



City of Coachella

Development Services Department

53990 Enterprise Way

Coachella, CA 92236

(760) 398-3502

(760) 398-3102

CEQA Guidelines Section 15183 Exemption Checklist

COVA Project

Coachella, California

Project Title: COVA

Case No: Environmental Assessment 25-03
Tentative Tract Number – TTM No. 39330
Conditional Use Permit – CUP 396, C
Architectural Review – AR 25-07
Development Agreement DA 25-01
Zoning Code Amendment ZOA 26-02 – Regional Commercial Zoning Text Amendment
STR Ordinance Amendment ZOA 26-03 – STR Ordinance Text Amendment

Lead Agency City of Coachella
Name and Address: Development Services Department
53990 Enterprise Way
Coachella, CA 92236

**Property Owner/
Developer:** Relevant Coachella Owner, LLC.
c/o Mr. Grant King
6417 Selma Avenue
Hollywood, CA 90028

Applicant: Relevant Coachella Owner, LLC.
c/o Mr. Grant King
6417 Selma Avenue
Hollywood, CA 90028

Prepared By: MSA Consulting, Inc.
34200 Bob Hope Drive, Rancho Mirage, CA 92270 (760) 320-9811

**Contact Person
and Phone Number:** Kendra Reif, Community Development Director
Development Services Department
(760) 398-3502

Project Location: Southwest corner of Avenue 52 and Van Buren Street, Coachella
APN: 780-060-001, -002, 780-040-001, -003

Zoning: Existing – Regional Commercial (R-C)
Proposed – Regional Commercial (R-C)

**General Plan
Designations:** Existing – Regional Retail District
Proposed – Regional Retail District

Page intentionally blank

TABLE OF CONTENTS

CHAPTER 1: Project Description 6

1.1 Existing Conditions..... 6

1.2 General Plan Land Use and Zoning Designations 6

1.3 Surrounding Uses..... 6

1.4 Project Description..... 7

CHAPTER 2: Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist (Pursuant to CEQA Guidelines §15183) 25

2.1 Overview of 15183 Checklist..... 25

2.2 General Plan Update Program Environmental Impact Report..... 26

2.3 Summary of Findings..... 27

CHAPTER 3: CEQA Guidelines §15183 Exemption Checklist..... 29

3.1 Overview..... 29

3.2 Checklist Analysis 30

1. Aesthetics..... 30

2. Agriculture and forestry resources..... 44

3. Air quality 47

4. Biological resources..... 63

5. Cultural resources and tribal cultural resources..... 69

6. Energy 76

7. Geology and soils..... 89

8. Greenhouse gas emissions 96

9. Hazards and hazardous materials..... 104

10. Hydrology and water quality 113

11. Land use and planning 126

12. Mineral resources..... 130

13. Noise 132

14. Population and housing..... 148

15. Public services 152

16. Recreation 155

17. Transportation 157

18. Utilities and service systems..... 172

19. Wildfire..... 180

TABLES

Table 1	Surrounding Uses - Land Use and Zoning Designations	6
Table VI-1	Operational Electricity Demand	77
Table VI-2	Operational Natural Gas Demand	79
Table VI-3	Construction Worker Gasoline Demand	80
Table VI-4	Construction Vendor Gasoline Demand.....	81
Table VI-5	Construction Equipment Diesel Fuel Demand	81
Table VI-6	Hauling Diesel Fuel Demand	81
Table VI-7	Operational Petroleum Demand	82
Table VI-8	Operational Annual Petroleum.....	82
Table XI-1	Existing Uses and Land Use Designations	127
Table XIII-1	Significance Criteria Summary	134
Table XIII-2	Ambient Noise Level Measurements	137
Table XIII-3	Construction Reference Noise Levels	139
Table XIII-4	Construction Equipment Noise Level Summary	140
Table XIII-5	Construction Noise Level Compliance.....	140
Table XIII-6	Daytime Construction Noise Level Increases	141
Table XIII-7	Daytime Project Operational Noise Levels	143
Table XIII-8	Nighttime Project Operational Noise Levels.....	143
Table XIII-9	Operational Noise Level Compliance	144
Table XIII-10	Daytime Project Operational Noise Level Increases	144
Table XIII-11	Nighttime Operational Noise Level Increases.....	145
Table XIII-12	Vibration Source Levels for Construction Equipment	146
Table XIII-13	Project Construction Vibration Levels	146
Table XIV-1	Combined Weekday and Weekend Daily Annualized Population.....	149
Table XIV-2	Combined Weekday and Weekend Daily Annualized Employees	150
Table XVII-1	Project Trip Generation Rates ¹ Weekday	160
Table XVII-2	Projected Trip ITE Trip Generation Results Weekday	160
Table XVII-3	Intersection Analysis for Opening Year (2030) Plus Project Traffic Conditions.....	161
Table XVII-4	Intersection Analysis for Opening Year (2030) Plus Project and Cumulative Projects with Improvements.....	163
Table XVII-5	Project Service Population (SP)	166
Table XVII-6	County-wide and Project VMT Estimates.....	167
Table XVII-7	City-wide and Project VMT Estimates.....	167
Table 8-1	Solid Waste Generation.....	175

EXHIBITS

Exhibit 1	Regional Location Map	13
Exhibit 2	Vicinity Map.....	14
Exhibit 3	Aerial Photograph.....	15
Exhibit 4	Site Plan.....	16
Exhibit 5	Site Plan – Hotel.....	17
Exhibit 6	Site Plan – Public Beach Club.....	18
Exhibit 7	Site Plan – Residential.....	19
Exhibit 8	Circulation Plan	20
Exhibit 9	Site Security Plan	21
Exhibit 10	Landscape Zone Key Map.....	22
Exhibit 11	Landscape Plan.....	23
Exhibit 12	Phasing Plan	24
Exhibit I-1	Project Hotel Rendering	39
Exhibit I-2	Project Condo Hotel Rendering	39

Exhibit I-3	Project Residential Elevations.....	40
Exhibit I-4	Project Inspiration – Residential	40
Exhibit I-7	Project Materials Board.....	41
Exhibit XIII-1	Noise Measurement Locations	136
Exhibit XIII-2	Receiver Locations	138

APPENDICES

Appendix A	Air Quality Report
Appendix B	Habitat Assessment and Coachella Valley Multiple Species Habitat Conservation Plan Consistency Analysis
Appendix C	Cultural Resources Survey
Appendix D	Geotechnical Investigation and Percolation / Infill Testing
Appendix E	Greenhouse Gas Analysis
Appendix F.1	Phase I Environmental Site Assessment
Appendix F.2	Phase II Environmental Site Assessment
Appendix G	Preliminary Water Quality Management Plan
Appendix H	Noise Report
Appendix I	Traffic Impact Analysis

CHAPTER 1: Project Description

1.1 Project Site, Location, and Existing Conditions

The COVA project is proposing the development of a luxury lifestyle resort on approximately 87 acres in the City of Coachella (City). The site is formed by four contiguous parcels (APNs 780-040-001, 780-040-003, 780-060-001, and 780-060-002) south of Avenue 52, west of Van Buren Street and east of Calhoun Street. The project site is located in the southwest portion of the City of Coachella and currently includes agricultural fields with date palm trees and grape vines. The project site also contains an irrigation pond in the central-northern area of the site, with nearby pump housing and approximately three existing support structures. These are dilapidated and uninhabitable structures with a combined estimated building footprint of approximately 6,143 square feet, and they appear to have been used in connection with past agricultural operations.

1.2 General Plan Land Use and Zoning Designations

The existing General Plan Land Use designation for the project site is Regional Retail District. The Regional Retail District land use designation allows for a wide range of retail, lodging, entertainment, and residential uses, with a focus on connectivity between these allowed uses throughout the project area. Residential uses are allowed at a density of 10 – 15 dwelling units per acre, and commercial densities are allowed at a density of 0.35 – 2.0 floor area ratio (FAR). Heights are generally one- and two-story buildings but may be up to four stories for mixed use projects, with further increased heights permitted in special circumstances such as hotels and iconic buildings or structures. The existing zoning designation is Regional Commercial (RC), which is consistent with the Regional Retail District, except that single-family residential uses are not an expressly allowed use in this zone. Accordingly, the project analyzed in this document includes an application by the Developer to amend the City’s Zoning Code to allow single-family residential uses in the Regional Commercial zone to bring the zone into full consistency with the General Plan land use designation. With that minor revision to the City’s Zoning Code, the project is consistent with the existing land use and zoning designations, as explained in more detail below.

1.3 Surrounding Uses

The project is surrounded by existing agricultural uses, vacant land, and scattered residential homes. Avenue 52 delineates the project’s northern boundary, Van Buren Street delineates the project’s eastern boundary, and Calhoun Street delineates a portion of the eastern boundary. The northern and eastern properties are located within the City of Coachella’s jurisdiction, while the western and southern properties are located within Riverside County’s jurisdiction.

The land use and zoning designations for the surrounding areas are depicted in the table below.

Table 1 Surrounding Uses - Land Use and Zoning Designations

Property	Jurisdiction	Use	Land Use	Zoning
Site	City of Coachella	Agriculture, with Three Abandoned Structures	Regional Retail District	Regional Commercial (RC)
North	City of Coachella	Vacant Lot, Scattered Residential Homes, Agriculture	Regional Retail District	Regional Commercial (RC)
South	Unincorporated,	Residential Homes,	Agriculture	A-1-10, A-1-20

	Riverside County	Agriculture, Vacant Lot		
East	City of Coachella	Agriculture	Regional Retail District, General Neighborhood	Regional Commercial (RC), General Neighborhood (GN)
West	Unincorporated, Riverside County	Agriculture, Vacant Lot	Agriculture and Estate Density Residential	A-1-10, A-1-20

1.4 Project Description

The Applicant is proposing a hospitality focused, mixed-use development on the 87-acre site. The project will feature two primary components: a private sector and public sector. The private sector will consist of 240 condo hotel cottages and 162 single-family residential units comprised of estate lots, zero lot line lots, bungalow condominiums, and VIP suites. These units will operate under fractional ownership, timeshare, second homes, and/or short-term and long-term rental models that will function together as an integrated hospitality-oriented resort community organized around a central lagoon. These accommodations will be complemented by on-site resort amenities (i.e., recreation center, courts, spa/pool, beaches, bar and entertainment, library, restaurant), which will be used by guests/owners of this sector. The public sector will consist of an 11,950-square-foot beach club, 7,690-square-foot restaurant, and a 6,048-square-foot sports bar. These sub-areas are anticipated to operate with an assumed typical weekday capacity of 500 persons and an assumed weekend capacity of 1,500.

Development of the project would also include landscaping, street improvements, drive aisles, and parking. Access to the project will be provided from two access points on Avenue 52, two access points on Calhoun Street, and two access points on Van Buren Street. The project proposes 951 parking spaces and 193 cart spaces onsite.

The project proposes a mixed-use development, consisting of a total of 402 units on approximately 28 acres (14.4 du/acre), which is consistent with the General Plan residential density range of 10 – 15 dwelling units per acre. The private sector also includes complimentary resort features, including water amenities, club amenities, health and wellness spaces, sports and recreational amenities, additional areas for events and restaurants, roadways, and open space on the remainder of the site.

The private sector will consist of:

- 162 single-family residential units comprised of estate lots, zero lot line lots, bungalow lots, and VIP suites
- 240 condo hotel cottages
- On-site resort amenities: recreational courts, spa/pool, lagoon and water features, bar and entertainment, library, restaurant

The public sector is situated on approximately six acres in the northwest corner of the site and will consist of a:

- 11,950-square-foot beach club
- 28,800-square-foot beach club lounging area
- 7,690-square-foot restaurant
- 6,048-square-foot sports bar
- 11,907-square-foot back-of-house area
- 103,297-square-foot parking garage

The public sector uses have a combined FAR of approximately 0.65 and will require a future City-approved Conditional Use Permit (CUP) and Entertainment Permit, which will be sought once the plans and details for these uses are further defined during project implementation.

To facilitate the intended hospitality focus, the proposed single-family residential units and condo hotel units will operate under fractional ownership, timeshare, second homes, and/or short-term and long-term rental models. The on-site resort amenities (i.e., recreational courts, spa/pool, lagoon and water features, bar and entertainment, library, restaurant) will be used by guests/owners of the private sector. Exhibit 4 shows the illustrative site plan and Exhibits 5 through 7 illustrate the general areas of the resort, residential and beach club uses. To avoid any conflicts with the City’s short-term rental ordinance, the Developer is seeking an amendment to that ordinance to provide that projects with an approved Development Agreement are exempt from the provisions of that ordinance limiting the number of units that can be owned by one owner and limiting the percent of units that can be permitted for short-term rentals, as well as any other provisions of the ordinance specifically modified in the approved Development Agreement.

The project proposes a 9.4-acre main lagoon (“Hotel Lagoon”), which will provide waterfront properties and beach uses shared between the single-family residential and resort uses. A 2.5-acre lake will be situated in the southern portion of the site. The lake will act as a detention basin and collect onsite runoff. No water contact sports (i.e., swimming, etc.) will be permitted in the lake. A 0.4-acre lagoon is proposed in the public sector (“Beach Club Lagoon”) and, similar to the Hotel Lagoon, will allow swimming and recreational uses. The table below indicates the proposed sizes of the water amenities.

Table 2 Water Amenities

	Acres
Hotel Lagoon	9.4
Lake (no contact)	2.5
Beach Club Lagoon	0.4
<i>Total</i>	<i>12.3</i>

As discussed above and indicated in Table 2, the project proposes the 9.4-acre Hotel Lagoon and the 0.4-acre Beach Club Lagoon. The proposed lagoons will be developed with Crystal Lagoon® technology. Crystal Lagoon technology maintains water quality by utilizing a patented solution consisting of the application of controlled pulses of small amounts of oxidants/microbicides, such as chlorine, into water in specific patterns and cycles. The application cycles are determined by the system’s algorithms according to the growth cycles of algae and bacteria, as well as ambient conditions and the weather. This technology avoids the need to maintain a significant residual chemical level in the water. The application of additives is coordinated remotely by sensors and injectors/nozzles strategically located throughout the Hotel Lagoon and Beach Club Lagoon. The applied additives comply with National Sanitation Foundation (NSF) 60 Standards for drinking water treatment.¹ NSF 60 Standards establish minimum health-effects requirements to ensure that chemicals used in drinking water treatment do not introduce contaminants or impurities that could pose a risk to public health. The pulse-based disinfectants in the water achieve consistent quality and avoid water contamination from external agents, such as swimmers.

Development of the site would also include landscaping, street improvements, drive aisles, and parking.

Circulation

Access to the project will be provided from two access points on Avenue 52, two access points on Calhoun

¹ Water and Wastewater Standards, NSF Standards, website: <https://www.nsf.org/nsf-standards/standards-portfolio/water-wastewater-standards>.
80237.00027\45404105.1
80237.00027\45491467.1

Street, and two access points on Van Buren Street. The project includes three full access driveways on Calhoun Street (1), Avenue 52 (1), and Van Buren Street (1). In addition, Calhoun Street will have a right-in/right-out driveway and Avenue 52 will have a right-in/right-out exit only driveway. Public sector access is available exclusively off Calhoun Street; private sector access can be made via Avenue 52 or Van Buren Street, as well as through the Calhoun Street driveway. Exhibit 8 illustrates the project circulation plan.

Access to the resort and residential portions of the site will be gated. A manned gated access point and remote access will be located on Avenue 52, and a service gate and remote entry gates will occur along Van Buren Street. The public Beach Club area will not include gated access points from Avenue 52 and Calhoun Street. See Exhibit 9 for the site security plan.

Moreover, street frontages will be constructed with curb and gutter improvements, sidewalks, and landscaping. The project proposes 951 parking spaces and 193 cart spaces onsite, as indicated in the table below. The parking spaces provided for the project will be consistent with Section 17.54.010, Parking Requirements, of the Coachella Municipal Code (CMC).

Table 3 Parking Provided*

Use	Units	Car Spaces	Parking Ratio	Cart Spaces
<i>Single-Family Residential</i>				
Grand Estate Lots	6 Grand Estate Lots	12	2.0 spaces/unit	12
Estate Lots	27 Estate Lots	54	2.0 spaces/unit	27
Zero Lot Line Lots	12 Residence	24	2.0 spaces/unit	-
Bungalows (Vehicular Access)	112 Bungalows	51	1.0 spaces/unit	
Bungalows (Cart Access)		61	1.0 spaces/unit	104
Beach Club (2-Level Parking Garage)	5 VIP Villas	321	-	-
<i>Single-Family Residential Total</i>	<i>162 Units</i>	<i>523</i>		<i>143</i>
<i>Condo Hotel</i>				
Hotel (2-Level Basement Parking Garage)	240 Hotel Cottages	360	-	50
Hotel (Surface Parking at Grove)		50	-	-
Hotel (Surface Parking at BOH)		18	-	-
<i>Condo Hotel Total</i>	<i>240 Units</i>	<i>428</i>		<i>50</i>
Project Total	402 Units	951	-	193

*Compliant with Section 17.54.010, Parking Requirements, of the Coachella Municipal Code.

Landscape

The project proposes multiple landscape themes throughout the project. Each theme will include native and drought-tolerant trees and plants, which will be approved by the City and water district. The various themes are summarized below and illustrated in Exhibit 10.

- **Desert Native:** The project frontages will consist of the Desert Native landscape theme. This landscape theme will include date palms, various trees (acacia, willow, ironwood, palo verde, mesquite), cactus and accent plants (aloe, saguaro, green desert spoon, gopher plant, ocotillo, organ pipe cactus, yucca), and shrubs and grasses to blend the existing desert environment with the project frontage.
- **Agrarian Heritage:** The internal primary street will consist of the Agrarian Heritage landscape theme. This landscape theme will include date palms, various trees (acacia, willow, olive, palo

verde, mesquite), cactus and accent plants (aloe, agave, green desert spoon, gopher plant, yucca), and shrubs and grasses.

- Beach: The Beach Club Lagoon and Hotel Lagoon frontages, and an island will incorporate a Beach landscape theme. This landscape theme will include various palms (date, Mediterranean fan, Mexican fan), trees (acacia, willow Tashkentensis, olive, ironwood, mesquite), cactus and accent plants (century plant, aloe, yucca), and shrubs and grasses to contribute to the casual and coastal feel of this area.
- The Grove: The primary resort entry and the sports center and some condo hotel units will consist of the Grove landscape theme. This landscape theme will include date palms, various trees (acacia, willow, olive, Tashkentensis, ironwood, palo verde, mesquite), cactus and accents (aloe, agave, saguaro, green desert spoon, gopher plant, yucca), and various shrubs and grasses to generate a structured landscape.
- Desert Oasis: The resort core and estate lots across from the resort beach (separated by the Hotel Lagoon) will consist of the Desert Oasis landscape theme. This landscape theme will include various palms (sago, Mediterranean fan, date, Canary Island date, and California fan), trees (acacia, desert willow, olive, citrus, ironwood, palo verde, mesquite), cactus and accent plantings (agave, aloe vera, aloe, yucca), and various shrubs and grasses that will contribute to a desert oasis environment with lush refuge, vertical drama, and shade.
- Desert Lush: The residential use and some of the resort units will consist of the Desert Lush landscape theme. This landscape theme will include various palms (date, Mediterranean fan, California), trees (acacia, willow Tashkentensis, olive, ironwood, palo verde, mesquite), cactus and accent plants (aloe, agave, gopher plant, yucca), and shrubs and grasses to generate residential comfort, seasonal color, and layered texture throughout this area.
- Spa Water Garden: The resort spa will consist of the Spa Water Garden landscape theme. This landscape theme will include various palms (Mediterranean fan, date), trees (acacia, willow, jacaranda, ironwood, crape myrtle), and shrubs and grasses to create a naturalistic, low maintenance, and habitat-friendly environment at the resort spa.

In addition to the proposed landscaping, the project also proposes 8-foot privacy walls along the northern, eastern, southern, and portions of the western property boundaries (see Exhibit 9, Site Security Plan).

Utilities

Areas surrounding the project site are served by electricity, natural gas, water, and sewer facilities. The proposed project will be required to connect to existing facilities, as summarized below.

The site is served by natural gas uses by Southern California Gas Company (SoCalGas). Overhead power lines occur north of the project (along Avenue 52), east of the project (along Van Buren Street), and west of the project (along Calhoun Street). The proposed project has received a will-serve letter from the Imperial Irrigation District (IID) that is conditioned on an additional substation and distribution facilities being constructed in the general project area. The project has designated a potential site for a substation, but based on current electrical infrastructure planning in the area, it is expected that the new substation will be constructed off-site in the area with new distribution conduits (if required) to be constructed in existing road rights-of-way to serve the project. The future IID substation is expected to serve multiple projects in the area, both within and outside the City of Coachella, and as an independent project, it will be subject to its own environmental review under the California Environmental Quality Act (CEQA) once the substation project and location have been determined. The project would also incorporate solar generation and battery storage systems to help offset electricity demand from the regional grid. These systems would reduce reliance on off-site energy sources and support overall energy efficiency. In the future, the project may consider implementing a microgrid or geothermal system to further offset demand

on the grid; however, these features are not part of the current project proposal and are not evaluated as a component of the project at this time. See the Energy Resources and Utilities and Service Systems discussions of this document for further analysis.

The project will connect to existing water and sewer mains. Existing water mains occur on Van Buren Street, approximately 0.26 miles north of the project, and Avenue 52, approximately 0.26 miles east of the project. The project will connect to these mains and extend 12-inch public lines 0.26 miles south from the existing Van Buren Street main, and 0.26 miles west from the existing Avenue 52 main. The project will extend a total of approximately 2,760 feet of 12-inch public water lines to the project. Public 12-inch water lines will occur within the public beach and resort main streets. Public 8-inch water lines will occur throughout the project within the residential areas. See the Utilities and Service Systems discussion of this document for further analysis.

Existing sewer lines within proximity to the proposed project are located at the Avenue 52 and Van Buren Street intersection, the Fredrick Street and Avenue 53 intersection, and Avenue 64. The project will connect to the existing 12-inch sewer main at the Avenue 52 and Van Buren Street intersection and extend approximately 174 feet of 12-inch public sewer lines to the project. The proposed public sewer line will connect to a private sewer force main, which will connect to private 8-inch sewer mains throughout the site.

Drainage

The site's topography is generally flat and gradually slopes to the southeast. Project stormwater drainage is designed to collect onsite runoff and convey them to onsite facilities via street flow to localized low points where they will be conveyed via underground storm drain lines to the irrigation pond (i.e., the 2.5-acre lake) located in the southern portion of the site.

Demolition and Construction

As previously stated, the project currently operates as a date palm grove. The project site also contains an irrigation pond in the central-northern area of the site, with nearby pump hosing and approximately three existing structures. The combined estimated building footprint of the structures is approximately 6,143 square feet. These existing structures will require demolition and off-site removal as part of the proposed project construction activities. The date palm grove will also be cleared as a part of the site preparation phase.

The site is proposed to be developed over four phases. Phase 1 will include the water features, public beach club, and resort uses. Phase 1 covers the majority of the site. Phase 2 will develop the residential uses south of the Hotel Lagoon and surrounding the proposed lake. Phase 3 will include the residential estate lots south of Phase 2. Finally, Phase 4 will develop the residential estate lots south and west of Phases 2 and 3. The grading design for the project site balances, avoiding the need to import or export dirt in connection with mass grading the site.

Operation

The resort characteristics of the project are unique, designed to function as an internal destination with resort home dwelling units, dining experiences, on-site resort amenities, outdoor and recreational spaces, and entertainment areas. This is projected to result in locally serving options for the City of Coachella and regionally for the Coachella Valley, attracting those already in the area to vacation or visit for local events.

The project would be affected by typical seasonality trends observed within the Coachella Valley and further confirmed through market research conducted by the developer. Time of year use distribution will

be concentrated between mid-February through May, with the lowest demand generally occurring mid-July through the end of September and the first half of December.

The resort and residential project will accommodate many of the needs of the guests onsite. Many of guests' daily needs would be accommodated by the resort lodging, recreation, dining, and entertainment options without leaving the property. A significant share of the public facing restaurant, beach club, and event space are anticipated to be used by onsite guests.

Entitlements

A Tentative Tract Map (TTM No. 39330) will identify the various proposed lots for subdivision and condominium purposes, specifically splitting the site into single family residential, condominium, public beach club, back of house, amenity, street, and open space lots. The project will also undergo evaluation in Architectural Review and CUP Review. Approval of these entitlements will render the project in full compliance with City regulations.

A Development Agreement is being prepared for the project. The Development Agreement will vest the applicant's right to develop the COVA project area pursuant to the entitlements described above, address short-term rentals within the project area, ensure that the project has a net positive fiscal impact on the City, and ensure the timely completion of infrastructure to serve the project and surrounding area. The Development Agreement will also ensure that all uniformly applied development policies or standards previously adopted by the City and applicable to the Project, and all mitigation measures identified in the General Plan Update and this CEQA Section 15183 Exemption Checklist, are enforceable by the City as project requirements.

As noted above, the project also includes two accompanying applications to (1) amend the City's Zoning Code for the Regional Commercial zone to allow single-family residential use and bring it into conformity with the General Plan land use designation for the site (Regional Retail District), and (2) amend the City's Short-Term Rental Ordinance to exempt projects with an approved Development Agreement from the provisions of that ordinance limiting the number of units that can be owned by a single owner and limiting the percent of units that can be permitted for short-term rentals, as well as any other provisions of the ordinance specifically modified in the approved Development Agreement.

Other public agencies whose approval is required:

- Regional Water Quality Control Board (RWQCB)
- Coachella Water Authority (CWA)
- State Water Resources Control Board (SWRCB)
- South Coast Air Quality Management District (SCAQMD)

