MS4 Permit.

The Project specific WQMP and Hydrology Report will identify a strategy of site design, source controls, and treatment controls with a required operation and maintenance program to address post-construction runoff quality and quantity. To achieve this, future development will be divided into multiple drainage management

areas with corresponding underground retention facilities. Runoff from the impervious areas of the Project (building buildings, hardscape, asphalt) will be conveyed to a corresponding retention facility sized to collect and percolate the entire stormwater volume resulting from the controlling 100-year storm event. The site plan, grading design, catch basin design, and retention facilities of the Project must be factored in the Project specific WQMP development and documentation. The Project design will be subject to City review and approval. During construction and operation, the proposed Project will be required to comply with CWA, NPDES, and local regulations to prevent impacts to water quality standards and the beneficial uses assigned to local receiving waters. No impacts are anticipated relative to the Conditional Use Permit. The imposition of conditions of approval and adherence to local, state, and federal requirements will assure that impacts associated with water quality standards are less than significant.

b) Less Than Significant Impact. The Coachella Water Authority (CWA) is the primary domestic water purveyor for the City of Coachella and the Project area, primarily relying on groundwater as the primary supply. The Project area and City of Coachella are underlain by the East (Lower) Whitewater River Subbasin, which forms part of the Coachella Valley groundwater basin. The East (Lower) Whitewater River Subbasin is managed regionally by a collaborative effort by multiple agencies. The collaboration among CWA, CVWD, and other local water districts has resulted in an established water conservation, water reuse, and groundwater recharge strategy to ensure water availability and system capacity to meet the growing needs of the City. These planning efforts include residential and commercial landscape and irrigation upgrade rebates, water audits, water conservation kits, budget-tiered rate structure, water conservation workshops, and a Memorandum of Understanding between the City and CVWD to help ensure a sufficient and reliable water supply for development projects within the City and in its Sphere of Influence.

In 2014, the California Legislature signed a three-bill legislative package into law, collectively known as the Sustainable Groundwater Management Act (SGMA). SGMA allows local agencies to manage groundwater resources in a sustainable manner, with management efforts tailored to the resources and needs of their specific communities. Groundwater management is described as the planned and coordinated monitoring, operation, and administration of a groundwater basin sustainability. As part of this effort, the Coachella Water Authority was elected to serve as a groundwater sustainability agency (GSA) to develop and implement the Groundwater Sustainability Plan. Since groundwater management has been a historic effort in the Coachella Valley, local agencies, including Coachella Water Authority, have been able to adapt their current measures as part of their sustainability plan.

Local groundwater resources are managed under the 2015 City of Coachella Urban Water Management Plan (2015 UWMP). The 2015 UWMP serves as a planning tool that documents actions in support of long-term water resources planning and ensures adequate water supplies are available to meet the existing and future urban water demands.

The 2015 UWMP indicates that the Coachella Valley groundwater basin historically has been in a state of overdraft. An overdraft condition occurs when the outflows (demands) exceed the inflows (supplies) to the groundwater basin over a period of time. To address this condition, the Coachella Water Authority and other domestic water suppliers like CVWD have implemented water conservation measures and groundwater replenishment efforts to stabilize the groundwater levels and eliminate the overdraft condition. Artificial replenishment, or recharge, is recognized by the water districts as one of the most effective methods available for preserving local groundwater supplies, reversing aquifer overdraft and meeting demand by domestic consumers. According to the CVWD web site on Ground Replenishment and Imported Water, local agencies have percolated over 650 billion gallons of water back into the aquifer to date. In the eastern Coachella Valley, Thomas E. Levy Groundwater Replenishment Facility is the primary site for groundwater recharge. This facility operates by recharging water obtained from the Coachella Canal at a capacity of 40,000-acre feet per year (AFY).

Combined with water conservation and efficiency requirements, individual development projects can contribute to groundwater sustainability by implementing the required stormwater runoff retention and infiltration facilities.

The Project's location and setting will not impede any existing or planned groundwater recharge facility, such that it would impede sustainable groundwater management in this manner. The proposed Project aligns with

the local and regional groundwater recharge strategies by implementing on-site retention, infiltration and low impact development improvements as part of the site design. Project's stormwater management design includes a system of on-site retention basins designed to collect and infiltrate storm water runoff resulting from the controlling 100-year event. Based on the preliminary engineering estimates, the proposed underground retention structures will have a combined capacity of approximately 60,524 cubic feet. As such, the entire volume of stormwater runoff generated on-site up to the 100-year event will be percolated onsite, contributing to groundwater recharge.

The Project will connect to existing water lines adjacent to Tyler Lane. No new wells or additional water infrastructure are proposed. The Project will be required to comply with the CWA's water-efficiency requirements, including the use of drought-tolerant planting materials and limited landscaping irrigation. Implementation of these and other applicable requirements will ensure that water-related impacts remain at less than significant levels.

c.i) Less Than Significant Impact. The Project property consists of fallow farmland and a relatively flat terrain absent of any on-site natural drainage features or courses attributed to any stream or river. The Project sites surroundings include man-made drainage controls, including fully improved curb and gutter improvements along its southerly and westerly portions. Runoff resulting from precipitation events would have the propensity to follow the elevation gradient toward the southeast, but no defined drainage paths, depressions, or basins are present. The nearest defined drainage feature to the Project is the engineered Coachella Valley Stormwater Channel (CVSC), located approximately 4,500 feet to the east. This channel accepts urban runoff from developed and undeveloped areas throughout the City of Coachella and other upstream jurisdictions. The CVSC facility is physically and hydrologically separated from the Project site by a system of engineered levees.

As previously mentioned, the proposed conditional use permit does not involve development entitlement or physical improvement on the vacant land that would result in the alteration of any drainage course or stream, such that would raise concerns about erosion or siltation. As a standard condition, future development of the site, whether under the existing or proposed land use policy, would require a proper and thorough review of the existing hydrologic conditions for site planning decisions that avoid drainage alterations. The proposed land use policy change would not preclude future development from undergoing environmental review and implementing the appropriate site design considerations to prevent substantial erosion or siltation impacts.

The proposed Project will be required to comply with the City's storm water retention requirements, including the approval of a project-specific final hydrology study and water quality management plan prior to the issuance of building permits. Implementation of these and other applicable requirements will assure that the Project will not create or contribute water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Approval of the WQMP, SWPPP, and the required BMPs will reduce impacts to surface waters by reducing siltation and eliminating pollutants in storm flows. With the implementation of this standard requirement, the impacts associated with surface water pollution will be less than significant.

c.ii) Less Than Significant Impact. The proposed Project does involve the physical alterations to the existing undeveloped land. Project development on this site is considered under the General Plan designation for Industrial. The portion of impervious cover (buildings, hardscape, pavement) allowable under the development standards of this designation would typically result in a potential increase in surface runoff rates and amounts. Therefore, the Project will be required to implement the appropriate storm drain and retention facilities to prevent controlling the volume and rate of stormwater runoff, as stipulated in Chapter 13.16 of the Coachella Municipal Code (Ordinance #1152). On-site stormwater retention systems of the Project will be adequately sized to protect the proposed buildings and facilities from flooding conditions up to the controlling 100-year storm event. As such, the Project's storm drains and flood control improvements are not expected to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts are anticipated to be less than significant.

c.iii) Less Than Significant Impact. Runoff from the impervious surfaces introduced by the Project will not be directly connected to the municipal stormwater system, such that it would exceed its capacity or introduce

additional sources of runoff pollution. The City is currently in the process of developing its stormwater master plan, which will factor land use projects with and without on-site retention facilities. In complying with the applicable retention requirements, the Project is not expected to interfere with the City's stormwater master planning efforts currently underway. Impacts are anticipated to be less than significant.

c.iv) No Impact. As previously discussed, the Project is absent of any mapped natural drainage courses or designated FEMA zones with flood flow concerns. The site is not situated in an area where flood flows could be impeded, redirected, or increased as a result of the implementation of the proposed Project. However, the Project's storm drain system will meet the local MS4 and City requirements by including the properly sized retention facilities. No impacts are anticipated.

d) No Impact. Flood Insurance Rate Maps (FIRMs) serve as the basis for identifying potential flood hazards. According to FIRM panel 06065C2270H, effective March 6, 2018, the entire Subject Property is located within Zone X, which applies to areas of 0.2 % annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas of less than 1 square mile; and areas protected by levees from 1% annual chance flood. Furthermore, this flood zone is categorized as an area of minimal flood hazard. The Project is not located near any coastal areas and therefore is not prone to tsunami hazards. The Project is not located near any body of water and therefore is not prone to seiche hazards. The Project will be required to design a storm drain system designed to properly capture the site's urban runoff to prevent any risk of uncontrolled pollutant discharge. The proposed Project typically does not host the storage of pollutants, petroleum products, or other hazardous materials in conditions which would be deemed a risk of release in an inundation condition. Therefore, no impacts are anticipated.

e) No Impact. As discussed previously, the Project proponent for future development is required to implement a project-specific Water Quality Management Plan (WQMP) to comply with the most current standards of the Whitewater River Region Water Quality Management Plan for Urban Runoff, Whitewater River Watershed MS4 Permit, and the City of Coachella's Water Quality Control regulations outlined in the Code of Ordinances (Chapter 13.16). The WQMP will incorporate grading, hydrology, and other plans to document the site design, source controls, and treatment controls with a required operation and maintenance program to comply with the hierarchy water quality objectives. Moreover, storm water retention facilities will ensure that urban runoff is recharged into the ground via infiltration. Combined with the required water conservation practices, the Project is expected to contribute to the groundwater sustainability efforts implemented for the Coachella Valley region. No impacts are anticipated.

3.10.4 Cumulative Impacts

None.

3.10.5 Mitigation and Monitoring Measures

None required.

3.11 Land Use and Planning

3.11.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan Update;
- *Municipal Code,* City of Coachella; and
- Land Use Map and Zoning Map*,* City of Coachella.

3.11.2 Environmental Setting

The Project site is governed by the policies and land use designations of the Coachella General Plan and Zoning Ordinance. Currently, the site is designated as Industrial District in the 2035 General Plan Land Use Map and be zoned M-S (Manufacturing Service) on the City's Zoning Map. The surrounding area is comprised of existing RV and Self-Storage facility, industrial storage, and vacant industrial designated land. The City of Coachella participates in the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), as discussed above under Biological Resources. The Project would not impact Land Use and Planning, as discussed below.

3.11.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Land Use and Planning Would the Project				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the General Plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Discussion/Analysis

a) No Impact. The Project site is currently vacant and undeveloped. The site is within an area designated for industrial development and adjacent to industrial uses and vacant industrial designated land. The proposed Project is an extension of the existing RV and Self-Storage facility which is a "permitted use" subject to "Architectural Review." The Project area is partially developed with industrial buildings, industrial parcels including outside storage. There are no residences in the immediate area but there is a residential neighborhood northwest of the Project site. That neighborhood is a "stand alone" community, independently accessed via Tyler Street and not divided by the surrounding industrial uses and vacant land. It is not part of a planned development. The proposed Project will not physically divide an established community and no impacts are anticipated.

b) Less Than Significant Impact The subject site is designated as Industrial District Specific Plan in the City's General Plan Land Use and M-S (Manufacturing Service) on the Zoning Map, respectively. The designations allow for the Project's proposed use as a "Conditional Use," subject to "Architectural Review" and a "Conditional Use Permit." The proposed Project is consistent with existing zoning and land use plans with regard to use, size, and scale. Therefore, the proposed Project will be consistent with adopted plans and programs and less than significant impacts to land use policy are expected.

3.11.4 Cumulative Impacts

None.

3.11.5 Mitigation and Monitoring Measures

None required.

3.12 Mineral Resources

3.12.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035; and
- Final EIR for the City of Coachella 2035 General Plan Update.

3.12.2 Environmental Setting

Riverside County emphasizes the importance of mineral resources and its protection. For this reason, the State Mining and Geology Board (SMGB) listed and prioritized the mineral deposits in Riverside County. These Mineral Resource Zones (MRZ) help identify mineral deposits that need to be protected from encroaching urbanization and land uses incompatible with mining. The SMGB categorized the mineral resources into six zones and identifies designation as having either a regional or a statewide economic significance. The purpose of these designations is to identify those areas that are of prime importance in meeting the future needs of the study region and protect these areas from a land use perspective.

The City's important mineral resources include sand and gravel (known as aggregate). Sand and gravel are an important component of asphalt, concrete, road base, stucco, and plaster, such that 80 percent to 100 percent of these materials can be comprised of aggregate. The City's aggregate mineral resources (sand and gravel) provide necessary materials for the local economy. Mining generally occurs north of the City, in its Sphere of Influence. The majority of City lands have been classified as Mineral Zone MRZ-1 "Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources."

3.12.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Mineral Resources Would the Project				
a) Result in the loss of availability of a known mineral resource in an area classified or designated by the State that would be of value to the region or the residents of the State?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local General Plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion/Analysis

a/b. No Impact. The Project site is designated as Mineral Resource Zone 1 (MRZ-1) by the State Mining and Geology Board. Available geological information indicates that areas within this designated zone have little likelihood of significant mineral resources (Riverside County General Plan 2015). There are no permitted mining operations in the vicinity of the Project site, nor does this area of the City lend itself to mining activities, as described in the General Plan. The Project site is located in an urbanized area designated for mixed use development and is not zoned for mineral resource extraction. No impact is expected.

3.12.4 Cumulative Impacts

None.

3.12.5 Mitigation and Monitoring Measures

The Project was found to have no impact on Mineral Resources. Therefore, no mitigation is required.

3.13 Noise

3.13.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035; and
- Final EIR for the City of Coachella 2035 General Plan Update.

3.13.2 Environmental Setting

Noise is simply defined as “unwanted sound.” Sound becomes unwanted when it interferes with normal activities, causing physical harm or adverse effects on health. Noise is measured on a logarithmic scale of pressure level known as a decibel (dB). An A-weighted decibel (dBA) is an expression of the relative loudness of sounds in air as perceived by the human ear. In the A-weighted system, the decibel values of sounds at low frequencies are reduced compared with unweighted decibels, in which no correction is made for audio frequency. Excessive noise or prolonged exposure to noise can contribute to temporary and permanent impairments, such as hearing loss, fatigue, stress, sleep deprivation, anxiety, and annoyance. Although noise has been accepted as a necessary by-product of urban development, it can become an environmental hazard. A variety of components of the urban environment generate noise; these include construction equipment and activities, motor vehicles, air traffic, mechanical equipment, household appliances, and other sources. Figure 4.10-1 in the Coachella General Plan Update (CGPU) Environmental Impact Report (EIR) outlines common indoor and outdoor noise levels.