Exhibit 1 Regional Location Map

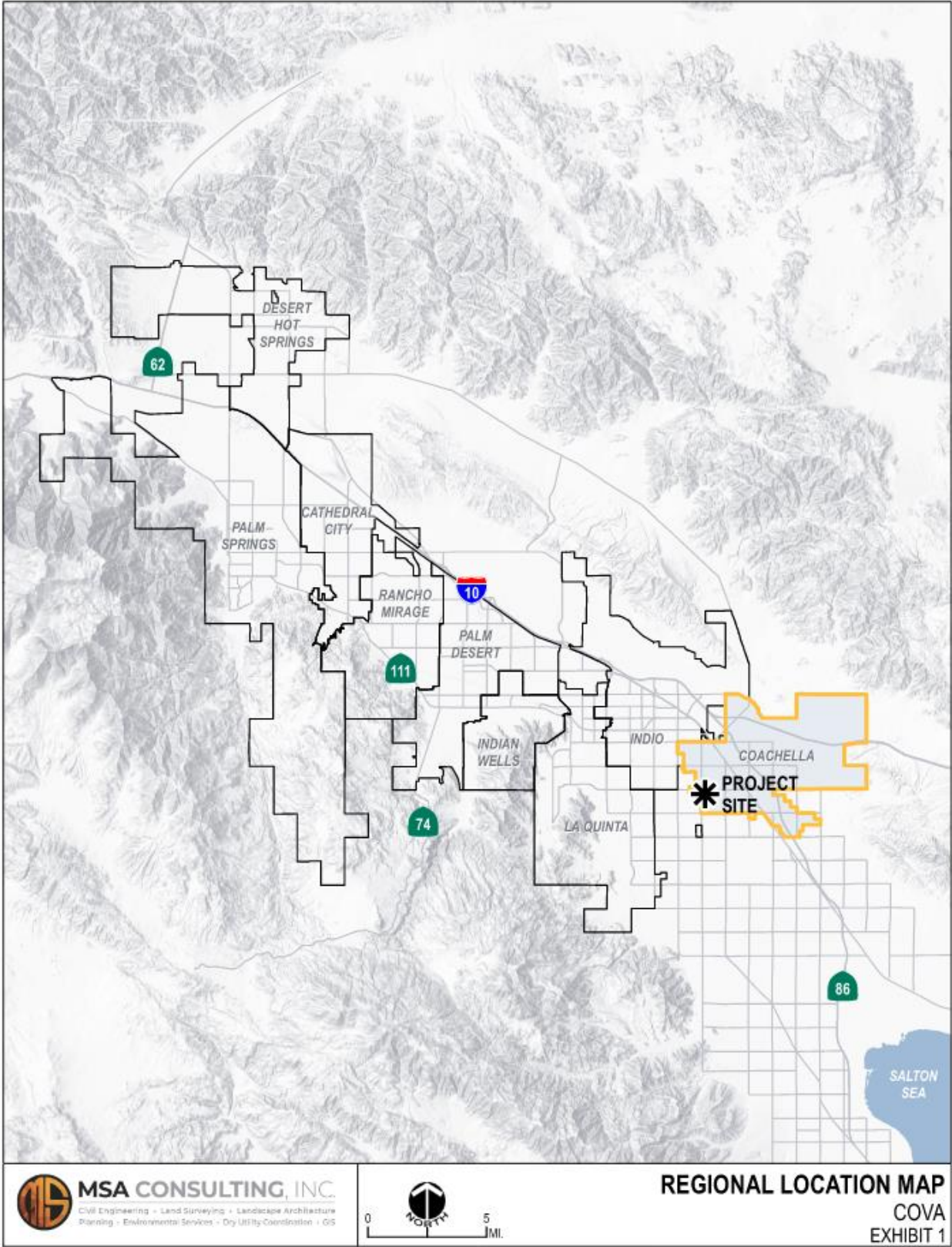


Exhibit 2 Vicinity Map

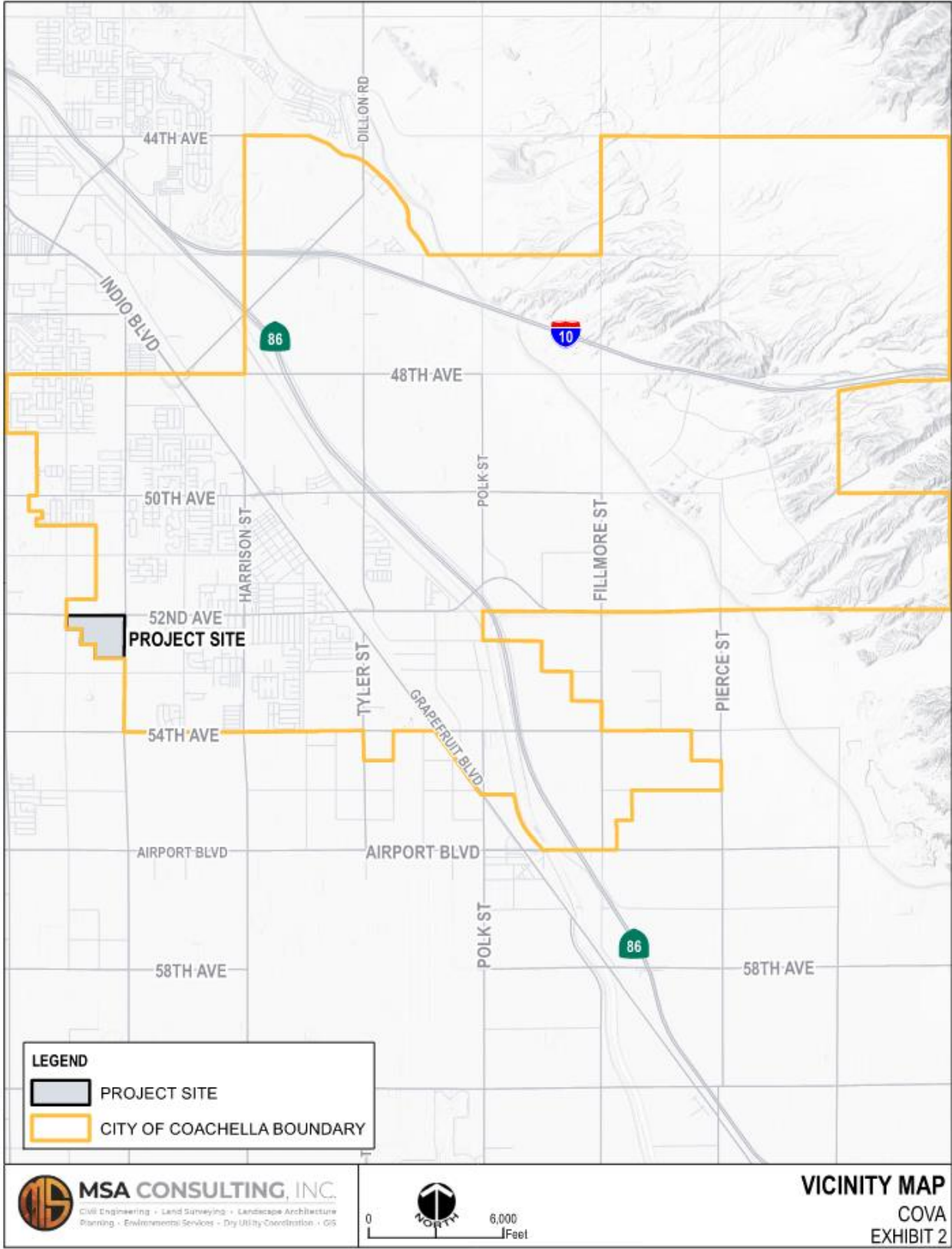


Exhibit 3 Aerial Photograph

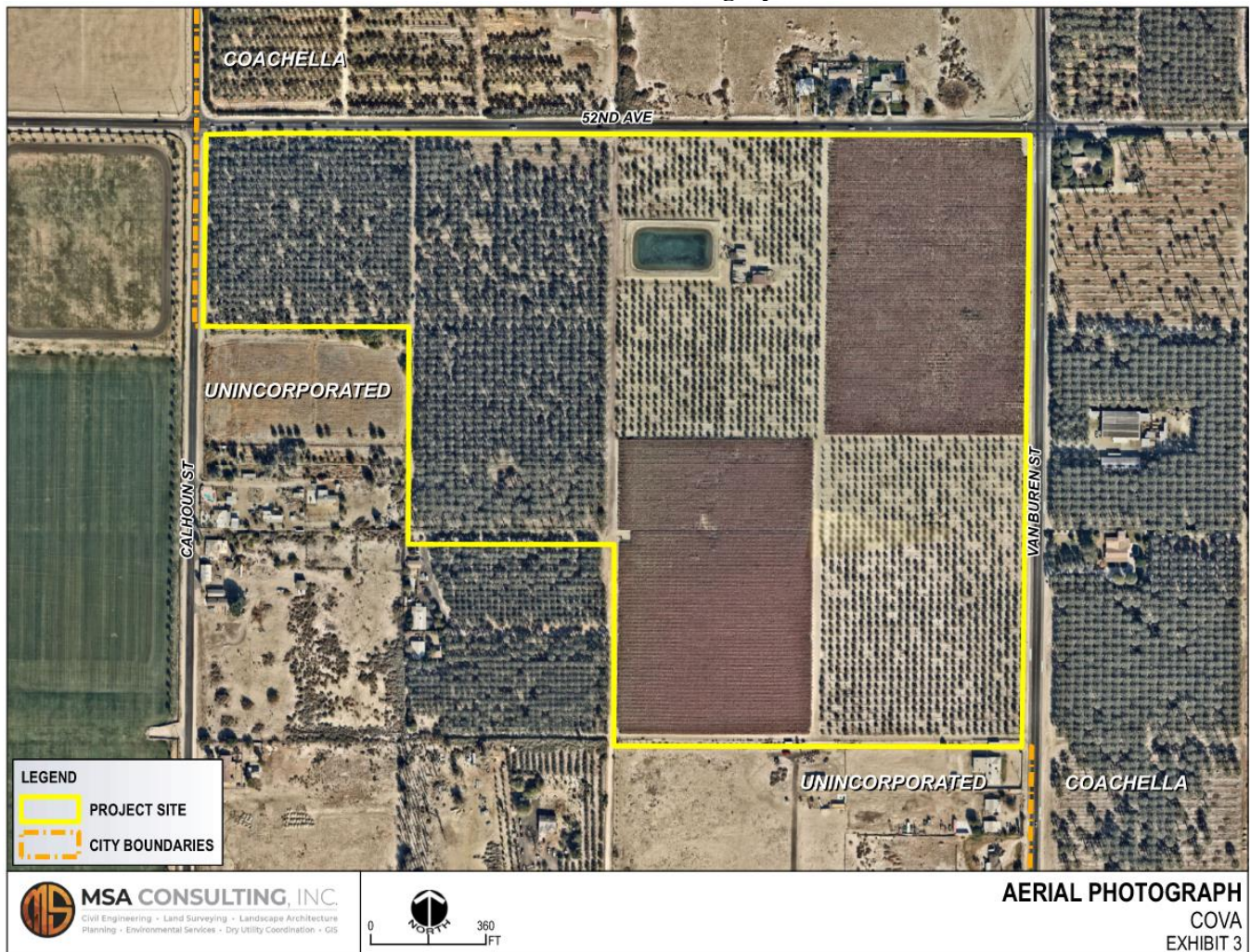


Exhibit 4 Site Plan

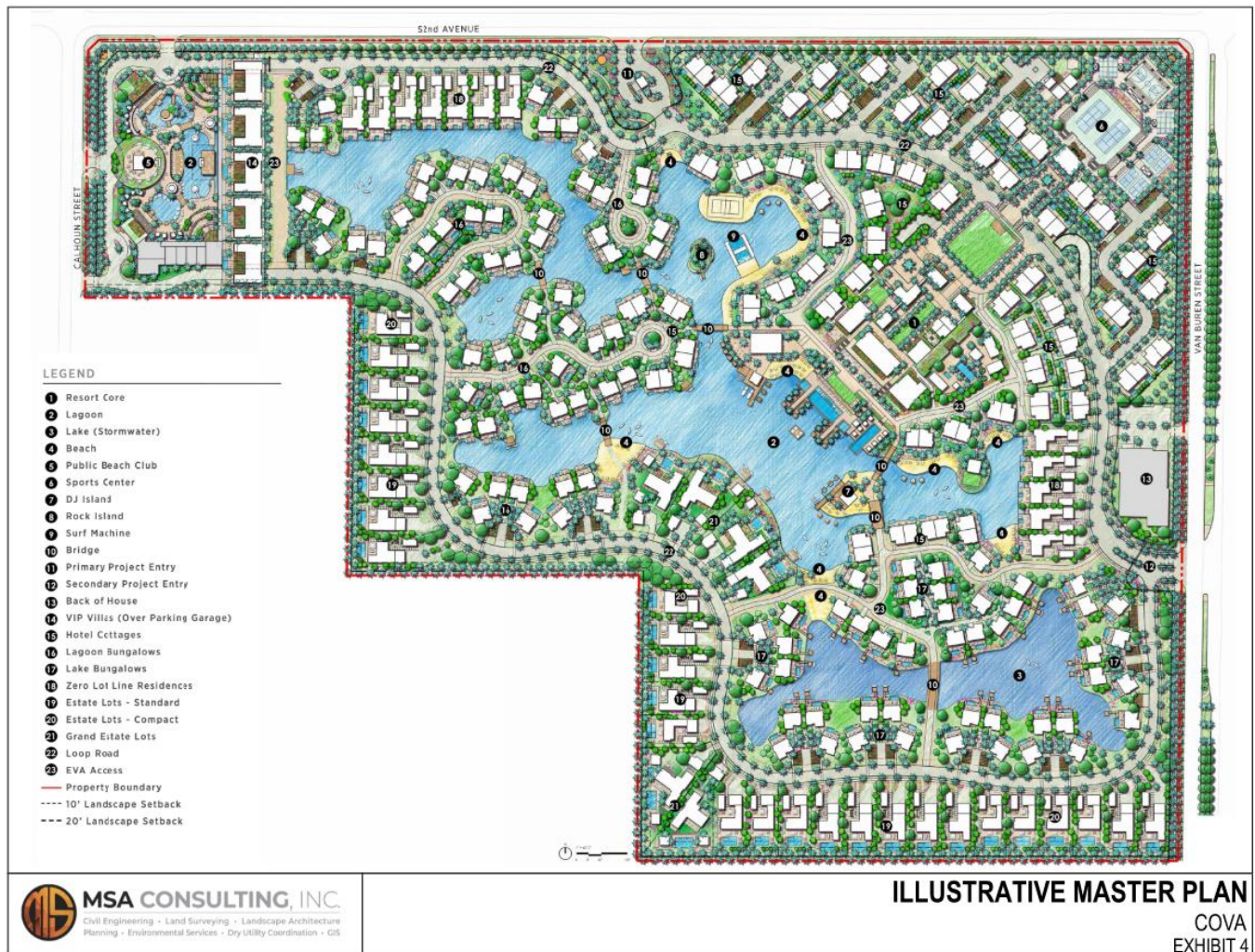


Exhibit 5 Site Plan – Hotel

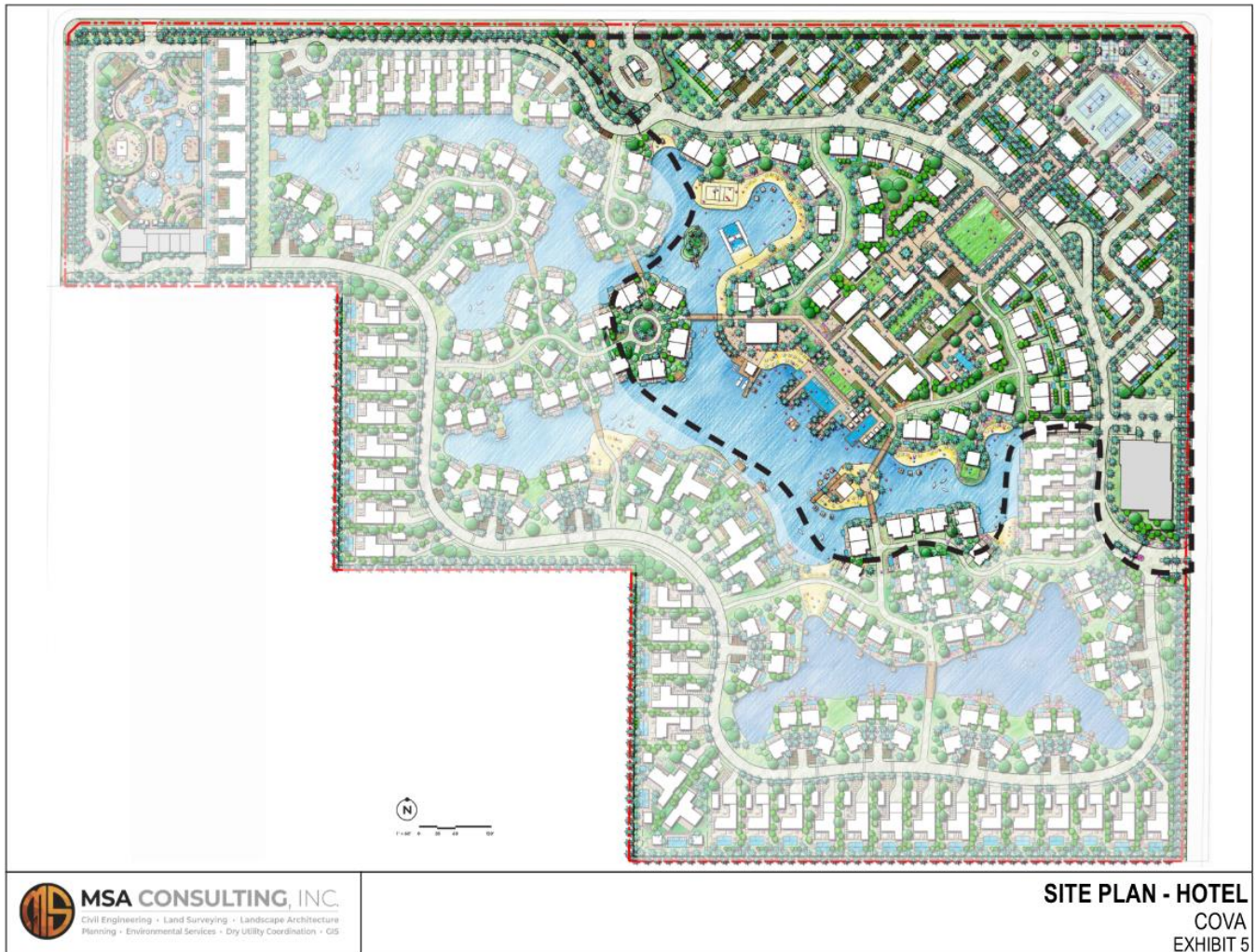


Exhibit 6 Site Plan – Public Beach Club

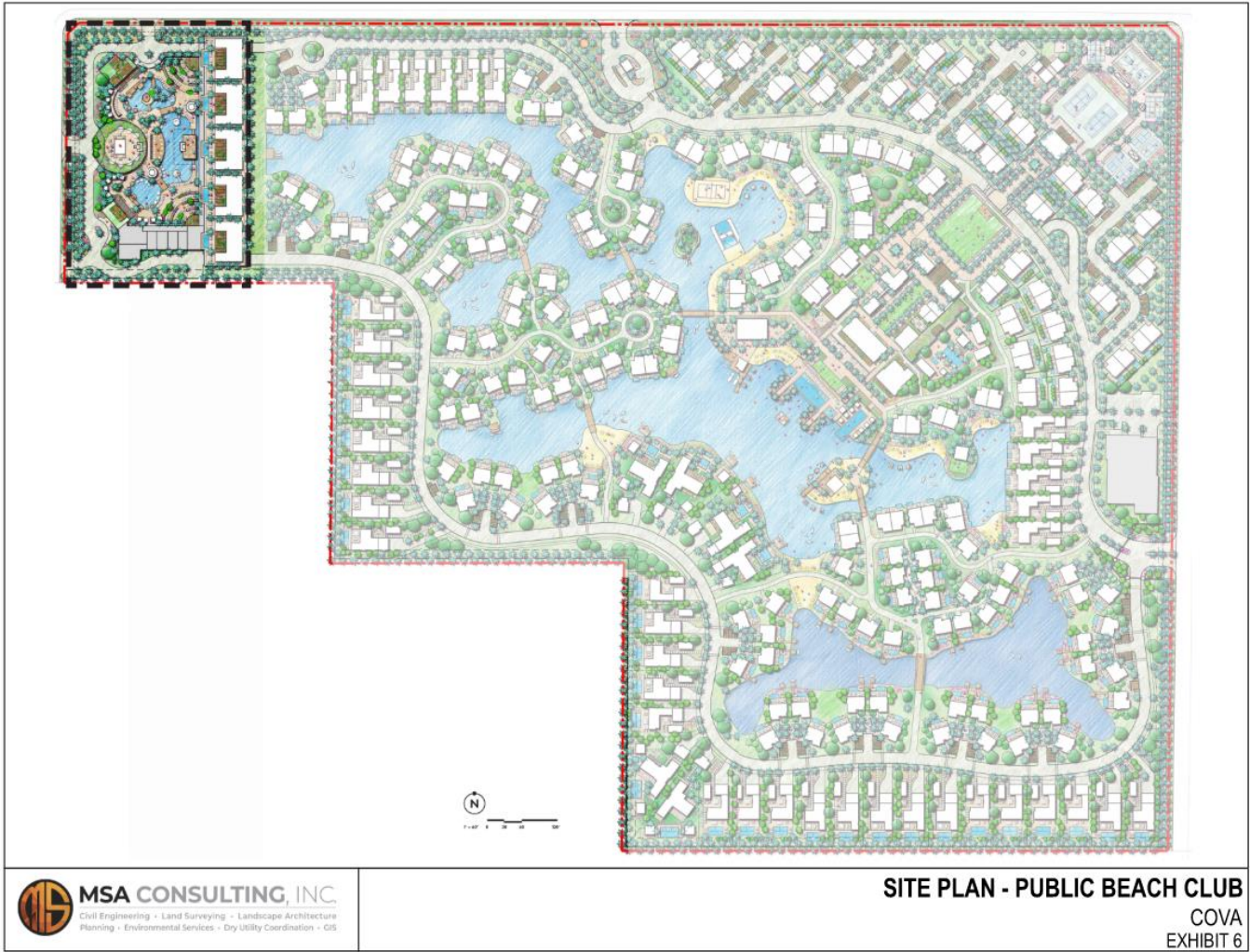


Exhibit 7 Site Plan – Residential



Exhibit 8 Circulation Plan

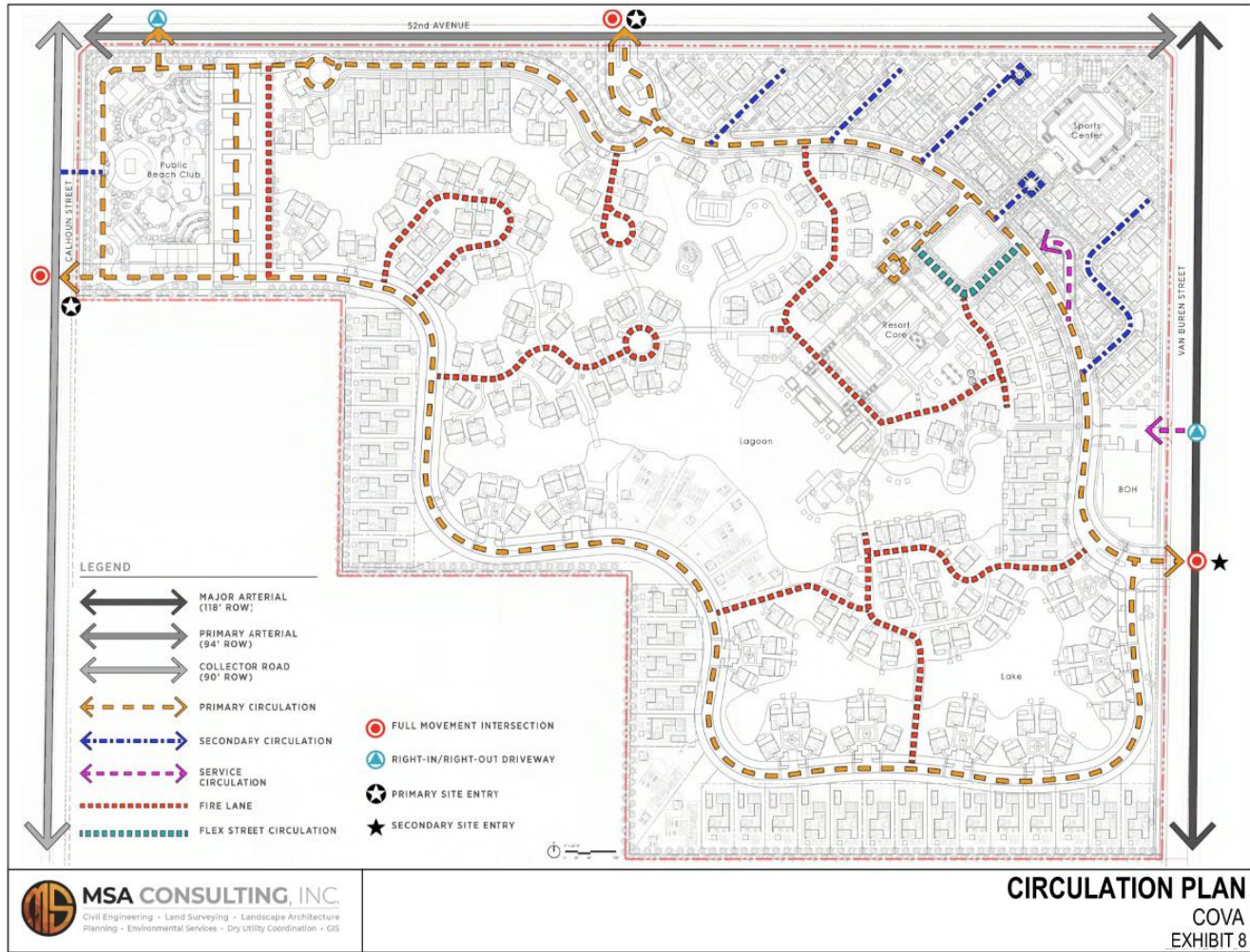


Exhibit 9 Site Security Plan

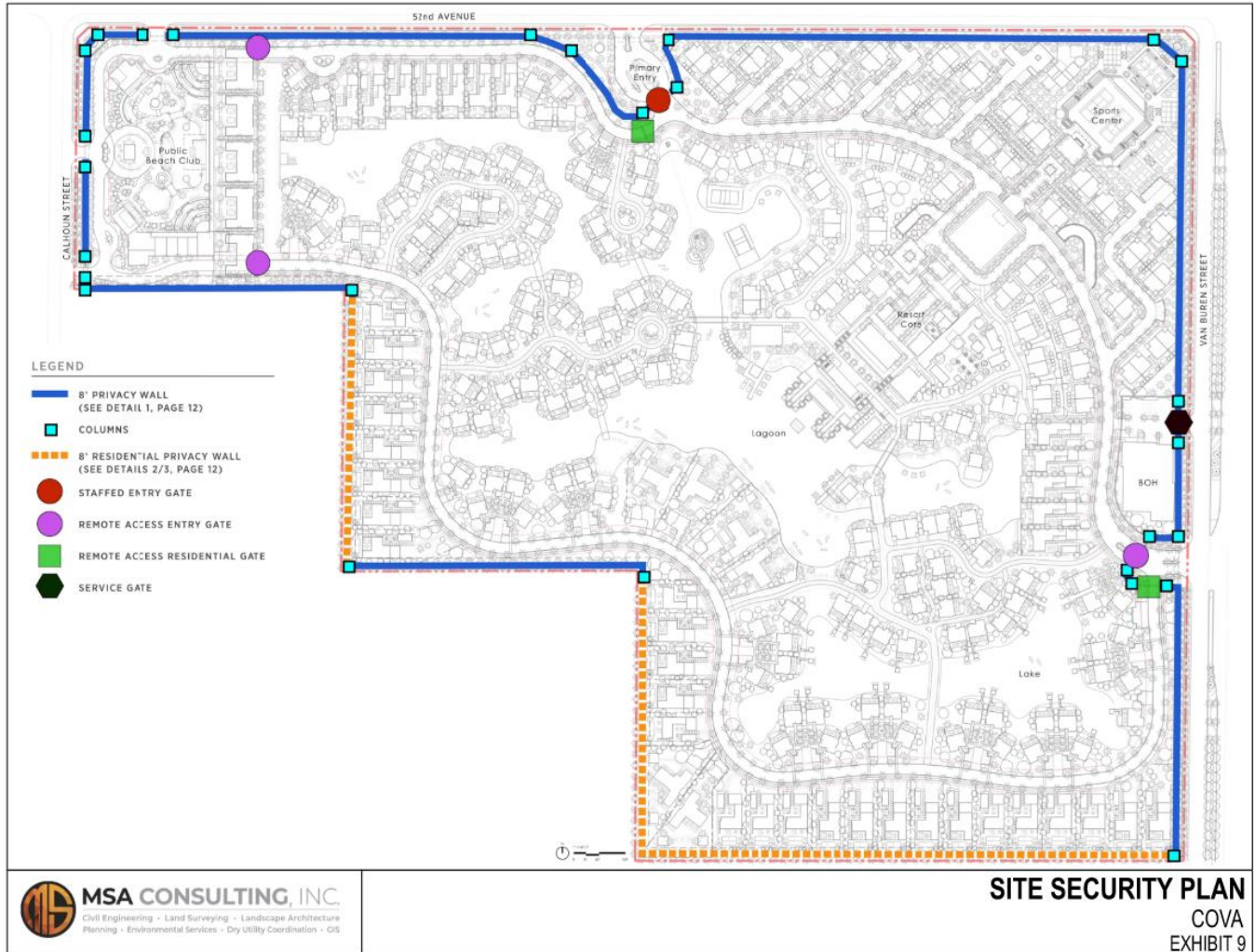


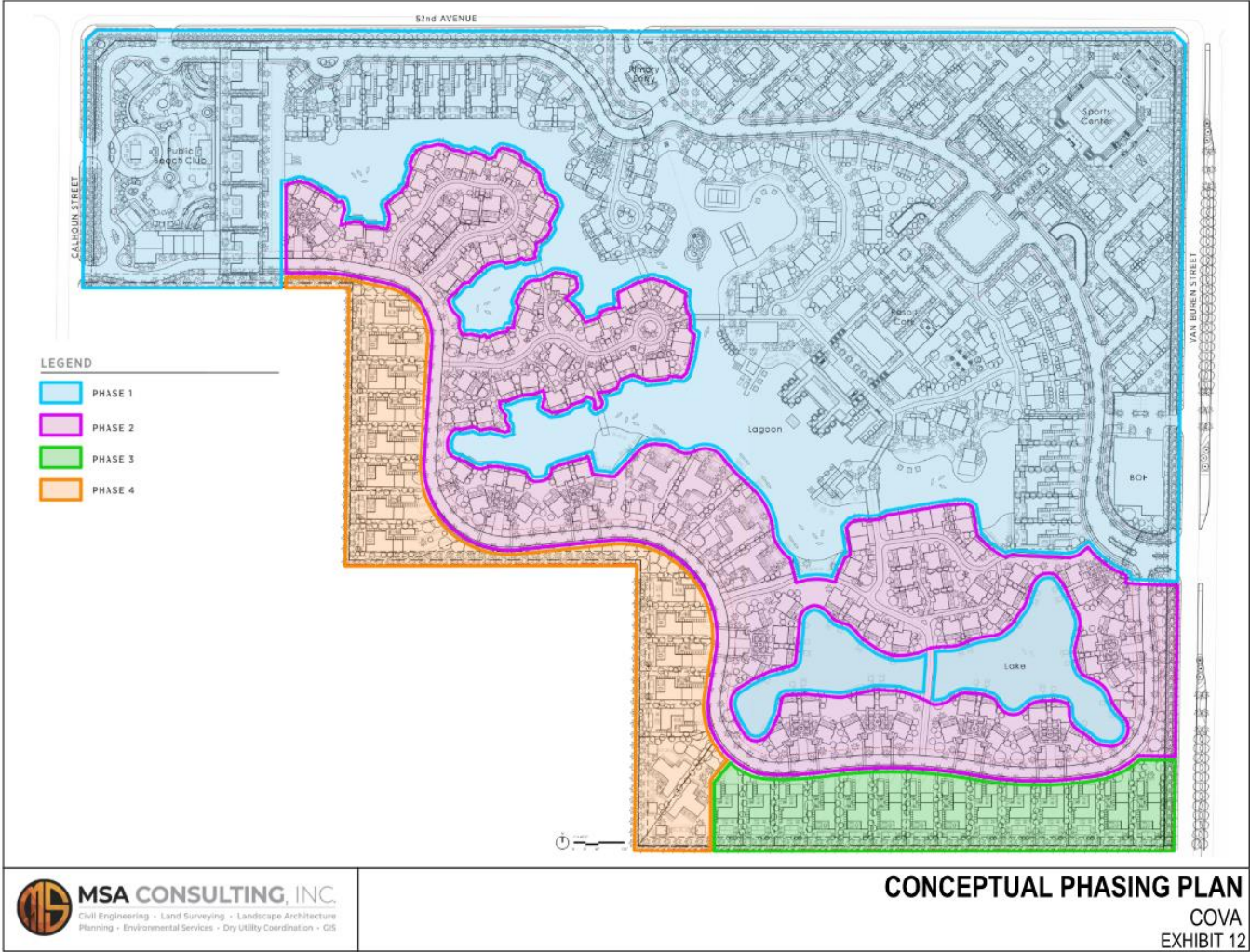
Exhibit 10 Landscape Zone Key Map



Exhibit 11 Landscape Plan



Exhibit 12 Phasing Plan



CHAPTER 2: Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist (Pursuant to CEQA Guidelines §15183)

2.1 Overview of 15183 Checklist

California Public Resources Code Section 21083.3 and California Code of Regulations, Title 14 (CEQA Guidelines) Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 of the CEQA Guidelines specifies that examination of environmental effects shall be limited to those effects that: (1) are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent; (2) are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action; or (3) are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183, subdivision (c) of the CEQA Guidelines further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

2.2 General Plan Update Program Environmental Impact Report

The General Plan is a state-mandated document that outlines goals, policies, and programs that provide the framework for future development in the City and its Sphere of Influence (SOI). The City of Coachella General Plan Update 2035 (GPU) provides the City with a long-term plan intended to guide development within the City while assisting decision-making in the City. The GPU was adopted on April 22, 2015 and has a horizon year of 2035.² The City Council of the City of Coachella approved amendments to GPU on July 26, 2023 and September 13, 2023. The GPU addresses land use, all modes of transportation, housing, and safety; includes a comprehensive update to the City's General Plan; and addresses the development of a Climate Action Plan (CAP). Through the GPU, the City's General Plan was reorganized into eight elements (Land Use and Community Character, Mobility, Community Health and Wellness, Sustainability and the Natural Environment, Safety, Infrastructure and Public Services, Noise, and Housing). The GPU's General Plan Land Use Designations map includes 15 land use designations.³ Each use provides direction on use, intensity/density, form, and character. The analysis contained in the GPU Program EIR focuses on both the GPU and the CAP, addressed together as the GPU. In addition, the City adopted a new Housing Element on September 13, 2023 and a revised Land Use and Community Character Element on June 28, 2023.

The passage of Assembly Bill 32 (AB 32), the California Global Warming Solutions Act, in 2006 prompted cities and counties to develop plans to reduce greenhouse gas (GHG) emissions by 2020 and beyond. To demonstrate that the City is doing its part to meet the requirements of AB 32, the GPU was required to provide measures to mitigate its GHG emissions impacts. Thus, the purpose of developing a CAP for the City is to align the City's General Plan with the state's GHG emissions reduction efforts. The CAP is a blueprint for reducing GHG emissions associated with GPU buildout and meeting mandated GHG reduction targets. The CAP addresses climate change at the local level by focusing on the major sources of GHG emissions in the City; establishing a detailed long-term strategy to achieve GHG emissions reduction targets; and providing a framework for compliance with federal, state, and local regulations. Ultimately, the CAP identifies reasonable and effective GHG reduction measures and informs mitigation strategies for the GPU EIR.

The GPU EIR was certified in conjunction with adoption of the GPU on April 22, 2015. The GPU EIR comprehensively evaluated environmental impacts that would result from implementation of the GPU, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

² City of Coachella, General Plan 2035 (Apr. 22, 2015),
<https://www.coachella.org/home/showpublisheddocument/10698/638906775782700000>.

³ City of Coachella, General Plan 2035, General Plan Land Use Designations, pg. 04-59 (Apr. 22, 2015).
80237.00027\45404105.1
80237.00027\45491467.1

2.3 Summary of Findings

The project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures (see Table 1.0-1, Impacts Overview Matrix, of the GPU EIR for complete list of GPU Mitigation Measures).

A comprehensive environmental evaluation has been completed for the project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the City General Plan, as analyzed by the City GPU EIR (SCH #2009021007), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the project qualifies for an exemption because the following findings can be made:

1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.

The project is located within the City's General Plan Regional Retail District, and Regional Commercial (R-C) zoning designation. Regional Retail Districts and R-C zones allow 10 – 15 dwelling units per acre and a floor area ratio (FAR) of 0.35 – 2.0. The project would be consistent with the Regional Retail District land use designation identified for the site in the GPU. Similarly, the project would be consistent with the Regional Commercial (R-C) zoning designation for the site in the Zoning Map once the application to amend the City's Zoning Code is approved, as discussed above. The project proposes 14.4 dwelling units per acre and 0.65 FAR, which is consistent with the Regional Retail Districts and R-C zone.

2. There are no project specific effects which are peculiar to the project or its site, and which the GPU EIR failed to analyze as significant effects.

The subject property currently operates as a combination of an active date palm grove and grape vines that have been allowed to go fallow. The site is surrounded by agricultural uses, vacant land, and scattered residential properties. Currently, the subject property operates similarly to the surrounding uses. The project proposes to develop a hospitality project with resort, residential, and recreational uses. The project is consistent with the City's Regional Retail District land use designation and Regional Commercial zoning designation. The project does not propose project-specific effects which are peculiar to the project or its site. The project site does not contain any unique or peculiar environmental features that would result in environmental effects beyond those previously identified and analyzed.

In addition, as explained further in the §15183 Exemption Checklist below, all project impacts were adequately analyzed by the GPU EIR. Applicable mitigation measures specified within the GPU EIR have been applied to the project.

3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.

Preparation of the §15183 Exemption Checklist did not identify any significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.

4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

As explained in the §15183 Exemption Checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

5. The project will undertake feasible mitigation measures specified in the GPU EIR.

As explained in the §15183 Exemption Checklist below, the project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through project design, compliance with regulations and ordinances, or through the project's conditions of approval.

Signature

Date

Printed Name

Title

CHAPTER 3: CEQA Guidelines §15183 Exemption Checklist

3.1 Overview

This checklist provides an analysis of potential environmental impacts resulting from the project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under CEQA Guidelines §15183.

- Items checked “Peculiar Impact that is not Substantially Mitigated” indicate that the project could result in a peculiar impact, including a physical change that belongs exclusively or especially to the project or that is a distinctive characteristic of the project or the project site and that peculiar impact is not substantially mitigated by the imposition of uniformly applied development policies or standards. (CEQA Guidelines §15183(b)(1), (f).)
- Items checked “Impact not Analyzed as Significant Effect in the General Plan EIR” indicate that the project could result in a significant effect that was not analyzed as significant in the February 2015 GPU EIR (SCH No. 2009021007). Such a project impact is not significant if it can be substantially mitigated by the imposition of uniformly applied development policies or standards. (CEQA Guidelines §15183(b)(2), (c), (f).)
- Items checked “Potentially Significant Offsite or Cumulative Impact Not Discussed in the GPU EIR” indicate the project could result in a significant offsite or cumulative impact that was not discussed in the General Plan EIR. Such an offsite or cumulative project impact is not significant if it can be substantially mitigated by the imposition of uniformly applied development policies or standards. (CEQA Guidelines §15183(b)(3), (c), (f).)
- Items checked “Adverse Impact More Severe Based on Substantial New Information” indicate that there is new information that leads to a determination that the project impact is more severe than discussed in the GPU EIR. Such an impact is not more severe if it can be substantially mitigated by the imposition of uniformly applied development policies or standards. (CEQA Guidelines §15183(b)(4), (c), (f).)
- Items checked “No New Impact” indicate that potential impacts from the Project have been adequately analyzed in the GPU EIR.

A project does not qualify for a §15183 exemption if it is determined that it would result in the following: 1) a peculiar impact that was not identified as a significant impact under the GPU PEIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in the Appendices. The Appendix contains a list of GPU EIR mitigation measures.

3.2 Checklist Analysis

1. AESTHETICS -- Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning or other regulations governing scenic quality?	☐	☐	☐	☐	☒
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐	☐	☒

Sources: "California Scenic Highway Mapping System," 2019; 2035 Coachella General Plan Update, 2015; Coachella Municipal Code

Setting

The topography in the City of Coachella, and surrounding cities, is defined as a low and relatively flat desert basin bounded by mountainous terrain as a result of past seismic activity.⁴ The most notable surrounding mountain ranges are the Santa Rosa Mountains to the south and southwest, the San Jacinto Mountains and San Gorgonio Mountains to the northwest, the Little San Bernardino Mountains and the Indio Hills to the north and northeast, and the Mecca Hills to the east. The topographic variety in the Coachella Valley includes elevations from over 10,000 feet at the Mount San Jacinto peak, 1,000 feet in the Mecca Hills, to approximately 160 feet below sea level south of Thermal.⁵ 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 southwestern portion of the City. The 87-acre site operates as date palm groves and grape vineyards. Historical imagery indicates that the project site operated as agricultural uses since at least 1984.⁶ The date palms and grape trellises align the project frontages, and three small, dilapidated structures are found in the center of the project. It should be noted that agricultural uses are not currently a compatible use with the existing land use designation (Regional Retail District) and zoning designation (Regional Commercial) (CMC Section 17.28.020 – Permitted uses). Therefore, this is a legal non-conforming use.