The main sources of noise in an urban environment include road traffic, aircraft, railroads, construction, industry, noise in buildings, and consumer products. According to the United States Environmental Protection Agency (US EPA), in any city, the main sources of traffic noise are the motors and exhaust systems of autos, trucks, buses, and motorcycles. Temporary noise sources include landscape maintenance activities, home stereo systems, and barking dogs, and are governed by the provisions of the City Noise Ordinance and Municipal Code.

Noise levels are generally low in agricultural and rural areas, and higher in more urbanized areas. Noise in eastern Coachella Valley is generally related to linear sources, or “noise corridors,” such as roadways and railroads, or to aircraft. Within the General Plan area, principal noise corridors are major roadways such as Highway 111 and Highway 86/86S; Southern Pacific Railroad; Harrison Street and Polk Street; and the Jacqueline Cochran Regional Airport. Other sources of vehicular noise include the local streets in the General Plan area. Transportation noise is concentrated along these roadways and can vary with the volume of traffic, the vehicular speed, the vehicular mix, and the roadway cross-section.

The City of Coachella has established goals, policies, and programs to limit and reduce the effects of noise intrusion on sensitive land uses and to set acceptable noise levels for varying types of land uses. For the General Plan 2035 EIR analysis, ambient noise levels were measured to characterize the variability of noise and to assist in determining constraints and opportunities to avoid noise conflicts. Noise level measurements were taken by RECON Environmental, Inc. at nine locations throughout the City on July 29, 2015. The results of the short-term noise measurements are summarized in Table 4.12-1. The dominant source of noise in Coachella is motor vehicles traveling along regional freeways, major highways, arterials, collector, and local streets. Traffic noise is directly related to the traffic volume, speed, and mix of vehicles. The vehicle type also has a significant effect on traffic noise; for instance, electric vehicles generate much lower noise levels than internal combustion engines. The noisiest roads in Coachella include Hwy 111, approximately 500 feet east of the proposed Project. The existing noise contours from Hwy 111 range between 60 and 70 dBA and do not reach the proposed Project site.

3.13.2 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Noise Would the Project				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

Discussion/Analysis

a) Less Than Significant Impact. The Project site is currently undeveloped. The main noise source is vehicular traffic from nearby roadways (Hwy 111). The nearest sensitive receptors are the residential neighborhood located northwest of the site, which is approximately 400 feet away from the subject property line.

PROJECT IMPACTS

Construction Impacts

Based upon similar projects, modeled unmitigated construction noise levels could reach 71.8 dBA Leq at the existing adjacent industrial property. FTA daytime construction noise levels should not exceed 80 dBA Leq for an 8-hour period at residential uses and 85 dBA Leq for an 8-hour period at commercial uses. However, these requirements do not include industrial land. Therefore, project construction would not be anticipated to exceed the FTA thresholds for either residential or commercial uses. Further, with compliance with the City's Municipal Code, it is assumed that construction would not occur during the noise-sensitive nighttime hours.

Construction noise impacts would be less than significant. Less than significant impacts will be further minimized with adherence to applicable Municipal Ordinances and implementation of the measures presented in addition to adherence to the City of Coachella Municipal Code which limits the construction hours of operation, the following measures are recommended to reduce construction noise and vibrations, emanating from the proposed Project:

1. During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.
2. The contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project site.
3. Equipment shall be shut off and not left to idle when not in use.

4. The contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the Project site during all Project construction.
5. Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from sensitive receptors.
6. The Project proponent shall mandate that the construction contractor prohibit the use of music or sound amplification on the Project site during construction.
7. The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment.

Groundborne Vibration Impacts

Construction equipment is anticipated to be located at a distance of at least 200 feet or more from any receptor. Temporary vibration levels associated with Project construction would be less than significant. Therefore, impacts associated with construction activities would be less than significant. No mitigation is required.

b) Less Than Significant Impact. Ground-borne vibration and/or ground-borne noise would be produced during construction of the proposed Project. The human threshold of perception for vibration is 0.0018 inches/second, and Caltrans set significant thresholds for human annoyance at 0.2 inches/second PPV and 0.3 inches/second PPV for structures. Construction of the proposed Project would not necessitate the use of pile drivers, which are known to generate substantial construction vibration levels. The highest degree of ground-borne vibration would be generated during the paving phase from the operation of a vibratory roller.

Based on Federal Transit Administration (FTA) data, vibration velocities from vibratory roller operations are estimated to be approximately 0.1980 inches/second PPV at 26 feet from the source of activity. Therefore, the vibration levels beyond a 26-feet distance from the construction site would be below the Caltrans threshold for human annoyance and impact on structures. The nearest sensitive receptor is a single-family dwelling located approximately 400 feet northwest of the Project site; therefore, no construction would occur within 26 feet of the dwelling. As such, no structure or people in the Project vicinity would experience levels of groundborne vibration or noise above the Caltrans thresholds. Construction-related impacts will be temporary and only occur during the less sensitive daytime hours. Long-term operation of the Project is not expected to generate groundborne vibrations or noise. Overall, impacts would be less than significant regarding generation of ground-borne vibration and noise.

c) No Impact. The Project is located approximately 1.3 miles from the Jacqueline Cochran Regional Airport and is located outside of the 70, 65, and 60 CNEL noise contours associated with this facility. No impacts are expected relative to the proposed Project.

3.13.4 Cumulative Impacts

None.

3.13.5 Mitigation and Monitoring Measures:

None required.

3.14 Population and Housing

3.14.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan (Interim Final Draft – April 2019);
- Final EIR for the City of Coachella 2035 General Plan Update (March 2019); and

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• E-5, E-8 Population and Housing Estimates prepared by the California Department of Finance; SCAG: Profile of the City of Coachella [2019]).

3.14.2 Environmental Setting

According to the California Department of Finance (DOF), the City of Coachella had a total population of 40,704 people in 2010. Based on the 2020 DOF population and housing estimates, the City of Coachella's current total population is approximately 47,186, which is an approximately 16 percent increase from the City's population in 2010. The City of Coachella's population accounts for approximately 1.9 percent of the County of Riverside's total population of 2,442,304 people (2020). In 2018 the median age in the City of Coachella was 30.8, while the median age in Riverside was 35 (SCAG Local Profiles, Coachella). Additionally, the number of jobs in Coachella in 2017 was 9,785; an approximately 9.2 percent increase in jobs since 2016.

Between 2000 and 2020, according to the DOF Population and Housing Estimates. In 2000, Coachella had 5,024 total households which increased to 10,631 total households by 2020, representing a 111.6 percent increase in 20 years.

The CGPU Environmental Impact Report analyzed future growth under Chapter 4.13, Population and Housing. Figure 4.13-2 in the EIR forecasts a population of 135,000 by year 2035. As of January 2020, the City of Coachella had a population of 47,186 (California Department of Finance). As a result of Project build-out, the future development could add up to approximately 6,110 new residents to the City, for an approximate City population of 53,296. This is an increase of 13 percent and still below the projected 2035 population forecast of 135,000. Although future development would contribute to the growth within the City of Coachella, significant growth to the population, housing and employment is already anticipated in the City's General Plan and EIR.

There are three housing types in the City of Coachella. Total Dwelling Units by Type of Structure, 2000 to 2020, these housing units include single family units, consisting of both detached and attached units; multifamily units, consisting of apartments, duplexes, triplexes, fourplexes, plus; and mobile homes.

In 2020, the City of Coachella had a total of 10,631 total housing units, of which 10,126 units (approximately 95 percent of units), were occupied. Conversely, 505 units, or 5 percent, were registered as vacant in 2020 by the DOF. This vacancy rate may be due to the seasonal, recreational, or occasional use of homes that are popular in the Coachella Valley. The average household size in the City of Coachella is 4.65 persons.

3.14.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Population and Housing Would the Project				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion/Analysis

a) Less Than Significant Impact. Construction of the proposed Project is expected to occur over an eight-month period. Due to the small scale of the Project, construction labor is expected to be derived from the local

work force within the Coachella Valley, with the potential for supplemental workers from the greater Riverside County areas. Project construction is not expected to induce population growth.

During operation, the proposed Project is expected to have up to three employees, which are likely to be existing residents in the City and Coachella Valley. As discussed above, the City is expected to have a total population of 61,000 in 2045. The proposed Project would generate limited employment opportunities in the City and the anticipated population growth will be considerably greater than that needed to supply employees to the facility. The Project will benefit from anticipated population growth and is not expected to induce it.

Furthermore, the Project site is within an area that is fully served by existing infrastructure, public services, and utilities. As a result, development of the Project would not cause potential growth inducing effects by extending utilities into an undeveloped area. The Project will pave and improve existing roadways and connect to existing utility services and will not result in the construction or expansion of new infrastructure. Overall, less than significant impacts are anticipated.

b) No Impact. The subject property is vacant, and the proposed Project would not displace any existing housing or require replacement housing elsewhere. No impact will occur.

3.14.4 Cumulative Impacts

None.

3.14.5 Mitigation and Monitoring Measures

The proposed Project was found to have a less than significant impact on Population and Housing Resources. Therefore, no mitigation is required.

3.15 Public Services

3.15.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035; and
- Final EIR for the City of Coachella 2035 General Plan Update.

3.15.2 Environmental Setting

Fire Protection

The City of Coachella contracts with Riverside County Fire Department (RCFD) for a full range of fire protection services provided 24-hours a day, 7-days a week. The RCFD is staffed with a combination of County and State of California Department of Forestry & Fire Protection employees. They operate 96 fire stations that serve 1,360,000 residents over 6,970 miles of Riverside County. The City of Coachella has one Fire station, Battalion 6, Coachella Fire Station No. 79, located at 1377 6th Street and approximately 1.3 miles from the Project site. Fire Station No. 79 is staffed by 18 full-time personnel, 10 volunteer firefighters, and 10 explorer cadets. Six firefighters are on duty at times. The Station is equipped with two Type 1 fire engines which includes a staff of three people per engine per day.

It is the goal of the RCFD fire service to have the first engine company arrive on the scene within five minutes 90 percent of the time. Response times to emergency calls within the City average approximately four minutes or less 80% of the time.

Police Protection

Law enforcement services are provided to the City of Coachella through a contractual agreement with Riverside County Sheriff's Department. The Sheriff's department provides 24-hour municipal police services associated with a City police department. The Sheriff's station is located at 86-625 Airport Boulevard,

approximately 1.4 miles southeast of the subject property. Per the City's General Plan EIR, the Coachella Police Department has 36 sworn officers and 2 non-sworn, totaling 38 positions. 24 of these positions are dedicated to the patrol division with the remaining deputies dedicated to special assignments such as the Community Action Team, a School Resources Officer, and Gang and Narcotics Enforcement. The Coachella Police Department divides the City into three beats. The Patrol Division of the department covers an area of 30 square miles.

Schools

The Project site falls within the boundary of the Coachella Valley Unified School District (CVUSD). The nearest elementary school is Valley View Elementary School located approximately .75 miles northwest of the Project site, at 85270 Valley Road. Bobby Duke Middle School located at 85358 Bagdad Avenue is the closest secondary school, approximately 1 mile from the Project site. Coachella Valley High School is approximately 2 miles southwest of the Project site.

Parks

The Coachella Valey Recreation and Park District (CVRPD) provide park and recreational services to the City. Per the City of Coachella General Plan EIR (2015), there are seven public parks located within the City of Coachella, totaling approximately 60.3 acres.

3.15.3 Impacts

Public Services Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire Protection?	☐	☐	☒	☐
b) Police Protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☐	☒
e) Other Public Services?	☐	☐	☐	☒

Discussion/Analysis

a) Less Than Significant Impact. Based on proximity to Coachella Fire Station No. 79, located at 1377 6th Street and approximately 1.3 miles from the Project site, the proposed Project would not require new or expanded facilities. Moreover, to ensure adequate emergency fire protection services, the City of Coachella maintains a mutual aid agreement with surrounding City and County jurisdictions. There are three other existing stations that are within proximity of the City. These include Fire Station No. 39, located outside of the City limits at the Jacqueline Cochran Airport in Thermal, Fire Station No. 70 located at Avenue 54 and Madison Street in La Quinta, and Fire Station No. 86, located at Jackson Street and Dr. Carreon Boulevard in Indio. Fire Station 39 is approximately 1.5 miles away from the Project site, Fire Station 70 is approximately 4.3 miles away and Fire Station 86 is approximately 4.9 miles away. Through the Regional Fire Serve System, the City of Coachella received an immediate response from the outlying stations, including personnel and equipment for any major event or multiple events that may occur within the City. The City also participates in a

cost sharing agreement with the Cities of Indio, La Quinta, and Riverside County for the use of the 100' ladder truck located at Fire Station 86 in Indio.

The proposed Project will marginally increase the potential demand for fire services in the City. The Project proponent will be required to pay the City's development impact fees for fire facilities and apparatus and required to annex into the City's Communities Facilities District for Fire Services, which is a special tax used to pay for public services. This fee is designed to allow new development to pay its fair share of future facilities. In accordance with standard City practices, the Fire Department would review Project plans before permits are issued to ensure compliance with all applicable fire and building code standards and to ensure that adequate fire and life safety measures are incorporated into the Project in compliance with all applicable state and city fire safety regulations. Emergency access will be provided to the site via the existing public roadway network, and a continuous driveway through the site will provide access to the building structures.

Because the proposed Project would be required to comply with City standards and the proposed Project is not anticipated to generate substantial additional demand for fire protection services and would not result in the need for new or expanded facilities, the Project's potential impact on fire protection services would be less than significant. The impact would be less than significant.

b) Less Than Significant Impact. Development of the Project site will result in a marginal increase in demand for police services. However, this demand is not expected to hinder the City's ability to provide police services or create demands that would require the construction of a new police station. The Project is located in an urban area, surrounded by existing development that is currently served by the Riverside County Sheriff's Department. The Project will be required to comply with the City's Development Impact Fees in place at the time of construction. These fees on new development allow the City to continue to finance public facilities which goes towards the funding of various public services, including police. It also assists in offsetting impacts by providing enough revenue for necessary emergency service improvements to ensure acceptable police and fire response times, equipment, and personnel are maintained. Future development will be required to annex into the City's Communities Facilities District for Police Services, which is a special tax used to pay for public services. Impacts will be less than significant.

c*)* Less Than Significant Impact. The Project is located within the Coachella Valley United School District (CVUSD). The proposed Project's storage buildings will not generate permanent population and, therefore, will have no impact on schools. The proposed Project will be subject to the CVUSD developer fees in place at the time development occurs, which currently stand at $0.51 per square foot of commercial. Payment of the developer fee would mitigate potential significant impacts to school resources to less than significant levels.

d/e) No Impact The proposed Project's storage buildings and small number of employees is unlikely to induce population growth in the area, therefore, will have no impact on existing local or regional parks or other public facilities. Overall, Project build out is expected to have no impact on local regional parks or other public facilities.