Properties surrounding the proposed project include existing residential homes, vacant land, and agricultural land (see Exhibit 3, Aerial Map, above). Avenue 52 delineates the project's northern boundary, Van Buren Street

⁴ City of Coachella, General Plan 2035: Existing Conditions, at 3-24 (Apr. 22, 2015).

⁵ Ibid.

⁶ Phase I Environmental Site Assessment, Sladden Engineering (Appendix F.1).
80237.00027\45404105.1
80237.00027\45491467.1

delineates the project's eastern boundary, and Calhoun Street delineates a portion of the project's western boundary. The surrounding rights-of-way are paved.

Proposed Project

The project proposes the construction of a residential and resort community. The project will consist of 162 single family residential units and 240 condo hotel cottages for a total of 402 units. The project also proposes water amenities, club amenities, health and wellness spaces, sports and recreational amenities, and additional areas for events and restaurants. The project will improve the existing street frontages with a perimeter wall and landscaping complementing the desert environment. The buildings will also have modern architecture with a neutral color palate consisting of browns, greys, and various earth tones. See discussion c, below, for conceptual renderings of the project.

General Plan

The City of Coachella categorizes the different land uses into six specific designations. These six different designations include: Ranchos, Neighborhoods, Centers, Districts, Specific Plans, and Public.⁷ The project is in the City's District Designation, which provides primary retail and entertainment areas, and provides jobs and economic development opportunities. District Designations include four subareas: Suburban Retail, Regional Retail, Industrial, and Resort.⁸ The project is in the Regional Retail District of the City which provides opportunities for a wide range of shopping and entertainment in a variety of urban and suburban formats.⁹ These include regional shopping centers, mixed designation centers or similar uses. The intended physical character for Regional Retail Districts is organized in blocks by a combination of public and private streets that provide access and parking for them. The blocks of this District may be the largest for the City, with buildings, landscape, and signage similarly scaled up in size, but not neglecting the importance of creating a comfortable and attractive pedestrian environment for shoppers. Development intensities for Regional Retail Districts vary from 10 to 15 dwelling units per acre, with a commercial floor area ratio (FAR) 0.35 to 2.0.¹⁰ The proposed project is consistent with the Regional Retail District land use designation.

Zoning

The zoning designation for the site is Regional Commercial (RC). RC zones are intended to provide for and encourage a wide range of shopping and entertainment in a variety of urban and suburban formats.¹¹ These include regional shopping centers, mixed destination centers, or similar uses. The uses allowed in this zone will cater to regional clientele and provide a unique amenity to all residents of the Coachella Valley and an important revenue source for the City. The primary purpose of this zone is to provide commercial opportunities with residential uses supporting the retail environment. The project is consistent with the existing zoning designation once the application to amend the Zoning Code is approved, as discussed above.

- a) **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant.¹² The GPU lists Policies 6.1 (view corridor preservation) and 10.8 (preservation of natural land features) in the Sustainability and Natural Environment Element to ensure the protection of scenic vistas in the City. No mitigation is required. Scenic vistas provide valuable aesthetic resources, including expansive landscape views of the Coachella Valley, to the residents and patrons of the City and SOI (i.e., "Planning Area"). Scenic vistas within the Planning Area include views of the Mecca Hills in the eastern portion of the of the Planning Area. Additional scenic vistas that are not within the Planning Area (but can be seen from within the Planning Area) include the Santa Rosa and San Jacinto Mountains, which can be viewed to the west and southwest of the Planning Area, and the

⁷ City of Coachella, General Plan 2035: Land Use & Community Character, at 04-6 (Apr. 22, 2015).

⁸ *Id.*, at 04-34 – 04-46.

⁹ *Id.*, at 04-38 – 04-41.

¹⁰ *Id.*, at 04-38.

¹¹ Zoning Code Section 17.28.010.

¹² City of Coachella, General Plan 2035 Update: Draft Environmental Impact Report (GPU Draft EIR), Aesthetic Resources, at 4.1-5 (October 2014), available at [https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.1 - aesthetic resources.pdf](https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.1_-_aesthetic_resources.pdf).

80237.00027\45404105.1

80237.00027\45491467.1

Little San Bernardino Mountains, which can be viewed to the north and northwest of the Planning Area. According to the GPU, the natural topography of the hills, the existing agricultural uses, and the views of the surrounding mountains should be maintained and preserved for their scenic quality.¹³ The value of scenery can be highly subjective due to personal preferences and opinions. Scenic value is generally affected by the presence and intensity of neighboring man-made improvements, such as structures, overhead utilities, and landscaping. Certain man-made features can either add to or obstruct from a scenic vista.

The project site is located in the southwestern corner of Coachella, in the General Plan's Regional Retail District land use designation and RC zoning designation. The 87-acre project property is surrounded by existing, scattered residential homes, vacant land, and agricultural land. Avenue 52 delineates the project's northern boundary, Van Buren Street delineates the project's eastern boundary, and Calhoun Street delineates a portion of the project's western boundary. The surrounding rights-of-way are paved.

The project will consist of 162 single family residential units and 240 condo hotel cottages, for a total of 402 units. The project also proposes water amenities, club amenities, health and wellness spaces, sports and recreational amenities, and additional areas for events and restaurants. The buildings will vary from one to two stories. Ingress and egress from the project will be provided by two access points on Calhoun Street, two access points on Van Buren Street, and two access points on Avenue 52. Street improvements include curb and gutter improvements and perimeter landscaping as part of project development.

According to the GPU, hillsides and mountains in the Coachella Valley create scenic vistas around the City.¹⁴ From the project site, views of the San Jacinto Mountains to the west, Santa Rosa Mountains to the south, and Little San Bernardino Mountains to the north and northeast are distant. The surrounding mountains are largely observed by motorists and pedestrians travelling along the rights-of-way, and the private properties north, south, east, and west of the project. Due to the distance of the mountain vistas, baseline and some midrange views are obstructed; however, peak views are visible from the roadways adjacent to the proposed project. Depending on viewpoint location, the views of these mountain ranges are partially or fully obstructed by existing manmade structures (i.e., buildings), infrastructure (i.e., utility poles), agricultural properties (i.e., trees from surrounding groves), and landscaping. The following discussion analyzes the project's impact on scenic vistas from the surrounding rights-of-way and the surrounding properties.

Analysis from Van Buren Street (East)

Van Buren Street is a north-south trending roadway that delineates the project's eastern boundary. From the segment of Van Buren Street along the project's frontage, views of the Little San Bernardino Mountains to the north, the Santa Rosa Mountains to the south and southwest, and the San Jacinto Mountains to the northwest, are distant. Existing structures, agriculture/vegetation, and manmade facilities obstruct the baseline views of the mountains from Van Buren Street. However, mid-range and peak views are visible. Views of the Mecca Hills to the east are obstructed by existing agriculture/vegetation.

As previously stated, the San Jacinto Mountains are northwest of the project and distant (approximately 19 miles from Van Buren Street). Currently, baseline and mid-range views of the San Jacinto Mountains are obstructed by the existing vineyards onsite. Development of the proposed project would result in the brief obstruction of the San Jacinto Mountains (to the northwest) and Santa Rosa Mountains (to the southwest) from motorists and pedestrians traveling along Van Buren Street.

The project proposes the resort hotel facility at the northeast corner of the site and residences along the central, southern, and southeastern portion of the site. The buildings proposed along the eastern side of the site will include condo hotels, and residences. These buildings will be two-stories in height and set back from the roadway, compliant with the zoning code, to allow for reduced impacts of the views of the San Jacinto Mountains. Additionally, the proposed building's roof types and rooflines will vary from simple and flat roof forms with slopes. The proposed building height and rooflines are typical of those throughout the City and

¹³ City of Coachella, General Plan 2035: Land Use & Community Character, at 04-3 (Apr. 22, 2015).

¹⁴ *Id.*, at 02-13.

80237.00027\45404105.1

80237.00027\45491467.1

existing residential and commercial buildings. Moreover, building height variations and breaks in-between buildings allow for visual relief and views of San Jacinto Mountains from motorists and pedestrians traveling along Van Buren Street. Building obstructions will also be brief until the motorist passes the buildings. The project will be developed in compliance with the CMC.

Due to the direction of traffic being north-south along Van Buren Street, the primary scenic vistas observed from the right-of-way includes the Little San Bernardino Mountains to the north and Santa Rosa Mountains to the south. Thus, due to the project's location west of Van Buren Street, the project will not impact the views of the Santa Rosa Mountains to the south or the Little San Bernardino Mountains to the north.

Overall, impacts to the scenic vistas when viewed from Van Buren Street would be less than significant.

Analysis from Avenue 52 and Existing Properties (North)

As previously stated, Avenue 52 is the east-west right-of-way that delineates the project's northern boundary. North of Avenue 52 includes vacant lots, agricultural properties, and single-family residences. From Avenue 52 and the existing residential structures, views of the Little San Bernardino Mountains to the north and east, the Santa Rosa Mountains to the south and southwest, and the San Jacinto Mountains to the northwest, are distant. Existing structures, landscaping/vegetation, and manmade facilities (i.e., utility posts, etc.) obstruct the baseline views of the mountains. However, mid-range and peak views are visible depending on viewpoint location.

Development of the proposed project would result in the partial obstruction of the Santa Rosa Mountains to the south. The buildings proposed along the northern side of the site will include condo hotels and residences. These buildings will be two-stories in height and set back from the roadway, compliant with Section 17.28.030 of the CMC, to allow for reduced impacts of the views of the Santa Rosa Mountains. The project proposes building heights up to 30 feet, with chimneys reaching 34 feet. According to Section 17.28.030, the maximum heights in R-C zones shall be two stories or thirty-five (35) feet, whichever is less. Maximum heights allowed for hotels can be eighty-five (85) feet. Additionally, the proposed building's roof types and rooflines will vary from simple and flat roof forms with slopes. The proposed building height and rooflines are typical of those throughout the City and existing residential and commercial buildings. Moreover, building height variations and breaks in-between buildings allow for visual relief and views of Santa Rosa Mountains. Buildings will be set back greater than 30 feet from the Avenue 52 right-of-way. Per the CMC, the minimum perimeter setback for residential or hotel projects without frontage of buildings along perimeter street shall equal at minimum 10 feet at any point and have an average perimeter landscape setback of 20 feet for the entire frontage. An equestrian trail is also proposed along the project frontages, including along Avenue 52. The project will be developed in compliance with the CMC. The proposed setbacks, rooflines, and building height restrictions ensure that the scenic views of the hills and mountains are protected, consistent with GPU Policies 6.1 and 10.8.

Additionally, per Section 17.28.030(L) of the CMC, all development in the RC zone is subject to Architectural Review as set forth in CMC Section 17.72.010. In accordance with the CMC, Architectural Review will provide flexibility in the placement and interrelationship of structures and uses subject to Architectural Review; provide for the implementation of sound site plan design concepts while maintaining the overall intensity of land use and density of population; review the site plan of those uses which are not intrinsically objectionable to the predominant use category of the district, but which have inherent characteristics which, if not properly handled, have potentials for becoming detrimental to the health, safety, or general welfare of the public, or to neighboring land uses; determine whether or not a proposed development will properly comply with the architectural guidelines of the city and the provisions and development standards required by this chapter or as prescribed by the planning director, or other authorized agent; and improve the quality of development and to provide a mechanism whereby the city can insure well-designed development.

Due to the direction of traffic being east-west along Avenue 52, the primary scenic vistas observed from the right-of-way include the Santa Rosa Mountains to the south and the Mecca Hills to the east. Because of the project's location south of Avenue 52, the project will not obstruct existing primary views observed along Avenue 52.

The project will not impact the views of the San Jacinto Mountains to the northwest or the Little San Bernardino Mountains to the north. Overall, the project would result in less than significant impacts to scenic vistas when viewed from the properties north of the project.

Analysis from Existing Properties (South)

The property south of the project consists of residential structures, agricultural fields, and vacant lots. The closest residential structure is located approximately 50 feet from the project's southeastern boundary. From the existing structure, views of the Little San Bernardino Mountains to the north, the Santa Rosa Mountains to the south, and the San Jacinto Mountains to the northwest are distant. Existing structures, landscaping/vegetation, and manmade facilities obstruct the baseline views of the mountains. However, mid-range and peak views are partially visible depending on viewpoint location.

Development of the proposed project would result in the obstruction of the Little San Bernardino Mountains to the north. The buildings proposed along the southern side of the site will include residences and 8-foot privacy walls for security purposes. These buildings will be two-stories in height and set back from the southern boundary, compliant with the zoning code, to allow for reduced impacts of the views of the Little San Bernardino Mountains. Additionally, the proposed building's roof types and rooflines will vary from simple and flat roof forms with slopes. The proposed building height and rooflines are typical of those throughout the City and existing residential buildings. The project will be developed in compliance with the CMC.

Moreover, the project will not impact the southern property's view of the Santa Rosa Mountain to the south or the Mecca Hills to the east because the project is located north of the property. Additionally, due to the distance of the San Jacinto Mountain to the northwest, views of the mountain would not be impacted. Therefore, the project would result in less than significant impacts to scenic vistas when viewed from the developed property south of the project.

Analysis from Calhoun Street and Existing Properties (West)

As previously stated, Calhoun Street is a north-south trending right-of-way that delineates a portion of the project's western boundary. The remainder of the project's western boundary is delineated by existing residences and agricultural properties. West of Calhoun Street includes agricultural lots. From Calhoun Street, views of the Little San Bernardino Mountains to the north, Santa Rosa Mountains to the south, and San Jacinto Mountains to the northwest are distant. Existing structures, agriculture/vegetation, and manmade facilities (i.e., utility posts, etc.) obstruct the baseline views of the mountains. However, mid-range and peak views are partially visible depending on viewpoint location. From the existing residences southwest of the project, views of the San Jacinto Mountains to the northwest and Santa Rosa Mountains to the southwest are distant, and baseline views are partially obstructed by existing vegetation and manmade facilities. Views of the Little San Bernardino Mountains to the north and Santa Rosa Mountains to the south are obstructed by existing vegetation, structures, and manmade facilities. Views of the Mecca Hills are obstructed by existing agriculture/vegetation.

Development of the proposed project would not result in obstructions to the Little San Bernardino Mountains because views of the Mountain are currently obstructed by existing vegetation/agriculture. Moreover, the project will not impact the western properties views of the San Jacinto Mountains to the northwest or Santa Rosa Mountains to the south and southwest due to the project's location east of these properties. Overall, the project would result in less than significant impacts to scenic vistas when viewed from the developed properties west of the project.

Construction activities associated with the proposed project would be temporary and would include site clearing and installation of construction fencing along the perimeter of the site. Although construction activities and fencing may temporarily alter views of the project site, they would not substantially obstruct or adversely affect views of the surrounding scenic vistas from public rights-of-way. Construction fencing would be removed as development progresses, and views of the surrounding scenic vistas discussed above would remain available from public rights-of-way, depending on viewpoint location.

Conclusion

The project proposes the development of a residential and resort community and will be developed consistent with the Regional Retail District land use designation and Regional Commercial zoning designation. The proposed project buildings along the property boundaries will be two stories and set back from the property line to reduce impacts to the surrounding viewsheds. The project will also be surrounded by an 8-foot privacy wall along the southern, eastern, northern property boundaries, and portions of the western property boundaries, typical of resort properties or residential communities in the City.

Overall, the proposed project is not anticipated to adversely alter the existing viewshed on any scenic vistas, and less than significant impacts are expected.

As previously stated, the GPU EIR concluded that impacts to scenic vistas would be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would not increase impacts identified within the GPU EIR, and there is no new information of substantial importance than what was identified within the GPU EIR.

- b) **Less than Significant Impact.** The State Scenic Highway Program was established to preserve and enhance the natural beauty of California.¹⁵ It not only adds to the pleasure of the residents but also encourages the growth of recreation and tourism in the State. The 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.¹⁶ There are three officially designated state scenic highways in Riverside County. They include Highway 273, 62, and the closest, Highway 74, which is approximately 11 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. The southern section is the closest eligible state scenic highway and is located approximately 7.75 miles southeast of the project.

The GPU EIR concluded that the GPU would not result in impacts to scenic resources within a State scenic highway.¹⁷ According to the GPU, the Policies 6.2 (restricting new billboards on scenic roadways), 10.9 (encouraging the preservation of agricultural and other lands), and 13.16 (encouraging parks and trails to be designed to conserve scenic and natural features) in the Sustainability and Natural Environment Element to ensure the protection of scenic resources in the City. No mitigation is required. The GPU EIR states that there are no designated, or eligible, State scenic highways within the Planning Area. However, major historic highways within the Planning Area include Old Highway 99 (now Dillon Road between Grapefruit Boulevard and Interstate 10), Old Highway 86 (Harrison Street south of Grapefruit Boulevard), and Old Highway 111 (Grapefruit Boulevard), and Highway 86-S Expressway south of Interstate 10. These historic highways represent visual corridors and serve as an aesthetic resource for the City.¹⁸ Although there are no designated State scenic highways, the GPU provides policies that minimize aesthetic obstruction along these highways. The project lies two miles west of the closest City designated visual corridor, Grapefruit Boulevard, thus, development of the project will not impact the aesthetic resource. Moreover, the property does not contain any landmarks or scenic resources, such as trees, rock outcroppings, or historic buildings that may be altered or damaged by utilization of the site.

The proposed project is not located within close proximity to any designated County or State scenic highway, as identified by Caltrans. Therefore, development of the proposed project would not result in adverse impacts to scenic resources adjacent to or near a State scenic highway. No impacts are expected.

As previously stated, the GPU EIR concluded that impacts to scenic resources within a state scenic highway

15 Cal. Streets & Highways Code § 260 (West 2025).

16 Caltrans, *Scenic Highway Guidelines* § II (Apr. 12, 2012), available at https://www.cahighways.org/caltrans-resources/scenic/120412-scenic_highway_guidelines.pdf.

17 City of Coachella, General Plan 2035 Update: Draft Environmental Impact Report (GPU Draft EIR), Aesthetic Resources, at 4.1-6 (October 2014), available at https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/4.1_-_aesthetic_resources.pdf.

18 *Id.*, at 4.1-8.

80237.00027\45404105.1

80237.00027\45491467.1

would be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would not increase impacts identified within the GPU EIR.

- c) **Less than Significant Impact.** According to the City's GPU, the preservation of the natural beauty and scenic quality of the City is a community goal.¹⁹ The Planning Area has a unique visual characteristic in its scenic geographical location, agricultural and rancho history, and quality architecture of historic buildings. The expected growth under the GPU will turn Coachella into a medium-sized city with many more amenities and services to offer visitors and residents. The physical development under the GPU could change the existing visual characteristic of the City, thus resulting in significant and unavoidable impacts.²⁰ Although the alteration of the existing landscape is unavoidable due to future development, the views of the mountains and the rural, agricultural character should be respected, maintained, and preserved.²¹ The GPU outlines various land uses throughout the City. The GPU provides detailed guidance on the type of buildings that should be constructed in each land use in order to create the form and character sought by the GPU. The GPU also lists various 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 of the City or create a new complementary visual character.²² The policies focus on the City's character and identity (Policy 2.2), urban design as identity (Policy 2.3), natural context (i.e., topography, farmlands, waterway corridors) (Policy 2.4), and high-quality construction and architecture (Policy 2.5). With the implementation of the policies, design guidelines and development strategies presented in the GPU, impacts to visual character are reduced. However, based on the overall scale of growth under the GPU, there is potential for significant impacts to the visual character of the City.

The project site is located in a developed area of the City, where agricultural properties and vacant lots are within the immediate vicinity, but residential and commercial uses are a mile east. The project site is currently characterized by agricultural land, specifically date palm groves and grape vineyards, similar to the surrounding properties.

As previously stated, the project site is within Regional Retail District land use designation. The intended physical character for Regional Retail Districts is to be developed into blocks by a combination of public and private streets that provide addresses for the businesses and organize access and parking for them. The blocks of this District may be the largest in Coachella with buildings, landscape, and signage similarly scaled up in size, but not neglecting the importance of creating a comfortable and attractive pedestrian environment for shoppers.

Urban form guidelines for Regional Retail Districts are established in the Coachella GPU.²³ Per the guidelines, building heights for this District are generally one or two stories, but may be up to four stories, particularly for mixed use projects, and exceptions are allowed in special circumstances. The Regional Retail District (including its streets, buildings, parking fields, and signage) should be designed for the comfort and wayfinding of shoppers within the District, while projecting a unique and compelling image from the adjoining highways.²⁴ The project is consistent with the Regional Retail District land use designation and guidelines associated with this designation.

The zoning designation for the project site is Regional Commercial ("RC"). The Coachella GPU and Municipal Code Chapter 17.28 provides guidance on permitted uses and building types that should be constructed to create the form and character envisioned by the City. All developments in the RC zone are subject to Architectural Review.²⁵ The project will comply with the City's standards for projects in RC zones, except that building heights will exceed the one-story height specified in the zoning code (but will be substantially below the heights

19 City of Coachella, General Plan 2035: Land Use & Community Character, at 04-3 (Apr. 22, 2015).

20 City of Coachella, GPU Draft EIR: Aesthetics, at 4.1-7.

21 City of Coachella, General Plan 2035: Land Use & Community Character, at 04-3 (Apr. 22, 2015).

22 City of Coachella, GPU Draft EIR, Aesthetics, at 4.1-8.

23 City of Coachella, General Plan 2035: Land Use & Community Character, at 04-38 – 04-41 (Apr. 22, 2015).

24 *Id.*, at 04-39.

25 CMC § 17.72.010.

80237.00027\45404105.1

80237.00027\45491467.1

permitted under the GPU and analyzed in the GPU EIR. The table below lists the development standards for RC Zones.

Table I-1 RC Zone Development Standards

Development Standards	RC Zone Development Standards
Lot Requirements	
Minimum Lot Size	20,000 sf for commercial uses
Minimum Lot Width	None
Minimum Lot Depth	None
Maximum Lot Coverage	None
Yard Requirements	
Front Yard	15 ft in depth, except where one or both adjoining zones are residential, in which case the required yard shall be increased to equal the average of the required front yards of the adjoining zones.
Side Yard	No side yard requirement except where a RC zone adjoins a street or a residential zone, in which case there shall be a side yard of not less than 10 feet on the side or sides adjoining said street or residential zones. In the case of a reversed corner lot, the side lot adjoining the street shall be not less than the required front yard of the adjoining key lot to the rear.
Rear Yard	No rear yard requirement except where the RC zone adjoins a residential zone, in which case there shall be a rear yard of not less than 10 feet adjoining that residential zone.
Permitted Encroachments in Required Yards	The yards required for front/rear/side yards (above) may be used as part of an automobile parking area, provided however that a minimum 3-ft wide screen planting strip shall be maintained adjacent to the planned highway right-of-way line.
Height Limits	
Height Limits	Within 150-ft of any RS, single family residential zone, or any agricultural zone, shall be 1 story or 20 ft, whichever is less. - Maximum height of all other buildings shall be 2 stories or 35 feet, whichever is less, except that hotels shall have a maximum height of 85 ft.
Additional Requirements	
Distance Between Buildings	No requirements, except that buildings not actually adjoining shall be determined through site plan review.
Off Street Parking and Loading	Off-street parking and loading facilities shall be provided in accordance with the provisions of Section 17.54.010.
Screening	Where the RC zone abuts upon a residential zone, there shall be provided screening not less than 6 ft, or more than 8 ft in height on the zone boundary line. Said screening shall be reduced to 42 inches in height within a required yard adjacent to a street or highway.
Architectural Review	All development in RC zone is subject to Architectural Review set forth in Section 17.72.010 of this title.

Source: Section 17.28.030, RC Property Development Standards, Coachella Municipal Code.

The project proposes residential units and resort cottages that will vary from one- to two-stories. Currently, there is a residential structure south of the project site and agricultural uses south of the project site. The project proposes residential units consisting of two-story buildings along the southern portion of the site. The proposed residential structures will be setback from the southern project boundary by approximately 45 feet and separated by the southern property by a 8-foot tall perimeter wall. The perimeter wall will separate the project from the southern properties. Accordingly, the two story buildings will not cause any significant visual character compatibility impacts and will be consistent with the height and visual character of the development analyzed in the GPU EIR.

The project proposes a mixed-use community on approximately 87 acres of agricultural land south of Avenue 52 and west of Van Buren Street. The project is designed to have modern architecture, with natural wood facades that will complement the desert landscape and the existing surroundings. The architectural features will create texture and wall breaks, and natural finishes. Project landscaping will include a mix of various trees, shrubs and ground coverings to provide shade for pedestrians, and vertical variation and interest.

The project is designed to be an attractive resort property with high-end and unique amenities including multiple water features. The images below illustrate building elevations, visual simulations, and color and materials.

Exhibit I-1 Project Hotel Rendering



Exhibit I-2 Project Condo Hotel Rendering



Exhibit I-3 Project Residential Elevations

ALTERNATIVE 1



FRONT ELEVATION



REAR ELEVATION

ALTERNATIVE 2



FRONT ELEVATION



REAR ELEVATION

Exhibit I-4 Project Inspiration – Residential



Exhibit I-7 Project Materials Board



GL-01: GLAZING-INSULATED LOW-E



WD-01: THERMALLY TREATED SLAT WOOD



MT-01: METAL SEAM ROOF



CO-01: BOARD FORMED CONCRETE



WD-02: THERMALLY TREATED WOOD



MT-02: ANODIZED ALUMINUM

Additionally, the project is required to go through Architectural Review. The objectives of Architectural Review are to provide flexibility in the placement and interrelationship of the proposed structures and uses; to provide for the implementation of sound site plan design concepts while maintaining the overall intensity of land use and density of population; to review the site plan of those uses which are not intrinsically objectionable to the predominant use category of the district, but have inherent characteristics which, if not properly handled, have potentials for becoming detrimental to the health, safety, or general welfare of the public, or to neighboring land uses; to determine whether or not a proposed development will properly comply with the architectural guidelines of the city and the provisions and development standards required by this chapter or as prescribed by the planning director, or other authorized agent; to improve the quality of development and to provide a mechanism whereby the city can insure well-designed development.²⁶

Moreover, the project will comply with Policies 2.3 and 2.5 of the GPU. Policy 2.3 recognizes that the City can differentiate itself from other Coachella Valley cities through urban design practices such as the development of complete neighborhoods, preservation of agriculture and open space, pedestrian-oriented design and sustainable development practice, and Policy 2.5, requires high-quality and long-lasting building materials on all new development projects in the City. The project will develop a complete neighborhood and provide sidewalk and street improvements to allow for pedestrian use. The project also proposes high-quality building materials to develop a desirable residential and resort community in the City.

With the proposed enhancements, the modern architecture, and Architectural Review, the project is not expected to conflict with applicable zoning and other regulations governing scenic quality. Thus, less than significant impacts are expected.

As previously stated, the GPU EIR concluded that impacts to the visual character of the City would be

²⁶ CMC § 17.72.010.
80237.00027\45404105.1
80237.00027\45491467.1

significant and unavoidable due to the anticipated total amount of growth in the City.²⁷ However, the project would not have any new or more severe impacts than previously analyzed in the General Plan and would not have any impacts peculiar to the site for the reasons detailed above, including that the scale and intensity of development would be substantially below what is permitted in the General Plan's Regional Commercial District. Therefore, the project would be consistent with the GPU EIR and would not increase impacts identified within the GPU EIR and there is no new information of substantial importance than identified within the GPU EIR.

- d) **Less than Significant Impact.** The GPU EIR concluded that impacts to light and glare would be less than significant.²⁸ GPU Policy 6.5 requires light pollution from outdoor sources to be limited, especially in rural, hillside and mountain areas, and open spaces, to maintain darkness for night time viewing. Currently, nighttime glare exists in the western portion of the City where dense neighborhoods are a source of nighttime lights. This lighting affects nighttime views and sometimes creates a glare for exterior land that is less developed and has fewer nighttime light sources. Nighttime glare and light intrusion are minimized through the selection of appropriate lighting and light shields that limit light spill from individual properties.

The GPU EIR states that as development occurs under the GPU, additional sources of light will also be created, especially as agricultural lands are converted into urban uses to accommodate the anticipated growing population. New development would introduce new light sources that are typical of urban development projects. The new urban uses would include light sources such as street and parking lot lighting, landscape lighting, illuminated signs, exterior lighting on lamps and buildings, security lighting, and automobile lighting (i.e., headlights).²⁹

As explained previously, the project site is located in the Regional Retail District land use designation in the City of Coachella. The project site currently operates as date palm tree groves and grape vineyards. Existing sources of onsite lighting may include the supporting structure in the center of the site. However, due to the agricultural uses currently onsite, the site does not contribute to daytime or nighttime glare.

The properties surrounding the project site include agricultural properties, residential homes, and vacant lots. Therefore, sources of fixed nighttime lighting can be attributed to the existing homes in the vicinity to the project site. Home lighting typically consists of low-intensity, wall-mounted, downward-oriented fixtures in the patio, side and front yards of homes. The rights-of-way adjacent to the project site do not include streetlights. Non-fixed sources of daytime or nighttime lighting are attributed to vehicular traffic in the surrounding area.

The proposed project can be expected to generate increased levels of light and glare from interior and exterior building lighting, safety and security lighting, landscape and signage lighting and vehicles accessing the site. However, the project will be required to adhere to the lighting standards established in the CMC. Chapter 17.54.010(K) (Off-Street Parking and Loading: Lighting) of the CMC states that parking area lighting is not always required; however, if lit parking areas are required, parking lighting fixtures shall include hoods provided and adjusted, so as to preclude the direct glare of the light from shining onto property or streets. The project shall comply with Chapter 17.54.010(K) in order to provide lighting for cars and pedestrians without generating excess light and spillage.

Pertaining to glare, the project would not introduce buildings with large reflective surfaces that would generate substantial glare, nor would the project involve new sources of high-intensity lighting that would be deemed incompatible with the surrounding existing properties. As illustrated in Exhibit I-7, above, the project materials will consist of concrete, wood, and anodized aluminum. The concrete and wood are natural, non-reflective materials. The anodized aluminum is coated to reduce reflectivity. The proposed structures are expected to have light finishes (including white) combined with earth-tones that do not have highly reflective properties or other conditions that would cause substantial daytime or nighttime glare. Less than significant impacts are expected.

²⁷ City of Coachella, GPU Draft EIR, Aesthetics, at 4.1-7.

²⁸ City of Coachella, GPU Draft EIR, Aesthetics, at 4.1-9.

²⁹ *Ibid.*

80237.00027\45404105.1

80237.00027\45491467.1

As previously stated, the GPU EIR concluded that impacts to light and glare would be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would not increase impacts identified within the GPU EIR, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Aesthetics, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified. The project would not negatively affect a scenic vista, scenic resources within a state scenic highway, or the existing visual character. Additionally, the project will not create a new source of substantial light or glare.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR. The EIR adequately addressed the potential for impacts to aesthetic resources related to the buildout of the City.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures are required within the GPU EIR. Compliance with Sections 17.28.030, 17.72.101, 17.54.010 of the CMC, and General Plan Policies 2.3 and 2.5 from the Land Use and Community Form Element, and Policies 6.1 and 10.8 from the Sustainability and Natural Environmental Element ensure that potential impacts to aesthetic resources would remain less than significant.

2. AGRICULTURAL RESOURCES – Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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 zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☐	☒
c) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses?	☐	☐	☐	☐	☒

Sources: *California Farmland Mapping and Monitoring Program*, California Department of Conservation, 2022; *California Williamson Act Enrollment Finder*, 2024; *City of Coachella 2035 General Plan Update*, 2015; *City of Coachella Official Zoning Map*, April 2023.

- a) **Significant and Unavoidable Impacts.** The GPU states that implementation of the General Plan would convert 9,862 acres of farmland to urbanized use. The GPU EIR determined this would result in significant and unavoidable impacts³⁰. To combat the impacts of farmland conversion, the City divided the planning area into 17 subareas and placed every parcel in the City in one of these subareas.³¹ The purpose of the subareas is to define an overall vision and specific policy direction that supplements the General Plan Designations and the Citywide goals and policies. The General Plan includes numerous goals and policies to minimize impacts to agricultural resources. Most notably, the implementation of the 17 subareas is meant to focus development in a direction that is reflective of the growing city population, while also preserving certain subareas for agricultural use. For example, Subarea 1 contains existing residential developments and is envisioned to serve as an infill development of new neighborhoods in the future, whereas Subarea 15 and Subarea 16 will highly prioritize farmland conservation.³²

To manage the urbanization of land throughout the City with consideration to agricultural uses, Policy 2.14 in the General Plan reserves Subareas 13, 15, and 16 to maintain their current land or agriculture use until the identified High Priority Development Areas and Growth Expansion Areas are at least 60 percent developed with urban uses or preserved open spaces.³³ The City's approach to development as proposed by the General Plan (described in Policies 2.12, 2.13, and 2.14) would help reduce the impact to agricultural resources by focusing new development in High Priority Development Areas and Growth Expansion Areas and prohibiting or limiting development of land in Subareas 13, 15, and 16. These subareas are in the northeastern and southeastern part of the City. If the General Plan is implemented as proposed, all the growth anticipated to occur in Coachella by 2035 could be accommodated without any development in Subarea 16.

The project site is located within Subarea 3, the "Van Buren Corridor."³⁴ The vision of Subarea 3 is that it will transform into a major sub-regional retail destination that will provide a wide variety of goods and services for

³⁰ City of Coachella, 2035 GPU Draft EIR, Agricultural Resources, at 4.2-10.

³¹ City of Coachella, General Plan 2035 Update: Land Use & Community Character, at 04-2 (Apr. 22, 2015).

³² *Id.*, at 04-66 – 04-67, 04-82 – 04-83.

³³ *Id.*, at 04.86 – 0.4-87.

³⁴ *Id.*, at 04-68.

Coachella residents, as well as neighboring communities. Subarea 3 does not contain plans to preserve agricultural land³⁵; therefore, based on the vision for Subarea 3 within the General Plan, the project site is expected to be developed in the future. Due to the project's location in Subarea 3, it is not designated as an area intended to reserve its current agriculture uses, per Policies 2.12, 2.13, and 2.14. The proposed project will consist of a mixed-use development with residential and commercial components.

According to the Farmland Mapping and Monitoring Program (FMMP) by the California Department of Conservation³⁶, the property is designated as Prime Farmland. Prime Farmland is defined by the Department of Conservation as irrigated land with the best combination of physical and chemical features able to sustain long term production of agricultural crops.³⁷ This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Although the project site is designated as Prime Farmland, the project is consistent with the GPU and the direction for Subarea 3, for which the impacts to agricultural land have already been considered in the GPU EIR. The properties on all sides of the project are classified as Prime Farmland and Farmland of Local Importance and are encompassed within Subarea 3.

As previously stated, the GPU EIR determined impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be significant and unavoidable. To minimize the impacts to agricultural resources, the GPU divides the City into 17 Subareas to channel development in a way that supported the planning area's growing population while preserving existing agricultural land. Because the proposed project is consistent with the City's land use designation and the City's vision for Subarea 3, the project would be consistent with the analysis within the GPU EIR. The project would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- b) **Significant and Unavoidable Impacts.** As previously discussed, implementation of the General Plan would convert farmland to urbanized use, and the GPU EIR determined that impacts would be significant and unavoidable.³⁸ Through the implementation of Subareas, the GPU identifies land use types to support agricultural production, and agricultural activities are to be highly prioritized for conservation within Subarea 15 and Subarea 16. The project site is located within Subarea 3, the "Van Buren Corridor." The vision of Subarea 3 is that it will transform into a major sub-regional retail destination that will provide a wide variety of goods and services for Coachella residents, as well as neighboring communities. Subarea 3 does not contain plans to preserve agricultural land. Based on the GPU EIR, the project site, in its current state, will likely be converted to non-agricultural uses based on the vision of the City for Subarea 3.

Furthermore, the land use designation for the proposed project site is Regional Retail District, which does not allow for agricultural use. According to the 2024 California Williamson Act Enrollment Finder, no portion of land within the proposed project site is recognized as being under a Williamson Act Contract. Because the proposed project is consistent with the City's land use designation, is consistent with the City's vision for Subarea 3, and is not subject to any Williamson Act Contracts, the project is consistent with the analysis within the GPU EIR. The project would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- c) **Less than Significant Impacts.** The GPU EIR determined impacts to be less than significant.³⁹ As outlined in the General Plan, the City plans on accommodating a population growth of over 94,000 residents within the next two decades. Moreover, the broader Coachella Valley region is projected to grow by nearly 500,000 new residents. The City of Coachella does not have the financial means or political support to purchase all the threatened agricultural land in Coachella to prevent conversion to urban uses. Additionally, the City cannot accommodate this growth and avoid impacts to agriculture land simply because there is not enough non-agriculture land in the City. Instead, the General Plan presents a strategy of managing the transition from

³⁵ *Ibid.*

³⁶ See Gov. Code § 65570.

³⁷ California Department of Conservation, *Important Farmland Categories – Farmland Mapping & Monitoring Program*, Prime Farmland definition (2025), <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx>.

³⁸ City of Coachella, 2035 GPU Draft EIR, Agricultural Resources, at 4.2-15.

³⁹ City of Coachella, 2035 GPU Draft EIR, Agricultural Resources, at 4.2-16.

80237.00027\45404105.1

80237.00027\45491467.1

agricultural to urban uses through focused growth areas, market support, and land use controls with the intent of preventing the premature conversion of agricultural lands.⁴⁰ Implementation of the GPU EIR would result in the development of urban uses adjacent to farmland throughout the City, of which impacts could be considered potentially significant.

To manage the urbanization of land throughout the City with consideration to agricultural land, Policy 2.14 in the General Plan reserves Subareas 13, 15, and 16 to maintain their current land or agriculture use until the identified High Priority Development Areas and Growth Expansion Areas are at least 60 percent developed with urban uses or preserved open spaces.⁴¹ The City's approach to development as proposed by the General Plan (described in Policies 2.12, 2.13, and 2.14) would help reduce the impact to agricultural resources by focusing new development in High Priority Development Areas and Growth Expansion Areas and prohibiting or limiting development of land in Subareas 13, 15, and 16. These subareas are in the northeastern and southeastern part of the City. If the General Plan is implemented as proposed, all the growth anticipated to occur in Coachella by 2035 could be accommodated without any development in Subarea 16. Furthermore, the implementation of policies 10.8 and 10.9 in the Sustainability and Natural Resource Element would provide provisions of buffers and right-to-farm policies that protect nearby agricultural operations.⁴²

The proposed project's adherence to Policies 2.12, 2.13, 2.14, 10.8, and 10.9 would limit the project's impact on neighboring farmland and is consistent with the analysis within the GPU EIR. All land surrounding the project is anticipated to be converted to non-agricultural uses through the buildout of the General Plan. The proposed project would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Additional current CEQA Agriculture resources thresholds not included in the GPU EIR include potential impacts relating to forest land and timberland. Discussion is provided for informational purposes. The Planning Area of the City of Coachella does not have any forest land or timberland. As a result, no areas are zoned as forest land in the City of Coachella and there would be no loss of forest land or conversion of forest land to non-forest use. No impacts are anticipated.

Conclusion:

With regards to the issue area of Agricultural and Forestry Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR adequately addressed the impact to agricultural resources.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the City of Coachella General Plan 2035 Program EIR..
4. No mitigation measures are required within the GPU EIR for agricultural resources. Compliance with General Plan Policies 2.12, 2.13, 2.14, 10.8, and 10.9 ensures that potential impacts to agricultural resources would occur such that they are accounted for within the GPU EIR.

40 City of Coachella, General Plan 2035 Draft EIR, Agricultural Resources, 4.2-14.

41 City of Coachella, General Plan 2035 Update: Land Use & Community Character, at 04.86 – 0.4-87 (Apr. 22, 2015).

42 City of Coachella, General Plan 2035 Update: Sustainability & Natural Environment, at 07.10 (Apr. 22, 2015).

80237.00027\45404105.1

80237.00027\45491467.1

3. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation or 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 pollutant concentrations?	☐	☐	☐	☐	☒
d) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☐	☒

Sources: The City of Coachella 2035 General Plan, 2015; City of Coachella Climate Action Plan, 2014; Air Quality Impact Analysis, Urban Crossroads, Inc. November 2025 (Appendix A); *Final 2022 Air Quality Management Plan* (AQMP), by SCAQMD, December 2022; *Final 2003 Coachella Valley PM10 State Implementation Plan* (CVSIP), by SCAQMD, August 2003; *Analysis of the Coachella Valley PM10 Redesignation Request and Maintenance Plan*, by the California Air Resources Board, February 2010; South Coast AQMD Rule Book.

- a) **Less than Significant Impact.** The GPU EIR determined that the GPU would not conflict with or obstruct implementation of the applicable air quality plan, and therefore the impact would be less than significant.⁴³ The GPU was found to be consistent with regional growth forecasts, applicable AQMP control measures, and California Air Resources Board (CARB) siting recommendations. The GPU's population projections were found to generally align with the Southern California Association of Government's (SCAG) growth forecasts, which form the basis of the AQMP's land use and transportation assumptions. Because AQMP growth assumptions are based on SCAG forecasts, the GPU's growth trajectory was deemed consistent with the AQMP.

The GPU included numerous policies that would reduce per capita emissions through land use design, walkability, and multimodal transportation. These policies, such as enhanced pedestrian connectivity, bicycle infrastructure, and compact development, are consistent with research showing that infill and compact development reduce VMT and associated emissions compared to greenfield development. The GPU was found to align with SCAQMD control measures applicable to the Coachella Valley, including those addressing PM₁₀ emissions from construction, disturbed lands, unpaved surfaces, and agricultural activities. Policies in the Sustainability + Natural Environment Element support dust control, minimize new pollutant sources, and establish buffers near agricultural uses.

Since the GPU was found to be consistent with SCAG growth forecasts, applicable AQMP control measures, and CARB siting guidance, the GPU EIR concluded that the GPU would not conflict with or obstruct implementation of the applicable air quality plan. Accordingly, the impact was found to be less than significant.

⁴³ City of Coachella, GPU Draft EIR, Air Quality, 4.11-12.
80237.00027\45404105.1
80237.00027\45491467.1

Current AQMP Framework

The project site and Coachella Valley are situated within the Riverside County portion of the Salton Sea Air Basin (SSAB), under jurisdiction of the SCAQMD and the adopted 2022 Air Quality Management Plan (2022 AQMP), superseding the 2016 AQMP and the 2012 AQMP that were in effect during the GPU EIR analysis. The 2022 AQMP provides updated strategies for air quality attainment while recognizing the challenges from experiencing the worst levels of ground-level ozone (smog) and among the highest levels of fine particulate matter (PM_{2.5}) in the nation, despite the progress in air pollution reduction.⁴⁴ The 2022 AQMP also recognizes the Coachella Valley's necessity to meet federal ozone standards due to transport of pollution from the upwind South Coast Air Basin. As a result, the updated strategies focus on reducing emissions of nitrogen oxides (NO_x), the key pollutant that creates ozone, by 67 percent more than is required by adopted rules and regulations in 2037.⁴⁵ This is to be achieved in part through the deployment and regulation of zero emission technologies across all stationary and mobile sources, combined with additional controls over stationary sources that currently account for approximately 20 percent of NO_x emissions. The 2022 AQMP recognizes that the overwhelming majority of NO_x emissions are from heavy-duty trucks, ships, and other State and federally regulated mobile sources that are mostly beyond the SCAQMD's control; therefore, State and federal regulatory action will help meet the AQMP goals. The 2022 AQMP does not involve numeric revisions to the SCAQMD Air Quality Significance Thresholds, nor is it understood to implement land use and land development restrictions. The Air Quality Significance Thresholds are uniformly applied to the governed region, including the Coachella Valley.⁴⁶ The 2022 AQMP accounts for information and assumptions from the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to support the integration of land use and transportation toward meeting the federal Clean Air Act requirements.⁴⁷ Local air quality is measured at three established Coachella Valley monitoring stations that are part of the SCAQMD 2025 Annual Air Quality Monitoring Network Plan: Palm Springs (AQS ID 060655001), Indio (AQS ID 060652007), and Mecca (Saul Martinez - AQS ID 060652005).⁴⁸

The 2022 AQMP provides guidance for the State Implementation Plans (SIP) for attainment of the applicable ambient air quality standards. The Coachella Valley region is in non-attainment for Particulate Matter (PM₁₀) and Ozone (O₃),⁴⁹ which are described below.

Particulate Matter (PM₁₀):

PM₁₀ is a criteria air pollutant consisting of particulate matter (airborne particles) with an aerodynamic diameter of up to 10 microns.⁵⁰ In terms of health effects, elevated levels of ambient particulate matter are linked to increases in respiratory infections, number and severity of asthma attacks, the number of hospital admissions, and mortality rates. As indicated in the 2022 AQMP, the Coachella Valley is currently designated as a serious nonattainment area for PM₁₀.

PM₁₀ levels in the Coachella Valley are largely attributed to sources of fugitive dust (e.g., construction activities, re-entrained dust from paved and unpaved road travel, and natural wind-blown sources). The Coachella Valley is subject to frequent high winds that generate wind-blown sand and dust, leading to high episodic PM₁₀ concentrations, especially from disturbed soil and natural desert blow sand areas.

44 South Coast Air Quality Management District, *2022 Air Quality Management Plan (AQMP): Executive Summary*, ES-1 to ES-3 (Dec. 2022).

45 *Id.*, at ES-2.

46 SCAQMD Air Quality Significance Thresholds website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=f7601d61_25.

47 South Coast Air Quality Management District, *2022 Air Quality Management Plan – Appendix IV-C: SCAG's Regional Transportation Plan/Sustainable Communities Strategy and Transportation Control Measures* (Dec. 2, 2022).

48 SCAQMD Air Quality Monitoring Network Plan – July 1, 2026, Page 6, Table 1.

49 SCAQMD Clean Air Plans website: <https://www.aqmd.gov/home/air-quality/clean-air-plans>.

50 U.S. Env't Prot. Agency, *Particulate Matter (PM) Basics* (May 2026), <https://www.epa.gov/pm-pollution/particulate-matter-pm-basics>.

80237.00027\45404105.1
80237.00027\45491467.1

The Final 2003 Coachella Valley PM10 State Implementation Plan (CVSIP) was approved by the U.S. Environmental Protection Agency (EPA) on December 14, 2005.⁵¹ It incorporated updated planning assumptions, fugitive dust source emissions estimates, mobile source emissions estimates, and attainment modeling with control strategies and measure commitments. Some of those measures are reflected in SCAQMD Rules 403 and 403.1, which are enacted to reduce or prevent man-made fugitive dust sources with their associated PM10 emissions.

Rule 403.1 recognizes blowsand as a form of larger particulate matter that can contribute to the production of the smaller PM10 (Particulate Matter with a diameter of 10 micrometers or smaller) particles in two ways: (1) by direct particle erosion and fragmentation as natural PM10, and (2) by secondary effects, as sand deposits on road surfaces. SCAQMD has defined a Coachella Valley Blowsand Zone as the corridor of land extending two miles on either side of the Interstate 10 (I-10) Freeway, beginning at the SR-111/I-10 junction and continuing southeast to the I-10/ Jefferson Street interchange in Indio. The project site is located in the City of Coachella and therefore is outside of the Coachella Valley Blowsand Zone.

Ozone and Ozone Precursors:

Ozone (O₃) is a photochemical oxidant formed through chemical reactions of nitrogen oxides (NO_x), volatile organic compounds (VOCs), and oxygen in the presence of sunlight.⁵² In terms of health effects, individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are the most susceptible sub-groups for the effects of ozone.

The Coachella Valley portion of the SSAB is deemed to be in nonattainment for the 1997 8-hour ozone standard.⁵³ The Coachella Valley is unique in its geography due to its location downwind from the South Coast Air Basin (SCAB). As such, when high levels of ozone are formed in the SCAB upstream, they are transported to the Coachella Valley. Similarly, when ozone precursors such as NO_x and VOCs are emitted from mobile and stationary sources located in the SCAB, they are also transported to the Coachella Valley. The 2022 AQMP has found and established that the Coachella Valley does not have large sources of smog-forming emissions and therefore, local sources of air pollution have a limited impact on ozone levels compared to the transport of ozone precursors generated upwind in SCAB.⁵⁴ Based on the 2022 AQMP, the attainment date for the said ozone standard is August 2033.⁵⁵ In accordance with AB 1318 Mitigation Fees Fund, SCAQMD continues to reduce ozone and improve air quality in the Coachella Valley, in part by providing more than \$50 million in grant funding towards paving dirt roads and parking lots, clean energy projects and cleaner vehicles.⁵⁶ Future emission reductions anticipated to occur in the South Coast Air Basin associated with current and planned regulations on mobile and stationary sources are expected to contribute to improvements in ozone air quality in the Coachella Valley and lead to attainment of the standard.

Eastern Coachella Valley Community Emissions Reduction Plan:

The project site is situated within the Eastern Coachella Valley (ECV) Community Emissions Reduction Plan (CERP) area, which was approved in July 2021 as part of the implementation of Assembly Bill 617 (AB 617).⁵⁷ AB 617 was signed into law in 2017 to address the disproportionate impacts of air pollution on environmental

51 U.S. Env't Prot. Agency, Approval and Promulgation of State Implementation Plans; California — South Coast and Coachella Valley; PM-10, 70 Fed. Reg. 69,081 (Nov. 14, 2005).

52 U.S. Env't Prot. Agency, *What is Ozone?* (May 2026), <https://www.epa.gov/ozone-pollution-and-your-patients-health/what-ozone>.

53 SCAQMD, Request for Reclassification of Coachella Valley for the 1997 8-Hour Ozone Standard, (undated), [fact-sheet-for-coachella-valley-ozone-reclassification-request-english.pdf](#).

54 South Coast Air Quality Management District, 2022 Air Quality Management Plan – Chapter 7: Current & Future Air Quality – Desert Nonattainment Areas SIP (Coachella Valley), at 7-10 (Dec. 2022).

55 South Coast Air Quality Management District, 2022 Air Quality Management Plan – Chapter 1: Introduction, at 1-14 (Dec. 2022) (showing the attainment deadline for the 2015 8-Hour Ozone NAAQS in the Coachella Valley as August 3, 2033).

56 Update on AB 1318 Emission Mitigation Projects, SCAQMD Administrative Committee, Background, Agenda: <https://www.aqmd.gov/docs/default-source/Agendas/Admin-Cmte/ac-agenda-1-12-18.pdf>.

57 California Air Resources Board, *Eastern Coachella Valley Community Emissions Reduction Program (CERP) Staff Report*, at 1 (Aug. 13, 2021), https://ww2.arb.ca.gov/sites/default/files/2021-08/ECV%20CERP%20Staff%20Report_FINAL_acc.pdf.

justice communities.⁵⁸ The ECV boundary under AB 617 includes the incorporated and unincorporated portions of the Eastern Coachella Valley and City of Coachella. The CERP was developed to achieve air pollution emission and exposure reductions within the ECV community and address this community's air quality priorities. The plan describes the community outreach conducted to develop the CERP and provides emissions and exposure reduction actions, an implementation schedule, and an enforcement plan. The CERP finds that the primary sources of air pollution emissions in the ECV community are on-road vehicles, farming equipment, trains, off-road equipment, and certain industrial activities. The ECV is also deemed to be highly impacted by the declining Salton Sea levels, resulting in increasing dust emissions from the Salton Sea playa.

To protect public health, the CERP has identified efforts for improved monitoring, collaboration, and enforcement activities to be undertaken by the various responsible agencies across the ECV. Both CARB and SCAQMD enforcement staff have had a presence in the community of ECV for many years. From 2017 through 2019, CARB conducted over 1,500 inspections and South Coast AQMD responded to approximately 370 complaints and conducted over 300 inspections within the Eastern Coachella Valley community. CERP indicates that both CARB and South Coast AQMD will continue to coordinate their enforcement programs to address air pollution sources effectively within their respective jurisdictions. The most relevant topics and concerns of the CERP applicable to the project are 1) pesticides, 2) fugitive road dust and off-roading, and 3) open burning/illegal dumping.

Regional Significance Threshold Criteria:

SCAQMD considers air quality impacts significant when a project has the potential to cause or contribute to regional or localized exceedances of federal or state ambient air quality standards, such as the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). To support lead agencies in making significance determinations, SCAQMD has established quantitative thresholds for short-term construction emissions and long-term operational emissions, covering both direct and indirect sources. Table III-1 presents the SCAQMD Air Quality Significance Thresholds, published in March 2023, which were used to evaluate the project's emissions.

Table III-1 SCAQMD's Air Quality Significance Thresholds (Pounds/Day)

Emission Source	CO	VOC	NOx	SOx	PM10	PM2.5
Construction	550	75	100	150	150	55
Operation	550	55	55	150	150	55

Source: Air Quality Analysis Guidance Handbook and SCAQMD Air Quality Significance Thresholds, March 2023

Localized Significance Threshold Criteria:

The SCAQMD developed the Final Localized Significance Threshold (LST) Methodology to identify potential localized air quality impacts that could contribute to, or cause, exceedances of federal or state ambient air quality standards.⁵⁹ The methodology was created in response to environmental justice and community health concerns regarding exposure to criteria pollutants. LST analysis evaluates whether a project may generate significant localized impacts at the nearest sensitive receptors, including schools, churches, residences, hospitals, day care centers, and elderly care facilities. The methodology establishes separation distances between project sites and sensitive receptors, ranging from 25 meters (82 feet) to 500 meters (1,640 feet). LST thresholds represent the maximum emissions a project can generate without exceeding the most stringent applicable ambient air quality standard at the nearest receptor, accounting for ambient concentrations in each source receptor area, project size, and receptor distance. Meeting the lowest allowable emissions thresholds ensures compliance with the most protective standards for the project area.

⁵⁸ Cal. Health & Safety Code § 39607.1 (West 2025).

⁵⁹ SCAQMD, Localized Significance Thresholds, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

SCAQMD divides its jurisdiction into 37 source receptor areas (SRAs) for applying LSTs. The proposed development is located in SRA 30, which covers the Coachella Valley and the City of Coachella.⁶⁰ LSTs apply only to certain criteria pollutants, including carbon monoxide (CO), oxides of nitrogen (NOx), particulate matter 10 microns or smaller (PM10), and particulate matter 2.5 microns or smaller (PM2.5).

Methodology:

The current analysis and findings are based on the results of the project-specific *COVA Air Quality Impact Analysis* (AQIA), completed in November of 2025⁶¹ to evaluate the potential impacts to air quality associated with construction and operation of the project and identify measures to mitigate impacts considered potentially significant in comparison to thresholds established by the SCAQMD. The AQIA relied on the most current version of the California Emissions Estimator Model™ (CalEEMod) Version 2022⁶² which is the adopted software from the California Air Pollution Control Officers Association (CAPCOA) to quantify construction emissions and operational emissions from land development projects. The software is designed to calculate criteria pollutants and greenhouse gas emissions using widely accepted methodologies from project-specific and accepted default data inputs. Sources of these methodologies and default data include, but are not limited to, the United States Environmental Protection Agency (USEPA) AP-42 emission factors, CARB vehicle emission models, studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle.

The AQIA modeled the criteria air emissions from the proposed project land uses and dimensions consisting of 409 units: 165 two-story single-family residences (SFR) and 244 condo hotel units.⁶³ The development factors also included a crystal lagoon, and other residential amenities including restaurants, a beach club, event space, pop-up shops, outdoor amphitheater, pools, recreation areas and kids play spaces. The factors and reasoning for calculating construction and operational emissions are summarized below and fully described in Appendix A.

Construction Emission Factors

Demolition Activities: The AQIA observed that the project site contains approximately three existing structures. The combined estimated building footprint of these structures is approximately 6,143 square feet. These existing structures will require demolition and off-site removal as part of the proposed project construction activities.

Construction Emission Factors: The AQIA utilized a construction duration from August of 2026 through December of 2030 for activities involving demolition, site preparation, grading, building construction, paving and architectural coating. This construction time frame represents a “conservative” analysis scenario. If construction begins after the above-indicated dates, the associated emission factors will be lower, as regulatory standards become more stringent over time and the analysis year advances. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per the CEQA Guidelines. Consistent with industry standards and typical construction practices, each piece of construction equipment factored into the construction scenario is assumed to operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the City code.

Operational Emission Factors

60 SCAQMD, SRA City Table,

http://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.aqmd.gov%2Fdocs%2Fdefault-source%2Fceqa%2Fhandbook%2Flocalized-significance-thresholds%2Fsra-city-table.xls%3Fsfvrsn%3D94641d61_2&wdOrigin=BROWSELINK.

61 COVA Air Quality Impact Analysis (AQIA), Urban Crossroads, November 2025 (Appendix A).

62 CalEEMod Version 2022.1 (User Guide) (California Air Pollution Control Officers Association, Apr. 2022).

63 Note: The AQIA analysis was prepared using an earlier project description with 409 units. The currently proposed Project includes 402 units, representing a reduction in development intensity relative to the analyzed scenario.

80237.00027\45404105.1

80237.00027\45491467.1

The AQIA factored operational activities consisting of mobile, area, and energy sources as subsequently described.

Operational Mobile Source Emissions: The operational air quality emissions derive primarily from vehicle trips generated by the project, including employee and visitor/attendee trips associated with the proposed use. Trip characteristics available from the COVA Traffic Impact Analysis were utilized in the AQIA.

Fugitive Dust Related to Vehicular Travel: Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of brake and tire wear particulates. The emissions estimate for travel on paved roads was calculated using CalEEMod.

Operational Area Source Emission Factors

Architectural Coatings: Over a period of time the buildings that are part of this Project would require maintenance and would therefore produce emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings. The emissions associated with architectural coatings were calculated using CalEEMod.

Consumer Products: Consumer products include, but are not limited to, detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod.

Landscape Maintenance Equipment: Landscape maintenance equipment generates emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346.⁶⁴ The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by January 1, 2024, which is now in effect. However, for purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod, and do not incorporate the emissions reductions that would be realized from implementation of AB 1346.

Operational Energy Source Emission Factors

Combustion Emissions Associated with Electricity and Natural Gas: Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity. However, because electrical generating facilities for the project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SSAB, criteria pollutant emissions from offsite generation of electricity are excluded from the evaluation of significance. Natural gas and electricity usage associated with the project were calculated by CalEEMod using default parameters.

This analysis also incorporates the fugitive dust control measures required during construction under the City's Dust Control Ordinance and SCAQMD Rules 403 and 403.1. The measures of temporary soil stabilization required under this local regulatory framework are designed to prevent sediment track-out onto public roads, prevent visible dust emissions from exceeding a 20-percent opacity, and prevent visible dust emissions from extending more than 100 feet (vertically or horizontally from the origin of a source) or crossing any property line. Being a requirement in the Coachella Valley, the dust control practices are not considered mitigation.

Table III-2 demonstrates that the construction-related activities consisting of demolition, site preparation, grading, utilities/building construction, paving, and architectural coating associated with the proposed project

⁶⁴ Cal. Legis. Info., Assembly Bill 1346 (Berman & Gonzalez) – Chapter 753, Statutes of 2021 (approved by Governor Oct. 9, 2021).
80237.00027\45404105.1
80237.00027\45491467.1

will not exceed the applicable SCAQMD Air Quality Significance Thresholds for criteria pollutants, including PM10 and Ozone precursors. As a standard requirement, dust control measures will be implemented during construction as part of a City-approved fugitive dust control plan in accordance with SCAQMD Rule 403/403.1 and the City of Coachella dust control requirements per Chapter 8.20 (Fugitive Dust Control) of the Municipal Code. The requirements apply to construction-related work practices, construction and demolition activities, performance standards, and reporting/recordkeeping. Project operators required to submit a fugitive dust control plan must ensure that visible fugitive dust does not exceed 20 percent opacity, travel more than 100 feet from its source, or cross a property line. By fully implementing and maintaining all required control measures, keeping complete and accurate records, and documenting any high wind conditions on the affected day, operators can demonstrate compliance and avoid violations during high wind episodes, even if visible emissions temporarily increase. Thus, a less than significant impact would occur for the construction-related emissions in relation to the applicable South Coast AQMD Air Quality Significance Thresholds.

Table III-2 Summary of Construction Emissions (Unmitigated) (Pounds/Day)

Construction Emissions						
Year	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
2026	3.40	30.20	29.00	0.05	1.63	1.23
2027	4.39	37.20	55.90	0.09	6.06	2.66
2028	3.54	21.30	53.90	0.06	5.99	1.87
2029	18.20	21.70	58.50	0.07	6.90	2.06
2030	18.80	27.40	67.40	0.08	7.28	2.28
Winter						
2026	5.11	45.60	41.70	0.07	10.10	5.77
2027	4.86	43.20	43.00	0.09	9.95	5.60
2028	3.29	21.70	41.70	0.07	5.99	1.87
2029	17.80	22.00	45.10	0.07	6.90	2.06
2030	18.50	27.70	54.30	0.08	7.28	2.28
Maximum Daily Emissions	18.80	45.60	67.40	0.09	10.10	5.77
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: COVA Air Quality Impact Analysis, 3.4.5 Construction Emissions Summary, Urban Crossroads, Inc. November 2025 (Appendix A).

The AQIA analysis also calculated the long-term operational air pollutant emissions that would occur during the life of the project. These operations include area, energy, and mobile sources. As shown in Table III-3 below, the project-related operational emissions of criteria pollutants are also not expected to exceed the SCAQMD Air Quality Significance Thresholds. Therefore, a less than significant impact is expected for operational emissions from the project.

Table III-3 Summary of Operational Emissions (Unmitigated) (Pounds/Day)

Operational Emissions						
Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
Mobile	6.42	4.00	99.30	0.23	23.20	5.89
Area	24.80	0.33	36.30	0.00	0.03	0.03
Energy	0.17	3.05	2.56	0.02	0.23	0.23
Maximum Daily Emissions	31.39	7.38	138.16	0.25	23.46	6.15
SCAQMD Regional Thresholds	55	55	550	150	150	55

Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter						
Mobile	5.47	4.44	63.30	0.20	23.20	5.89
Area	20.60	0.00	0.00	0.00	0.00	0.00
Energy	0.17	3.05	2.56	0.02	0.23	0.23
Maximum Daily Emissions	26.24	7.49	65.86	0.22	23.43	6.12
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: COVA Air Quality Impact Analysis, 3.5.4 Operational Emissions Summary, Urban Crossroads, Inc. November 2025 (Appendix A).

As introduced previously, the 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 RTP/SCS, a planning document that supports the integration of land use and transportation to help the region meet the federal Clean Air Act (CAA) requirements. The project's consistency with the AQMP will be determined using the 2022 AQMP as discussed below.

SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal metropolitan planning organization (MPO) requirements under the Sustainable communities and Climate Protection Act. It should be noted that although the 2024-2050 RTP was released after approval of the 2022 AQMP, the 2022 AQMP is reliant in part upon the general plan land use designations.

AQMP consistency was evaluated using the criteria provided in Chapter 12 of South Coast AQMD's 1993 CEQA Air Quality Handbook. The evaluation considers whether the project is consistent with regional growth forecasts and whether project emissions could impede implementation of the AQMP's attainment strategies. The relevant consistency indicators are discussed below. (21).

Consistency Criterion No. 1

Potential to result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The violations that Consistency Criterion No. 1 refer to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded.

Construction Impacts – Consistency Criterion 1

As evaluated, the project's localized and regional construction-source emissions would not exceed applicable regional significance threshold and LST thresholds. As such, a less than significant impact is expected.

Operational Impacts – Consistency Criterion 1

As evaluated, the project's localized and regional operation-source emissions would not exceed applicable regional significance threshold and LST thresholds. As such, a less than significant impact is expected.

On the basis of the preceding discussion, the project is determined to be consistent with the first criterion.

Consistency Criterion No. 2

Potential to exceed the assumptions in the AQMP based on the years of project build-out phase. The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. As discussed above, development consistent with the growth projections in City of Coachella General Plan is considered to be consistent with the AQMP.

Construction Impacts – Consistency Criterion 2

Peak day emissions generated by construction activities are largely independent of land use assignments but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds will be exceeded, a less than significant impact would result.

Operational Impacts – Consistency Criterion 2

The proposed project consists of 402 units: 162 two-story SFR and 240 condo hotel units, two crystal lagoons, a non-contact recreational lake, and other residential amenities including restaurants, a beach club, event space, pop-up shops, outdoor amphitheater, pools, recreation areas, and kids play spaces. These uses are consistent with the City of Coachella General Plan designates the Project site as "Regional Retail District" land uses and "Regional Commercial" zoning uses.

The Regional Retail District designation provides opportunities for a wide range of shopping and entertainment in a variety of urban and suburban formats. These include regional shopping centers, mixed destination centers, or similar uses. The uses allowed in this designation will cater to regional clientele and provide a unique amenity to all residents of the Coachella Valley and an important revenue source for the City. The primary purpose of the District is to provide for commercial opportunities, with residential uses supporting the retail environment.

The Regional Commercial Zoning Designation is intended to provide for and encourage a wide range of shopping and entertainment in a variety of urban and suburban formats. These include regional shopping centers, mixed destination centers or similar uses. The uses allowed in this zone will cater to regional clientele and provide a unique amenity to all residents of the Coachella Valley and an important revenue source for the City. Implementing the Regional Retail land use designation in the General Plan, the zone's primary purpose is to provide for commercial opportunities, with residential uses supporting the retail environment.

In conclusion, the proposed Project is consistent with the City's development intensities allowed under the existing designations. Additionally, the project on an individual basis does not have an impact and, as such, the proposed project would not conflict with the goals and objectives of the AQMP. Furthermore, the project, as evaluated herein would not exceed the regional or localized air quality significance thresholds.

On the basis of the preceding discussion, the project is determined to be consistent with the second criterion.

Eastern Coachella Valley Community Emissions Reduction Plan: As previously introduced, the project is located within the ECV CERP, approved by SCAQMD in July 2021. The CERP was developed to achieve air pollution emission and exposure reductions within the ECV community and address this community's air quality priorities. CERP calls for coordination with various agencies, including CARB and SCAQMD, to improve air monitoring, collaboration, and enforcement across various sectors. The CERP finds that the primary sources of air pollution emissions in the ECV community are on-road vehicles, farming equipment, trains, off-road equipment, and certain industrial activities. The ECV is also deemed to be highly impacted by the declining Salton Sea levels, resulting in increasing dust emissions from the Salton Sea playa. The most relevant topics of

the CERP applicable to the project are 1) pesticides, 2) fugitive road dust and off-roading, and 3) open burning/illegal dumping and the Greenleaf Desert View Power Plant (DVP) facility.