3.15.4 Cumulative Impacts

None.

3.15.5 Mitigation and Monitoring Measures

The Project was found to have no impact on Public Services. Therefore, no mitigation is required.

3.16 Recreation

3.16.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035; and
- Final EIR for the City of Coachella 2035 General Plan Update.

3.16.2 Environmental Setting

Parks and open space provide for the preservation, continued growth and enhancement of Coachella's parklands, recreational areas, and surrounding open spaces. Open spaces are areas intended to remain essentially open with limited or no development. This includes spaces used for passive recreation, resource protection, and/or hazard avoidance. Parks include greenways, developed parks and other areas primarily used for recreation. Typically, these areas are characterized by a high degree of open area and a limited number of buildings. Parks frequently include sports fields, playground equipment, and picnic areas, sitting areas, concession businesses, open turf, natural areas, trails, and public golf courses. The City provides a variety of recreation facilities and currently has eight parks, one tot lot, two community centers, one boxing club and a swimming pool. The parks are funded by the Coachella parks and recreation foundation.

3.16.3 Impacts

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

Discussion/Analysis

a/b) No Impact. The proposed Project is an RV and Self-Storage operation and does not include any residential development. The proposed development will not induce substantial population growth that will result in significant impacts to existing neighborhood and regional parks or other recreational facilities. The proposed Project will not require the construction or expansion of recreational facilities. No impacts are anticipated.

3.16.4 Cumulative Impacts

None.

3.16.5 Mitigation and Monitoring Measures

The Project was found to have no impact on Recreational Resources. Therefore, no mitigation is required.

3.17 Transportation and Traffic

3.17.1 Sources

The following sources were utilized to support the conclusions made in this section:

- Ganddini Group, Transportation Study Screening Assessment, August, 2022; and
- City of Coachella General Plan 2035; and
- Final EIR for the City of Coachella 2035 General Plan Update, Traffic Section.

3.17.2 Environmental Setting

The proposed Project is situated as a vacant internal industrial parcel, not adjacent to any arterial roadway and entirely accessible from existing adjacent connections from both the east and west. From the east, the Project site is accessed from the adjacent existing Sunridge Self-Storage facility located at 53-301 Hwy 111. That facility receives access from one (1) driveway on Hwy 111, approximately 1,400 feet north of Avenue 54. The second and primary access leading directly into the Project is from the existing Tyler Lane cul-de-sac adjacent west. Tyler Lane is reached from Tyler Street to the west, connecting to Hwy 111 to the north and Avenue 54 to the south. The proposed Project is within the City of "Industrial" land use designation, specifically zoned Manufacturing Service (M-S).

The Transportation Study Screening Assessment prepared by the Ganddini Group determined that based upon the low projected trip generation (122 daily trips) from the proposed Project, the proposed project does not warrant the preparation of a transportation impact study with LOS analysis based on the County-established exemptions as adopted by the City of Coachella.

The following analysis evaluated the potential circulation system deficiencies that may result from potential development of the site within the proposed zoning designations. Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Edition, 2012) rates were used to determine trip generation of the proposed project.

Level of Service

Level of Service (LOS) is a measure of transportation system performance based upon the ratio of traffic volume relative to the capacity of the roadway or intersection. The volume-to-capacity ratio (V/C) indicates the overall performance of the roadway segment or intersection and corresponds to a rating of A through F identifying its level of capacity utilization and relative level of congestion. LOS A represents free-flow traffic with little or no delay whereas LOS F represents a breakdown of traffic flow and a high incidence of delay. According to the City of Coachella Traffic Impact Study, the City of Coachella has established LOS D as the acceptable LOS for its intersections. Therefore, any intersection operating at LOS E or F will be considered deficient for the purposes of the analysis.

Vehicle Miles Travelled (VMT)

Vehicle Miles Traveled (VMT) is a measure of the amount of travel for all vehicles in a geographic region over a given period of time, typically a one-year period. The analysis of VMT (SB743) attributable to a project in CEQA went into full effect statewide on July 1, 2020. According to the Governor's office of Planning and Research (OPR) proposed CEQA Guideline Implementing SB 743, projects that decrease vehicle miles traveled in a project area compared to existing conditions should be considered to have a less than significant transportation impact. The California Air Pollution Control Officers Association (CAPCOA) publishes a resource for Local Government to assess emission reductions from GHG Mitigation Measures. The CAPCOA report recognizes that land use planning provides the best opportunity to influence GHG emissions through a reduction in overall VMT.

Goals for reducing GHG have been the primary motivation for the shift to VMT measures. Reductions in VMT produce many other potential benefits such as reductions in other air pollutant emissions, water pollution, wildlife mortality, and traffic congestion, as well as improvements in safety and health and savings in public and private costs.

The City's Climate Action Plan (CAP) includes the following Reduction Target/Goal: Establish a per service population 2020 emissions reduction target of 15% below 2010 levels and a 2035 emissions reduction target of 49% below 2010 levels. The CAP states that the combustion of gasoline and diesel fuels by the transportation sector contributed the largest proportion of emissions in Coachella. Transportation gasoline use resulted in 41% of the community total of GHG emissions in 2010. The CAP further states that lowering transportation emissions requires making vehicles and their fuels cleaner, reducing the length of driving trips, managing the demand for travel, and providing alternatives such as walking, biking, and transit for travel.

According to the National Center for Sustainable Transportation, a number of cities, regions, and states across the United States have begun to deemphasize vehicle delay metrics such as LOS. In their place, policymakers are considering alternative transportation impact metrics that more closely approximate the true environmental impacts of driving. VMT is one metric that is increasingly being utilized.

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TUMF

The Transportation Uniform Mitigation Fee (TUMF) Ordinance became effective July 1, 1989. The TUMF program is a component of the twenty-year Measure A, sales tax program managed by the Coachella Valley Association of Governments (CVAG) and approved by voters in November 1988. In 2002, a thirty-year extension was approved by Riverside County voters and resulted in an expiration date of 2039.

Under the TUMF, developers of residential, industrial, and commercial property pay a development fee to fund transportation projects that will be required as a result of the growth the projects create. TUMF will be required as a Condition of Approval for any future development project.

The City of Coachella implements a Development Impact Fee (DIF.) The proposed Project is located within the City of Coachella and any proposed future development will therefore be subject to the DIF. Eligible facilities for funding the City DIF program are identified on the County of Riverside's Public Needs List.

3.17.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Transportation and Traffic Would the Project				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

Discussion/Analysis

a) Less Than Significant. To analyze the Project's potential impacts, an analysis was conducted to examine the expansion of the existing RV and Self-Storage facility by the Ganddini Group. The analysis was based upon a variety of sources, including the General Plan EIR Traffic Section and the Institute of Transportation Engineers' Trip Generation Manual.

Existing Traffic Conditions in the Project Vicinity

The Project site is currently vacant and generates no traffic. The surrounding main roads include Hwy 111 (operating at acceptable LOS), Tyler Street, and Tyler Lane, local streets which have not been studied. The proposed Project is projected to generate 102 daily trips. This would have no impact on any roadway intersections that would be operating at unacceptable levels of service. Therefore, the proposed Project would result in a less than significant impact on roadways.

Existing Traffic Conditions

The Project site is currently vacant and generates no traffic.

Land Use	ITE LU Code	Quantity	AM Peak Hour Total	PM Peak Hour Total	Daily
Mini-Warehouse (Storage Units)	151	59,624[1] TSF	5	9	86
Mini-Warehouse (RV Parking)	151	0.870 HSU	1	1	16
Total Trips Generated	___	4.85 Acres	6	10	102

Table 9 Project Trip Generation

1 Traffic Study Screening Assessment prepared by Ganddini Group in August, 2022 analyzed a smaller square footage, however, Conclusions remain the same.

Future Traffic Impacts

The Project will result in the construction of 62,979 square foot self-storage units and 71 RV storage spaces for an RV and Self-Storage use. To determine the trip generation by the proposed Project, the ITE land use category 151 was utilized for self-storage and RV units. Based on the analysis results, the site is expected to generate approximately 102 new trips per day with six (6) AM peak hour trips and ten (10) PM peak hour trips (Table 9). The proposed use is consistent with the General Plan designation for the property and would have been considered in the traffic analysis for the General Plan. According to the General Plan EIR, intersections in the vicinity of the Project will operate at acceptable levels (LOS D or better) at General Plan build out. Overall, impacts would be less than significant.

Alternative Transportation

There are currently no bike lanes, transit routes, or other multi-modal facilities within the Project area. SunLine Transit Agency provides bus transit services to the Coachella Valley, including the City Coachella. There are established bus routes to the west and south of the Project area on Van Buren Street and Airport Boulevard. While employees will have limited access to alternative transportation, the impacts are expected to be less than significant.

The proposed project is forecast to generate a total of approximately 102 daily trips, including 6 trips during the AM peak hour and 10 trips during the PM peak hour. According to the Traffic Study Screening Assessment, the proposed project does not warrant the preparation of a transportation impact study with LOS analysis based on the County-established exemptions as adopted by the City of Coachella. The proposed project satisfies the County-established screening criteria for small projects as adopted for use by the City of Coachella impacts to VMT will result in a less than significant VMT impact.

b) No Impact. CEQA Guidelines section 15064.3 sets forth guidelines for implementing Senate Bill 743 (SB 743). SB 743 requires amendments to the CEQA Guidelines (pre-2020) to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (Public Resources Code Section 21099(b)(1).) Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates,

or automobile trips generated." CEQA Guidelines were amended to require all lead agencies to adopt vehicle miles traveled (VMT) as a replacement for automobile delay-based level of service (LOS) for identifying transportation impacts. This statewide mandate went into effect July 1, 2020.

Regulations or thresholds pertaining to VMT and the reduction of GHG emissions have not been adopted by the Coachella. Therefore, the following Project VMT analysis is based on the adopted County of Riverside's Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled (December 2020), which the City utilizes for this analysis.

The Riverside County's VMT Guidelines describe specific screening criteria based on the location/project type that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed project level VMT analysis. A land use project need only meet one of the screening thresholds to result in a less than significant impact:

- Small Projects, which includes General Light Industrial buildings with area less than or equal to 179,000 SF
- Projects Near High Quality Transit
- Low VMT Area

The Project proposes self-storage building uses with a total building area of 62,979 square feet. The proposed storage uses are consistent with the City's General Plan Industrial designation and Manufactured Service zoning designation. Therefore, the Project meets the threshold of Small Projects in the County VMT guidelines and can be determined to have less than significant impact on circulation. The Project will not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

c/d) No Impact. As described above, primary access to the proposed Project will be provided from Tyler Lane via Tyler Street. Secondary access will be provided via the adjacent existing RV and Self-Storage facility via Hwy 111. Regional access to the site will be provided via Hwy 111, I-10 freeway, major arterials, secondary arterials, and a variety of local roads. Prior to construction, both the Fire Department and Police Department will review the site plan to ensure safety measures are addressed, including emergency access and geometric design. As is the case for any roadway design, the City of Coachella should periodically review traffic operations in the vicinity of the project once the Project is constructed to assure that the traffic operations are satisfactory.

Adequate emergency access is generally assured with two proposed points of access; however, the final project site plan, including internal roadway widths and access, should be reviewed by the City of Coachella emergency services provider(s) to ensure adequate emergency access is provided. Therefore, the proposed Project will not result in inadequate emergency access or increase hazards due to a geometric design feature.

3.17.4 Cumulative Impacts

None.

3.17.5 Mitigation and Monitoring Measures

The Project was found to have no impact on Transportation/Traffic. Therefore, no mitigation is required.

3.18 Tribal Cultural Resources

3.18.1 Sources

- City of Coachella General Plan 2035; and
- Final EIR for the City of Coachella 2035 General Plan Update.

3.18.2 Environmental Setting

As discussed in the Cultural Section of this Initial Study, the Coachella Valley is a historical center of Native American settlement, where U.S. surveyors noted large numbers of Indian villages and rancherías, occupied by the Cahuilla people, in the mid-19th century. The Takic-speaking Cahuilla are generally divided by anthropologists into three groups, according to their geographic setting: the Pass Cahuilla of the San Gorgonio Pass-Palm Springs area, the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains and the Cahuilla Valley, and the Desert Cahuilla of the eastern Coachella Valley.

The Cahuilla were primarily hunters and gatherers who exploited nearly all the resources available in a highly developed seasonal mobility system. They were adapted to the arid conditions of the desert floor, the lacustral cycles of Holocene Lake Cahuilla, and the environments of the nearby mountains. When the lake was full, or nearly full, the Cahuilla would take advantage of the resources presented by the body of fresh water. Once the lake had desiccated, they utilized the available terrestrial resources. They also migrated to the higher elevations of the nearby mountains to take advantage of the resources and cooler temperatures available in that environment.

The City of Coachella contains a significant amount of archaeological resources due to its rich cultural history and historical settlements within its boundaries. It was once the site of Native Americans tribal land, and some tribal land still exists there. The Native American population is still present in Coachella. Per Figure 4.4-2 in the Coachella General Plan Update (CGPU) Final Environmental Impact Report (EIR), most of the City is designated as “medium sensitivity to historical resources sensitivity”. This is due to the City’s historical, cultural, and archaeological resources. The proposed Project site occupies approximately 4.85 acres of vacant land previously used for agricultural operations. The site has been graded and disturbed since before 1953, according to historical aerial imagery.

3.18.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Tribal Cultural Resources Would the Project				
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the	☐	☒	☐	☐

significance of the resource to a California Native American tribe.				

Discussion/Analysis

a.i) Less Than Significant Impact with Mitigation Incorporated. As analyzed in Section 3.5,*Cultural Resources,* the Project site is included in areas of Medium Sensitivity for Prehistoric/Ethnohistoric Cultural Resources within the General Plan 2035 EIR. The City of Coachella has an extensive past and present Native American population. The Coachella General Plan 2035 requires the preservation of historic and prehistoric archaeological resources and requires development to implement strategies to protect or reduce impacts on these resources. According to a cultural resources study conducted by Laguna Mountain Environmental, Inc. April 2022, the surrounding area, including the Project site does not contain any resources identified as historically significant by the Riverside County Historical Commission, National Register of Historic Places, California Register of Historical Resources, or the City.

Additionally, as part of the Plan for Tribal Consultation, a further Request for a File Sacred Lands File & Native American Contacts List will file with the California Native American Heritage Commission for the Project site.

The Project site does not contain any tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), as confirmed by the City of Coachella as the lead agency. As previously mentioned, the Project site has been disturbed by grading. However, the lack of surface evidence of archaeological resources does not preclude their subsurface existence. Excavation at the site could extend to 4 feet deep, which could result in uncovering buried resources. During grading, any discovered cultural resources would be qualified as a resource defined under Public Resources Code section 5020.1(k).