Pesticides: The ECV community includes a large amount of agricultural activity with associated use of pesticides that has raised concerns over the adverse health effects. The CERP recognizes that CARB, SCAQMD, Department of Pesticide Regulation (DPR), and Office of Environmental Health Hazard Assessment (OEHHHA) are to be responsible for undertaking continued research and air monitoring to identify exposure reductions. The project will convert existing agricultural uses (date palm orchards and grape vines) into a residential and resort community. The existing use of pesticides associated with date palm and grape cultivation will be discontinued and reduced to the site landscaping needs. Thus, the proposed development will not constitute a new source of agricultural pesticide application and would not interfere with the measures undertaken by the responsible agencies.

Fugitive Road Dust and Off-Roading: The CERP identifies a concern over inhalable particulate matter (PM₁₀) emitted from unpaved and paved roadways and from dust resuspended by off-road vehicles. To address community concerns about emissions from fugitive road dust and off-roading in ECV, the CERP has identified additional agency monitoring and enforcement efforts, combined with the pursuit of opportunities to implement paving to reduced unpaved travel.

The project will include the appropriate street and driveway improvements (paving) at its property frontage on 52nd Street, Calhoun Street, and Van Buren Street, thus eliminating the unpaved shoulder condition that would otherwise contribute to fugitive dust. During construction, fugitive dust will be regulated by an approved dust control plan under SCAQMD Rule 403/403.1 and under the City's Dust Control Ordinance (Chapter 8.20). Therefore, project implementation would not interfere with or impede CERP implementation on this community concern.

Open Burning and Illegal Dumping: The CERP identified as concern over agricultural burning, particularly associated with grapes, dates, citrus, and other crops. To address community concerns about open burning and illegal dumping emissions and exposures, the CERP has identified additional agency monitoring and enforcement efforts, combined with the pursuit of opportunities to work with agricultural operators for reduced open burning activities. The proposed project would not involve new potential sources of open burning or illegal activity. Therefore, project implementation would not interfere or impede CERP implementation on this community concern.

Greenleaf Desert View Power Plant (DVP): The DVP facility has previously been identified as a community concern for air quality in the ECV study area under this plan. This facility has been in operation since 1992. Since this facility is located on tribal land, it is regulated by Region 9 of the U.S. EPA. The CERP acknowledges the concerns raised about air pollutant emissions from this facility and has established various actions under the SCAQMD responsibility to compile further information about the facility emissions, including monitoring and air quality measurements, and implement reduction measures as necessary. On April 30, 2024, the operator of DVP announced an indefinite idling of operations. The proposed development would not interfere or impede CERP implementation on this community concern involving the closed DVP facility.

In summary, the project would not have the potential to result in or cause NAAQS or CAAQS violations. The project would not exceed the regional or localized construction and operational thresholds, and the project's development intensity is consistent with the development intensities evaluated with the GPU EIR. As such, the project is therefore considered to be consistent with the AQMP as determined for the GPU implementation. Pertaining to the obstruction of an applicable air quality plan, less than significant impacts are anticipated. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- b) **Less than Significant Impact.** The GPU EIR evaluated whether its implementation would violate any air quality standard or contribute substantially to an existing or projected air quality violation, and impacts were

determined to be less than significant.⁶⁵ The GPU EIR estimated Citywide emissions for 2035 with SCAQMD's CalEEMod model, reported in tons per year, for comparison to regional emissions. The EIR estimated the long-term emissions taking into account the implementation of GPU policies that increased density, improved walkability, and expanded transit access. Coachella's estimated emissions were compared to District-wide emissions projected for 2030 in the effective AQMP for VOC, NOx, CO, SOx, and PM2.5. Coachella's future operational emissions were found to represent less than one percent of total regional emissions. This comparison was considered conservative because regional emissions were expected to increase between 2030 and 2035. In addition, the GPU's transportation and land use policies were expected to reduce per-capita emissions by improving multimodal travel options. Based on the EIR analysis, the City's long-term emissions were not expected to exceed regional levels or represent a disproportionate share and were found to be consistent with regional forecasts; therefore, impacts were less than significant.

The GPU EIR also found that the potential to create CO "hotspots" at congested intersections from GPU implementation would be less than significant. CO hotspot analysis represents the standard method for evaluating localized air quality impacts from traffic related emissions, as CO is the most likely to exhibit intersection level concentration increases under congested conditions. Although CO concentrations could increase near intersections with severe congestion, the Coachella Valley had been in attainment of state and federal CO standards for nearly 30 years, with long-term monitoring data showing a steady decline in CO levels due to cleaner vehicles, improved fuels, and inspection programs. The highest recent 8-hour CO concentration (0.6 ppm in 2011) remained far below the 9.0 ppm standard.⁶⁶

Screening criteria indicated that CO hotspot analysis would be warranted only at intersections operating at loss of service (LOS) E or F where project traffic would significantly increase congestion. However, the GPU included roadway improvements and circulation policies that would increase capacity, reduce vehicle use, and support alternative transportation. With these measures in place, traffic operations would not deteriorate to levels that would cause exceedances of the 1-hour or 8-hour CO standards.

Accordingly, even with increased vehicle trips under the GPU, localized CO concentrations would remain below ambient air quality standards. Localized air quality impacts related to CO hotspots were determined to be less than significant, and no additional mitigation was required. The GPU EIR did not identify or evaluate any other types of localized pollutant exceedances, and no evidence has since emerged indicating that other localized exceedances have occurred or would reasonably be expected to occur under GPU implementation.

The GPU recognized that ozone exceedances in the Coachella Valley were primarily driven by emissions transported from the SCAB rather than by local sources. The EIR noted that SCAQMD had not imposed region-specific ozone control measures for this reason, and regional modeling in the 2012 AQMP projected attainment of federal ozone standards even with substantial population growth in Coachella Valley. Although construction and operational activities associated with GPU implementation would generate ozone precursors, the City's contribution to regional emissions was minimal, and implementation of GPU land use, mobility, and sustainability policies would further reduce local precursor emissions. As a result, growth under the GPU was not expected to impede regional progress toward ozone attainment.

As discussed previously, the Coachella Valley portion of the SSAB is in nonattainment for the 1997 8-hour ozone standard.⁶⁷ Under the 2022 AQMP, the target attainment date for this standard is August 2033.⁶⁸ SCAQMD has established that the Coachella Valley does not have large sources of smog-forming emissions and, therefore, local sources of air pollution have a limited impact on ozone levels compared to the transport of ozone precursors generated upwind in SCAB. As demonstrated in Tables III-2 and III-3, short-term construction and long-term operational emissions associated with the residential land use component of the Specific Plan

65 City of Coachella, *General Plan Update Draft EIR*, Air Quality Section (Section 4.11), pg. 4.11-12.

66 City of Coachella, *General Plan Update Draft EIR*, Air Quality Section (Section 4.11), pg. 4.11-21.

67 Request for Reclassification of Coachella Valley for the 1997 8-Hour Ozone Standard, S. C. A. Q. M. D. (undated) at ES-1.

68 2022 Air Quality Management Plan for the South Coast Air Quality Management District, *Chapter 1 – Introduction*, at 1-1, 1-9 (Dec. 2022).

80237.00027\45404105.1

80237.00027\45491467.1

would not exceed the SCAQMD Air Quality Significance Thresholds for ozone precursors, such as NOx and Reactive Organic Gas (ROG)/VOC. Therefore, pertaining to the ozone nonattainment status, the proposed project would not result in an exceedance to the applicable threshold or result in a cumulatively considerable net increase in the precursors of this criteria pollutant.

As recognized in the GPU EIR, the Coachella Valley is designated as a serious nonattainment area for PM10 and is under the EPA-approved Coachella Valley PM10 State Implementation Plan with an attainment strategy for meeting the PM10 standard.⁶⁹ Some of the existing measures include the requirement of detailed fugitive dust control plans from builders that specify the use of more aggressive and frequent watering, soil stabilization, wind screens, and phased development to minimize fugitive dust. Appropriate air quality measures to prevent fugitive dust are required by the City's Fugitive Dust Control ordinance and plan implementation requirements, which are consistent with SCAQMD Rules 403 and 403.1 that apply to the Coachella Valley strategy for reducing fugitive dust emissions. Under the City's dust control regulations per Chapter 8.20 (Fugitive Dust Control) of the Municipal Code, a Fugitive Dust Control Plan must be prepared and approved prior to any grading, earth-moving, demolition, or building operation with a disturbed surface area of more than five thousand (5,000) square feet. Consistent with SCAQMD Rules 403 and 403.1, implementation of the Fugitive Dust Control Plan is required to occur under the supervision of an individual with training on Dust Control in the Coachella Valley. The plan will include methods to prevent sediment track-out onto public roads, prevent visible dust emissions from exceeding a 20-percent opacity, and prevent visible dust emissions from extending more than 100 feet (vertically or horizontally from the origin of a source) or crossing any property line. The most widely used measures include proper construction phasing, proper maintenance/cleaning of construction equipment, soil stabilization, installation of track-out prevention devices, and wind fencing. As shown in Tables III-2 and III-3, project-related short-term construction and long-term operational emissions that factor in the required soil stabilization measures are expected to not exceed the applicable SCAQMD Air Quality Significance Thresholds for PM10.

Pertaining to the attainment efforts of PM10, ozone precursors, and other criteria pollutants, the proposed project would not result in an exceedance to the applicable thresholds or result in a cumulatively considerable net increase. Less than significant impacts are anticipated. The project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- c) **Less than Significant Impact.** The GPU EIR concluded under Impact 4.11-2 that construction-related emissions would result in a less-than-significant impact to local air quality because implementation of the General Plan Update would not generate substantial emissions of air pollutants in areas near sensitive receptors. Construction activities associated with future development under the proposed CGPU were anticipated to generate temporary emissions from construction equipment, truck trips, soil disturbance, worker vehicles, and architectural coatings; however, these emissions were not expected to result in adverse air quality effects at nearby sensitive receptor locations.⁷⁰ These activities would emit ozone precursors (NOx and CO) and fugitive dust (PM10), and demolition activities posed the potential to release asbestos or other toxic air contaminants. Because detailed information on future development was not available at the programmatic level, the analysis relied on a qualitative assessment. GPU policies, such as maintaining buffers from sensitive receptors (Policy 11.3) and requiring construction practices that limited emissions and dust (Policy 11.8), were found to reduce overall impacts. Compliance with SCAQMD Rules 402, 403, and 403.1 would further minimize emissions by requiring best available dust control measures and fugitive dust control plans for construction sites. With adherence to GPU policies and SCAQMD rules, construction-related air quality impacts were reduced to less than significant, and no mitigation measures were required.

⁶⁹ South Coast Air Quality Management District, Coachella Valley PM10 Plan – Final 2002 CVSIP (2002).
California Air Resources Board, Coachella Valley PM10 Redesignation Request & Maintenance Plan ES-1 (Feb. 2010).

⁷⁰ City of Coachella, *General Plan Update Draft EIR*, Air Quality Section (Section 4.11), pg. 4.11-28.

A sensitive receptor is a person or group in the population particularly susceptible (i.e. more susceptible than the population at large) to health effects due to exposure to an air contaminant. Sensitive receptors and the facilities that house them are of particular concern if they are located in close proximity to localized sources of CO, toxic air contaminants, or odors. Residences, long-term health care facilities, schools, rehabilitation centers, playgrounds, convalescent centers, childcare centers, retirement homes, and athletic facilities are generally considered sensitive receptors.

The AQIA has evaluated the project settings to identify potential sensitive receptors. Localized air quality impacts were evaluated at sensitive receptor land uses nearest the project site. All distances were measured from the project site boundary to the outdoor living areas (e.g., backyards) or at the building façade, whichever is closer to the project site. These receptor locations are located as follows:

- R1: Location R1 represents the existing residence at 83890 52nd Avenue, approximately 104 feet north of the project site. Receptor R1 is placed at the building façade facing the project site.
- R2: Location R2 represents the existing residence at 84045 52nd Venue, approximately 130 feet east of the project site. Receptor R2 is placed in the private outdoor living area (backyard) facing the project site.
- R3: Location R3 represents the existing residence at 52815 Van Buren Street, approximately 59 feet south of the project site. Receptor R3 is placed in the private outdoor living area (backyard) facing the project site.
- R4: Location R4 represents the existing residence, approximately 56 feet southwest of the project site. Receptor R4 is placed at the building façade facing the project site.
- R5: Location R5 represents the existing residence at 53465 52nd Avenue, approximately 834 feet west of the project site. Receptor R5 is placed at the building façade facing the project site.

SCAQMD recommends that the nearest sensitive receptor be considered when determining a project's impact. The nearest land use where an individual could remain for 24 hours to the project site has been used to determine localized construction and operational air quality impacts for emissions of PM10 and PM2.5 (since PM10 and PM2.5 thresholds are based on a 24-hour averaging time). Consistent with LST Methodology, the nearest industrial/commercial use to the project site is used to determine construction and operational LST air impacts for emissions of NOX and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assumed that an individual could be present at these sites for periods of one to 8 hours.

As displayed in Table III-4, emissions during the peak construction activity will not exceed the SCAQMD's localized significance thresholds at the maximally exposed receptor location. All other modeled locations in the study area would experience lower concentrations, resulting in a reduced impact. As such, the project's localized impacts during construction activity would be less than significant.

Table III-4 Summary of Localized Construction Emissions (In Pounds/Day)

Peak Construction	CO		NO ₂	PM ₁₀	PM _{2.5}
	Averaging Time				
	1-Hour	8-Hours	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	0.02	0.01	0.02	1.81	0.99
Background Concentration ^A	1.10	0.80	0.038		
Total Concentration	1.12	0.81	0.05	1.81	0.99
SCAQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
Threshold Exceeded?	NO	NO	NO	NO	NO

Source: COVA Air Quality Impact Analysis, 3.6.7 Construction-Source Localized Emissions, Urban Crossroads, Inc. November 2025 (Appendix A).

Pertaining to operational-source localized emissions, the total development of the project is to consist of 162 two-story SFR and 240 condo hotel units. The development includes two lagoons, and other residential amenities including restaurants, a beach club, event space, pop-up shops, outdoor amphitheater, pools, recreation areas, and kids play spaces. According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed project does not include such uses, and thus, due to the lack of significant stationary source emissions, no long-term localized significance threshold analysis is needed. Moreover, project-related traffic at any intersections in the vicinity of the project would not cause or contribute to a CO hotspot since the background concentrations are low and any contribution from project traffic would be negligible.

The potential impact of project-generated air pollutant emissions at sensitive receptors has also been considered. Results of the LST analysis in the AQIA indicate that the project would not exceed the SCAQMD localized significance thresholds during construction. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during project construction.

Additionally, the project would not exceed the SCAQMD localized significance thresholds during operational activity. Further Project traffic would not create or result in a CO “hotspot.” Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project operations.

Friant Ranch Case: In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, the California Supreme Court held that an EIR’s air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided.

Most local agencies, including the City of Coachella, have not conducted their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or “generic” data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), existing scientific tools cannot accurately estimate health impacts of the project’s air emissions without undue speculation. Instead, readers are directed to the project’s air quality impact analysis above, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project’s construction and long-term operation.

Notwithstanding, the project-specific AQIA evaluated the proposed project’s localized impact to air quality for emissions of CO, NOx, PM10, and PM2.5 by comparing the proposed project’s on-site emissions to the SCAQMD’s applicable LST thresholds. The LST analysis above determined that the project would not result in emissions exceeding SCAQMD’s LSTs. Therefore, the proposed project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NOx, PM10, and PM2.5. As the project’s emissions would comply with federal, state, and local air quality standards, the proposed project’s emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and would not provide a reliable indicator of health effects if modeled.

The project would not result in emissions capable of exposing sensitive receptors to localized substantial pollutant concentrations. Moreover, the proposed project would not situate new housing in a location known to be exposed to existing or planned sources of substantial emissions. Less than significant impacts are anticipated. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- d) **Less than Significant Impact.** The GPU EIR found that long-term emissions associated with future development under the GPU would be less than significant.⁷¹ While individual projects could exceed SCAQMD project-level thresholds, such projects would undergo separate CEQA review and incorporate feasible mitigation as needed. At the programmatic level, long-term emissions were evaluated by comparing GPU buildout to SCAG regional growth forecasts and to future regional emissions in the 2012 AQMP. The GPU EIR assessed that SCAQMD rules 402 (Nuisance) and 410 (Odors from Transfer Stations and Material Recovery Facilities) would help address offensive odor concerns within the GPU planning area, as these rules have mechanisms for citizen complaints to local governments and the SCAQMD that can lead to enforcement on facilities.

Overall growth under the GPU would remain generally consistent with regional planning assumptions. GPU policies promoting higher density, walkability, mixed-use development, and multimodal transportation would reduce per-capita vehicle miles traveled and support applicable SCAQMD and CARB control measures.

CalEEMod modeling for 2035 showed that Coachella's future operational emissions would represent less than one percent of total regional emissions across all criteria pollutants. This comparison is conservative because regional emissions would increase between 2030 and 2035. With GPU policies reducing reliance on automobiles and improving transportation efficiency, long-term emissions would remain consistent with regional forecasts. Therefore, impacts were determined to be less than significant.

Pertaining to odors, the GPU EIR assessed that SCAQMD rules 402 (Nuisance) and 410 (Odors from Transfer Stations and Material Recovery Facilities) would help address offensive odor concerns within the GPU planning area, as these rules have mechanisms for citizen complaints to local governments and the SCAQMD that can lead to enforcement on facilities.

Objectionable odors can be associated with toxic or non-toxic emissions. While odors seldom cause physical harm, they can be unpleasant and lead to considerable annoyance and distress among the public. Examples of facilities commonly known to generate considerable odors include agricultural operations such as livestock and farming, wastewater treatment plants, food processing facilities, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities.

Per the ECV CERP, the project area is exposed to odor concerns associated with elevated levels of hydrogen sulfide (H₂S) that occur from natural processes in the Salton Sea. H₂S odor events are primarily observed during the hot summer months, when emissions from the Salton Sea are transported northwest toward inland areas of the Coachella Valley. As part of the ECV CERP, SCAQMD has expanded the H₂S monitoring network to identify the origin, provide real-time H₂S data, and inform community members of potential odor events.

The project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements under Rule 403, which call for contractors to operate properly maintained equipment to minimize emissions, would also help reduce odor impacts from construction.

The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction; thus, it is considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. The project site's water features would be properly operated with mechanical aeration, circulation, and maintained to prevent these features from

⁷¹ City of Coachella, General Plan Update Draft EIR, Air Quality Section (Section 4.11), pg. 4.11-19.
80237.00027\45404105.1
80237.00027\45491467.1

presenting an additional source of objectionable odors. The proposed development would not conflict with or obstruct with the ECV CERP strategies for addressing odor concerns from the Salton Sea.

Therefore, odors and other emissions (such as those leading to odors) associated with construction and operations activities of the proposed project would be less than significant and no mitigation is required. As a result, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Air Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified. The project-specific Air Quality Impact Analysis determined that construction and operational emissions would not exceed the applicable South Coast Air Quality Management District (SCAQMD) regional significance thresholds for criteria pollutants, including ozone precursors, PM10, and PM2.5. Localized Significance Threshold analyses also demonstrated that emissions at nearby sensitive receptors would remain below applicable thresholds.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR evaluated consistency with the applicable Air Quality Management Plan, regional and cumulative criteria pollutant emissions, localized air quality impacts, exposure of sensitive receptors, and odor impacts associated with buildout of the General Plan. The Program EIR concluded that implementation of the City of Coachella General Plan 2035 would not conflict with regional air quality planning efforts and would result in less-than-significant air quality impacts.
3. No substantial new information has been identified which results in an impact more severe than anticipated by the City of Coachella General Plan 2035 Program EIR. Although the applicable air quality planning framework has been updated through adoption of the 2022 Air Quality Management Plan and the Eastern Coachella Valley Community Emissions Reduction Plan, the project-specific Air Quality Impact Analysis demonstrates that construction and operational emissions would remain below applicable regional and localized significance thresholds. The Project would also remain consistent with the assumptions, goals, and attainment strategies of the current Air Quality Management Plan and would not interfere with implementation of the Eastern Coachella Valley Community Emissions Reduction Plan.
4. No mitigation measures were identified in the GPU EIR for air quality impacts. Compliance with SCAQMD Rules 402, 403, and 403.1; Chapter 8.20 (Fugitive Dust Control) of the City of Coachella Municipal Code; and applicable General Plan policies related to air quality protection, dust control, compatible land use planning, and multimodal transportation would ensure that potential impacts related to criteria pollutants, localized air quality, sensitive receptors, and odors would remain less than significant.

4. BIOLOGICAL RESOURCES -- Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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 Wildlife 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, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☐	☒
c) 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?	☐	☐	☐	☐	☒
d) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☐	☒

Sources: City of Coachella 2035 General Plan Update, 2015; Coachella Valley Multiple Species Habitat Conservation Plan, 2007; *Habitat Assessment and CVMSHCP Consistency Analysis*, ELMT Consulting (ELMT), April 2025.

- a) **Less Than Significant with Mitigation.** Because the City is not fully developed, the biodiversity surrounding the planning area could be negatively impacted by growth under the General Plan. The GPU EIR determined that impacts would be less than significant with mitigation.⁷² However, Subarea 3, in which the proposed project will be developed, is not indicated to include sensitive wildlife or plant species within the GPU EIR. Regardless, this does not exclude the presence of sensitive species, and therefore the development of the planning area will be required to adhere to the following policy to ensure that impacts are not significant:

⁷² City of Coachella, 2035 GPU Draft EIR, Biological Resources, at 4.3-23.
80237.00027\45404105.1
80237.00027\45491467.1

- 9.8. Sensitive Species.** Require projects proposing to develop in Subareas 5, 6, and 7 to conduct surveys to determine if there is occurrence of sensitive species within the project area. If sensitive species are present, projects must implement mitigation measures necessary as prescribed by a qualified biologist and approved by any applicable resource agency in order to receive necessary City permits.

Despite existing in Subarea 3, the proposed project had a biological survey and subsequent report prepared for site by ELMT in February 2025 (Appendix B). The report states that the 87-acre project site supports an agricultural land cover type in the form of row crops. Agricultural segments for date palm (*Phoenix dactylifera*) and grape (*Vitis sp.*) occur throughout the proposed project site. These areas consist of dense monocultures of the aforementioned crop species. Additional plant species in the agricultural areas onsite include Russian thistle (*Salsola tragus*), Saharan mustard (*Brassica tournefortii*), Mediterranean mustard (*Hirschfeldia incana*), and prickly lettuce (*Lactuca seriola*).

The developed area of the project site contains an irrigation pond in the central-northern area of the site, with nearby pump housing and approximately three existing support structures. These are dilapidated and uninhabitable structures with a combined estimated building footprint of approximately 6,143 square feet, and they appear to have been used in connection with past agricultural operations. These areas are predominantly void of vegetation with the exception of a few weedy, ruderal, and nonnative/invasive species. The pond was primarily inundated due to recent pumping practices and precipitation and serves to irrigate the surrounding agricultural areas onsite. The irrigation pond does not support hydrophytic vegetation or wetland-obligate species.

No special-status plant species were observed on-site during the field investigation. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats on-site, it was determined the project site does not have potential to support any special-status plant species known to occur in the area, and all are presumed absent due to the removal of native habitats through historical agricultural land use and development within the project site. Therefore, no impact is expected to occur on special-status plant species. This is consistent with the determination for Subarea 3 in the GPU EIR.

The project site provides suitable habitat to support reptilian species adapted to disturbed environments and conditions in the Coachella Valley. No reptilian species were detected onsite during the investigation.

The project site provides suitable foraging and nesting habitat for avian species adapted to routine human disturbance and desert environments. The 2025 California Natural Diversity Data Base by California Department of Fish and Wildlife (CDFW) lists a total of 26 special-status wildlife species as having the potential to occur within the Indio quadrangle (list available in the Habitat Assessment in Appendix B). No special-status animal species were observed on-site during the field investigation. Based on habitat requirements for the identified special-status wildlife species, known distributions, and the routine disturbance, it was determined that the proposed project site has a high potential to support Cooper's hawk (*Astur cooperii*) due to suitable foraging habitat. However, Cooper's hawk is not a State or federally listed species. Further, it was determined that no other special-status wildlife species have the potential to occur on-site, and all are presumed absent. Although the project site has a high potential to support Cooper's hawk occurrences, it is not expected to nest onsite due to the location of the site lying outside of the typical breeding range for the species. In addition, the ELMT biological survey and report states that "No bat species are expected to roost on-site due to a lack of suitable roosting habitat (i.e., trees, crevices, abandoned structures) within and surrounding the project site. " This is consistent with the General Plan EIR, which concluded that no special status bat species are expected to occur in the planning area.

No nest of any avian species was found within the project boundaries. However, the project site and surrounding areas contain numerous suitable nesting sites. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). Therefore, to

ensure impacts to any special status birds would be less than significant, the biological report recommends a pre-construction nesting bird clearance survey shall be conducted prior to ground disturbance if construction occurs between February 1st and August 31st. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. The biological report states that the pre-construction nesting bird survey is compliant with and will be performed per the MBTA and California Fish and Game Code, detailed above. While surveys are not included in the original text of the MBTA and Game Code, the United States Fish and Wildlife Services (USFWS) formally recognizes and provides best management practices for nesting bird surveys.⁷³ The implementation of these practices will reduce impacts to migratory and nesting birds within the project site.

The biological report states that if construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities are to stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances; Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.⁷⁴

One functionally non-covered and sensitive avian species was a possible occupant of the project site and vicinity: the burrowing owl (*Athene cunicularia*). The burrowing owl, a candidate endangered species under the California Endangered Species Act (CESA), was not observed or detected on or near the project site. The existing agricultural crops do not provide line-of-sight observations favored by burrowing owl. Further, the trees found onsite and surrounding electrical poles north of the project site provide suitable perching opportunities for large raptors (i.e., red-tailed hawks) that can prey on burrowing owl. Based on the results of the field investigation, it was determined that the project site does not have potential to support burrowing owl, and focused surveys are not recommended.

The project area is located within the Plan Area of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), which outlines policies for conservation of habitats and natural communities. According to Figure 4-1 of the CVMSHCP, the site is not designated as a conservation area. Additionally, the site is not located immediately adjacent to a Conservation Area of the CVMSHCP and is therefore not subject to CVMSHCP requirements regarding lands adjoining Conservation Areas. The project is required as a standard condition to comply with and pay the relevant CVMSHCP Land Development Mitigation Fees (LDMF). This is required in the City's Municipal Code, Chapter 4.48: Coachella Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan Mitigation Fee.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. However, the EIR determined impacts to be less than significant with the incorporation of a

⁷³ United States Fish and Wildlife Services, *Nationwide Avoidance & Minimization Measures for Birds*, 2024, <https://www.fws.gov/media/nationwide-avoidance-minimization-measures-birds>

⁷⁴ *Habitat Assessment and CVMSHCP Consistency Analysis*, ELMT Consulting (ELMT), April 2025, at page 21.
80237.00027\45404105.1
80237.00027\45491467.1

biological site assessment and adherence to any mitigation proposed by a qualified biologist. The proposed project will have avoidance measures in place for nesting migratory birds and will be and the requirement to pay the LDMF by the City Municipal Code. Therefore, the project would be consistent with the analysis within the GPU EIR. The project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- b) **Less than Significant Impact.** Within the planning area, riparian habitat occurs in a very limited area north of the City near the Whitewater River. Impacts of the GPU were determined to be less than significant.⁷⁵ There are no other occurrences of riparian habitat within the City. Due to the dispersed nature of riparian habitat, the planning area does not support associated sensitive species. The proposed project does not contain nor is it adjacent to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or U.S. Fish and Wildlife Service. There is no blue line stream within the project property as depicted on the United States Geological Survey topographic maps or National Hydrography Dataset.⁷⁶ Therefore, the project would be consistent with the analysis within the GPU EIR and would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.
- c) **Less than Significant Impact.** The GPU determined that impacts would be less than significant.⁷⁷ Though there is potential for impact on migratory species from the loss of forage areas for these species from such growth as projected by the GPU, these impacts are expected to be less than significant due to the significant tracts of land that would be set aside as open space as proposed by the GPU Land Use Plan.⁷⁸

No migratory wildlife corridors or native wildlife nursery sites are found on the project or adjacent properties. As previously discussed, the site consists primarily of agricultural development in the form of row crops in the central and eastern portion of the site and a palm plantation within the western portion. An irrigation pond occurs in the central-northern area of the site with nearby pump housing and additional support structures. Disturbances have eliminated the natural plant communities that historically occurred on the project site. Moreover, there are no existing drainages that would support wildlife nursery sites or corridors, and the site is not located in a known wildlife corridor. To ensure no impact occurs to migratory birds, the biological report prepared by ELMT suggests a pre-construction nesting bird clearance survey which will be conducted prior to ground disturbance if construction occurs between February 1st and August 31st. This recommendation is consistent with the requirements of the MBTA, California Fish and Game Code, and USFWS.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as less than significant. The project would be consistent with the analysis within the GPU EIR. The project would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- d) **Less than Significant Impact.** The City of Coachella and its SOI are located within the area for the CVMSHCP. According to the GPU EIR, impacts to this resource were anticipated to be less than significant.⁷⁹ There is very little CVMSHCP Conservation Land within the Planning Area, occurring in Subarea 17 only. Under the GPU, these areas are proposed for preservation as open space. Additionally, the GPU identifies and provides policy for the City to support and adhere to the CVMSHCP. To ensure compliance with the CVMSHCP, the following policies can be found in the Sustainability + Natural Environment Element of the GPU.⁸⁰

⁷⁵ City of Coachella, 2035 GPU Draft EIR, Biological Resources, at 4.3-26.

⁷⁶ Riverside County Map My County Interactive Map, *Blueline Streams* (2025), https://gis1.countyofriverside.us/Html5Viewer/?viewer=MMC_Public.

⁷⁷ City of Coachella, 2035 GPU Draft EIR, Biological Resources, at 4.3-28.

⁷⁸ *Ibid.*

⁷⁹ *Id.*, at 4.3-29.

⁸⁰ City of Coachella, General Plan 2035 Update: Sustainability & Natural Environment, at 07.9 – 0.7-10 (Apr. 22, 2015).

80237.00027\45404105.1

80237.00027\45491467.1

- 9.4 Conservation and preservation easements.** Develop a program to facilitate the creation of conservation and preservation easements that identifies key habitat areas, habitat corridors and sensitive biological resources and:
 - Establishes a simple process for land owners to grant easements, including identifying organizations or agencies capable of holding the easements; and
 - Provides information to the landowners of identified properties about the benefits of conservation and preservation easements.
- 9.5 Multiple species habitat conservation plan.** Support and adhere to the Coachella Valley Multiple Species Habitat Conservation Plan.
- 10.2 Whitewater river corridor.** Preserve a public open space corridor of trails and wildlife habitat along the Whitewater River.
- 10.7 Wildlife corridors.** Establish and preserve wildlife corridors.

As previously stated, the project site occurs in Subarea 3 and is not located within or adjacent to a designated Conservation Area under CVMSHCP. Therefore, it is not subject to CVMSHCP requirements regarding lands adjoining Conservation Areas. The CVMHSCP implements a Local Development Mitigation Fee for all new development to support the acquisition of conservation lands. The fee would be applied per Chapter 4.48 of the City of CMC. Based on these provisions, the applicable fees would be collected, and the project is expected to comply with the policies outlined in the Sustainability + Natural Environment Element of the GPU, which were designed in accordance with provisions of the CVMSHCP. There are no local tree preservation policies or ordinances in place. The proposed project will include landscaping improvements in a manner that is consistent with local development standards. The project will comply with landscaping policies outlined in the Sustainability + Natural Environment Element of the GPU and the CVMSHCP. Policies include integration of native, drought tolerant desert plants as well as site-sensitive architectural designs with the goal of providing or enhancing wildlife habitat and extending the desert environment into the urban design of the city. There are no other unique local policies or ordinances protecting biological resources that would cause a conflict, nor does the site support valuable biological resources that could be affected.

As stated, the GPU EIR found impacts to a habitat conservation plan to be less than significant. The project would be consistent with the analysis within the GPU EIR and it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Additional current CEQA Biological Resources thresholds not addressed in the GPU EIR include those pertaining to impacts on state or federally protected wetlands. This is provided for informational purposes. The project site does not contain, nor is it adjacent to, federally protected wetlands, marshes, or other drainage features. As a result, implementation of the proposed project would not result in direct removal, filling, or other hydrological interruption of these resources. The project applicant will also be required to develop and implement a Project-Specific Water Quality Management Plan (WQMP) to ensure that the project does not contribute pollutants of concern from storm runoff. Therefore, no impacts are anticipated.

Conclusion:

With regards to the issue area of Biological Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR adequately addressed the potential impacts to biological resources.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the City of Coachella General Plan 2035 Program EIR. The biological report prepared by

ELMT Consulting is consistent with the findings and assumptions of the Program EIR.

4. No mitigation measures are required within the GPU EIR. Recommendations pertaining to pre-construction surveys are compliant with requirements established by the MBTA, California Fish and Game Code, and the USFWS. Recommendations will reduce impacts to nesting birds to less than significant levels. The project specific impacts would be less than significant with the adherence to the MBTA, CDFW Fish and Game Code, and USFWS.

5. CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES - Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §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 dedicated cemeteries?	☐	☐	☐	☐	☒
d) Directly or indirectly destroy a unique paleontological resource or site or unique geologic figure?	☐	☐	☐	☐	☒
e) Would the project cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resource Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size 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 Resource 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	☐	☐	☐	☐	☒

Source: City of Coachella General Plan 2035, 2015; City of Coachella General Plan 2035 Draft Environmental Impact Report, 2015; Cultural Resources Survey Report Ranch at Coachella, CRM Tech, June 2025).

- a) No Impact.** CEQA establishes that “a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.”⁸¹ “Substantial adverse change” means “demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired.”⁸² CEQA Guidelines state that the term “historical

⁸¹ Pub. Res. Code § 21084.1.

⁸² *Id.* at § 5020.1(q).

80237.00027\45404105.1

80237.00027\45491467.1

resource” applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency.⁸³

Records searches of historical/archaeological resources were conducted at the South Coastal Information Center (SCIC) at the San Diego State University on February 11, 2025 by CRM Tech (Appendix C).⁸⁴ Digital maps, records, and databases for previously identified cultural resources and existing cultural resources reports within a one-mile radius of the project were reviewed as a part of the records search. Previously identified cultural resources included properties designated as California Historical Landmarks, as well as those listed in the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), or the California Historical Resources Inventory (CHRIS). Historical research also included a review of published literature in local and regional history, US General Land Office (GLO) land survey plat maps dated 1856, U.S. Geological Survey (USGS) topographic maps dated 1904-1979, aerial/satellite photographs taken in 1953-2025, as well as materials presented in past studies on the project area.

Within the one-mile scope of the records search, SCIC records identified 56 additional studies and 36 additional cultural resources, including 30 sites and six isolates. Eight of the sites and five of the isolates were prehistoric in origin, consisting mainly of habitation remains, a resource procurement area, scattered ceramic and lithic artifacts, and a cremation site. The other 22 sites and one isolate dated to the historic period and consisted of various buildings, farm/ranch complexes, structural remains, refuse items, and a cemetery. None of these sites or isolates was found in the immediate vicinity of the project area. Therefore, none of them requires further consideration during the study.

According to the SCIC records, the project area was covered in its entirety by three similar cultural resources surveys completed in 2005, 2006, and 2008. As a result of the 2005 and 2006 surveys, a farm complex dating to the 1940s-1950s, including two single-family residences, and an isolated prehistoric groundstone artifact were recorded on the property and subsequently designated 33-014903 and 33-014904 in the CHRIS. Since all three of these surveys are now more than 10 years old, they are considered out-of-date for statutory compliance purposes today.

Site 33-014903 was first recorded during the 2005 and 2006 studies on the project area as a farm complex dating to the 1940s-1950s era. Used for table grape and date cultivation at the time, the farm contained two single-family residences, both constructed in or around 1949-1950, along with ancillary buildings such as two work sheds. The 2008 study on the project area reported that by then one of the residences at was no longer extant. During the field survey for the study, it was observed that the farm remained operational, with date palms planted on approximately two-thirds of the total acreage. The grape vines on the rest of the land, meanwhile, appeared to have been abandoned. The surviving residence had also been abandoned and was in a dilapidated state.

Isolate 33-014904 was recorded during the 2006 study on the project area as a granitic biface mano. No other prehistoric cultural material was observed nearby, and the mano was collected at the time since it could be easily obscured by shifting surface silt. Neither the 2008 survey nor the current survey found any artifacts or archaeological features on the surface at or near the isolate. At the time of the field survey, the location of the isolate was occupied by rows of table grape vines, but the vineyard operation appeared to have been abandoned. A dense collection of fallen foliage and overgrown grass obscured much of the ground surface between the vines.

The Cultural Resources Survey determined that the localities do not meet CEQA definition of a “historical resource.” As an isolate, or a locality with fewer than three artifacts, 33-014904 by definition does not qualify as an archaeological site due to the lack of contextual integrity. As such, it would not be considered

⁸³ Cal. Code Regs. tit. 14, § 15064.5(a).

⁸⁴ Cultural Resources Survey Report Ranch at Coachella, CRM Tech, June 2025 (Appendix C).

80237.00027\45404105.1

80237.00027\45491467.1

a potential “historical resource” if it remained extant in the field. Regarding Site 33-014904, the 2005 and 2006 studies both concluded that the farm, or the residences individually, did not appear to meet any of the criteria for listing in the CRHR. No other potential historical resources were encountered. Therefore, it was determined that no historical resources exist within the project area.

The proposed project is consistent with the GPU EIR, which finds impacts to historical resources less than significant through adherence to existing regulatory requirements and the following General Plan policies:⁸⁵

- **Policy 12.2 (Tribal Coordination):** Requires notification of California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.
- **Policy 12.4 (Preservation of Historic Resources):** Where practical, encourages the preservation of historic resources.
- **Policy 12.5 (Document Historic Resources):** When it is not practical to preserve a historic resource, requires the architectural details and design elements of historic structures to be preserved during renovations and remodels.

Therefore, there are no recognizable potential historical resources as defined in Section 15064.5 of the CEQA Guidelines that would be adversely affected by the proposed project. No impacts are anticipated. The project would be consistent with the analysis within the GP EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GP EIR.

- b) Less Than Significant Impact.** As previously discussed, CRM Tech conducted a records search with the SCIC. Within the one-mile scope of the records search, SCIC records identified 56 additional studies and 36 additional cultural resources, including 30 sites and six isolates. Eight of the sites and five of the isolates were prehistoric in origin, consisting mainly of habitation remains, a resource procurement area, scattered ceramic and lithic artifacts, and a cremation site. The other 22 sites and one isolate dated to the historic period and consisted of various buildings, farm/ranch complexes, structural remains, refuse items, and a cemetery. None of the sites or isolates were found in the immediate vicinity of the project area. Therefore, further study was not conducted.

According to SCIC records, the project area was covered in its entirety by three similar cultural resources surveys completed in 2005, 2006, and 2008. As a result of the 2005 and 2006 surveys, a farm complex dating to the 1940s-1950s, including two single-family residences, and an isolated prehistoric groundstone artifact were recorded on the property and subsequently designated 33-014903 and 33-014904 in CHRIS. However, the 2008 survey noted that one of the residences a part of Site 33-014903 was no longer extant, and CRM Tech’s survey noted that the other residence has been abandoned and was in a dilapidated state. Moreover, Isolate 33-014904 is no longer extant in the field.

Based on these findings, the proposed project will have no impact on any known historical resources, as discussed above. However, sources consulted during this study suggest that the project area was the site of early settlement activities dating at least to the early 20th century, before the onset of widespread settlement and development in the Coachella Valley. In addition, the project location lies in the relatively close proximity to an important Desert Cahuilla village known as La Mesa dated around the turn of the century (now a part of the Augustine Indian Reservation). As a result, the project area demonstrates the potential for subsurface archaeological deposits of both prehistoric and early historical origin.

On February 13, 2025, CRM Tech submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the commission’s Sacred Lands File. The NAHC is the State of California’s trustee agency for the protection of “tribal cultural resources,” as defined by the California Public Resources Code section 21074, and is tasked with identifying and cataloging properties

⁸⁵ City of Coachella, General Plan 2035 Update: Sustainability & Natural Environment, at 07-12 (Apr. 22, 2015).
80237.00027\45404105.1
80237.00027\45491467.1

of Native American cultural value. In the meantime, in accordance with previously established consultation protocol with the Desert Cahuilla tribes, CRM Tech also notified, by email and telephone, the nearby Torres Martinez Desert Cahuilla Indians of the upcoming archaeological field survey and invited tribal participation.

In response to CRM Tech's inquiry, the NAHC states in a letter dated March 3, 2025, that the Sacred Lands File identified no Native American cultural resources in the project vicinity. Noting that the lack of specific information in the Sacred Lands File does not necessarily indicate the absence of such resources, however, the NAHC recommended that local Native American groups be consulted for further information and provided a referral list of 25 individuals associated with 12 local Native American groups. The Torres Martinez Desert Cahuilla Indians were notified of the archaeological fieldwork and invited to participate, but no response was received during the preparation and completion of the Cultural Resources Survey.

The proposed project is consistent with the City of Coachella General Plan 2035 EIR, which finds impacts to unique archaeological resources less than significant through adherence to existing regulatory requirements and the following General Plan policies:⁸⁶

- **Policy 10.3 (Archaeological Resource Preservation):** Requires preservation of important archaeological and paleontological resources from loss or destruction, and requires development to include appropriate mitigation to protect the quality and integrity of these resources.
- **Policy 10.4 (Mitigation and Preservation of Cultural Resources):** Requires development to avoid archaeological and paleontological resources whenever possible. If complete avoidance is not possible, requires development to minimize and fully mitigate the impacts to the resources.
- **Policy 10.5 (Grading):** Requires that proposed projects involving a significant amount of grading have an archaeological and paleontological survey conducted before construction.

Therefore, impacts to unique archaeological resources would be less than significant and the project would be consistent with the analysis within the GP EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GP EIR.

- c) **Less Than Significant Impact.** As discussed above, the records search at the SCIC as well as the archaeological survey of the project area did not identify a cultural resource onsite. Moreover, the NAHC Sacred Lands File search was negative for known tribal resources. Pursuant to the State of California Health and Safety Code section 7050.5 and the CEQA Guidelines section 15064.5 require that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlay adjacent remains, until the County Coroner has examined the remains. If the coroner determines the remains to be Native American or has reason to believe that they are those of Native American, the coroner shall contact the Native American Heritage Commission by telephone within 24-hours. Pursuant to the California Health and Safety Code, proper actions shall take place in the event of a discovery or recognition of any human remains during project construction activities.

The proposed project is consistent with the GPU EIR, which similarly identifies the potential for discovery of human remains during ground-disturbing activities and requires compliance with California Health and Safety Code section 7050.5, CEQA Guidelines section 15064.5, and the California Native American Graves Protection and Repatriation Act, consistent with General Plan Policy 12.1 and 12.6.⁸⁷

⁸⁶ *Id.*, at 07-10.

⁸⁷ *Id.*, at 07-12 – 07-13.

80237.00027\45404105.1

80237.00027\45491467.1

- **Policy 12.1 (Disturbance of human remains):** Requires that any human remains discovered on proposed project sites, the project must implement mitigation measures to prevent impacts to human remains in order to receive permit approval.
- **Policy 12.6 (Discovery of human remains):** Requires any discovered human remains to be treated with respect and dignity, fully complying with the California Native American Graves Protection and Repatriation Act and other applicable laws.

Adherence to these existing requirements reduces impacts to less than significant. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- d) **Less than Significant Impact.** According to the GPU EIR Paleontological Resources Sensitivity Exhibit 88 the project area is located within a portion of the planning area with low sensitivity, or probability, for having paleontological resources. Impacts to paleontological resources within the planning area were deemed to be less than significant due to currently developed conditions. The proposed project is consistent with the GPU EIR, which finds impacts to paleontological resources less than significant through adherence to existing regulatory requirements and General Plan Policies 10.3, 10.4, and 10.5, as discussed above, as well as the following additional policy:⁸⁹
- **Policy 12.7 (Paleontological Resources):** Requires any paleontological artifacts found within the City or Sphere of Influence to be reported to the City and temporarily loaned to local museums such as the Western Science Center for Archaeology and Paleontology in Hemet, CA.

Therefore, less than significant impacts to paleontological resources are anticipated. The project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR

- e.i) **No Impact.** As discussed in the Historical Resources section above, no historical resources were identified within the project area. No tribal cultural resources meeting the definition of Public Resources Code section 21074, including any site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe, that are listed or eligible for listing in the CRHR or a local register of historical resources, were identified within the project area.

The project area lies in relatively close proximity to an important Desert Cahuilla village known as La Mesa dated around the turn of the century, now a part of the Augustine Indian Reservation. In consideration of this proximity, CRM Tech submitted a written request to the NAHC for a Sacred Lands File search. The NAHC responded in a letter dated March 3, 2025 that the Sacred Lands File identified no Native American cultural resources in the project vicinity. The Torres Martinez Desert Cahuilla Indians were notified of the archaeological fieldwork and invited to participate, but no response was received during the course of the study.

Because the proposed project is processed as a General Plan Consistency Analysis pursuant to CEQA Guidelines Section 15183 and Public Resources Code Section 21083.3 formal AB 52 tribal consultation is not required. The proposed project is consistent with the GPU EIR, which requires coordination with Native American tribes and organizations pursuant to General Plan Policy 12.2 (Tribal Coordination). Therefore, no impacts to tribal cultural resources listed or eligible for listing in the California Register or a local register are anticipated. The project would be consistent with the analysis within the GPU EIR because it would not

⁸⁸ GPU EIR Section 4.4 Cultural Resources Figure 4.4.3 Paleontological Resources Sensitivity.

⁸⁹ *Id.*, at 07-13.

80237.00027\45404105.1

80237.00027\45491467.1

create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

e.ii) Less than Significant Impact. As discussed above, the NAHC Sacred Lands File search produced negative results for Native American cultural resources in the project vicinity, and the Torres Martinez Desert Cahuilla Indians were notified and invited to participate in the archaeological fieldwork but did not respond. No other tribes responded during the course of the study.

No tribal cultural resources were identified during the field survey or through the records search process that have been determined, in the lead agency's discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of Public Resources Code section 5024.1.

However, the project area retains sensitivity for buried tribal cultural resources due to the isolated prehistoric artifacts and cremation site previously documented within the records search area, as well as the project's proximity to the historic Desert Cahuilla village of La Mesa.

The proposed project is consistent with the GPU EIR, which directly addresses this sensitivity through the following applicable policies:⁹⁰

- **Policy 10.4 (Mitigation and Preservation of Cultural Resources):** Requires development to avoid archaeological and paleontological resources whenever possible. If complete avoidance is not feasible, requires development to minimize and fully mitigate impacts to those resources.
- **Policy 12.2 (Tribal Coordination):** Requires notification of California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.

Adherence to these policies ensures that any Tribal Cultural Resources encountered during project implementation would be appropriately avoided, minimized, or mitigated in coordination with local Native American groups. Because the proposed project is processed as a General Plan Consistency Analysis pursuant to CEQA Guidelines Section 15183 and Public Resources Code Section 21083.3, formal AB 52 tribal consultation is not required. With adherence to the applicable General Plan policies, impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, would be less than significant. As such, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, or introduce new information of substantial importance beyond that identified within the GPU EIR.

Conclusion:

With regards to the issue area of Cultural and Tribal Cultural Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified. The project area does not contain any historical, archaeological, or tribal cultural resources listed or eligible for listing in any federal, state, or local register.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR adequately addressed the potential for discovery of buried prehistoric and historic resources within the planning area, including areas of Native American sensitivity.
3. No substantial new information has been identified which results in an impact more severe than anticipated by the City of Coachella General Plan 2035 Program EIR. The records search, Sacred Lands File search, and tribal outreach conducted by CRM Tech are consistent with the findings and assumptions of the

⁹⁰ *Id.*, at 07-10, 07-12.
80237.00027\45404105.1
80237.00027\45491467.1

Program EIR.

4. No mitigation measures were identified in the GPU EIR for historical or archaeological resources. Compliance with General Plan Policies 10.3, 10.4, 10.5, 12.1, 12.2, 12.4, 12.5, 12.6, and 12.7 ensures that potential impacts to cultural and tribal cultural resources would remain less than significant.

6. ENERGY -- Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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 of energy efficiency?	☐	☐	☐	☐	☒

Sources: The City of Coachella 2035 General Plan, 2015; City of Coachella Climate Action Plan, 2014; California Energy Consumption Database, California Energy Commission, 2025; Greenhouse Gas Analysis, Urban Crossroads, Inc. November 2025⁹¹ (Appendix E); U.S. Energy Information Administration, 2025.

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and GPU EIR within the Sustainability and Natural Environment Element. The analysis below specifically evaluates the energy use of the project for informational purposes.

- a) **Less than Significant Impact.** The project site occupies approximately 87 acres of land west of Van Buren Street, south of Avenue 52, and east of Calhoun Street in the City of Coachella. The project proposes a mixed-use development consisting of residential, resort, and recreational uses with 162 two-story single-family residences, 240 condo hotel cottages, Crystal Lagoon water features, a lake, restaurants, a beach club, event space, pop-up shops, outdoor amphitheater, pools, recreation areas, and kids play spaces. Total buildout will result in 402 units, private sector uses ((i.e., onsite resort amenities, recreational courts, spa/pool, lagoon and water features, bar and entertainment, library, restaurant), approximately 170,000 square feet of public sector uses (i.e., beach club, bar, restaurant, etc.), and approximately 12 acres of water features. Associated improvements include pedestrian walkways and sidewalks, and paved drive aisles and parking spaces.

According to the City of Coachella’s Climate Action Plan (CAP), energy is used for heating and cooling, transportation, manufacturing, and producing food.⁹² 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.⁹³ 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 the CAP.

Electricity is provided to the City of Coachella by Imperial Irrigation District (IID). IID is the sixth-largest utility in California, has an energy service area of 6,471 square miles, serving more than 166,000 customers and controlling more than 1,100 megawatts (MW) of energy.⁹⁴ Electricity is delivered through high voltage

⁹¹ Greenhouse Gas Analysis, Urban Crossroads, Inc. November 2025 (Appendix E).

⁹² City of Coachella, CAP, at 1 (April 22, 2015).

⁹³ City of Coachella, GPU Draft EIR, Greenhouse Gases, at 4.12-4, 4.12-7; *see also* City of Coachella, General Plan Update 2035: Existing Conditions, at 03-17 (April 22, 2015).

⁹⁴ Imperial Irrigation District, Power: About IID Power (2025), <https://www.iid.com/power>.

80237.00027\45404105.1

80237.00027\45491467.1

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. Distribution power poles lie on the northern boundary of the project.

The Southern California Gas Company (SoCalGas or the Gas Company) provides natural gas to the City of Coachella, including the project site. Natural gas is used primarily for space and water heating, as well as cooking. High pressure distribution pipelines operate at pressures above 60 pounds per square inch (psi) and deliver gas in smaller volumes to the lower pressure distribution system.

The project is expected to consume energy in the form of electricity, natural gas, and petroleum during project construction and operation. In November 2025, a Greenhouse Gas Analysis was prepared by Urban Crossroads, Inc. to evaluate project-related construction and operational emissions (Appendix E). Urban Crossroads utilized the most recent version of California Air Pollution Control Officers Association’s (CAPCOA) modelling resource (CalEEMod 2022.1.1.30) to calculate construction-source and operational-source emissions and energy consumption.

Electricity

According to the California Energy Commission (CEC), Riverside County consumed approximately 17,418 million kWh (GWh) in 2024.⁹⁵ Electricity is provided to the City of Coachella, and the project site, by IID. In 2024, IID’s service area consumed 3,645 million kWh (GWh) of electricity.⁹⁶ Electricity use resulted in the second largest emissions produced community-wide, behind petroleum (discussed further below).

Construction

Temporary electrical power for lighting and electronic equipment, such as computers inside interim construction trailers, would be provided by IID. Electricity consumed for onsite construction trailers, which are used by managerial staff during the hours of construction activities, and electrically powered hand tools are expected to use a minimal amount of electricity. However, the electricity used for such activities would be temporary and negligible. Most energy used during construction would be from petroleum consumption (discussed further below).

Operation

The project proposes the operation of 162 single family units, 240 condo hotel cottages, recreational amenities (i.e., restaurants, bar, event spaces, kids play areas, spas, etc.), 12 acres of water features, and associated improvements (i.e., pedestrian sidewalks, and paved aisles, parking spaces, and landscaping). According to the CalEEMod calculations the project is expected to generate the demand for approximately 13,497,884 kWh of annual unmitigated electricity use for the site and approximately 6,862,266 kWh/yr of annual mitigated electricity use, as depicted in the table below.

Table VI-1 Operational Electricity Demand

Land Use	Electricity Use (kWh/yr)	
	Unmitigated	Mitigated
Single Family Housing	1,545,056	768,447
Condo/Townhouse	1,790,418	893,101

⁹⁵ California Energy Commission, *Energy Consumption Data Files* — “AGG_CONSUMPTION_ELEC_COUNTY_TBL_ada.xlsx” (county/year totals; data last updated Sept. 5, 2025), <http://www.energy.ca.gov/files/energy-consumption-data-files>.

⁹⁶ U.S. Energy Info. Admin., *Electric Sales, Revenue & Average Price*, Table T10 (All sectors, by state & utility) (with data for 2024) (Oct. 7, 2025), https://www.eia.gov/electricity/sales_revenue_price/pdf/table_10.pdf.

Movie Theater (No Matinee) ⁹⁷	8,438,137	4,219,069
Quality Restaurant	1,485,248	742,624
User Defined Residential	0	0
Parking Lot	239,025	239,025
Recreational Swimming Pool	0	0
Other Asphalt Surfaces	0	0
Total	13,497,884	6,862,266

Sources: Greenhouse Gas Analysis, Urban Crossroads, Inc. November 2025 (Appendix E).

The project would not result in the use of excessive amounts of electricity and would not result in the need to develop additional sources of energy. Even though energy use at the project would not be excessive, the project would incorporate several measures directed at minimizing energy use. These measures include applying energy efficient design building shells and building components, such as windows, roof systems, electrical lighting systems, and heating, ventilating, and air conditioning systems to meet the most current Title 24 California Building Standards Code, as well as providing low-flow appliances and covered parking stalls. Therefore, reducing the use of electricity during project operation.

The proposed project has received a will-serve letter from IID and would contribute financially to a new regional substation to provide electrical power to the project site. The project would also incorporate solar generation and battery storage systems to help offset electricity demand from the regional grid. The project-specific Greenhouse Gas Analysis (Appendix E) recommends 50 percent of electricity for single-family homes, condos/townhomes, movie theaters, and restaurants to be provided by on-site solar systems/photovoltaic systems (GHG-2). This is consistent with the City Climate Action Plan, which recommends the incorporation of solar/photovoltaic systems into all new construction. For single family homes built prior to 2020, provide 10 percent of the projected electricity demand via onsite solar photovoltaics. For single family homes built between 2020 and 2035, provide 25 percent of the projected electricity demand via onsite solar photovoltaics. For non-residential and multi-family residential buildings built prior to 2020, provide 20 percent of the project electricity demand via onsite solar photovoltaics. For non-residential and multi-family residential buildings built between 2020 and 2035, provide 50 percent of the project electricity demand via onsite solar photovoltaics. It is likely that the majority of the solar/photovoltaic systems will occur on rooftops, with the battery storage being mounted nearby. These systems would reduce reliance on off-site energy sources and support overall energy efficiency. In the future, the project may consider implementing a microgrid or geothermal system to further offset demand on the grid; however, these features are not part of the current project proposal and are not evaluated as a component of the project at this time. Electrical improvements will take place within the boundaries of the project and will not result in significant environmental impacts.

Natural Gas

Natural gas is provided to the City of Coachella, and the project site, by SoCalGas. According to the CEC, SoCalGas provided 4,959 millions of therms in 2024, while Riverside County consumed 426.7 millions of therms in 2024.⁹⁸

97 The project does not propose the construction or operation of a movie theater. The “Movie Theater (No Matinee)” land use subtype was used in the modeling, which, per the CalEEMod User Guide, consist of audience seating, single or multiple screens and auditoriums, a lobby and a refreshment stand. Movie theaters without matinees show movies on weekday evenings and weekends only; there are no weekday daytime showings. This land use subtype was used in the modelling because it was the closest use to the Project’s operation of the beach club use, since the beach club will not open sooner than 11:00 a.m., similar to a movie theater, with a majority of the trips arriving in close duration to each other. Both the movie theater and the beach club are entertainment uses open all day and night, where people come and stay for a few hours, and arrival and departure times are spread out throughout the day with multiple rounds of event/movie turnover.

98 California Energy Commission, *California Natural Gas Consumption Dashboard – Annual Agency and County Totals* (data last updated Sept. 5, 2025), <https://data.cnra.ca.gov/dataset/california-natural-gas-consumption>.

80237.00027\45404105.1

80237.00027\45491467.1

Note, the CalEEMod program uses thousand British thermal units (kBtu) to quantify natural gas use, where 1 therm equals approximately 99.976 kBtu. For example, an approximately 600,000 therm increase of natural gas consumption between 2005 and 2010 is equivalent to approximately 59,985,680 kBtu. Thousand British thermal units will be used when analyzing the potential project-related natural gas consumption below.

Construction

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the following petroleum subsection. Any minor amounts of natural gas that may be consumed because of project construction would be temporary and negligible and would not have an adverse effect.

Operation

The consumption of natural gas typically occurs during building heating, water heating, and cooking, which will occur during project operation. The project's expected natural gas consumption was calculated using the CalEEMod default values. Based on the CalEEMod calculations, the project is estimated to consume approximately 11,356,473 kBtu of natural gas annually during operation of the restaurant and recreational uses. This is displayed in Table VI-2, Operational Natural Gas Demand, below.

Table VI-2 Operational Natural Gas Demand¹

	Natural Gas Use
Land Use	kBtu/yr
Single Family Housing	0
Condo/Townhouse	0
Movie Theater (No Matinee) ⁹⁹	9,024,353
Quality Restaurant	2,332,120
User Defined Residential	0
Parking Lot	0
Recreational Swimming Pool	0
Other Asphalt Surfaces	0
Total	11,356,473

Sources: Greenhouse Gas Analysis, Urban Crossroads, Inc. November 2025 (Appendix E).

CalEEMod Modeling utilized for electricity consumption during operation.

Note: 1. Mitigated and unmitigated natural gas use is the same.

As such, the project would result in a long-term increase in demand for natural gas. However, the project would be designed to comply with Title 24, Part 6 of the California Code of Regulations (CCR). Moreover, the residential buildings (single-family homes and condos/townhomes) will be fully electrified, eliminating the use of natural gas. This is identified in Measure GHG-1 (see Appendix E, Greenhouse Gas Analysis, and the Greenhouse Gas Emissions discussion). Natural gas consumption would be appropriate and not place a significant burden on SoCalGas services.

Petroleum

⁹⁹ See *Id.* 85. The project does not propose the construction or operation of a movie theater. The "Movie Theater (No Matinee)" land use was used in the modeling because the use is similar to those proposed in the project.

Petroleum is the main energy source for transportation in the U.S., accounting for 89 percent in 2025.¹⁰⁰ In 2024, California consumed 26.4 billion gallons of petroleum, including 13.6 billion gallons of finished gasoline and 3.5 billion gallons of diesel.¹⁰¹ Gasoline and other vehicle fuels are commercially provided commodities and would be available to the project via commercial outlets.¹⁰² Technological advances, market trends, consumer behavior, and government policies could result in significant changes to fuel consumption by type and total. Various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce vehicle miles traveled (VMT) at federal and state levels. Technological advances have made use of other energy resources or alternative transportation modes increasingly feasible, as market forces have driven the price of petroleum products steadily upward.

The transportation sector within the City of Coachella produced approximately 206,909 MTCO₂e in 2010, being the largest contributor to GHG emissions in the City.¹⁰³ Overall, the transportation sector emitted 54 percent of the City's GHG emissions in 2010. Transportation sector emissions were estimated in the City's CAP by applying conversion factors to daily VMT. It was estimated that 75 percent of the GHG emissions from the transportation sector were the result of burning gasoline, and the remainder resulted from burning diesel fuel.¹⁰⁴

Construction

Petroleum would be consumed throughout construction of the project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, while VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty equipment used for project construction would rely on diesel fuel, as would haul trucks involved in off-hauling materials from excavation. Construction workers are expected to travel to and from the project site in gasoline-powered passenger vehicles. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities or use of equipment that would not conform to current emission standards (and related fuel efficiencies).

Heavy-duty construction equipment of various types would be used during each phase of construction. CalEEMod was used to estimate construction equipment usage. Fuel consumption from construction equipment was estimated by converting the total CO₂ emissions from each construction phase to gallons using the conversion factors shown in the tables included below.

Table VI-3, Construction Worker Gasoline Demand (below), illustrates the demand of gasoline fuel for construction worker trips to and from the site. Construction worker demand equals a total of 236,744.6 gallons of gasoline during operation of the project.

Table VI-3 Construction Worker Gasoline Demand

Phase	Days	Trips	Miles	VMT	KgCO ₂ e	Kg/CO ₂ /Gallon ¹	Gallons
Demolition	75	20	18.5	27,750	9,110	8.89	1,024.7
Site Preparation	45	22.5	18.5	18,731.25	6,130	8.89	689.5
Grading	115	27.5	18.5	58,506.25	18,800	8.89	2,114.7
Building Const.	900	361	18.5	6,010,650	1,877,000	8.89	211,136.1
Paving	110	15	18.5	30,525	9,320	8.89	1,048.4

100 U.S. Energy Information Administration, Use of Energy Explained – Energy Use for Transportation (2025).

<https://www.eia.gov/energyexplained/use-of-energy/transportation.php>.

101 See California Energy Commission, California Gasoline Data, Facts & Statistics (2024), <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-gasoline-data-facts-and-statistics>; see also California Energy Commission, Diesel Fuel Data, Facts & Statistics (2024), <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics>.

102 *Ibid.*

103 City of Coachella, GPU Draft EIR, at 4.12-4 & tbl. 4.12-1.

104 City of Coachella, CAP, at 24 (April 22, 2015).

80237.00027\45404105.1

80237.00027\45491467.1

Arch. Coating	450	72.2	18.5	601,065	184,300	8.89	20,731.2
Total							236,744.6

Note: 1. <https://www.epa.gov/energy/greenhouse-gases-equivalencies-calculator-calculations-and-references>
<https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

Table VI-4, Construction Vendor Diesel Fuel Demand (below), illustrates the demand of diesel fuel for construction vendor trips to and from the site. These trips are associated with the delivery of construction materials during the construction phase. Construction vendor demand equals a total of 92,518.6 gallons of diesel fuel.

Table VI-4 Construction Vendor Gasoline Demand

Phase	Days	Trips	Miles	VMT	KgCO ₂ e	Kg/CO ₂ /Gallon	Gallons
Demolition	75	7	10.2	5,355	7,710	10.18	757.4
Site Preparation	45	4	10.2	1,836	2,630	10.18	258.3
Grading	115	10	10.2	11,730	16,500	10.18	1,620.8
Building Const.	900	74	10.2	679,320	915,000	10.18	89,882.1
Paving	110	0	10.2	0	0	10.18	0
Arch. Coating	450	0	10.2	0	0	10.18	0
Total							92,518.6

Table VI-5, Construction Equipment Diesel Fuel Demand (below), displays the demand for diesel fuel for construction vehicles on-site during the various construction phases. Construction equipment diesel demands equals a total of 282,750.5 gallons of diesel fuel.

Table VI-5, Construction Equipment Diesel Fuel Demand

Phase	Days	Equipment Units	KgCO ₂ e	Kg/CO ₂ /Gallon	Gallons
Demolition	75	8	169,000	10.18	16,601.2
Site Preparation	45	9	148,400	10.18	14,577.6
Grading	115	11	476,000	10.18	46,758.4
Building Const.	900	16	1,973,000	10.18	193,811.4
Paving	110	6	75,600	10.18	7,426.3
Arch. Coating	450	1	36,400	10.18	3,575.6
Total					282,750.5

Table VI-6, Hauling Diesel Fuel Demand (below), illustrates the demand of diesel fuel for hauling trips to and from the site. These trips are associated with the removal of materials (i.e., dirt, vegetation, etc.) during the demolition phase. Hauling demand equals a total of 221 gallons of diesel fuel.

Table VI-6 Hauling Diesel Fuel Demand

Phase	Days	Trips	Miles	VMT	KgCO ₂ e	Kg/CO ₂ /Gallon	Gallons
Demolition	75	0.95	20	1,425	2,250	10.18	221.0
Total							221.0

Overall, the project is estimated to consume approximately 236,744.6 gallons of gasoline and 375,490.1 gallons of diesel fuel during the project's construction phases. In total, the project will consume approximately 612,234.7 gallons of petroleum. Petroleum use is necessary to operate construction equipment. Recent amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation were approved by CARB in 2022. The 2022 amendments expand requirements that any added vehicles be cleaner and accelerate the phase-out of older, higher-emitting engines from existing fleets. Specifically, the 2022 amendments require that added vehicles be cleaner than previously required and that older, dirtier engines be removed from operation. In effect, only

Tier 4 or cleaner engines may be added to large and medium fleets starting January 1, 2024.¹⁰⁵ Fleet owners are required to report all vehicles to CARB through their online reporting system (DOORS).¹⁰⁶ The 2022 amendments require that fleets no longer operate vehicles with Tier 0, 1 or 2 off-road engines and comparable on-road vehicles over a 12-year period, between 2024 and 2036. The vehicle emissions standards will reduce both tailpipe and evaporative emissions from passenger cars, light-duty trucks, medium duty passenger vehicles, and some heavy-duty vehicles. Due to CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation and amendment, it is anticipated that construction equipment will include Tier 3 and 4 engines, therefore would be newer off-road equipment units.

The energy used during the construction of the project would be limited to the development of the project and would not require long-term petroleum use. Additionally, there are no unusual project characteristics or construction processes that require the use of equipment that would be more energy intensive than is used for comparable activities or use of equipment that would not conform to current emissions standards (and related fuel efficiencies). Thus, project construction would not consume petroleum in a wasteful or inefficient manner.

Operation

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 Coachella CAP, in 2010 the City produced approximately 900,000 vehicle miles traveled each day, producing 180,078 MTCO₂e from transportation-related emissions.¹⁰⁷

According to the figures provided by the CalEEMod calculations, the project would have an estimated annual VMT of 12,144,280, depicted in Table VI-7 below. Total mobile source CO₂e is 3,500 MT per year, or 3,550,000 kg per year. CalEEMod assumes 92.5 percent of VMT burns gasoline, while the remaining 7.5 percent burn diesel. Thus, of the 3,550,000 kg of mobile emissions, 3,283,750 kg is generated by gasoline combustion, and 266,250 kg is generated by diesel combustion. The project would have an annual gasoline demand of 369,375.7 gallons and an annual diesel demand of 26,154.2 gallons, as displayed in the following Table VI-8.