Therefore, following implementation of the recommended mitigation measure outlined in the Cultural Resources Section of this Initial Study, if buried archaeological deposits are discovered, Mitigation Measure CUL-MM 1 will require all work to be halted or diverted within 50 feet of the discovery until a qualified archaeologist can evaluate the nature and significance of the find(s). With implementation of Mitigation Measure CUL-MM 1, the Project would have a less than significant impact on listed or eligible historic resources.

a.ii. Less Than Significant Impact with Mitigation Incorporated. Public Resource Code 21074 identifies “Tribal Cultural Resources” as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe” and that are either included or determined to be eligible for inclusion on the national, state, or local register of historic resources, or that are determined by the lead agency, in its discretion, to be significant when taking into consideration the significance of the resource to a California Native American Tribe.

To ensure that all significant Tribal Resources are identified and fully considered, AB 52 Tribal Consultation will be implemented by the City prior to the Project going before the Planning Commission. This includes contacting the California Native American Heritage Commission to identify Local Government Tribal Consultation List Request CEQA Tribal Consultation List (AB 52) and obtaining the City of Coachella list of Tribes on file and preparing the 14-day notification letters including Project description, Project location, and must stating that the tribe has 30 days to request consultation. (PRC, § 21080.3.1(d)). The Lead agency must then begin the consultation process within 30 days of consultation request. (PRC, § 21080.3.1(b)). After conclusion of the Consultation process, the City will make the determination of significance of impacts to tribal cultural resources. The results of the consultation process (if not already included) will also be incorporated into the Tribal Cultural Resources Mitigation Measures.

Based on a review of other Tribal Consultations undertaken recently for similar Projects in the area, as well as other standard Tribal Cultural Resources Mitigation Measures, these measures, including use of Tribal Monitoring can be determined. With the presence of a Cultural Resources Monitor during ground disturbing activities, the compliance with standard environmental/tribal mitigation conditions, and additional coordination with the tribes prior to and during Project construction, the Project will result in less than significant impacts to

tribal cultural resources. These mitigation measures are indicated as **TCR-1** through **TCR-7** and discussed below.

3.18.4 Cumulative Impacts

None.

3.18.5 Mitigation and Monitoring Measures

The following mitigation from Section 3.5, *Cultural Resources*, is required to ensure impacts are less than significant.

CUL-MM 1 Grading Monitoring Program

Additional Mitigation Measures

TCR-MM 1: Tribal Consultation. Prior to the proposed Project going before the Planning Commission, the City will consult with all interested tribes and incorporate all measures deemed necessary to protect TCRs during development of the proposed Project as conditions of approval.

TCR-MM 2: The applicant/developer shall adhere to all mitigation measures and monitoring program requirements mandated by the City of Coachella.

TCR-MM 3: "The Cultural Resource Monitor(s) for this Project shall be approved by Tribal Offices of the Agua Caliente Band of Cahuilla Indians for any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer, requesting Tribal Historic Preservation Office (if requested), and other consulting tribal preservation offices requesting same."

TCR-MM 4: If requested, the applicant/developer shall provide tribe(s) which have initiated formal consultation under AB 52 the following:

- Cultural resources inventory of the Project area (by a qualified archaeologist) prior to any development activities in the area.
- Copy of the records search with associated survey reports and site records from the information center.
- Copies of any cultural resource documentation (report and site records) generated in connection with this Project.

TCR-MM 5: Prior to grading and permit issuance, if there are any changes to Project site design and/or proposed grades, the Applicant shall contact the consulting tribes to provide an electronic copy of the revised plans for reviewed. Additional consultation shall occur between the City of Coachella, Applicant, and consulting tribes to discuss the proposed changes and to review any new impacts and/or potential avoidance/preservation of the cultural resources on the Project. The applicant will make all attempts to avoid and/or preserve in place as many as possible of the cultural resources located on the Project site if the site design and/or proposed grades should be revised in consultation with the City of Coachella. In specific circumstances where existing and/or unable to be preserved in place despite all feasible alternatives, the developer shall make every effort to relocate the resources to a nearby open space or designated location on the property that is not subject to any future development, erosion, or flooding.

TCR-MM 6: The City and the consulting tribe(s) shall develop an archaeological monitoring plan to address details, timing, and responsibilities of all archaeological activities that will occur at the Project site, when it is determined by either the City or the consulting tribe(s) to be necessary. Details of the plan may include:

a) Project grading and development scheduling;

b) The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground disturbing activities on the site including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists;
c) The protocols and stipulations that the Developer, City of Coachella, the consulting tribes, and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation; and
d) Archaeological Monitoring Plan shall take into account the potential impacts to undiscovered buried archaeological and cultural resources and procedures to protect in place and/or mitigate such impacts.

TCR-MM 7: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources, items of cultural patrimony, or Tribal Cultural Resources are inadvertently discovered during the course of grading for this Project.

a) Temporary Curation and Storage: During the course of construction, all discovered resources shall be curated onsite, and a Conex be onsite with the keys to be secured by the tribal cultural resources monitor and archaeologist. If not, feasible artifacts shall be curated at the Tribal Historic preservation Office.

b) Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Coachella with evidence of same:

    i. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation.

    ii. A curation agreement with an appropriately qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation:

    iii. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Agua Caliente Cultural Museum.

3.19.5 Level of Significance after Mitigation

With implementation of Mitigation Measures CUL-MM 1 and TCR-MM 1-7, the proposed Project would have a less than significant impact on Tribal Cultural Resources.

3.19 Utilities and Service Systems

3.19.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General Plan 2035); and
- Final EIR for the City of Coachella 2035 General Plan Update.

3.19.2 Environmental Setting

Domestic Water

The Project site is located within the Coachella Water Authority (CWA) service area for domestic water. CWA's primary sources of water supply include groundwater produced by local potable water supply wells. Water supplies for the City of Coachella are primarily from the lower aquifer in the Lower Whitewater River Subbasin. Because the Whitewater River Basin is an un-adjudicated basin, CWA does not hold specific water rights, but rather pumps supplies from the aquifer as needed to meet demands within its service area. The Coachella Water Authority (CWA) provides over 8,000 municipal water service connections and over 2,128 million gallons (MG) of water to customers in their service area.

CWA's existing water system consists of different pressure zones, groundwater wells, storage reservoirs, booster pumping stations, and distribution facilities. Groundwater is pumped from six wells within the City's distribution system. The total capacity of active wells is approximately 11,400 gallons per minute (gpm). CWA has three storage reservoirs within the City with a total reservoir capacity of approximately 10.5 MG. CWA's distribution system network consists of approximately 120 miles of pipeline, which ranges from 4-inches to 36-inches in diameter.

Wastewater

Wastewater services are provided to the City by Coachella Sanitary District. The City of Coachella's sewer system consists of approximately 90 mils of sanitary sewers that collect local flows generated from the City's residential, commercia, and industrial areas and discharge to the City's Avenue 54 wastewater treatment plant (WWTP) with a capacity of 4.5 million gallons per day (MGD).

Floodplain Management

In the City of Coachella, local drainage facilities generally convey runoff from local streets and lots to the regional facilities. The local storm drain system consists of gutters, engineered storm drains, and channels. There are limited existing storm drainage facilities in the City. Regional drainage is managed by the Coachella Valley Water District, which maintains the Coachella Valley Stormwater Channel and the White Water Evacuation Channel.

Solid Waste

Residential and commercial areas in the City of Coachella are served by Burrtec Waste and Recycling Services. Residential garbage and recyclables are collected on a weekly basis. For commercial areas, more than one service per week is available. Trash is taken to the Coachella/Coachella Valley Waste Transfer Station in Coachella. That transfer station currently has a permitted maximum tonnage of 1,100 tons per day (tpd) of solid waste and a maximum capacity of 12,685 cubic yards per day. The facility can receive agricultural, construction and demolition, green material, industrial, inert, metal, mixed municipal, and tire wastes. Once waste enters the Coachella/Coachella Valley Waste Transfer Station, it enters the Riverside County waste stream, is sorted, and sent to one of the Riverside County landfills (Badlands, Blythe, Desert Center, El Sobrante, Lamb Canyon, Mecca Landfill II, and Oasis), which have a remaining combined capacity of 181,783,284 cubic yards.

Electricity

The Project will provide local connections to the existing IID infrastructure in the Project area. The Project will not require the addition or expansion of electric power facilities.

Natural Gas

The Project will provide local connections to the existing SoCalGas infrastructure in the Project area. The Project will not require the addition or expansion of natural gas facilities.

Telecommunications

The Project will provide local connections to the existing Frontier Communications infrastructure in the Project area. The Project will not require the addition or expansion of telecommunication facilities.

3.19.3 Impacts

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

Discussion/Analysis

a/b) Less Than Significant Impact. The Project site is located within Coachella Sanitary District's (CSD) service area. The proposed RV and Self-Storage use has minimal requirements for water and thus wastewater discharge. Additionally, the Project site is immediately adjacent to existing facilities. The proposed Project will be required to comply with all requirements of the City of Coachella relating to sewer system connection. The applicant will be required to pay sewer connection fees at the rate set by the District which serves to offset. The proposed Project will be required to comply with all rules, regulations, and other requirements of Coachella Water Authority (CWA) and CSD in order to provide water and sewer services to the site. Treatment of the additional residential effluent from the Project is anticipated to be routine and would not exceed the wastewater treatment requirements of the RWQCB. Anticipated Impacts will be less than significant.

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b) Less Than Significant Impact. The proposed Project involves the use of existing facilities for the purpose of an event facility and therefore there would be no new requirements to connect to existing City water and wastewater infrastructure to provide the necessary construction and domestic water/sewer needs for the Project. Anticipated Impacts will be less than significant.

c) No Impact. Storm water drainage infrastructure within the City consists of a network of natural and improved streams, storm drains, storm channels, and catch basins intended to manage stormwater that flows into Whitewater Storm Water Channel. Existing drainage onsite runs in a northwest-to-southeastern fashion. Future onsite drainage improvements must include the installation of a series of catch basin/inlets and storm drain piping that will collect and convey the site runoff to a proposed underground retention storage facility. No impacts are anticipated.

d) No Impact. Coachella Water Authority (CWA) will provide domestic water services to the proposed Project. Implementation of this Project will result in the consumption of additional amounts of water through domestic usage at the office. The Coachella Valley, as a region, has experienced groundwater overdraft in recent years. Typically, the water agencies require new projects to apply water conservation practices to the maximum extent practical including water efficient plumbing fixtures which comply with Title 20, California Administrative Code, Section 1604(f), the installation of drought tolerant plants in landscaped areas and the use of reclaimed water for irrigation when available. No impacts are anticipated.

e) No Impact. The Coachella Sanitary Division WWTP has a capacity of 4.9 MGD after the completion of its Phase 2 expansion in 2012. The WWTP currently treats approximately 2.9 mgd of wastewater, resulting in an available capacity of approximately 2 mgd. The Coachella WWTP implements all requirements of the Regional Water Quality Control Board (RWQCB), State Water Resource Control Board and City of Coachella 2015 Sewer System Master Plan pertaining to water quality and wastewater discharge. No impacts are anticipated.

f) Less than Significant Impact. As discussed above, Burrtec Waste and Recycling Services (Burrtec) provide solid waste services to the City of Coachella. Solid waste generated by the City is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at one of county's landfills. County landfills have a combined remaining capacity of 181,783,284 cubic yards, with a maximum permitted capacity of 266,159,998 cubic yard. The Project will generate 55.35 tons of solid waste per year as shown below. Impacts are anticipated to be less than significant.

Proposed Land Use	CIWMB Disposal Rates	Proposed	Solid Waste Disposal (pounds per day)	Solid Waste Disposal (tons per year)
Commercial	0.0024 tons/sf/year	53,900 sq ft	607	129.36
Total	.		(with 50% diversion)	**64.68**

Table 10 – Estimated Solid Waste Disposal at Project Buildout

g) No Impact. The project will be required to comply with all applicable federal, state, and local statutes and regulations related to solid waste. The Project will not impact any statutes or regulations that relate to solid waste compliance because the solid waste generated by the Project will be collected and recycled as required the City's Source Reduction and Recycling Element. No impacts are anticipated.

h) No Impact. There are no other public utilities associated with or potentially impacted by the Project. All public utilities are immediately adjacent to the proposed Project site and no new facilities will be required. No impacts will apply.

3.19.4 Cumulative Impacts

None.

3.17.5 Mitigation and Monitoring Measures

The Project was found to have no impact on Utilities/Services. Therefore, no mitigation is required.

3.20 Wildfire

3.20.1 Sources

The following sources were utilized to support the conclusions made in this section:

- City of Coachella General 2040; and
- Final EIR for the City of Coachella 2035 General Plan Update.

3.20.2 Environmental Setting

Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. A wildland-urban interface is an area where urban development is located in proximity to open space or "wildland" areas. The potential for wildland fires represents a hazard where development is adjacent to open space or within close proximity to wildland fuels or designated fire severity zones. The California Department of Forestry and Fire Protection (Cal Fire) has mapped areas of significant fire hazards in the state through its Fire and Resources Assessment Program (FRAP). The City of Coachella is not affected by wildfires and risk is generally considered "moderate" throughout the City.

3.20.3 Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wildfire If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion/Analysis

a) No Impact. The primary emergency evacuation routes in the City include Interstate 10, State Route 86, Highway 111, Harrison Street, and Jackson Street. The Project site is located behind Hwy 111, which provides access in an emergency. Development on the subject property would not substantially impair the City's

adopted emergency evacuation and response plans as the Project is not proposing to amend these routes to impede emergency evacuation. No impact is anticipated.

b/c) No Impact. The Project area is not located within a wildfire hazard severity zone nor a wildland-urban interface (WUI). The Project is located in an urban environment, and miles from an area of wildland fire potential. Urban roadways exist surrounding the Project, and no new wildfire risk infrastructure will be required. No impact is anticipated.

d) No Impact. The Project site is located on the valley floor where there is no potential for flooding, landslide, or post-fire slope instability. Therefore, the proposed Project would not expose people or structures to significant risks such as downslope or downstream flooding or landslides, post-fire slope instability, or drainage changes. No impact is anticipated.

3.20.4 Cumulative Impacts

None.

3.20.5 Mitigation and Monitoring Measures

The Project was found to have no impact on Wildfire. Therefore, no mitigation is required.

3.21 Mandatory Findings of Significance

3.21.1 Sources

All sources previously listed were used to support the conclusions made in this section.

3.21.2 Environmental Setting

The environmental setting for the Project site is summarized within Sections 3.1 through 3.20 of the Initial Study for each environmental issue.

3.21.3 Impacts

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

will cause substantial adverse effects on human beings, either directly or indirectly?				