Table VI-7 Operational Petroleum Demand

	Annual VMT
Combined Land Uses	12,144,280
Total	12,144,280

Table VI-8 Operational Annual Petroleum

	Annual VMT	KgCO₂e	Kg/CO₂/Gallon	Annual Gallons
Gasoline	11,233,459	3,283,750	8.89	369,375.7
Petroleum	910,821	266,250	10.18	26,154.2
Total				395,529.9

Over the lifetime of the project, the fuel efficiency of vehicles in use is expected to increase, as older vehicles are replaced with newer, more efficient models. Therefore, it is expected that the amount of petroleum consumed due to the vehicle trips to and from the project site during operation would decrease over time. Additional advancement of technology includes the use of plug-in hybrid and zero emission vehicles in California, which will also decrease the amount of future petroleum consumed in the state. With the foregoing, operation of the project is expected to use decreasing amounts of petroleum over time due to advances in fuel economy.

105 Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation, California Air Resources Board (2023), <https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-added-vehicle-restrictions-and-tier-phase-out-requirements>.

106 In-Use Off-Road Diesel-Fueled Fleets Regulation, California Air Resources Board (2026), <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation/about>.

107 City of Coachella, CAP, at 46 (Apr. 22, 2015).

80237.00027\45404105.1

80237.00027\45491467.1

Additionally, the proposed mixed-use project would reduce VMT traveled in the area since it is likely that the residents and visitors of the site would stay on the project site and enjoy the onsite restaurants and amenities. Commercial uses are located approximately 1 mile east of the project along Harrison Street.

Bus services, provided by SunLine Transit, will also be accessible to the project. Bus Route 8 provides the closest bus stops to the project, located a mile east and north of the project, at Cesar Chavez and Avenue 52, and Avenue 50 and Van Buren, respectively. Bus Route 8 travels from Coachella to North Indio, with connections to other routes throughout the Coachella Valley. The availability of bus lines and services will reduce the amount of potential VMT created by the proposed project.

Although the project would result in an increase in petroleum use during construction and operation compared to the existing, vacant conditions, the project would comply with the City's GPU, City Municipal Code, and CAP regarding VMT reduction. Project Design Feature 3 has been provided and requires the project applicant to ensure that any business operating within the proposed project (including both construction and operations of the proposed project) with 20 or more full-time onsite employees shall implement at least one of the following programs: (1) Pre-tax election program to allow employees to exclude wages for commuting costs for transit or vanpools; (2) An employer supplied transit pass; (3) Employer provided transit; or (4) Other, similar demand management programs.¹⁰⁸ With implementation of Project Design Feature 3, the project will be consistent with the transportation demand management in the CAP to reduce automobile trip generation related to employment. Additionally, the project would provide a pedestrian access network that internally links the proposed commercial uses to the surrounding uses. Providing a pedestrian access network to link areas within the project site and surrounding areas encourages people to walk instead of drive, therefore reducing the regional VMT and associated vehicular-source emissions. Given these considerations, petroleum consumption associated with the project operation would not be considered excessive.

Development and operation of the proposed project would increase demand for energy in the project area and in the service areas of IID and SoCalGas Company. However, based on the findings described above, project construction and operation are not anticipated to result in potentially significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- b) **Less than Significant Impact.** The approximately 87-acre project site proposes the development of 162 single family units, 240 condo hotel units, recreational amenities, 12 acres of water features, and associated improvements (i.e., pedestrian sidewalks, and paved aisles, parking spaces, and landscaping). As stated in the previous discussion, project development and operation are not anticipated to use an unnecessary or wasteful amount of energy resources. To ensure the conservation of energy, the state of California and the City of Coachella implement various regulations in order to be more energy efficient and reduce the amount of GHG emissions. Some of the state-wide and local regulations are listed below.

State Regulations

Assembly Bill 32

Assembly Bill 32 (AB 32) was signed in 2006 to establish and reduce the amounts of GHGs being emitted on a state-wide level.¹⁰⁹ Specifically, AB 32 requires a reduction of emissions to 1990 levels by 2020.¹¹⁰ It plans to do this by establishing an annual reporting program for significant sources. Energy efficiency goals listed in AB 32 include maximizing energy efficiency building and appliance standards, pursuing additional efficiency efforts including new technologies, and pursuing new policy and implementation mechanisms.

¹⁰⁸ COVA Greenhouse Gas Analysis, Urban Crossroads, Inc., 2026. Appendix E, at 59.

¹⁰⁹ Cal. Air Res. Bd., AB 32: The California Global Warming Solutions Act of 2006 (Sept. 28, 2018).

¹¹⁰ Cal. Health & Saf. Code § 38550 (West 2025).

80237.00027\45404105.1

80237.00027\45491467.1

Senate Bill 32

Senate Bill 32 (SB 32) was signed in 2016 and requires the reduction of greenhouse gas emissions to 40 percent below 1990 levels by the year 2030. SB 32 stresses the continued effort to reduce greenhouse gas emissions to protect all areas of the state, especially disadvantaged communities, as those communities are affected first by the impacts of climate change.

CARB Scoping Plan

A specific requirement of AB 32 was to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020.¹¹¹ CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. The initial Scoping Plan was approved in 2008, and contains a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the State's long-range climate objectives.¹¹² Updates to the Scoping Plan occurred in 2014,¹¹³ 2017,¹¹⁴ and 2022.¹¹⁵

Assembly Bill 1493/Pavley Regulations

California Assembly Bill 1493 (AB 1493), enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks.¹¹⁶ In 2005, CARB submitted a "waiver" request to the EPA from a portion of the federal Clean Air Act in order to allow the State to set more stringent tailpipe emission standards for CO₂ and other GHG emissions from passenger vehicles and light duty trucks.¹¹⁷ On December 19, 2007, the EPA announced that it denied the "waiver" request.¹¹⁸ On January 21, 2009, CARB submitted a letter to the EPA administrator regarding the State's request to reconsider the waiver denial.¹¹⁹ The EPA approved the waiver on June 30, 2009.¹²⁰

Executive Order S-3-05

Executive Order (EO) S-3-05, passed in 2005, established reduction targets of an 80 percent of 1990 levels reduction by 2050, and created agencies to achieve these targets.¹²¹ The passage of this regulation requires the use of more energy efficient practices regarding building development and operation in order to reduce the amount of GHGs produced.

Senate Bill 1389 and California Integrated Energy Policy Report

Senate Bill 1389 (SB 1389) required the CEC to prepare an integrated energy plan every other year that analyzed electricity, natural gas, and transportation fuel consumption. SB 1389 was passed in 2002. The CEC is responsible for preparing the Integrated Energy Policy Report (IEPR), which identifies major trends related to energy supply and demand in California.¹²² The IEPR provides policy recommendations to conserve resources, protect the environment, and ensure public health and safety, and maintain a healthy economy. The IEPR calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this

111 *Id.* at § 38561(h).

112 CARB, Climate Change Scoping Plan: A Framework for Change 4 (Dec. 2008).

113 CARB, *First Update to the Climate Change Scoping Plan* (May 22, 2014), Resolution 14-16.

114 CARB, *California's 2017 Climate Change Scoping Plan* (Nov. 2017), Resolution 17-46.

115 CARB, *2022 Scoping Plan for Achieving Carbon Neutrality* (Dec. 15, 2022), Resolution 22-21.

116 Cal. Health & Saf. Code § 43018.5 (West 2025).

117 Cal. Air Res. Bd., California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley) (2009).

118 U.S. Envtl. Prot. Agency, Letter to Governor Arnold Schwarzenegger from EPA Administrator Stephen Johnson Regarding California's Request for a Waiver of Pre-emption for Its Greenhouse-Gas Regulations (Dec. 19, 2007).

119 Congressional Research Service, California's Waiver Request under the Clean Air Act to Control Greenhouse Gases from Motor Vehicles (RL34099, Feb. 10, 2009) at 4.

120 U.S. Environmental Protection Agency, California State Motor Vehicle Pollution Control Standards; Notice of Decision Granting a Waiver of Clean Air Act Preemption for California's 2009 and Subsequent Model Year Greenhouse Gas Emission Standards for New Motor Vehicles, 74 Fed. Reg. 32744 (Jul. 8, 2009).

121 Cal. Exec. Order S-3-05, 2005 Cal. Exec. Order 3 (June 1, 2005).

122 California Energy Commission, Integrated Energy Policy Report, website accessed at <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr>.

policy, the IEPR identifies a number of strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

Title 20: Appliance Efficiency Standards

The CCR regulates the sale of appliances in California.¹²³ The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. Twenty-three categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles or other mobile equipment.

Title 24: Building Energy Efficiency Standards and CALGreen Building Standards Code

In addition to Title 20 of the CCR, Parts 6 and 11 of Title 24 also outline energy efficient building designs for new development. The CCR's Building Energy Efficiency Standards (Title 24, Part 6) and the CALGreen Building Standards Code (Title 24, Part 11) establish mandatory guidelines and standards requiring more energy efficient new and existing developments. The CEC adopted the Building Energy Efficient Standards for all new residential and nonresidential construction to reduce GHGs as a part of the California Building Code, Title 24. The Building Energy Efficiency Standards emphasize the use of heat pumps for space heating and water heating, and it encourages the use of photovoltaic and battery storage systems and other demand flexible technology to operate together with heat pumps to enable California buildings to be responsive to climate change. Title 24, Part 11, establishes design and development methods that include environmentally responsible site selection, building design, building siting, and development to protect, restore, and enhance the environmental quality of the site and respect the integrity of adjacent properties. The proposed project will be required to comply with the state implemented standards for energy efficient new developments.

California's Renewable Portfolio Standards

The California Renewable Portfolio Standards will reduce GHG emissions by requiring utility companies, such as IID, to switch from non-renewable resources, such as coal-fired power plants, to renewable resources, such as wind turbines and solar power.¹²⁴

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), or Executive Order (EO) S-1-07, establishes a low carbon fuel standard for transportation fuels in California.¹²⁵ EO S-1-07 was enacted to reduce carbon intensity in transportation fuels as compared to conventional petroleum fuels, such as gasoline and diesel. It requires that the carbon intensity of California's transportation fuels be reduced at least 10 percent by 2020.

Clean Car Standards

The Clean Car Standards, otherwise known as Pavley 1493, sets more stringent vehicle fuel economy standards for cars and light trucks that reduce greenhouse gas emissions.¹²⁶ In 2009, the federal government enabled the state of California to enforce stricter tailpipe emissions limits on new passenger vehicles.¹²⁷ In 2010, the US EPA and the Department of Transportation's National Highway Safety Administration announced new vehicle GHG emission standards and corporate average fuel economy standards that reinforce California's standard.¹²⁸

CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation and Amendments

123 Cal. Code Regs. tit. 20, §§ 1601-1608 (Appliance Efficiency Regulations).

124 Cal. Energy Comm'n, *Renewables Portfolio Standard – RPS* (2025), <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard>.

125 Cal. Exec. Order S-01-07 (Jan. 18, 2007), *Low Carbon Fuel Standard for California*, available at <https://climateactionnetwork.ca/wp-content/uploads/2011/06/CaliforniaExecutiveOrderLCFS2.pdf>.

126 Cal. Air Res. Bd., *California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley)*, at 1 (2009), <https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley>.

127 U.S. Env'tl. Prot. Agency, Notice of Decision Granting a Waiver of Clean Air Act Preemption for California's 2009 and Subsequent Model Year Greenhouse Gas Emission Standards for New Motor Vehicles, 74 Fed. Reg. 32744, 32744 (Jul. 8, 2009).

128 U.S. Env'tl. Prot. Agency & Nat'l Highway Traffic Safety Admin., *Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards; Final Rule*, 75 Fed. Reg. 25,324, 25,324 (May 7, 2010).

80237.00027\45404105.1

80237.00027\45491467.1

CARB's recent 2022 amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation expand requirements that any added fleet vehicles be cleaner and accelerate the phase-out of older, higher-emitting engines from existing fleets. The 2022 amendments require that added vehicles be cleaner than previously required and that older, dirtier engines be removed from operation. In effect, only Tier 4 or cleaner engines may be added to large and medium fleets starting January 1, 2024.¹²⁹ Fleet owners are required to report all vehicles to CARB through their online reporting system (DOORS).¹³⁰ The 2022 amendments require that fleets no longer operate vehicles with Tier 0, 1 or 2 off-road engines and comparable on-road vehicles over a 12-year period, between 2024 and 2036. The vehicle emissions standards will reduce both tailpipe and evaporative emissions from passenger cars, light-duty trucks, medium duty passenger vehicles, and some heavy-duty vehicles. Due to CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation and amendments, it is anticipated that construction equipment will include Tier 4 engines, therefore would be newer off-road equipment units.

City Regulations

The City of Coachella Climate Action Plan

The City of Coachella adopted their CAP in 2015 in order to achieve community-wide GHG reductions.¹³¹ The CAP quantifies emissions from the build-out of the City and includes additional policies and implementation actions to help Coachella further reduce emissions. The CAP analyzes policies from the GPU that reduce energy use, VMT, resource consumption, and GHG emissions, comparing the emissions to voluntary statewide emissions targets outlined in the California Climate Action Scoping Plan and Executive Order S-03-05. In compliance with the statewide emission targets, the City established a per service population 2020 emissions reduction target of 15 percent below 2010 levels and a 2035 emissions reduction target of 49 percent below 2010 levels.¹³²

The CAP organizes the General Plan policies into six strategies to reduce emissions reductions throughout the City: building and infrastructure energy efficiency, renewable energy generation, land use and transportation, vegetation and open space, solid waste, and water use.¹³³ According to the CAP, residential and non-residential buildings produce approximately 39 percent of Coachella's emissions and are a primary target for the CAP. The City plans to achieve this reduction through energy efficiency policies for homes, and businesses including energy performance targets to construct buildings 15 percent more energy efficient than Title 24 standards.

Coachella General Plan Update

Coachella's GPU emphasizes the importance of increasing energy conservation and efficiency and reducing energy consumption and emissions within its City. The various goals and policies outlined within the Sustainability and Natural Environment Element of the GPU focus on City development and its impact to climate change, energy, and water resources while presenting the goal to implement green building design into new developments in the City.¹³⁴ Reoccurring policies include GHG emissions reductions, water conservation methods, energy efficient building design, and implementation of renewable energy sources. Goal 2 specifically requires an energy efficient community that relies primarily on renewable and non-polluting energy sources.¹³⁵ Policies within this goal include building design strategies such as passive solar design, use of alternative energy, construction standards, and energy performance targets in order to create a more energy efficient community.

Another goal in the GPU is to establish efficient land use and transportation patterns in order to reduce emissions and VMT while improving air quality. The overall goal is to reduce energy consumption in the City to improve air quality, reduce GHG emissions, increase the quality of life for the City's residents.

¹²⁹ Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation, California Air Resources Board, 2023

<https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-added-vehicle-restrictions-and-tier-phase-out-requirements>.

¹³⁰ In-Use Off-Road Diesel-Fueled Fleets Regulation, California Air Resources Board, 2026. <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation/about>.

¹³¹ City of Coachella, CAP, at 1 (Apr. 22, 2015).

¹³² *Id.*, at 1.

¹³³ *Id.*, at 32.

¹³⁴ City of Coachella, General Plan 2035: Sustainability & Natural Environment Element, at 07-1 – 07-2 (Apr. 22, 2015).

¹³⁵ *Id.*, at 07-4.

80237.00027\45404105.1

80237.00027\45491467.1

Coachella Municipal Code

Similar to the City's CAP and GPU, the CMC also encourages the reduction of air pollution created by vehicle emissions. Chapter 12.40, Transportation Demand Management Program, of the CMC, is intended to protect the public health, welfare, and safety by reducing air pollution caused by vehicle trips and VMT. This chapter is intended to reduce emissions by requiring the development of a trip reduction and travel demand element to the congestion management plan (CMP), and it also requires the adoption and implementation of trip reduction and travel demand ordinances by local agencies.

The project proposes a mixed-use, residential, resort, and recreational community on 87 acres in the City of Coachella. The project will comply with state-implemented building standards such as those outlined in Title 20 and Title 24 of the California Code of Regulations. Energy efficient appliances, high efficiency lighting and covered parking stalls with photovoltaic solar facilities will be implemented during project operation. As stated in the previous discussion, project-related energy consumption and VMT created by the project are not anticipated to be substantial. Construction activities would require the use of equipment that would be more energy intensive than is used for comparable activities. Additionally, new construction equipment will comply with the Tier 3 and 4 program engines, per CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation,¹³⁶ and therefore would be newer off-road equipment units.

The project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, Off-Road Zero-Emission Targeted Manufacturer Rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the LCFS. As such, the project would be consistent with the 2022 Scoping Plan.

The project property is located in a built urban environment, surrounded by existing uses. Existing elementary schools, parks, and bus stops all lie within a half-mile radius of the project property. Pedestrian pathways that internally link all uses and connect to all existing planned external streets are proposed in the project design, which will assist in reducing potential project-related VMT.

The project has designated a potential on-site location for a substation as a contingency measure but based on current electrical infrastructure planning in the area, it is expected that the new substation will be constructed off-site in the area with new distribution conduits (if required) to be constructed in existing public road rights-of-way to serve the project. The project will contribute financially to a fair share contribution for a regional substation. The future IID substation is expected to serve multiple projects in the area, both within and outside the City of Coachella, and as an independent project, it will be subject to its own environmental review under CEQA once the substation project and location have been determined. The project would also incorporate solar generation and battery storage systems to help offset electricity demand from the regional grid. On-site solar systems will provide 50 percent of electricity for single-family homes, condos/townhomes, recreational uses, and restaurants. Additionally, all residential buildings (single-family homes and condos/townhomes) will be fully electrified, eliminating the use of natural gas. These systems would reduce reliance on off-site energy sources and support overall energy efficiency. In the future, the project may consider implementing a microgrid or geothermal system to further offset demand on the grid; however, these features are not part of the current project proposal and are not evaluated as a component of the project at this time. Electrical improvements will take place within the boundaries of the project and will not result in significant environmental impacts.

¹³⁶ Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation, California Air Resources Board, 2023.

<https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-added-vehicle-restrictions-and-tier-phase-out-requirements>

In-Use Off-Road Diesel-Fueled Fleets Regulation, California Air Resources Board, 2026. <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation/about>.

80237.00027\45404105.1

80237.00027\45491467.1

The project property will comply with all applicable State and local guidelines and regulations regarding energy efficient building design and standards. Therefore, the proposed project is not anticipated to conflict or obstruct a state or local plan for renewable energy or energy efficiency. Less than significant impacts are expected.

The City is consistent with the State planning efforts for energy efficiency. Additionally, the project is consistent with the applicable strategies of the City of Coachella's Climate Action Plan, as well as CARB's Scoping Plan. The project property will comply with all applicable federal, state, and local guidelines and regulations regarding energy efficient building design and standards. Therefore, the proposed project is not anticipated to conflict or obstruct a state or local plan for renewable energy or energy efficiency. The project proposes transient lodging uses and will not have any long-term effects on an energy provider's future energy development or future energy conservation strategies. Less than significant impacts are expected. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Energy Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified. The project would not result in wasteful, inefficient or unnecessary consumption of energy resources or conflict with a state or local plan for renewable energy or energy efficiency.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures are required within the GPU EIR. The project is consistent with the applicable strategies of the City of Coachella's Climate Action Plan, as well as CARB's Scoping Plan. The project property will comply with all applicable federal, state, and local guidelines and regulations regarding energy efficient building design and standards. The project specific impacts would be less than significant.

7. GEOLOGY AND SOILS -- Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☐	☒
i) Expose people or structures to potential substantial adverse effects, including risk of loss, injury or death involving 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) 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?	☐	☐	☐	☐	☒
c) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?	☐	☐	☐	☐	☒
d) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☐	☒
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?	☐	☐	☐	☐	☒

Sources: The City of Coachella 2035 General Plan, 2015; The City of Coachella 2035 General Plan Update EIR, 2015; Technical Background Report to the Safety Element of the General Plan for the City of Coachella, 2014; Geotechnical Investigation, Sladden Engineering, 2024; City of Coachella Municipal Code Chapter 15.66; Sustainable Groundwater Management Act (SGMA) Data Viewer; Federal Emergency Management Agency (FEMA) map number 06065C2262H, effective March 6, 2018; Riverside County General Plan EIR, 2015.

- a) i. **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant.¹³⁷ The GPU EIR concluded that the GPU policies related to fault hazards in the Safety Element provides mechanisms for identifying and avoiding threats from fault rupture. Particularly Policy 1.1, which requires new development to be designed in accordance with the most recent California Building Code; Policy 1.2, which requires all new

¹³⁷ City of Coachella, 2035 GPU Draft EIR, Geology and Soils, at 4.5-21.
80237.00027\45404105.1
80237.00027\45491467.1

habitable buildings and structures to be designed and built to be seismically resistant; and Policy 1.4, which promotes the strengthening of infrastructure and utilities to make them more earthquake resistant.¹³⁸

After consulting the Alquist-Priolo Earthquake Fault Zone Map issued by the State Geologist, it was concluded that the subject property lies approximately 3.8 miles southeast of the closest Alquist-Priolo Earthquake Fault Zone. Therefore, the project site is not located on an active fault or within an Alquist-Priolo Earthquake Fault Zone.

Additionally, Sladden Engineering conducted a project-specific Geotechnical Investigation in July 2024 (Appendix D).¹³⁹ The purpose of the Geotechnical Investigation was to determine specific engineering characteristics of the near surface soil on the site to provide recommendations for foundation design and site preparation. The investigation included field exploration, drilling exploratory boreholes, laboratory tests, literature review, performing site-specific ground motion procedures, and engineering analysis. There were no signs of active surface fault rupture or secondary seismic effects on the project property during Sladden Engineering's site assessment. However, the Geotechnical Investigation provided recommendations for site clearing and foundation preparation to reduce the potential impacts of seismic events. These recommendations are consistent with Policy 2.1 and 2.2 in the GPU EIR. Policy 1.2 requires that all development proposals in the City to conduct, as a condition of approval, geotechnical and engineering geological investigations, prepared by state-certified professionals (geotechnical engineers and engineering geologists, as appropriate) following the most recent guidelines of the California Geological Survey and similar organizations, that address, as a minimum, the site-specific geologic hazards identified in the Technical Background Report. This includes the hazard of slope failure in, and adjacent to, hillside areas. Policy 2.2 requires all new developments to mitigate the geologic hazards that have the potential to have an impact on habitable structures and other improvements. The Geotechnical Investigation recommendations include but are not limited to the following:

1. Site Clearing: Any vegetation associated root systems, or underground utilities and debris, should be removed from the proposed building areas, and the resulting excavations should be properly backfilled.
2. Preparation of building and foundation areas: To provide firm and uniform bearing conditions, over-excavation and re-compaction throughout the proposed building areas is recommended. All artificial fill soil and native low density near surface native soil should be removed to a depth of at least 5 feet below existing grade or 4 feet below the bottom of the footings, whichever is deeper. Remedial grading should extend laterally for a maximum of five feet beyond the building limits. The exposed native soil should be scarified, moisture-conditioned to near optimum, and compacted to at least 90% relative compaction before placing new fill. The removed soil can then be replaced as compacted engineered fill.
3. Compaction: Soil used as engineered fill must be free of organic matter, debris, and other unsuitable materials. Fill should be placed in loose lifts no thicker than six inches. If imported fill is needed, it should be low to non-expansive and meet the following criteria: Plasticity Index < 12, Liquid Limit < 35, 15–35% passing the #200 sieve, and a maximum aggregate size of 3 inches. Both the subgrade and fill should be compacted to at least 90% relative compaction using suitable equipment. A Sladden Engineering representative should observe the exposed subgrade before placing fill. Compaction testing must be performed on each lift to verify proper placement.
4. Shrinkage and Subsidence: Volumetric shrinkage of the material that is excavated and replaced as controlled compacted fill should be anticipated. It is estimated that this shrinkage should be between 10 and 20 percent. Subsidence of the surfaces that are scarified and compacted should be between 1 tenth and 3 tenths of a foot. This will vary depending upon the type of equipment used, the moisture content of the soil at the time of grading and the actual degree of compaction attained.

¹³⁸ City of Coachella, General Plan 2035: Safety Element, at 08-4 (Apr. 22, 2015).

¹³⁹ Geotechnical Investigation, Sladden Engineering, 2024 (Appendix D).

80237.00027\45404105.1

80237.00027\45491467.1

These recommendations will be incorporated into project design and are subject to development plan approval by the City. These recommendations are consistent with policies in the GPU EIR relating to fault rupture.

In addition to the recommendations provided in the Geotechnical Investigation, the CMC reflects the possible impacts of potential seismic hazards in Chapter 15.66, Seismic Hazards Mitigation. New buildings are required to follow these codes to be structurally stronger and more likely to survive an earthquake, with the main purpose of preventing the collapse of buildings.

With the foregoing, risks associated with fault rupture at the project site are considered low since the project site is not located within the Alquist-Priolo Earthquake Fault Zone and will comply with required building codes, recommendations provided in the Geotechnical Investigation, and the implementation of Policies 1.1, 1.2, 1.4, 2.1 and 2.2. The project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, and impacts would be less than significant. The project would be consistent with the GPU EIR because it would not create new impacts, and there is no new information of substantial importance than that covered in the GPU EIR.

- ii. **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant.¹⁴⁰ In order to reduce hazards associated with ground shaking impacts on people and buildings, the City of Coachella requires new buildings to be constructed in accordance with the most recent edition of the California Building Code (CBC) and CMC. The City implements the latest seismic safety design standards outlined in both the General Plan Technical Background Report, and the most recent CBC. Required adherence to the Uniform Building Code (UBC) for this seismic area will reduce the potential for nearly all impacts related to ground shaking for newly constructed buildings to a less than significant level. In particular, Section 15.08.030, Amendments to the California Building Code – Building Code Section 3403.5, includes requirements for new construction in Coachella that are more stringent than the standard CBC. Additionally, Chapter 15.66, Seismic Hazard Mitigation, identifies those buildings in the City that are most susceptible to earthquake damage and requires certain mitigation measures to protect the lives of persons working and residing in Coachella. Several proposed policies to minimize the effects of seismic ground shaking from the Safety Element of the GPU are listed below:¹⁴¹

- 1.3 Strengthened and seismically retrofitted older structures.** Promote the strengthening of older structures to make them more resistant to seismic shaking. This includes encouraging owners of potentially hazardous buildings, such as pre-1952 wood-frame structures, concrete tilt-ups, pre-1971 reinforced masonry, soft-story, multi-family residential buildings and manufactured homes, to assess the seismic vulnerability of their structures and conduct seismic retrofitting as necessary to improve the buildings' resistance to seismic shaking.
- 1.5 Seismically damaged buildings.** Prohibit any additions or reconstruction of structures damaged by seismic hazards, unless the structure is re-located to a safer area, or it can be demonstrated the proposed project and its occupants can be protected from future, recurrent damage by implementing mitigation measures not present in the original, damaged structure.
- 2.7 Damaged buildings.** Prohibit any additions or reconstruction of habitable structures destroyed or damaged by geologic hazards unless the structure is relocated to a safer area or the applicant proves that the remedial measures proposed will mitigate the unsafe geological conditions so the proposed project and its occupants can be protected from future, recurrent damage.

The project site is in a seismically active region where earthquakes originating on local and regional seismic 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. According to the project-specific Geotechnical Investigation, activity from nearby active faults is expected to produce strong seismic shaking during the design life of the proposed project. As stated in the previous discussion, the project will be required to implement the recommendations provided in the Geotechnical Investigations that will address the site's main geological concerns, which include

¹⁴⁰ City of Coachella, 2035 GPU Draft EIR, Geology and Soils, at 4.5-24.

¹⁴¹ City of Coachella, General Plan 2035: Safety Element, at 08-4, 08-6 (Apr. 22, 2015).

80237.00027\45404105.1

80237.00027\45491467.1

the presence of artificial fill soil, loose and potentially compressible near-surface soil, and the potential for seismic settlement, mitigating the impact of strong seismic ground shaking. The project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, and impacts would be less than significant. The project would be consistent with the GPU EIR because it would not create new impacts, and there is no new information of substantial importance than that covered in the GPU EIR.

- iii. **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant.¹⁴² 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, potentially compromising the ground. The GPU listed the following policies in the Safety Element to address liquefaction:¹⁴³

- 1.6 Liquefaction assessment studies.** Require liquefaction assessment studies be conducted for all projects proposed in areas identified as potentially susceptible to liquefaction (Plate 1-3, Technical Background Report). These studies need to be conducted in accordance with the provisions in the Seismic Hazards Mapping Act and the most recent version of the California Geological Survey's Special Publication 117: Guidelines for Evaluating and Mitigating Seismic Hazards in California.
- 1.7 Liquefaction mitigation.** In areas where geotechnical testing shows the sediments are susceptible to liquefaction, require the implementation of mitigation measures as a condition of approval. Liquefaction mitigation measures shall be applied to all habitable structures, bridges, roadways, major utility lines and park improvements to be built in these areas.
- 2.8 Critical facility siting.** Regulate the location of new essential or critical facilities in areas that could be affected by geologic hazards by comparing, during the project feasibility stage, the location of the proposed facilities with the mapped areas in the Technical Background Report identified as susceptible to natural hazards.

According to the General Plan *Seismic Hazard Zones Map* in the Technical Background Report (Plate 1.3), the project site is in an area with high liquefaction susceptibility due to the youthful, unconsolidated sediments, and historically shallow groundwater within 30 feet of the ground surface.

According to the Sustainable Groundwater Management Act (SGMA) Data Viewer, one of the nearest monitored public wells to the project is identified as State Well 06S07E13J003S, approximately 1.2 miles south of the subject property.¹⁴⁴ Based on the most recent monitoring information, reported on March 11, 2025, the depth to groundwater at this well site was approximately 56.8 feet. During the boring tests for the project-specific Geotechnical Investigation, a groundwater depth of approximately 35 feet below the existing ground surface was found onsite. The native soil throughout the site consists primarily of fine-grained silty sand (SM), sandy silt (ML), and sandy clay (CL). Based on the current depth to groundwater and the generally uniform soil conditions underlying the site, differential seismic settlements are expected to be less than 1 inch over a horizontal distance of approximately 100 feet.

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

¹⁴² City of Coachella, 2035 GPU Draft EIR, Geology and Soils, at 4.5-25.

¹⁴³ City of Coachella, General Plan 2035: Safety Element, at 08-4, 08-6 (Apr. 22, 2015).

¹⁴⁴ SGMA Data Viewer, <https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#gwlevels>.

80237.00027\45404105.1

80237.00027\45491467.1

the ground surface as settlement. Unconsolidated young alluvial deposits are especially susceptible to this hazard. Mitigation measures for seismically induced settlement and liquefaction are similar, according to the GPU Technical Background Report. The measures generally fall into one of two categories: (1) ground improvement and (2) foundation design. Recommended methods of ground improvement involve over-excavation and re-compaction of low-density soils, removal of excess groundwater, and densification of soils.

In addition to the Technical Background Report, the project-specific Geotechnical Investigation recommends the stripping of vegetation, root systems, and debris, over-excavation and re-compaction, and compaction. The recommendations provided in the Geotechnical Investigation are consistent with Policy 2.1 and 2.2 in the GPU EIR. With the implementation of Policy 2.1 and 2.2, impacts from seismically induced liquefaction, settlement, and ground failure on the project would be less than significant. The project would be consistent with the GPU EIR because it would not create new impacts, and there is no new information of substantial importance than that covered in the GPU EIR.

- iv. **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant¹⁴⁵. The project site and much of the surrounding lands are predominantly urbanized and level. A majority of the City has a 0 to 10 percent grade, including the project site. Areas with a 10 percent grade or greater involves the areas along the San Andreas Fault east of the project site. There are no natural slopes or other geologic conditions that would render the area susceptible to unstable slopes and landslides. According to Plate 1-3, *Seismic Hazard Zones*, in the Technical Background Report of the GPU, the project site is not located in an area that is susceptible to seismically induced rockfalls, rockslides, soil falls, soil slides, or soil slumps. Therefore, impacts are less than significant. The project is found to be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.
- b) **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant.¹⁴⁶ The proposed project site is located in the western portion of the City of Coachella, on land that was previously utilized for agricultural purposes. The majority of the City has a grade of 0 to 10 percent, meaning that Coachella is relatively flat. The Technical Report in the City of Coachella's General Plan claims lake and distal fan as being a substantial deposit of the City, including the project site (Plate 2-1a, b, *Geologic Map and Explanation for Geologic Map*). This consists of predominantly fine-grained sand, silt, and clay. According to the project-specific Geotechnical Investigation, native soil throughout the site consists primarily of fine-grained silty sand (SM), sandy silt (ML) and clay (CL). Silty sand was the most prominent soil within the exploratory bores, but sandy silt and sandy clay were also encountered. The various soil components are vital to the stability of the project site specifically regarding landslides, lateral spreading, subsidence, liquefaction, or collapse.

As described above, relatively uniform grained sand and silty sand layers were encountered at the project site. When paired with the presence of groundwater at 35 feet below ground surface (bgs) at the site, the soils make the project site potentially susceptible to liquefaction during seismic shaking at its current state. Liquefaction is the process in which loose, saturated granular soil loses strength as a result of cyclic loading. The strength loss is a result of a decrease in granular sand volume and a positive increase in pore pressures. Generally, liquefaction can occur if all of the following conditions apply: liquefaction-susceptible soil, groundwater within a depth of 50 feet or less, and strong seismic shaking.