Discussion/Analysis

a) Less Than Significant Impact with Mitigation Incorporated. As concluded in the Biological, Cultural Resources, Geotechnical and Tribal Cultural Resource sections of this Initial Study, the Project would result in no impacts or less than significant impacts with mitigation to these resources. The Project is compatible with the City of Coachella Zoning and its surroundings. The Project will not significantly degrade the overall quality of the region's environment, or substantially reduce the habitat if a wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California History or pre-history. Based upon the information and mitigation measures provided within this Initial Study and the independent studies for previously prepared Biological and Cultural Resources in the area that were analyzed, approval and implementation of the Project is not expected to substantially alter or degrade the quality of the environment, including biological, cultural or historical resources.

Overall, there will be no significant environmental impacts which cannot be mitigated. Project related impacts, including cumulative impacts, are considered less than significant. Following the mitigation measures outlined in the Biological, Cultural Resources, Geotechnical, and Tribal Cultural Resource sections less than significant impacts are expected.

b) Less Than Significant Impact. A significant impact could occur if the proposed Project, in conjunction with related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. Here, however, the impacts of the proposed Project are individually limited and not cumulatively considerable. The proposed Project is consistent with the development envisioned for this area of the City in the City's General Plan. All environmental impacts that could occur as a result of the proposed Project would be less than significant with the implementation of mitigation measures included herein, and when viewed in conjunction with other closely related past, present, or reasonably foreseeable future projects, would not be significant.

c) Less Than Significant. The proposed Project will not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly, with the implementation of the City's Municipal Code, other standard requirements and requirements of law, and the mitigation measures included in this document.

3.21.4 Mitigation and Monitoring Measures

See Biological, Cultural Resources, Geotechnical and Tribal Cultural Resource sections.

Chapter 4 References

Aesthetics

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Agriculture and Forestry Resources

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Air Quality

- California Emissions Estimator Model (CalEEMod) Version 2022.4.0 (Appendix B);
- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Biological Resources

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;
- "Biological Resources Survey Report," Vincent N. Scheidt Biological Consultant 2022;

Cultural Resources

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;
- Cultural Resources Survey, Laguna Mountain Environmental, Inc. April, 2022.

Energy

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Geology and Soils

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;
- Geotechnical Investigation AAA Storage Facility, Sladden Engineering, March, 2022

Greenhouse Gas Emissions

- California Emissions Estimator Model (CalEEMod) Version 2022.4.0 (Appendix B);
- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Hazards and Hazardous Materials

- California Emissions Estimator Model (CalEEMod) Version 2022.4.0 (Appendix B);
- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Pl
- *Phase I Environmental Site Assessment AAA Storage"*, Coachella, CA 92201 Coachella Valley Engineers, November, 2021.

Hydrology and Water Quality

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Land Use and Planning

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Mineral Resources

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Noise

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Population and Housing

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;
- *Municipal Code,* City of Coachella;
- E-5 Population and Housing Estimates prepared by the California Department of Finance;
- E-8 Historical Population and Housing Estimates prepared by the California Department of Finance;

SCAG: Profile of the City of Coachella [2019])

Public Services

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Recreation

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Transportation and Traffic

- Ganddini Group, Traffic Study Screening Assessment, 2022;
- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Tribal Cultural Resources

- Brian F. Smith and Associates, Inc., *PHASE I CULTURAL RESOURCES ASSESSMENT FOR THE*
- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Utilities and Services

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Wildfire

- City of Coachella General Plan 2035;
- Final EIR for the City of Coachella 2035 General Plan;

Appendices

Appendix A Mitigation & Monitoring Program

Appendix B California Emissions Estimator Model (CalEEMod) Version 2022.4.0

MITIGATION MONITORING AND REPORTING PROGRAM AAA RV & SELF-STORAGE AR

The following mitigation measures must be implemented for this project in order to mitigate environmental impacts to a less than significant level. The responsible party must sign and date this form where provided when each measure is completed. A fully executed form fulfills the City's monitoring requirements under Public Resources Code Section 21081.6.

Mitigation Measures	Responsible Party	Timing of Compliance	Impact After Mitigation
3.4 Biological Resources			
BIO-MM 1 Restrictions on Site Clearing In order to avoid impacts to potential wildlife nursery sites, standard seasonal restrictions on clearing and grading should be implemented. Therefore, site brushing, grading, and/or the removal of vegetation within 300 feet of any potential migratory songbird nesting location, including nesting locations for ground-nesting birds, should not be permitted during the spring/summer migratory songbird breeding season, defined as from 15 February to 31 August of each year. This is required in order to ensure compliance with the Sections 3503, 3503.5, 3511, and 3513 of the California Fish and Game Code and the federal Migratory Bird Treaty Act. Limiting activities to the non-breeding season will minimize chances for the incidental take of migratory songbirds or raptors. Should it be necessary to conduct brushing, grading, or other site activities during the songbird breeding season, a preconstruction nesting survey of all areas affected by the proposed activity should be required. The results of the survey should be provided in a report to the Director of the City of Coachella Planning Department, for concurrence with the report's conclusions and recommendations. **BIO-MM 2 CVMSHCP Local Development Mitigation Fee** The project applicant shall pay CVMSHCP Local Development Mitigation fees as established and implemented by the City of Coachella Development Services Department. The CPI for the Riverside-San Bernardino-Ontario metropolitan area rose by 2.1% for calendar year 2020. The LDMF based on the size of the Project is thus $31,075. This is based on a categorization of Commercial/Industrial and a fee of $6,215 per acre as of 1 July 2021. Mitigation Monitoring: **BIO-MM A** Prior to the issuance of any permit to allow ground disturbance on the site, the project applicant to: 1. Conduct ground clearing activities outside of the songbird breeding season; or 2. Conduct a preconstruction nesting survey of the site.	Project applicant, Project Biologist, Planning Department, Building Department.	Prior to the issuance of a grading permit	Less than significant.

BIO-MM B Prior to the issuance of any permit to allow ground disturbance on the site, the project applicant shall pay CVMSHCP Local Development Mitigation fees as established and implemented by the City of Coachella Development Services Department.			
3.5 Cultural Resources			
CUL-MM 1 Grading Monitoring Program For monitoring of the Sunridge Self-Storage Project (formerly AAA Storage of Coachella, LLC) during ground-disturbing activities, if buried archaeological deposits are discovered, Mitigation Measure CUL-MM 1 will require all work to be halted or diverted within 50 feet of the discovery until a qualified archaeologist can evaluate the nature and significance of the find(s). <u>Grading Monitoring Program</u> A Grading Monitoring Program to mitigate potential impacts to undiscovered buried archaeological resources within the Self-Storage and RV Storage Project shall be implemented to the satisfaction of the lead agency. This program shall include, but not be limited to, the following actions: 1) Prior to issuance of a grading permit, the applicant shall provide written verification that a certified archaeologist has been retained to implement the monitoring program. This verification shall be presented in a letter from the project archaeologist to the lead agency. 2) The certified archaeologist/historian shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program. 3) During the original cutting of previously undisturbed deposits, the archaeological monitor(s) shall be on-site full time to perform periodic inspections of the excavations. The frequency of inspections will depend on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. 4) Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed. 5) In the event that previously unidentified cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground-disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the lead agency at the time of discovery. The archaeologist, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared	Project Planning Department Public Works Department	1) Prior to the issuance of a grading permit 2) During ground disturbing activities	Less than significant.

by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods. If any human bones are discovered, the County coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the most likely descendant, as identified by the NAHC, shall be contacted in order to determine proper treatment and deposition of the remains. 6) Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered via a "non-invasive" analysis on artifacts discovered. The Tribal resources Monitor is to concur with the archaeological monitor's determination of the amount of material to be recovered for an adequate artifact sample for analysis. 7) All cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation. 8) A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms. **CUL-2 MM**: If Human Remains Found If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant". The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.	Project Applicant, Planning Department, City Engineer	Prior to the issuance of a grading permit	Less than significant
Mitigation Monitoring: **CUL MM-A**: Prior to the issuance of a grading permit for the site, the applicant shall provide a fully executed monitoring agreement to the City **CUL MM-B**: Within 30 days of the completion of ground	Project Applicant, Project Archaeologist Tribal Monitor	Within 30 days of the completion of ground disturbing activities on the project site	Less than significant

disturbing activities on the project site, a report of findings shall be filed with the City. The report will summarize the methods and results of the monitoring program, including an itemized inventory and a detailed analysis of recovered artifacts, upon completion of the field and laboratory work. The report should include an interpretation of the cultural activities represented by the artifacts and a discussion of the significance of all archaeological finds. **CUL MM-C**: Monitoring: Monitoring shall be required if human remains are found pursuant to California Public Resources Code Section 5097.98.	Planning Department,		
3.18 Tribal Cultural Resources **TCR-MM 1 Tribal Consultation** Prior to the proposed Project going before the Planning Commission, the City will implement the Plan for AB 52 Tribal Consultation was prepared for the Project and will consult with all interested tribes and incorporate all measures deemed necessary to protect TCRs during development of the proposed Project as conditions of approval. **TCR-MM 2:** The applicant/developer shall adhere to all mitigation measures and monitoring program requirements mandated by the City of Coachella.	Planning Department Consulting Tribes	Prior to Planning Commission Hearing	Less than significant
TCR-MM 3: The Cultural Resource Monitor(s) for this Project shall be approved by Tribal Offices of the Agua Caliente Band of Cahuilla Indians for any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer, requesting Tribal Historic Preservation Office (if requested), and other consulting tribal preservation offices requesting same."	Planning Department Tribal Monitor	Prior to Planning Commission Hearing	Less than significant
TCR-MM 4: If requested, the City shall provide tribe(s) which have initiated formal consultation under AB 52 the following: - Cultural resources inventory of the project area (by a qualified archaeologist) prior to any development activities in the area. - Copy of the records search with associated survey reports and site records from the information center. - Copies of any cultural resource documentation (report and site records) generation in connection with this project.	Planning Department Consulting Tribes	Prior to Planning Commission Hearing	Less than significant
TCR-MM 5: Prior to grading and permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant shall contact the consulting tribes to provide and electronic copy of the revised plans for	Planning Department	Prior to issuance of grading	Less than significant

reviewed. Additional consultation shall occur between the City of Coachella, Applicant, and consulting tribes to discuss the proposed changes and to review any new impacts and/or potential avoidance/preservation of the cultural resources on the project. The applicant will make all attempts to avoid and/or preserve in place as many as possible of the cultural resources located on the project site if the site design and/or proposed grades should be revised in consult with the City of Coachella. In specific circumstances where existing and/or unable to be preserved in place despite all feasible alternatives, the developer shall make every effort to relocate the resources to a nearby open space or designated location on the property that is not subject to any future development, erosion or flooding.	Consulting Tribes	permits, during grading and other ground disturbing activities	
TCR-MM 6: The City and the consulting tribe(s) shall develop an archaeological monitoring plan to address details, timing and responsibilities of all archaeological activities that will occur at the project site, when it is determined by either the city or the consulting tribe(s) to be necessary. Details of the plan may include: a) Project grading and development scheduling; b) The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists; c) The protocols and stipulations that the Developer, City of Coachella, the consulting tribes and project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation; d) Archaeological Monitoring Plan shall take into account the potential impacts to undiscovered buried archaeological and cultural resources and procedures to protect in place and/or mitigate such impacts.	Planning Department Consulting Tribes	Prior to issuance of grading permits, during grading and other ground disturbing activities	Less than significant
TCR-MM 7: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources, items of cultural patrimony, or Tribal Cultural Resources are inadvertently discovered during the course of grading for this project. a) Temporary Curation and Storage: During the course of construction, all discovered resources shall be curated onsite, and a Conex be onsite with the keys to be secured by the tribal cultural resources monitor and archaeologist. If not feasible artifacts shall be curated at the Tribal Historic preservation Office. b) Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural	Planning Department Consulting Tribes	Prior to issuance of grading permits, during grading and other ground disturbing activities	Less than significant

resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Coachella with evidence of same: i. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; ii. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation: iii. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Agua Caliente Cultural Museum.			
See **CUL-MM 1 Grading Monitoring Program** (Above)	Planning Department	1) Prior to the issuance of a grading permit 2) During ground disturbing activities	Less than significant

Sunridge RV & Storage Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Sunridge RV & Storage
Lead Agency	City of Coachella
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.00
Precipitation (days)	8.80
Location	33.6601824045305, -116.16065575460337
County	Riverside-Salton Sea
City	Coachella
Air District	South Coast AQMD
Air Basin	Salton Sea
TAZ	5667
EDFZ	19
Electric Utility	Imperial Irrigation District
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	53.0	1000sqft	1.22	53,000	—	—	—	—
Parking Lot	39.0	1000sqft	0.90	0.00	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-3	Use Local Construction Contractors
Construction	C-4*	Use Local and Sustainable Building Materials
Construction	C-12	Sweep Paved Roads
Energy	E-7*	Require Higher Efficacy Public Street and Area Lighting
Energy	E-15	Require All-Electric Development
Water	W-7	Adopt a Water Conservation Strategy
Waste	S-1/S-2	Implement Waste Reduction Plan
Area Sources	AS-2	Use Low-VOC Paints

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.18	50.4	17.6	18.3	0.03	0.83	7.21	8.05	0.77	3.46	4.22	—	2,833	2,833	0.11	0.07	2.15	2,857
Mit.	2.18	50.4	17.6	18.3	0.03	0.83	7.21	8.05	0.77	3.46	4.22	—	2,833	2,833	0.11	0.07	2.15	2,857
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.79	1.50	12.2	13.6	0.03	0.51	0.37	0.87	0.47	0.09	0.56	—	2,780	2,780	0.11	0.07	0.06	2,803

Mit.	1.79	1.50	12.2	13.6	0.03	0.51	0.37	0.87	0.47	0.09	0.56	—	2,780	2,780	0.11	0.07	0.06	2,803
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.97	1.63	6.81	7.62	0.01	0.29	0.30	0.59	0.27	0.10	0.37	—	1,467	1,467	0.06	0.03	0.44	1,479
Mit.	0.97	1.63	6.81	7.62	0.01	0.29	0.30	0.59	0.27	0.10	0.37	—	1,467	1,467	0.06	0.03	0.44	1,479
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.18	0.30	1.24	1.39	< 0.005	0.05	0.06	0.11	0.05	0.02	0.07	—	243	243	0.01	0.01	0.07	245
Mit.	0.18	0.30	1.24	1.39	< 0.005	0.05	0.06	0.11	0.05	0.02	0.07	—	243	243	0.01	0.01	0.07	245
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	2.18	1.84	17.6	18.3	0.03	0.83	7.21	8.05	0.77	3.46	4.22	—	2,833	2,833	0.11	0.07	2.15	2,857
2024	0.98	50.4	6.53	9.81	0.01	0.31	0.20	0.51	0.29	0.05	0.33	—	1,472	1,472	0.06	0.02	0.85	1,479
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	1.79	1.50	12.2	13.6	0.03	0.51	0.37	0.87	0.47	0.09	0.56	—	2,780	2,780	0.11	0.07	0.06	2,803
2024	1.70	1.42	11.7	13.4	0.03	0.46	0.37	0.83	0.42	0.09	0.51	—	2,768	2,768	0.11	0.07	0.05	2,791

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.97	0.82	6.81	7.62	0.01	0.29	0.30	0.59	0.27	0.10	0.37	—	1,467	1,467	0.06	0.03	0.44	1,479
2024	0.30	1.63	2.03	2.44	< 0.005	0.08	0.06	0.15	0.08	0.02	0.09	—	482	482	0.02	0.01	0.15	486
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.18	0.15	1.24	1.39	< 0.005	0.05	0.06	0.11	0.05	0.02	0.07	—	243	243	0.01	0.01	0.07	245
2024	0.05	0.30	0.37	0.45	< 0.005	0.01	0.01	0.03	0.01	< 0.005	0.02	—	79.7	79.7	< 0.005	< 0.005	0.02	80.4

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	2.18	1.84	17.6	18.3	0.03	0.83	7.21	8.05	0.77	3.46	4.22	—	2,833	2,833	0.11	0.07	2.15	2,857
2024	0.98	50.4	6.53	9.81	0.01	0.31	0.20	0.51	0.29	0.05	0.33	—	1,472	1,472	0.06	0.02	0.85	1,479
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	1.79	1.50	12.2	13.6	0.03	0.51	0.37	0.87	0.47	0.09	0.56	—	2,780	2,780	0.11	0.07	0.06	2,803
2024	1.70	1.42	11.7	13.4	0.03	0.46	0.37	0.83	0.42	0.09	0.51	—	2,768	2,768	0.11	0.07	0.05	2,791
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.97	0.82	6.81	7.62	0.01	0.29	0.30	0.59	0.27	0.10	0.37	—	1,467	1,467	0.06	0.03	0.44	1,479
2024	0.30	1.63	2.03	2.44	< 0.005	0.08	0.06	0.15	0.08	0.02	0.09	—	482	482	0.02	0.01	0.15	486
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.18	0.15	1.24	1.39	< 0.005	0.05	0.06	0.11	0.05	0.02	0.07	—	243	243	0.01	0.01	0.07	245
2024	0.05	0.30	0.37	0.45	< 0.005	0.01	0.01	0.03	0.01	< 0.005	0.02	—	79.7	79.7	< 0.005	< 0.005	0.02	80.4

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.90	2.08	0.74	7.11	0.01	0.03	0.31	0.35	0.03	0.06	0.09	50.3	2,233	2,284	5.22	0.11	1,416	3,864
Mit.	0.90	2.06	0.74	7.11	0.01	0.03	0.31	0.35	0.03	0.06	0.09	13.3	2,164	2,178	1.45	0.06	1,416	3,647
% Reduced	—	1%	—	—	—	—	—	—	—	—	—	74%	3%	5%	72%	50%	—	6%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.40	1.62	0.77	3.27	0.01	0.03	0.31	0.34	0.03	0.06	0.08	50.3	2,106	2,156	5.22	0.11	1,413	3,733
Mit.	0.40	1.60	0.77	3.27	0.01	0.03	0.31	0.34	0.03	0.06	0.08	13.3	2,037	2,050	1.45	0.06	1,413	3,516
% Reduced	—	1%	—	—	—	—	—	—	—	—	—	74%	3%	5%	72%	49%	—	6%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.62	1.83	0.75	4.87	0.01	0.03	0.31	0.34	0.03	0.06	0.08	50.3	2,157	2,207	5.22	0.11	1,414	3,785
Mit.	0.62	1.81	0.75	4.87	0.01	0.03	0.31	0.34	0.03	0.06	0.08	13.3	2,088	2,101	1.45	0.06	1,414	3,569
% Reduced	—	1%	—	—	—	—	—	—	—	—	—	74%	3%	5%	72%	49%	—	6%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.11	0.33	0.14	0.89	< 0.005	0.01	0.06	0.06	0.01	0.01	0.02	8.33	357	365	0.86	0.02	234	627
Mit.	0.11	0.33	0.14	0.89	< 0.005	0.01	0.06	0.06	0.01	0.01	0.02	2.19	346	348	0.24	0.01	234	591
% Reduced	—	1%	—	—	—	—	—	—	—	—	—	74%	3%	5%	72%	49%	—	6%

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.46	0.42	0.45	4.58	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	1,041	1,041	0.04	0.05	3.76	1,059
Area	0.41	1.65	0.02	2.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.48	9.48	< 0.005	< 0.005	—	9.51
Energy	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,110	1,110	0.09	0.01	—	1,115
Water	—	—	—	—	—	—	—	—	—	—	—	23.5	72.6	96.1	2.41	0.06	—	174
Waste	—	—	—	—	—	—	—	—	—	—	—	26.8	0.00	26.8	2.68	0.00	—	93.9
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Total	0.90	2.08	0.74	7.11	0.01	0.03	0.31	0.35	0.03	0.06	0.09	50.3	2,233	2,284	5.22	0.11	1,416	3,864
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.37	0.33	0.49	3.04	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	923	923	0.04	0.05	0.10	938
Area	—	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,110	1,110	0.09	0.01	—	1,115
Water	—	—	—	—	—	—	—	—	—	—	—	23.5	72.6	96.1	2.41	0.06	—	174
Waste	—	—	—	—	—	—	—	—	—	—	—	26.8	0.00	26.8	2.68	0.00	—	93.9
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Total	0.40	1.62	0.77	3.27	0.01	0.03	0.31	0.34	0.03	0.06	0.08	50.3	2,106	2,156	5.22	0.11	1,413	3,733
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.39	0.35	0.47	3.51	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	969	969	0.04	0.05	1.62	986
Area	0.20	1.46	0.01	1.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.67	4.67	< 0.005	< 0.005	—	4.69
Energy	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,110	1,110	0.09	0.01	—	1,115
Water	—	—	—	—	—	—	—	—	—	—	—	23.5	72.6	96.1	2.41	0.06	—	174

Waste	—	—	—	—	—	—	—	—	—	—	—	26.8	0.00	26.8	2.68	0.00	—	93.9
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Total	0.62	1.83	0.75	4.87	0.01	0.03	0.31	0.34	0.03	0.06	0.08	50.3	2,157	2,207	5.22	0.11	1,414	3,785
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.07	0.06	0.09	0.64	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.01	—	161	161	0.01	0.01	0.27	163
Area	0.04	0.27	< 0.005	0.21	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.77	0.77	< 0.005	< 0.005	—	0.78
Energy	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	184	184	0.01	< 0.005	—	185
Water	—	—	—	—	—	—	—	—	—	—	—	3.89	12.0	15.9	0.40	0.01	—	28.8
Waste	—	—	—	—	—	—	—	—	—	—	—	4.45	0.00	4.45	0.44	0.00	—	15.6
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234
Total	0.11	0.33	0.14	0.89	< 0.005	0.01	0.06	0.06	0.01	0.01	0.02	8.33	357	365	0.86	0.02	234	627

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.46	0.42	0.45	4.58	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	1,041	1,041	0.04	0.05	3.76	1,059
Area	0.41	1.63	0.02	2.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.48	9.48	< 0.005	< 0.005	—	9.51
Energy	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,110	1,110	0.09	0.01	—	1,115
Water	—	—	—	—	—	—	—	—	—	—	—	1.17	3.63	4.81	0.12	< 0.005	—	8.68
Waste	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.3
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Total	0.90	2.06	0.74	7.11	0.01	0.03	0.31	0.35	0.03	0.06	0.09	13.3	2,164	2,178	1.45	0.06	1,416	3,647
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.37	0.33	0.49	3.04	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	923	923	0.04	0.05	0.10	938

Area	—	1.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,110	1,110	0.09	0.01	—	1,115
Water	—	—	—	—	—	—	—	—	—	—	—	1.17	3.63	4.81	0.12	< 0.005	—	8.68
Waste	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.3
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Total	0.40	1.60	0.77	3.27	0.01	0.03	0.31	0.34	0.03	0.06	0.08	13.3	2,037	2,050	1.45	0.06	1,413	3,516
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.39	0.35	0.47	3.51	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	969	969	0.04	0.05	1.62	986
Area	0.20	1.44	0.01	1.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.67	4.67	< 0.005	< 0.005	—	4.69
Energy	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,110	1,110	0.09	0.01	—	1,115
Water	—	—	—	—	—	—	—	—	—	—	—	1.17	3.63	4.81	0.12	< 0.005	—	8.68
Waste	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.3
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Total	0.62	1.81	0.75	4.87	0.01	0.03	0.31	0.34	0.03	0.06	0.08	13.3	2,088	2,101	1.45	0.06	1,414	3,569
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.07	0.06	0.09	0.64	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.01	—	161	161	0.01	0.01	0.27	163
Area	0.04	0.26	< 0.005	0.21	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.77	0.77	< 0.005	< 0.005	—	0.78
Energy	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	184	184	0.01	< 0.005	—	185
Water	—	—	—	—	—	—	—	—	—	—	—	0.19	0.60	0.80	0.02	< 0.005	—	1.44
Waste	—	—	—	—	—	—	—	—	—	—	—	2.00	0.00	2.00	0.20	0.00	—	7.00
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234
Total	0.11	0.33	0.14	0.89	< 0.005	0.01	0.06	0.06	0.01	0.01	0.02	2.19	346	348	0.24	0.01	234	591

3. Construction Emissions Details

3.1. Demolition (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.07	1.74	17.0	16.9	0.02	0.76	—	0.76	0.70	—	0.70	—	2,494	2,494	0.10	0.02	—	2,502
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.10	0.93	0.93	< 0.005	0.04	—	0.04	0.04	—	0.04	—	137	137	0.01	< 0.005	—	137
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.17	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	22.6	22.6	< 0.005	< 0.005	—	22.7
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.08	0.07	0.08	1.42	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	195	195	0.01	0.01	0.78	198
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.71	9.71	< 0.005	< 0.005	0.02	9.84
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.61	1.61	< 0.005	< 0.005	< 0.005	1.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Demolition (2023) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.07	1.74	17.0	16.9	0.02	0.76	—	0.76	0.70	—	0.70	—	2,494	2,494	0.10	0.02	—	2,502
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.10	0.93	0.93	< 0.005	0.04	—	0.04	0.04	—	0.04	—	137	137	0.01	< 0.005	—	137
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.17	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	22.6	22.6	< 0.005	< 0.005	—	22.7
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.08	1.42	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	195	195	0.01	0.01	0.78	198
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.71	9.71	< 0.005	< 0.005	0.02	9.84
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.61	1.61	< 0.005	< 0.005	< 0.005	1.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.63	1.37	13.7	11.6	0.03	0.60	—	0.60	0.55	—	0.55	—	2,716	2,716	0.11	0.02	—	2,725
Dust From Material Movement	—	—	—	—	—	—	1.59	1.59	—	0.17	0.17	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.11	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.3	22.3	< 0.005	< 0.005	—	22.4
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.70	3.70	< 0.005	< 0.005	—	3.71
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.05	0.85	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	117	117	< 0.005	< 0.005	0.47	119
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.87	0.87	< 0.005	< 0.005	< 0.005	0.89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.14	0.14	< 0.005	< 0.005	< 0.005	0.15
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Site Preparation (2023) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.63	1.37	13.7	11.6	0.03	0.60	—	0.60	0.55	—	0.55	—	2,716	2,716	0.11	0.02	—	2,725
Dust From Material Movement	—	—	—	—	—	—	1.59	1.59	—	0.17	0.17	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.11	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.3	22.3	< 0.005	< 0.005	—	22.4
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.70	3.70	< 0.005	< 0.005	—	3.71
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.05	0.85	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	117	117	< 0.005	< 0.005	0.47	119
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.87	0.87	< 0.005	< 0.005	< 0.005	0.89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.14	0.14	< 0.005	< 0.005	< 0.005	0.15
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.12	1.78	17.5	16.3	0.02	0.83	—	0.83	0.77	—	0.77	—	2,453	2,453	0.10	0.02	—	2,462

Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.29	0.27	< 0.005	0.01	—	0.01	0.01	—	0.01	—	40.3	40.3	< 0.005	< 0.005	—	40.5
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.68	6.68	< 0.005	< 0.005	—	6.70
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	1.13	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	156	156	0.01	< 0.005	0.62	158
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.33	2.33	< 0.005	< 0.005	< 0.005	2.36
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.39	0.39	< 0.005	< 0.005	< 0.005	0.39
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Grading (2023) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.12	1.78	17.5	16.3	0.02	0.83	—	0.83	0.77	—	0.77	—	2,453	2,453	0.10	0.02	—	2,462
Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.29	0.27	< 0.005	0.01	—	0.01	0.01	—	0.01	—	40.3	40.3	< 0.005	< 0.005	—	40.5
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.68	6.68	< 0.005	< 0.005	—	6.70
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	1.13	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	156	156	0.01	< 0.005	0.62	158
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.33	2.33	< 0.005	< 0.005	< 0.005	2.36
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.39	0.39	< 0.005	< 0.005	< 0.005	0.39
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.66	1.38	11.7	12.0	0.02	0.50	—	0.50	0.46	—	0.46	—	2,201	2,201	0.09	0.02	—	2,209
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.66	1.38	11.7	12.0	0.02	0.50	—	0.50	0.46	—	0.46	—	2,201	2,201	0.09	0.02	—	2,209
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.74	0.62	5.25	5.39	0.01	0.23	—	0.23	0.21	—	0.21	—	986	986	0.04	0.01	—	990
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.14	0.11	0.96	0.98	< 0.005	0.04	—	0.04	0.04	—	0.04	—	163	163	0.01	< 0.005	—	164
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.13	0.14	2.52	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	347	347	0.01	0.01	1.39	352
Vendor	0.02	0.01	0.32	0.15	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	—	284	284	< 0.005	0.04	0.76	296
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.11	0.16	1.44	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	295	295	0.01	0.01	0.04	299
Vendor	0.02	0.01	0.35	0.15	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	—	284	284	< 0.005	0.04	0.02	296
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.06	0.80	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	141	141	0.01	< 0.005	0.27	143
Vendor	0.01	< 0.005	0.15	0.07	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	127	127	< 0.005	0.02	0.15	132
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.15	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	23.4	23.4	< 0.005	< 0.005	0.04	23.7
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21.0	21.0	< 0.005	< 0.005	0.02	21.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2023) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.66	1.38	11.7	12.0	0.02	0.50	—	0.50	0.46	—	0.46	—	2,201	2,201	0.09	0.02	—	2,209
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.66	1.38	11.7	12.0	0.02	0.50	—	0.50	0.46	—	0.46	—	2,201	2,201	0.09	0.02	—	2,209
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.74	0.62	5.25	5.39	0.01	0.23	—	0.23	0.21	—	0.21	—	986	986	0.04	0.01	—	990
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.96	0.98	< 0.005	0.04	—	0.04	0.04	—	0.04	—	163	163	0.01	< 0.005	—	164
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.13	0.14	2.52	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	347	347	0.01	0.01	1.39	352
Vendor	0.02	0.01	0.32	0.15	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	—	284	284	< 0.005	0.04	0.76	296
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.11	0.16	1.44	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	295	295	0.01	0.01	0.04	299
Vendor	0.02	0.01	0.35	0.15	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	—	284	284	< 0.005	0.04	0.02	296
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.06	0.80	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	141	141	0.01	< 0.005	0.27	143
Vendor	0.01	< 0.005	0.15	0.07	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	127	127	< 0.005	0.02	0.15	132
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.15	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	23.4	23.4	< 0.005	< 0.005	0.04	23.7
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21.0	21.0	< 0.005	< 0.005	0.02	21.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.58	1.32	11.2	11.9	0.02	0.46	—	0.46	0.42	—	0.42	—	2,201	2,201	0.09	0.02	—	2,209
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.25	0.21	1.76	1.87	< 0.005	0.07	—	0.07	0.07	—	0.07	—	345	345	0.01	< 0.005	—	346
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.32	0.34	< 0.005	0.01	—	0.01	0.01	—	0.01	—	57.1	57.1	< 0.005	< 0.005	—	57.2
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.09	0.14	1.31	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	287	287	0.01	0.01	0.03	291
Vendor	0.01	0.01	0.33	0.14	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	—	280	280	< 0.005	0.04	0.02	292
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.26	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	48.1	48.1	< 0.005	< 0.005	0.09	48.8
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	43.8	43.8	< 0.005	0.01	0.05	45.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.96	7.96	< 0.005	< 0.005	0.01	8.07
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.25	7.25	< 0.005	< 0.005	0.01	7.56
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Building Construction (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.58	1.32	11.2	11.9	0.02	0.46	—	0.46	0.42	—	0.42	—	2,201	2,201	0.09	0.02	—	2,209
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.25	0.21	1.76	1.87	< 0.005	0.07	—	0.07	0.07	—	0.07	—	345	345	0.01	< 0.005	—	346
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.32	0.34	< 0.005	0.01	—	0.01	0.01	—	0.01	—	57.1	57.1	< 0.005	< 0.005	—	57.2
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.11	0.09	0.14	1.31	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	287	287	0.01	0.01	0.03	291
Vendor	0.01	0.01	0.33	0.14	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	—	280	280	< 0.005	0.04	0.02	292
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.26	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	48.1	48.1	< 0.005	< 0.005	0.09	48.8
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	43.8	43.8	< 0.005	0.01	0.05	45.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.96	7.96	< 0.005	< 0.005	0.01	8.07
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.25	7.25	< 0.005	< 0.005	0.01	7.56
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.89	0.75	6.44	8.26	0.01	0.31	—	0.31	0.29	—	0.29	—	1,244	1,244	0.05	0.01	—	1,248
Paving	—	0.23	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.89	0.75	6.44	8.26	0.01	0.31	—	0.31	0.29	—	0.29	—	1,244	1,244	0.05	0.01	—	1,248

Paving	—	0.23	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.18	0.23	< 0.005	0.01	—	0.01	0.01	—	0.01	—	34.1	34.1	< 0.005	< 0.005	—	34.2
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.64	5.64	< 0.005	< 0.005	—	5.66
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.09	1.55	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	228	228	0.01	0.01	0.85	231
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.06	0.09	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	194	194	0.01	0.01	0.02	196
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.67	5.67	< 0.005	< 0.005	0.01	5.75

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.94	0.94	< 0.005	< 0.005	< 0.005	0.95
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Paving (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.89	0.75	6.44	8.26	0.01	0.31	—	0.31	0.29	—	0.29	—	1,244	1,244	0.05	0.01	—	1,248
Paving	—	0.23	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.89	0.75	6.44	8.26	0.01	0.31	—	0.31	0.29	—	0.29	—	1,244	1,244	0.05	0.01	—	1,248
Paving	—	0.23	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.18	0.23	< 0.005	0.01	—	0.01	0.01	—	0.01	—	34.1	34.1	< 0.005	< 0.005	—	34.2

Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.64	5.64	< 0.005	< 0.005	—	5.66
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.09	1.55	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	228	228	0.01	0.01	0.85	231
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.06	0.09	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	194	194	0.01	0.01	0.02	196
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.67	5.67	< 0.005	< 0.005	0.01	5.75
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.94	0.94	< 0.005	< 0.005	< 0.005	0.95
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	50.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.66	3.66	< 0.005	< 0.005	—	3.67
Architectural Coatings	—	1.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.61	0.61	< 0.005	< 0.005	—	0.61

Architectural Coatings	—	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.03	0.46	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	67.6	67.6	< 0.005	< 0.005	0.25	68.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.68	1.68	< 0.005	< 0.005	< 0.005	1.71
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.28
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Architectural Coating (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	50.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.66	3.66	< 0.005	< 0.005	—	3.67
Architectural Coatings	—	1.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.61	0.61	< 0.005	< 0.005	—	0.61
Architectural Coatings	—	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.03	0.46	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	67.6	67.6	< 0.005	< 0.005	0.25	68.6

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.68	1.68	< 0.005	< 0.005	< 0.005	1.71
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.28
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.46	0.42	0.45	4.58	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	1,041	1,041	0.04	0.05	3.76	1,059

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.46	0.42	0.45	4.58	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	1,041	1,041	0.04	0.05	3.76	1,059
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.37	0.33	0.49	3.04	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	923	923	0.04	0.05	0.10	938
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.37	0.33	0.49	3.04	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	923	923	0.04	0.05	0.10	938
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.07	0.06	0.09	0.64	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.01	—	161	161	0.01	0.01	0.27	163
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.07	0.06	0.09	0.64	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.01	—	161	161	0.01	0.01	0.27	163

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No	0.46	0.42	0.45	4.58	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	1,041	1,041	0.04	0.05	3.76	1,059
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.46	0.42	0.45	4.58	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	1,041	1,041	0.04	0.05	3.76	1,059
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.37	0.33	0.49	3.04	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	923	923	0.04	0.05	0.10	938
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.37	0.33	0.49	3.04	0.01	0.01	0.31	0.32	0.01	0.06	0.06	—	923	923	0.04	0.05	0.10	938
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.07	0.06	0.09	0.64	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.01	—	161	161	0.01	0.01	0.27	163
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.07	0.06	0.09	0.64	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.01	—	161	161	0.01	0.01	0.27	163

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	743	743	0.05	0.01	—	747
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	42.7	42.7	< 0.005	< 0.005	—	42.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	786	786	0.06	0.01	—	790
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	743	743	0.05	0.01	—	747
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	42.7	42.7	< 0.005	< 0.005	—	42.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	786	786	0.06	0.01	—	790
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	123	123	0.01	< 0.005	—	124
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.07	7.07	< 0.005	< 0.005	—	7.11
Total	—	—	—	—	—	—	—	—	—	—	—	—	130	130	0.01	< 0.005	—	131

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	743	743	0.05	0.01	—	747
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	42.7	42.7	< 0.005	< 0.005	—	42.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	786	786	0.06	0.01	—	790
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	743	743	0.05	0.01	—	747
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	42.7	42.7	< 0.005	< 0.005	—	42.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	786	786	0.06	0.01	—	790
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	123	123	0.01	< 0.005	—	124
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.07	7.07	< 0.005	< 0.005	—	7.11
Total	—	—	—	—	—	—	—	—	—	—	—	—	130	130	0.01	< 0.005	—	131

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	324	324	0.03	< 0.005	—	325
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	324	324	0.03	< 0.005	—	325
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	324	324	0.03	< 0.005	—	325
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	324	324	0.03	< 0.005	—	325
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	53.7	53.7	< 0.005	< 0.005	—	53.8
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Total	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	53.7	53.7	< 0.005	< 0.005	—	53.8

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	324	324	0.03	< 0.005	—	325
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	324	324	0.03	< 0.005	—	325
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	324	324	0.03	< 0.005	—	325
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	—	324	324	0.03	< 0.005	—	325
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	53.7	53.7	< 0.005	< 0.005	—	53.8

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	53.7	53.7	< 0.005	< 0.005	—	53.8

4.3. Area Emissions by Source

4.3.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	1.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.41	0.38	0.02	2.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.48	9.48	< 0.005	< 0.005	—	9.51
Total	0.41	1.65	0.02	2.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.48	9.48	< 0.005	< 0.005	—	9.51
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	1.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.04	0.03	< 0.005	0.21	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.77	0.77	< 0.005	< 0.005	—	0.78
Total	0.04	0.27	< 0.005	0.21	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.77	0.77	< 0.005	< 0.005	—	0.78

4.3.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	1.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.41	0.38	0.02	2.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.48	9.48	< 0.005	< 0.005	—	9.51
Total	0.41	1.63	0.02	2.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.48	9.48	< 0.005	< 0.005	—	9.51
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer	—	1.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	1.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.04	0.03	< 0.005	0.21	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.77	0.77	< 0.005	< 0.005	—	0.78
Total	0.04	0.26	< 0.005	0.21	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.77	0.77	< 0.005	< 0.005	—	0.78

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	23.5	72.6	96.1	2.41	0.06	—	174

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	23.5	72.6	96.1	2.41	0.06	—	174
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	23.5	72.6	96.1	2.41	0.06	—	174
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	23.5	72.6	96.1	2.41	0.06	—	174
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	3.89	12.0	15.9	0.40	0.01	—	28.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.89	12.0	15.9	0.40	0.01	—	28.8

4.4.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No	—	—	—	—	—	—	—	—	—	—	—	1.17	3.63	4.81	0.12	< 0.005	—	8.68
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	1.17	3.63	4.81	0.12	< 0.005	—	8.68
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	1.17	3.63	4.81	0.12	< 0.005	—	8.68
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	1.17	3.63	4.81	0.12	< 0.005	—	8.68
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.19	0.60	0.80	0.02	< 0.005	—	1.44
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.19	0.60	0.80	0.02	< 0.005	—	1.44

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	26.8	0.00	26.8	2.68	0.00	—	93.9
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	26.8	0.00	26.8	2.68	0.00	—	93.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	26.8	0.00	26.8	2.68	0.00	—	93.9
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	26.8	0.00	26.8	2.68	0.00	—	93.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	4.45	0.00	4.45	0.44	0.00	—	15.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.45	0.00	4.45	0.44	0.00	—	15.6

4.5.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.00	0.00	2.00	0.20	0.00	—	7.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.00	0.00	2.00	0.20	0.00	—	7.00

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,412	1,412
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	4/4/2023	5/2/2023	5.00	20.0	—
Site Preparation	Site Preparation	5/3/2023	5/7/2023	5.00	3.00	—
Grading	Grading	5/8/2023	5/16/2023	5.00	6.00	—
Building Construction	Building Construction	5/17/2023	3/20/2024	5.00	220	—

Paving	Paving	3/21/2024	4/4/2024	5.00	10.0	—
Architectural Coating	Architectural Coating	4/5/2024	4/19/2024	5.00	10.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Scrapers	Diesel	Average	1.00	8.00	423	0.48
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	7.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36

Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Scrapers	Diesel	Average	1.00	8.00	423	0.48
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29
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Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36

Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.5	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	22.3	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	8.69	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT

Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	4.45	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.5	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT

Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	22.3	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	8.69	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	4.45	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	79,500	26,500	2,340

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	—
Site Preparation	—	—	4.50	0.00	—
Grading	—	—	6.00	0.00	—
Paving	0.00	0.00	0.00	0.00	0.90

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	0.90	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2023	0.00	457	0.03	< 0.005
2024	0.00	457	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year

Unrefrigerated Warehouse-No Rail	92.2	92.2	92.2	33,660	1,137	1,137	1,137	414,921
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Unrefrigerated Warehouse-No Rail	92.2	92.2	92.2	33,660	1,137	1,137	1,137	414,921
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	79,500	26,500	2,340

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	594,364	457	0.0330	0.0040	1,011,573
Parking Lot	34,164	457	0.0330	0.0040	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	594,364	457	0.0330	0.0040	1,011,573
Parking Lot	34,164	457	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	12,256,250	0.00
Parking Lot	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	612,813	0.00
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	49.8	0.00
Parking Lot	0.00	0.00

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	22.4	0.00
Parking Lot	0.00	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Unrefrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced

Unrefrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	23.2	annual days of extreme heat
Extreme Precipitation	0.40	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.06	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	88.7
AQ-PM	8.80
AQ-DPM	53.3

Drinking Water	18.1
Lead Risk Housing	34.9
Pesticides	46.9
Toxic Releases	6.19
Traffic	10.4
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	65.3
Haz Waste Facilities/Generators	92.9
Impaired Water Bodies	77.3
Solid Waste	59.2
Sensitive Population	—
Asthma	54.3
Cardio-vascular	75.6
Low Birth Weights	45.1
Socioeconomic Factor Indicators	—
Education	88.2
Housing	98.0
Linguistic	99.9
Poverty	91.1
Unemployment	98.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	10.03464648

Employed	28.69241627
Median HI	10.22712691
Education	—
Bachelor's or higher	4.824842808
High school enrollment	8.135506224
Preschool enrollment	7.198768125
Transportation	—
Auto Access	63.41588605
Active commuting	6.544334659
Social	—
2-parent households	91.89015783
Voting	11.48466573
Neighborhood	—
Alcohol availability	73.0784037
Park access	19.64583601
Retail density	18.06749647
Supermarket access	15.03913769
Tree canopy	3.528807905
Housing	—
Homeownership	78.22404722
Housing habitability	29.87296292
Low-inc homeowner severe housing cost burden	7.891697677
Low-inc renter severe housing cost burden	24.79147953
Uncrowded housing	18.95290645
Health Outcomes	—
Insured adults	2.887206467
Arthritis	0.0

Asthma ER Admissions	54.4
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	47.0
Cognitively Disabled	74.6
Physically Disabled	57.4
Heart Attack ER Admissions	55.4
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	7.3
Elderly	97.6
English Speaking	7.1

Foreign-born	91.0
Outdoor Workers	2.5
Climate Change Adaptive Capacity	—
Impervious Surface Cover	68.8
Traffic Density	17.7
Traffic Access	23.0
Other Indices	—
Hardship	92.5
Other Decision Support	—
2016 Voting	20.7

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	76.0
Healthy Places Index Score for Project Location (b)	9.00
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	EasternCoachellaValley

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

Measure Title	Co-Benefits Achieved
CE-3: Post a Clear, Visible Enforcement and Complaint Sign	—

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Operations: Water and Waste Water	Minimal water usage

Staff Response to Comments

AGUA CALIENTE BAND OF CAHUILLA INDIANS
TRIBAL HISTORIC PRESERVATION

03-017-2023-004

July 24, 2023

[VIA EMAIL TO:amoreno@coachella.org]
City of Coachella
Adrian Moreno
53990 Enterprise Way
Coachella, CA 92236

Re: AB 52 Consultation CUP 369, AR 23-06, Variance 23-02, EA 23-05

Dear Adrian Moreno,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the CUP 369, AR 23-06, Variance 23-02, EA 23-05 project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area.A records check of the ACBCI registry indicates this area has not been surveyed for cultural resources. In consultation, the ACBCI THPO requests the following:

*Formal government to government consultion under California Assembly Bill No. 52 (AB-52).

*Copies of any cultural resource documentation (report and site records) generated in connection with this project.

*A cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area.

*A copy of the records search with associated survey reports and site records from the information center.

*A map that clearly delineates the project area.

*The presence of an approved Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer.

*The presence of an archaeologist that meets the Secretary of Interior's standards during any ground disturbing activities.

5401 DINAH SHORE DRIVE, PALM SPRINGS, CA 92264
T 760/699/6800 F 760/699/6924 WWW.AGUACALIENTE-NSN.GOV

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 883-1134. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Claritsa Duarte
Cultural Resources Analyst
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION

03-017-2023-004

October 02, 2023

[VIA EMAIL TO:amoreno@coachella.org]
City of Coachella
Adrian Moreno
53990 Enterprise Way
Coachella, CA 92236

Re: RE: AB 52 Consultation CUP 369, AR 23-06, Variance 23-02, EA 23-05

Dear Adrian Moreno,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the CUP 369, AR 23-06, Variance 23-02, EA 23-05 project. We have reviewed the documents and have the following comments:

*The presence of an approved Agua Caliente Native American Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.

*Please provide our office with updates or a status report of the project as it progresses. Also, please inform our office if there are changes to the scope of this project.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 883-1137. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Luz Salazar
Cultural Resources Analyst
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

STAFF RESPONSE

From: Adrian Moreno
Sent: October 02 23 8:43 AM
To: 'cduarte@aguacaliente.net'
Cc: 'Kline, Anthony (TRBL)'; 'THPO Consulting'
Subject: RE: AB 52 Consultation CUP 369, AR 23-06, Variance 23-02, EA 23-05

Hello Claritsa,

I am following up on the below email. If possible, please let me know if the Initial Study revisions address those comments discussed during tribal consultation by the end of **today, Monday, Oct 2, 2023.**

Adrian Moreno | **Associate Planner**
City of Coachella ◦ Development Services Department
53990 Enterprise Way ◦ Coachella, CA 92236
Phone: 760-398-3502 Ext: 118
Email: amoreno@coachella.org

Office Hours: Monday - Thursday 7:00 AM to 6:00 PM
Closed Fridays
Website | Map

From: Adrian Moreno
Sent: September 25 23 4:11 PM
To: 'cduarte@aguacaliente.net' <cduarte@aguacaliente.net>
Cc: 'Kline, Anthony (TRBL)' <akline@aguacaliente.net>; 'THPO Consulting' <ACBCI-THPO@aguacaliente.net>
Subject: RE: AB 52 Consultation CUP 369, AR 23-06, Variance 23-02, EA 23-05

Hello Claritsa,

I am following-up on the tribal consultation meeting between the City of Coachella and Agua Caliente Band of Cahuilla Indians on Thursday, August 10, 2023, regarding CUP 369, AR 23-06, Variance 23-02, EA 23-05 – Sunridge Self Storage project.

At this meeting the Tribe had comments regarding the Initial Study. Attached to this email is the original initial study presented during the tribal consultation meeting for this project, and attached is the cultural resources survey study. During the meeting, the tribe requested the records search from the EIC, highlighted in the attached Cultural Resources Survey Report are those records search results.

I sent through a separate email the updated Initial Study that addresses the Agua Caliente Tribe's comments discussed during the tribal consultation meeting.

If possible, please let me know if the Initial Study revisions address those comments discussed during tribal consultation by **Monday, Oct 2, 2023.** Please reach out if you have any questions

Thanks,

Adrian Moreno | **Associate Planner**
City of Coachella ◦ Development Services Department
53990 Enterprise Way ◦ Coachella, CA 92236
Phone: 760-398-3502 Ext: 118
Email: amoreno@coachella.org

Office Hours: Monday - Thursday 7:00 AM to 6:00 PM
Closed Fridays
Website | Map

From: Adrian Moreno
Sent: August 08 23 1:34 PM
To: 'Kline, Anthony (TRBL)' <akline@aguacaliente.net>; THPO Consulting <ACBCI-THPO@aguacaliente.net>
Cc: 'cduarte@aguacaliente.net' <cduarte@aguacaliente.net>
Subject: RE: AB 52 Consultation CUP 369, AR 23-06, Variance 23-02, EA 23-05

Hello Tribal Historic Preservation Office,

Attached for your review is the site plan, Initial Study, and Cultural Resources Survey Report prepared for the Sunridge Self Storage project at the City of Coachella. I am looking forward to the government to government consultation meeting for this project scheduled for **Thursday, August 10, 2023 at 3pm**. Let me know if you would like me to provide any more information on the project.

Project:
Self Storage CUP 369, AR 23-06, Variance 23-02, EA 23-05, for the construction of a mini storage warehouse and recreational vehicle storage of a parcel of land (APN: 763-141-018 on 4.85 acres) located at the end of Tyler Lane, north of Avenue 54, west of Grapefruit Boulevard, and east of Tyler St.

Thanks,
Adrian Moreno
Associate Planner| City of Coachella
53390 Enterprise Way
Coachella CA, 92236
Office: 760-398-3502

From: Kline, Anthony (TRBL) <akline@aguacaliente.net>
Sent: August 01 23 4:49 PM

To: THPO Consulting <ACBCI-THPO@aguacaliente.net>
Cc: Adrian Moreno <amoreno@coachella.org>
Subject: RE: AB 52 Consultation CUP 369, AR 23-06, Variance 23-02, EA 23-05

Hello Adrian,

Thanks for reaching out to ACBCI-THPO. It looks like our best time to meet you will be **Tuesday August 8th 3:30PM-5:00PM.**

Warm regards,

Anthony Kline
Admin Coordinator THPO
akline@aguacaliente.net
C: (760) 413-5836 | D: (760) 883-1139
5401 Dinah Shore Drive, Palm Springs, CA 92264

From: THPO Consulting
Sent: Tuesday, August 1, 2023 4:46 PM
To: Kline, Anthony (TRBL) <akline@aguacaliente.net>
Subject: FW: AB 52 Consultation CUP 369, AR 23-06, Variance 23-02, EA 23-05

From: Adrian Moreno <amoreno@coachella.org>
Sent: Tuesday, August 1, 2023 4:44 PM
To: THPO Consulting <ACBCI-THPO@aguacaliente.net>; Duarte, Claritsa (TRBL) <cduarte@aguacaliente.net>
Cc: Gabriel Perez <gperez@coachella.org>
Subject: FW: AB 52 Consultation CUP 369, AR 23-06, Variance 23-02, EA 23-05

Hello Tribal Historic Preservation Office,

The City of Coachella would like to set up a meeting for the formal government to government consultation requested for the Sunridge Self Storage CUP 369, AR 23-06, Variance 23-02, EA 23-05, for the construction of a mini storage warehouse and recreational vehicle storage of a parcel of land (APN: 763-141-018 on 4.85 acres) located at the end of Tyler Lane, north of

Avenue 54, west of Grapefruit Boulevard, and east of Tyler St. The project involves environmental review and preparation of an Initial Study by the applicant.

Please let me know what time works best for you.
Thursday, August 3rd, 9am-12pm, 3:30pm-5pm
Tuesday, August 8th, 8am-12pm, 3:30pm - 5pm

Let me know if you would prefer a separate date and time.

Thanks,
Adrian Moreno
Associate Planner| City of Coachella
53390 Enterprise Way
Coachella CA, 92236
Office: 760-398-3502

-----Original Message-----
From: Adrian Moreno
Sent: July 24 23 5:40 PM
To: 'THPO Consulting' ; 'cduarte@aguacaliente.net'
Cc: Gabriel Perez
Subject: FW: AB 52 Consultation CUP 369, AR 23-06, Variance 23-02, EA 23-05

Hello Tribal Historic Preservation Office,

The City of Coachella would like to set up a meeting for the formal government to government consultation requested for the Sunridge Self Storage CUP 369, AR 23-06, Variance 23-02, EA 23-05, for the construction of a mini storage warehouse and recreational vehicle storage of a parcel of land (APN: 763-141-018 on 4.85 acres) located at the end of Tyler Lane, north of Avenue 54, west of Grapefruit Boulevard, and east of Tyler St. The project involves environmental review and preparation of an Initial Study by the applicant.

Please let me know what time works best for you. The City is available to meet on:
Tuesday, August 1st 2pm-5pm
Wednesday, August 2nd from 8am-11pm, 1-3pm

Let me know if you would prefer a separate date and time. I can set up the zoom or Microsoft Teams meeting. Let me know what you would prefer.

Thanks,
Adrian Moreno
Associate Planner| City of Coachella
53390 Enterprise Way
Coachella CA, 92236
Office: 760-398-3502

-----Original Message-----
From: THPO Consulting
Sent: July 24 23 4:24 PM
To: Adrian Moreno
Subject: AB 52 Consultation CUP 369, AR 23-06, Variance 23-02, EA 23-05

Good evening Adrian,

If you have any questions about the attached letter please feel free to contact me.

Thank you,

Claritsa Duarte
Cultural Resources Analyst
cduarte@aguacaliente.net C: (760) 985-7538 | D: (760) 883-1134
5401 Dinah Shore Drive, Palm Springs, CA 92264

AUGUSTINE BAND OF CAHUILLA INDIANS
84-481 Avenue 54, Coachella CA 92236
Telephone: (760) 398-4722
Fax (760) 369-7161
Tribal Chairperson: Amanda Vance
Tribal Vice-Chairperson: Victoria Martin
Tribal Secretary: Geramy Martin

Date: 07/24/2023

Dear: Adrian Moreno
City of Coachella, Lead Contact

SUBJECT: Request to Consult on Conditional Use Permit 369, Architectural Review 23-06, Variance 23-02, Environmental Assessment 23-05 in Coachella, California (APN 763-141-018)

Thank you for the opportunity to offer input concerning the development of the above-identified project. We appreciate your sensitivity to the cultural resources that may be impacted by your project and the importance of these cultural resources to the Native American peoples that have occupied the land surrounding the area of your project for thousands of years. Unfortunately, increased development and lack of sensitivity to cultural resources have resulted in many significant cultural resources being destroyed or substantially altered and impacted. Your invitation to consult on this project is greatly appreciated.

At this time, we are unaware of specific cultural resources that may be affected by the proposed project, however, in the event, you should discover any cultural resources during the development of this project please contact our office immediately for further evaluation.

Very truly yours,

Geramy Martin

Geramy Martin, Tribal Secretary
Augustine Band of Cahuilla Indians

MESA GRANDE BAND OF MISSION INDIANS

P.O. BOX 270
SANTA YSABEL, CALIFORNIA 92070
(760)782-3818 Tribal Office
(760) 782-0795 Tribal Fax#
www.mesagrandeband-nsn.gov

July 21, 2023

Adrian Moreno
City of Coachella
1515 Sixth Street
Coachella, CA. 92236

Dear Adrian Moreno:

The purpose of this letter is to inform you that Mike Linton is no longer the Chairperson, or a representative of the tribe. In any future correspondence, please address all correspondence to the Mesa Grande Band of Mission Indians.

Sincerely,

Julia P. Garcia

Signer ID: P4PNL63Q10...

Julia Garcia
Administrative Assistant

From: Jill McCormick <historicpreservation@quechantribe.com>
Sent: July 27 23 3:52 PM
To: Adrian Moreno
Subject: Conditional Use Permit 369, Architectural Review 23-06, Variance 23-02, and Environmental Assessment 23-05 in Coachella California

This email is to inform you that we do not wish to comment on this project. We defer to the more local Tribes and support their determinations on this matter.

H. Jill McCormick M.A.
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-572-2423
Cell: 928-261-0254

From: Skaggs, Jacob@Wildlife <Jacob.Skaggs@Wildlife.ca.gov>
Sent: November 07 23 1:58 PM
To: Adrian Moreno
Subject: Requesting Biological Resources Survey Report for draft MND for the Sunridge Self Storage Project (SCH 2023100317)

Hi Adrian:

I am reviewing the draft MND for the Sunridge Self Storage Project (SCH 2023100317). Would you please provide me with a copy of the following document to support CDFW's review of the MND:

- Biological Resources Survey Report," Vincent N. Scheidt Biological Consultant 2022

Thanks,

Jacob

Jacob Skaggs
Senior Environmental Scientist Specialist
California Department of Fish and Wildlife
3602 Inland Empire Blvd, Ste C-220
Ontario, CA 91764
(760) 218-0320

STAFF RESPONSE

Adrian Moreno

From: Adrian Moreno
Sent: November 07 23 2:05 PM
To: 'Skaggs, Jacob@Wildlife'
Subject: RE: Requesting Biological Resources Survey Report for draft MND for the Sunridge Self Storage Project (SCH 2023100317)
Attachments: Vincent Scheidt Biology Report - AAA Biology Report.pdf

Hello Jacob,

See the attached requested document.

Thanks,
Adrian Moreno | **Associate Planner**
City of Coachella ◦ Development Services Department
53990 Enterprise Way ◦ Coachella, CA 92236
Phone: 760-398-3502 Ext: 118
Email: amoreno@coachella.org

Office Hours: Monday - Thursday 7:00 AM to 6:00 PM
Closed Fridays
Website | Map

From: Skaggs, Jacob@Wildlife <Jacob.Skaggs@Wildlife.ca.gov>
Sent: November 07 23 1:58 PM
To: Adrian Moreno <amoreno@coachella.org>
Subject: Requesting Biological Resources Survey Report for draft MND for the Sunridge Self Storage Project (SCH 2023100317)

Hi Adrian:

I am reviewing the draft MND for the Sunridge Self Storage Project (SCH 2023100317). Would you please provide me with a copy of the following document to support CDFW's review of the MND:

- Biological Resources Survey Report," Vincent N. Scheidt Biological Consultant 2022

Thanks,

Jacob

Jacob Skaggs
Senior Environmental Scientist Specialist
California Department of Fish and Wildlife
3602 Inland Empire Blvd, Ste C-220
Ontario, CA 91764

(760) 218-0320