Since the site is potentially susceptible to liquefaction without mitigation, it could also be susceptible to settlement and lateral spreading, which also requires a shallow water table or proximity to a water source that could cause inundation of onsite soils. As stated in the project-specific Geotechnical Investigation, the main geotechnical concerns are the presence of artificial fill soil, the presence of loose and potentially compressible near-surface native soil throughout the project site and the potential seismic settlements.

As described in the GPU EIR, settlement or collapsible soils typically occur in recently deposited sediments

¹⁴⁵ City of Coachella, 2035 GPU Draft EIR, Geology and Soils, at 4.5-27.

¹⁴⁶ *Id.*, at 4.5-28.

80237.00027\45404105.1

80237.00027\45491467.1

that accumulated in arid or semi-arid environments.¹⁴⁷ 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. The project-specific Geotechnical Investigation determined that settlement resulting from the anticipated foundation loads should be minimal provided that the recommendations included in their Geotechnical Investigation are considered in foundation design and construction to reduce impacts to less than significant. In addition, site clearing, the preparation of building and foundation areas, soil compaction, and shrinkage and subsidence tests, as recommended in the project-specific recommendations in the Geotechnical Investigation ensure that impacts from liquefaction and lateral spreading are less than significant. 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. Therefore, no impact would occur to the project site relating to landslides.

The project would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse, and impacts would be less than significant. The project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- c) **Less than Significant Impact.** The GPU EIR states that new development would need to meet California's Building Standard Codes in order to obtain permits for construction, as well as comply with maintenance codes enforced through code enforcement. Adherence to these regulations and standards will ensure that people or structures are not impacted by expansive soils. Additionally, prior to approval of development projects, geotechnical investigation reports are required for projects to determine if the development site is subject to expansive soils and other geological hazards. Therefore, the GPU EIR concluded this impact to be less than significant.¹⁴⁸

Sladden Engineering composed a project-specific Geotechnical Investigation in July 2024. The purpose of the Geotechnical Investigation was to determine specific engineering characteristics of the near surface soil on the site to provide recommendations for foundation design and site preparation. The investigation included field exploration, drilling exploratory boreholes, laboratory tests, literature review, performing site-specific ground motion procedures, and engineering analysis. According to the 2024 Geotechnical Investigation, the native soil throughout the site consists primarily of silty sand (SM), sandy silt (ML) and sandy clay (CL). Silty sand and sandy silt were the most prominent soils discovered during bore testing. Sandy clay was also encountered during the bore test. Laboratory testing conducted by Sladden Engineering indicated that the materials underlying the site are considered to have a "very low" expansion potential, in accordance with the UBC Standard 18-2. The expansion potential of the subsurface soil should be reevaluated after grading.

Risks of structural damage caused by expansive soils at the project site are anticipated to be less than significant with the implementation of GPU EIR Policy 2.1 and 2.2. The project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- d) **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant.¹⁴⁹ The loss and erosion of topsoil is addressed through the implementation of City regulations and requirements for development within the Planning Area, including CMC Chapters 8.20 (Fugitive Dust Control) and 13.16 (Water Quality Control), discussed below. Only projects in compliance with existing regulations would be granted development permits. No mitigation measures are required.

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, including the subject property, is highly susceptible to wind erosion due to the high

¹⁴⁷ *Id.*, at 4.5-16.

¹⁴⁸ *Id.*, at 4.5-29.

¹⁴⁹ *Id.*, at 4.5-30.

80237.00027\45404105.1

80237.00027\45491467.1

winds funneled from the west.¹⁵⁰ Windborne erosion not only causes physical and structural damage but also damages public health by causing respiratory problems. The proposed project will require activities such as clearing onsite vegetation, 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 (CMC 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 project 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, a majority of the City, including the project site, is susceptible to water erosion due to the distal fan and lake deposits. According to FEMA map number 06065C2262H, effective March 6, 2018, the entire project is located within the FEMA Flood Zone X, which are areas determined to have moderate to low flood risk. Flood Zone X 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. Approximately 2.9 miles 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 construction activities includes the developer's compliance with the State's most current Construction General Permit (CGP) (Order No. 2022-0057-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.¹⁵¹ 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.

The project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant. The project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- e) **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant.¹⁵² The project does not propose the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur. The project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Geology and Soils, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR adequately addressed geological and soil hazards with appropriate policies and recommendations.

150 Riverside County 2016 General Plan Safety Element, at S-38, (revised June 25, 2024), <https://planning.rctlma.org/sites/g/files/aldnop416/files/2024-07/Safety%20Element.pdf?archive-consent=true>.

151 The SWPPP is also enforced in Chapter 13.16, Water Quality Control, of the CMC.

152 City of Coachella, 2035 GPU Draft EIR, Geology and Soils, at 4.5-32.

80237.00027\45404105.1

80237.00027\45491467.1

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the City of Coachella General Plan 2035 Program EIR. The recommendations of the Geotechnical Investigation by Sladden Engineering are consistent with the findings and assumptions of the Program EIR.
4. No mitigation measures are required within the GPU EIR for geological or soil resources. Compliance with General Plan Policies 2.1 and 2.2 ensures that potential impacts to geological and soil resources would remain less than significant.

8. GREENHOUSE GAS EMISSIONS – Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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?	☐	☐	☐	☐	☒

Sources: Greenhouse Gas Analysis, Urban Crossroads, Inc. November 2025; California Greenhouse Gas Emissions for 2000 to 2020, Trends of Emissions and Other Indicators, 2022 Edition, California Air Resources Board; California Greenhouse Gas Emissions for 2000 to 2019, Trends of Emissions and Other Indicators, 2021 Edition, California Air Resources Board; Release No. 18-37 & 19-35, California Air Resources Board Press Release, July 2018 and August 2019.

a) Less than Significant with Mitigation.

The GPU EIR determined that GPU implementation would result in emission increases representing significant impacts, but such impacts would be mitigated under full adoption and implementation of State, GPU, and CAP measures and strategies. The GPU EIR further concluded that although existing State, federal, and local policies would reduce emissions sufficiently to meet the SCAQMD 2020 service population threshold, implementation of the GPU would introduce new GHG emission sources.¹⁵³ Even with these additions, the combined effect of GPU policies and broader State and federal reduction programs would keep 2020 emissions below the SCAQMD threshold of 6.6 MTCO₂e per service population. However, emissions would still exceed the City's more stringent 2035 target of 4.2 MTCO₂e per service population. Modeling prepared for the City's Climate Action Plan reached similar conclusions, showing that while State programs and GPU policies would achieve substantial reductions, additional measures would be required to meet the 2035 efficiency target.

The CAP evaluated reductions achievable through State programs, GPU policies, and additional CAP-recommended measures. State policies incorporated into the CAP, such as the Renewable Energy Portfolio Standard, Title 24, the Low Carbon Fuel Standard, and the Pavley Clean Cars standards, were estimated to reduce emissions by approximately 211,740 MT CO₂E in 2020 and 407,924 MT CO₂E in 2035.¹⁵⁴ GPU policies across the Land Use, Mobility, Sustainability and Natural Environment, Safety, and Infrastructure and Public Services Elements were estimated to provide an additional 126,306 MT CO₂E reduction in 2020 and 231,707 MT CO₂E in 2035.¹⁵⁵

In total, combined federal, State, and GPU-level reductions would lower Citywide emissions by approximately 338,046 MT CO₂E in 2020, resulting in a per-service-population value of 6.2 MT CO₂E, below the SCAQMD

¹⁵³ City of Coachella, General Plan 2035: Safety Element, at 08-4, 08-6 (Apr. 22, 2015).

¹⁵⁴ City of Coachella, GPU Draft EIR: Greenhouse Gases, at 4.12-13.

¹⁵⁵ City of Coachella, CAP, at 41 (Apr. 22, 2015).

threshold.¹⁵⁶ By 2035, these combined measures would reduce emissions by approximately 639,630 MT CO₂E, resulting in 5.4 MT CO₂E per service population, which would still exceed the City's 2035 target.¹⁵⁷

The CAP also evaluated more aggressive implementation programs and additional measures not included in the GPU. Full implementation of these strategies could achieve approximately 838,494 MT CO₂E in reductions by 2035, meeting the 4.2 MT CO₂E target.¹⁵⁸ However, because the CAP had not yet been adopted, there was no assurance these measures would be implemented. As a result, the GPU EIR found that impacts would be significant but mitigable. Mitigation requires implementation of the Additional CAP Measures identified in Table 18 of the CAP, or other equally effective strategies, to achieve 4.2 MT CO₂E per service population or less by 2035.

To address the long-term adverse impacts associated with global climate change, California has established a regulatory framework that continues to guide statewide GHG reduction efforts and inform CEQA analysis. California's regulatory framework continues to serve as the foundation for addressing the long-term adverse impacts associated with global climate change. The Global Warming Solutions Act of 2006 (AB 32) requires CARB to reduce statewide greenhouse gas emissions to 1990 levels by 2020, establishing the basis for the State's climate policy and informing the development of localized Climate Action Plans, including the City's CAP. Senate Bill 32 (SB 32), signed in 2016, strengthened this framework by requiring statewide emissions to be reduced to 40 percent below 1990 levels by 2030, ensuring that the State's regulatory structure remains central to guiding ongoing and future GHG reduction efforts.

California's annual statewide GHG emission inventory is a relevant tool for tracking California's progress in reducing GHGs and achieving the statewide GHG target. The GHG inventory relies on data collected through various California Global Warming Solutions Act (AB 32) programs. Based on the most recent *California Greenhouse Gas Emissions from 2000 to 2023, Trends of Emissions and Other Indicators*, released on November 4, 2025, statewide GHG emissions in 2023 totaled 360.4 MMTCO₂e, a reduction of 11.2 MMTCO₂e, 3.0 percent, from 2022 and the lowest level recorded across the 2000 to 2023 inventory period.¹⁵⁹ The data indicates that California continues its long-term downward emissions trend, driven by notable reductions across major transportation, industrial, and electricity sectors.

The City of Coachella developed their CAP in 2014 and adopted it on April 22, 2015 in order to achieve community-wide GHG emissions reductions.¹⁶⁰ The CAP quantifies emissions from the build-out of the City and includes additional policies and implementation actions to help Coachella further reduce emissions. The CAP analyzes policies from the GPU that reduce energy use, VMT, resource consumption, and GHG emissions, comparing the emissions to voluntary statewide emissions targets outlined in the California Climate Action Scoping Plan and Executive Order S-03-05. In compliance with the statewide emission targets, the City established a per service population 2020 emissions reduction target of 15 percent below 2010 levels and a 2035 emissions reduction target of 49 percent below 2010 levels. The CAP has also established a 2035 target of 4.2 MTCO₂e per service population.¹⁶¹

To achieve the targets, CAP organizes the General Plan polices into six strategies to reduce emissions reductions throughout the City: building and infrastructure energy efficiency, renewable energy generation, land use and transportation, vegetation and open space, solid waste, and water use.¹⁶² According to the CAP, residential and non-residential buildings produce approximately 39 percent of Coachella's emissions and are a primary target for the CAP.¹⁶³ The City plans to achieve this reduction through energy efficiency policies for homes, and

¹⁵⁶ *Id.*, at 33.

¹⁵⁷ *Id.*, at 36.

¹⁵⁸ *Id.*, at 37-38.

¹⁵⁹ CARB, California Greenhouse Gas Emissions from 2000 to 2023: Trends of Emissions and Other Indicators (Nov. 4, 2025), at 4, https://ww2.arb.ca.gov/sites/default/files/2025-11/nc-2000_2023_ghg_inventory_trends.pdf.

¹⁶⁰ City of Coachella, CAP (April 22, 2015).

¹⁶¹ *Id.*, at 29.

¹⁶² *Id.*, at 32.

¹⁶³ *Ibid.*

80237.00027\45404105.1

80237.00027\45491467.1

businesses including energy performance targets to construct buildings 15 percent more energy efficient than Title 24 standards.

The *COVA Greenhouse Gas Analysis* (GHGA) was completed in November of 2025 to evaluate project-related construction and operational emissions and determine the level of GHG impacts as a result of constructing and operating the project.¹⁶⁴ The GHGA relied on the most current version of the California Emissions Estimator Model™ (CalEEMod) Version 2022, which is the adopted software from the California Air Pollution Control Officers Association (CAPCOA) to quantify construction emissions and operational GHG emissions from land development projects. The GHGA modeled GHG emissions from the proposed project land uses and dimensions consisting of 409 units: 165 two-story SFR and 244 condo hotel units.¹⁶⁵ The development factors also included a crystal lagoon and other residential amenities including restaurants, a beach club, event space, pop-up shops, outdoor amphitheater, pools, recreation areas, and kids play spaces.

SCAQMD defines the SP as the total residents and employees associated with a project. The origin of the SP is based on CARB's 2008 Scoping Plan.¹⁶⁶ The 2008 Scoping Plan identified that based on the GHG emissions inventories for the state, the people of California generate approximately 14 tons of GHG emissions per capita and would need to reduce annual emissions to approximately 10 tons per capita in order to meet the GHG reduction target of AB 32.¹⁶⁷ Because people who live in California generally work in California, the SP metric did not include employees. As CEQA significance thresholds were being determined by air districts, the air districts considered applying this efficiency metric to their air district boundaries. Consistent with methodology provided by the Regional Targets Advisory Committee (RTAC) as part of the Senate Bill No. 375 – Sustainable Communities and Climate Protection Act of 2008, target setting discussions, the definition of SP was amended to include employees in addition to residents. This is because the transportation sector is the primary source of project-related GHG emissions; unlike the state as a whole, people who work in one county/air district may not live in the same county/air district boundary. Also, people who live in a county/air district boundary would also have other trip ends such as school, parks, and retail uses. As such, the air district/county boundary as a whole did not take into account other users within the site.

Relevant to the proposed project, the SCAQMD Tier 4 Option 3 was to utilize an efficiency target. SCAQMD has proposed targets for project-level and plan-level analysis. At the September 2010 working group meeting, the SCAQMD recommended a project-level efficiency target of 4.8 MTCO₂e/SP as a target.¹⁶⁸

The calculations behind this option are based on the same inventory calculated by CARB. The 4.8 MT/SP target is based on the same statewide 2020 GHG inventory in the CARB Scoping Plan, i.e., 295,530,000 MTCO₂e/yr. To derive the project level SP of 4.8 metric ton, SCAQMD took the 2020 statewide GHG reduction target for land use only (295,530,000 MTCO₂e/yr) and divided it by the total 2020 statewide population plus the total statewide employment for land use only (44,135,923 + 17,064,489) (i.e., (295,530,000 MTCO₂e/yr)/(44,135,923 + 17,064,489) = 4.8 MTCO₂e/yr). Thus, SCAQMD's threshold is another metric for assessing compliance with AB 32, just based on using numbers attributable to certain sectors and trying to break down the analysis to a finer grain based on a per person methodology associated with land use-related sectors.

This approach is a widely accepted screening threshold used by numerous cities in the basin and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans.¹⁶⁹ The SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources,

¹⁶⁴ Greenhouse Gas Analysis, Urban Crossroads, Inc. November 2025 (Appendix E).

¹⁶⁵ Note: The GHG analysis was prepared using an earlier project description with 409 units. The currently proposed Project includes 402 units, representing a reduction in development intensity relative to the analyzed scenario.

¹⁶⁶ California Air Resources Board, Climate Change Scoping Plan – A Framework for Change (Dec. 2008).

¹⁶⁷ *Id.*, at ES-1.

¹⁶⁸ South Coast Air Quality Management District (SCAQMD), *Draft Guidance Document: Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (October 2008), available at [https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf](https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf).

¹⁶⁹ *Ibid.*

Rules and Plans identifies a screening threshold to determine whether additional analysis is required. As noted by the SCAQMD:

“...the...screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects...the policy objective of [SCAQMD’s] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [MMTCO₂e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility.”¹⁷⁰

Although the SCAQMD’s draft significance criteria have not been adopted, the City has determined that the SCAQMD’s project-level efficiency threshold methodology can be used to set an appropriate significance criterion by which to determine whether the project emits a significant amount of GHG. To determine a project-level GHG efficiency threshold for the project’s Opening Year of 2030, a linear interpolation was used between the known targets of 2020 and 2045.

CARB’s 2022 Scoping Plan establishes a goal of reducing statewide GHG emissions by 85% below 1990 levels by 2045.¹⁷¹ Applying this 85% reduction to the previously established 2020 threshold of 4.8 MTCO₂e/SP, the resulting efficiency target for 2045 is 0.72 MTCO₂e/yr. A linear interpolation was applied between the established targets for 2020 and 2045 to calculate a project-level GHG efficiency threshold for the project’s Opening Year of 2030, yielding a threshold of 3.17 MTCO₂e/SP. According to the population generation of the COVA Transportation Analysis Report, buildout of the project has the potential to generate a future population of approximately 2,380 people, including approximately 330 employees for commercial uses and 2,050 residents for residential uses. The threshold of 3.17 MTCO₂e/SP is more conservative than the City’s target of 4.2 MTCO₂e/SP.¹⁷²

The GHGA applied the SCAQMD’s efficiency-based methodology to establish a project-level GHG threshold for the 2030 opening year, using linear interpolation between the established 2020 and 2045 statewide reduction targets. This approach yielded a significance threshold of 3.17 MTCO₂e per service population (SP). The project’s unmitigated emissions were estimated at 3.27 MTCO₂e/SP, which would exceed the threshold and result in a potentially significant impact. To evaluate consistency with the City of Coachella General Plan 2035 (GPU), City of Coachella Climate Action Plan (CAP), and applicable State requirements, the GHGA incorporated GHG-1 through GHG-8 into the emissions analysis. These actions are project-level implementation measures derived from adopted GPU policies, CAP measures, and applicable regulatory standards. As summarized in Table Table VIII – 1, each action is tied to a specific GPU policy, CAP measure, or regulatory requirement and could be incorporated into the project as conditions of approval to ensure implementation during construction and operation. The subsequent discussion summarizes the relationship between GHG-1 through GHG-8 and the applicable GPU policies, CAP measures, and regulatory standards supporting their inclusion in the GHGA. With implementation of GHG-1 through GHG-8, project emissions

¹⁷⁰ *Id.*, at 3-2 – 3-3.

¹⁷¹ CARB, 2022 Scoping Plan for Achieving Carbon Neutrality (Dec. 15, 2022), at 1.

¹⁷² COVA Transportation Analysis Report, pg. 26.

80237.00027\45404105.1

80237.00027\45491467.1

would be reduced to approximately 2.81 MTCO₂e/SP, which is below the applicable significance threshold of 3.17 MTCO₂e/SP.

Table VIII – 1 Project Consistency with City of Coachella GPU Policies, CAP Measures, and Regulatory Standards

City of Coachella GPU Policies	City of Coachella CAP Measure / Regulatory Standard	Project Measure
SNE Policy 2.6 (Energy Performance Targets - New Construction); SNE Policy 2.7 (Energy Performance Targets - Existing Buildings)	Energy Efficiency and Renewable Energy Strategies; Title 24/CALGreen	GHG-1 Building Electrification
SNE Policy 2.3 (Alternative Energy); SNE Policy 2.6 (Energy Performance Targets - New Construction); SNE Policy 2.7 (Energy Performance Targets - Existing Buildings); SNE Policy 2.12 (Solar Access)	Solar Energy Development Standard; Climate-Ready Development Standard requiring onsite solar PV. For nonresidential and multifamily residential buildings constructed between 2020 and 2035, provide 50% of project electricity demand via onsite solar photovoltaics.	GHG-2 On-Site Solar PV (50% Demand)
SNE Policy 3.1 (Conservation Performance Targets - New Construction)	Water Conservation Performance Targets	GHG-3 Indoor Water Conservation
SNE Policy 3.7 (Landscape Design); SNE Policy 13.14 (Sustainable Landscaping)	Landscape Water Reduction Strategy	GHG-4 Water-Efficient Landscaping
IPS Policy 5.3 (Solid Waste Diversion and Recycling); IPS Policy 5.4 (Zero Waste); IPS Policy 5.9 (Greener Waste Management Practices); IPS Policy 5.15 (On-Site Collection and Storage of Recyclables)	Solid Waste Reduction and Recycling Measures	GHG-5 Waste Diversion Program
No specific GPU policy identified; measure primarily implements CAP and State regulatory requirements.	Construction Emissions Reduction Development Standard; CARB Off-Road Diesel Vehicle Regulation (5-minute idling limit)	GHG-6 Construction Equipment Idling Restrictions
SNE Policy 2.3 (Alternative Energy); SNE Policy 2.11 (Building and Facility Energy Efficiency Upgrades)	Construction Emissions Reduction Development Standard encouraging electric or hybrid-electric construction equipment and alternative fuels.	GHG-7 Electric Construction Equipment and Temporary Electrical Service
Mobility Policy 5.1 (Transit Improvements); Mobility Policy 5.4 (Transit-Accessible Development); Mobility Policy 5.6 (Commute Survey); Mobility Policy 5.7 (Safe Routes to Transit)	Transportation Demand Management Development Standard for nonresidential projects with 20 or more employees.	GHG-8 Transportation Demand Management Program
Notes: GPU = City of Coachella General Plan 2035; CAP = City of Coachella Climate Action Plan; SNE = Sustainability and Natural Environment Element; IPS = Infrastructure and Public Services Element; CARB = California Air Resources Board. Policy references correspond to the applicable goals and policies contained in the City of Coachella General Plan 2035.		

GHG-1 through GHG-8 would implement existing greenhouse gas reduction strategies contained in the City of Coachella General Plan 2035 (GPU), the City of Coachella Climate Action Plan (CAP), and applicable State regulations.

GHG-1 and GHG-2 would implement GPU energy policies related to alternative energy, energy performance targets, and solar access, as well as CAP strategies promoting building electrification, renewable energy generation, and onsite solar photovoltaic systems. GHG-3 and GHG-4 would implement GPU and CAP water conservation strategies through high-efficiency fixtures, reduced potable water demand, drought-tolerant landscaping, and efficient irrigation practices. GHG-5 would implement GPU and CAP solid waste reduction objectives through diversion, recycling, composting, and waste minimization practices. GHG-6 and GHG-7 would implement the CAP's Construction Emissions Reduction Development Standard and applicable State requirements by reducing fuel consumption and emissions from construction equipment through idling restrictions, temporary electrical service connections, and increased use of electric-powered equipment. GHG-8 would implement the CAP Transportation Demand Management Development Standard and support GPU Mobility Element policies that promote transit use, transit-accessible development, vanpooling, ridesharing, and reductions in single-occupant vehicle trips.

Collectively, GHG-1 through GHG-8 would be consistent with, and in several instances would exceed, the performance standards and reduction strategies identified in the City of Coachella CAP. Because these actions would be tied to adopted GPU policies, CAP measures, and applicable regulatory requirements, they could be incorporated into the project as conditions of approval and implemented during construction and operation. Implementation of these actions would help reduce project-generated greenhouse gas emissions and support consistency with the City's greenhouse gas reduction goals and strategies.

The project's unmitigated emissions of 3.27 MTCO₂e/SP would be substantially lower than the Citywide 2035 emissions level modeled in the CAP of 5.4 MTCO₂e/SP and would also be below the City's more aggressive 2035 efficiency target of 4.2 MTCO₂e/SP. As discussed above, implementation of GHG-1 through GHG-8 would further reduce project emissions to approximately 2.81 MTCO₂e/SP, which is approximately 48 percent lower than the modeled 2035 CAP emissions level and approximately 33 percent lower than the City's 2035 efficiency target. These reductions demonstrate that the project would be consistent with the GPU and CAP greenhouse gas reduction framework and would perform substantially better than the emissions levels anticipated under the City's long-term planning documents. Accordingly, the project would not result in a new or more severe greenhouse gas impact than those evaluated in the GPU Program EIR. Consistent with CEQA Guidelines Section 15183, implementation of GHG-1 through GHG-8 would ensure consistency with the applicable GPU policies, CAP measures, and regulatory requirements, and no new information of substantial importance has been identified that would require additional environmental review beyond that contained in the GPU Program EIR.

- b) **Less than Significant Impacts:** The GPU EIR determined that the policies, programs, measures, and actions of the GPU were consistent with CARB's Scoping Plan, which served as the statewide strategy for achieving the goals of AB 32.173 This impact was therefore considered less than significant. Implementation of the GPU was determined to result in GHG emissions associated with construction and operational activities. However, in order for the City of Coachella and the State of California to meet their GHG reduction goals, both the efficiency of construction practices and the manner in which new and modified development operated were required to become more GHG efficient. Implementation of GPU policies and programs, together with the CAP, would affect the major GHG-producing sectors in the City, helping the City progress toward its reduction targets and maintain consistency with the Scoping Plan, SCAG RTP, and SCS. Therefore, the proposed project would be consistent with applicable GHG reduction plans. The GPU's consistency with the SCAG Sustainable Communities Strategy was discussed in Chapter 4.9, Circulation.

In addition to being consistent with the policies and goals of the adopted RTP and SCS, the proposed GPU would also be consistent with the RTP and SCS goal to achieve reductions in per capita GHG emissions of 8 percent by 2020 and 13 percent by 2035. Based on the GHG emission estimates in the CAP, implementation of the GPU, in combination with State initiatives, would reduce annual GHG emissions from 8.2 MT CO₂E per service population in 2010 to 6.2 MT CO₂E per service population in 2020 and 5.4 MT CO₂E per service population in 2035. These values represented reductions of approximately 25 percent and 34 percent by 2020

and 2035, respectively. While per service population and per capita metrics are not identical, the reductions demonstrated that the GPU would be generally consistent with the GHG reduction goals in the adopted RTP and SCS.

The GPU was developed to reduce GHG emissions consistent with AB 32 reduction goals. The GPU would implement numerous policies that reduce emissions from transportation, energy, water, and solid waste sources. Implementation of these policies supported CARB's Scoping Plan goals to achieve reductions from land use and development-related sources and to promote more GHG-efficient growth without constraining population or economic expansion. The GPU policies would reduce emissions across all sectors identified in the Climate Change Scoping Plan and would not preclude or obstruct its implementation. Therefore, the policies, programs, measures, and actions of the GPU were consistent with CARB's Scoping Plan, which served as the statewide strategy for achieving the goals of AB 32. This impact was therefore considered less than significant. The project would be consistent with the GPU EIR because it would not create new impacts, and there is no new information of substantial importance than that covered in the GPU EIR.

Conclusion:

With regards to the issue area of Greenhouse Gas Emissions, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified. The Project's greenhouse gas emissions were evaluated using a project-specific Greenhouse Gas Analysis and the SCAQMD efficiency-based service population methodology. The analysis determined that unmitigated emissions would be 3.27 MTCO₂e per service population (SP), and implementation of GHG-1 through GHG-8 would reduce emissions to approximately 2.81 MTCO₂e/SP, which is below the applicable significance threshold of 3.17 MTCO₂e/SP.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR evaluated the cumulative nature of greenhouse gas emissions, consistency with State greenhouse gas reduction goals, implementation of the City of Coachella Climate Action Plan (CAP), and the effectiveness of General Plan policies designed to reduce emissions from transportation, energy consumption, water use, and solid waste generation. The Program EIR concluded that implementation of CAP measures and General Plan policies would substantially reduce greenhouse gas emissions associated with future development accommodated under the General Plan.
3. No substantial new information has been identified which results in an impact more severe than anticipated by the City of Coachella General Plan 2035 Program EIR. Since certification of the Program EIR, California has continued to implement and expand greenhouse gas reduction programs through implementation of AB 32, SB 32, updated Climate Change Scoping Plans, renewable energy requirements, building efficiency standards, and transportation-related emissions reduction programs. The project-specific Greenhouse Gas Analysis demonstrates that the Project would be consistent with the assumptions, goals, and reduction strategies incorporated into the City of Coachella CAP and would not result in greenhouse gas impacts more severe than those evaluated in the Program EIR.
4. The GPU EIR determined that greenhouse gas impacts would be significant but mitigable through implementation of General Plan policies, Climate Action Plan measures, and other equally effective greenhouse gas reduction strategies. Consistent with the GPU EIR, GHG-1 through GHG-8 implement applicable City of Coachella General Plan 2035 policies, City of Coachella CAP measures, and State regulatory requirements related to energy efficiency, renewable energy generation, water conservation, waste reduction, transportation demand management, and construction emissions reductions. These measures can be incorporated into the Project as conditions of approval and would ensure that Project emissions remain below the applicable significance threshold and consistent with the City's greenhouse gas

reduction framework. Accordingly, greenhouse gas impacts would remain less than significant.

9. HAZARDS AND HAZARDOUS MATERIALS – Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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 or excessive noise for people residing or working in the project area?	☐	☐	☐	☐	☒
f) For a project near 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 or where residences are intermixed with wildlands?	☐	☐	☐	☐	☒

Sources: City of Coachella 2035 General Plan Update, 2015; City of Coachella Official Zoning Map, April 2023; Coachella Municipal Code; Coachella Technical Background Report to the Safety Element Update, 2014; Enforcement and Compliance History Online, EPA; EnviroStor, Department of Toxic Substances Control; GeoTracker, State Water Resources Control Board; Phase I Environmental Site Assessment, Sladden Engineering (Appendix F.1); Phase II Environmental Site Assessment, Kimly Horn (Appendix F.2).

a/b) **Less than Significant Impact.** The development of the Planning Area would include industrial and commercial land uses that could indirectly contribute to the temporary or continuous transportation of hazardous materials;

however, the GPU EIR concluded this impact to be less than significant with the implementation of existing regulations and policies regarding the transport of hazardous materials through the Planning Area.¹⁷⁴ The regulations and policies would reduce future potential risk and environmental impacts to a minimum by requiring safe transport, ongoing vehicle inspections, state licensing of transporters and effective response to spills. Per the GPU EIR, the GPU provides policies and guidelines to help steer the vision for development over the coming decades. The most likely occurrence of an impact occurring through the release of hazardous materials would occur on industrial land in the City. Additionally, there is an extensive framework of state and federal laws regulating the safe use, storage, disposal, and cleanup of hazardous waste.¹⁷⁵ No mitigation measures are required.

The project proposes the development of a mixed-use community with single family residences, condo hotels, suites, water amenities, and additional amenities including restaurants and bars, health and wellness, sports and recreational facilities. The project site is currently occupied by agricultural uses. The proposed project is not expected to involve the use of any hazardous materials with the operation of the residential community.

The Code of Federal Regulations defines hazardous materials based on ignitability, reactivity, corrosivity, and/or toxic properties.¹⁷⁶ 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.¹⁷⁷ As a result, the use and management of hazardous or potentially hazardous substances is regulated under existing state, federal and local laws. Hazardous waste requires 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.

Project construction would involve the use of heavy equipment that has a potential for fuel and oil spills due to the usage of fuel, oil, lubricants, and other potentially 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. 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; therefore, less than significant impacts during the construction of the project site are expected.

Operation of the project includes residential units, a commercial component, and water features, including a 9.4-acre Hotel Lagoon, 0.4-acre Beach Club Lagoon, and 2.5-acre lake. Development of the project, including the Lagoon and lake, will not result in export of soils, as the site will be balanced. The nature of these uses is not expected to involve, as a primary activity, the routine transport, use, or disposal of hazardous materials in quantities or in a manner that would pose a threat to the project and its surroundings by creating a significant hazard through foreseeable accident conditions involving the release of hazardous materials into the environment. The regular operation of the proposed project would not result in the use of hazardous materials in amounts that exceed what is typically required for resort, commercial, and residential uses. The handling, application, and storage of cleaning agents, building maintenance products, paints, solvents, and other related substances used to carry out the necessary operations in each facility is expected to occur within the project in

174 City of Coachella, GPU Draft EIR: Hazardous Materials, at 4.6-9.

175 *Id.*, at 4.6-11.

176 CFR Title 40, Part 261.

177 Cal. Code Regs. tit. 8, § 5161.

80237.00027\45404105.1

80237.00027\45491467.1

a manner typical of similar projects throughout the City. Additionally, these materials would not be present in sufficient quantities to pose a significant hazard to public health and safety or the environment.

The California Department of Public Health is authorized to establish standards for public swimming facilities. According to Section 65529, Public Pool Disinfection, of Title 22 of the CCR, it is required that public pools, when open or in use, be disinfected continuously by a chemical that imparts a disinfectant consistent with minimum and maximum concentrations, also determined in Section 65529. If halogens other than chlorine are used, residuals of equivalent strength shall be maintained. Records of the routine maintenance and repairs are also required per the CCR. Additionally, the pool operator shall maintain a test kit for measuring the disinfectant residual, pH and, if used, cyanuric acid concentration in the public pool. The public water features shall be required to adhere to all applicable standards and regulations within the CCR, the California Building Code, and the California Electrical Code regarding public swimming pools. The enforcing agency that would evaluate the plans prior to construction would be the Riverside County Department of Environmental Health.

The no contact recreational lake will also be required to implement the measures required by the Riverside County Department of Environmental Health.

Residential and resort uses, by nature, do not typically result in the use of hazardous materials in large quantities. The project proposes resort uses and recreational uses. The resort uses will consist of condo hotel units, suites, restaurants, bars, and fitness and spa areas. The recreational use will consist of a kids' area and sports courts. The regular operation of the proposed project will involve the handling, application, and storage of cleaning agents, building maintenance products, paints, solvents, and other related substances commonly used with residential and resort maintenance. However, these materials are not typically stored in quantities that could be harmful to the public or environment. The materials required for the maintenance of landscaped areas (i.e., fertilizers, pesticides, etc.), the water features, and the proposed buildings will be stored onsite and regulated by State and local law, including Fire Department regulations requiring proper storage and inspection. These regulations, including those imposed by both the County of Riverside and the Fire Department, are designed to lower impacts to less than significant levels. Compliance with these procedures will ensure that the use, transport, and disposal of hazardous materials would not impact the public or environment or result in the accidental release of hazardous materials.

The handling, application and storage of cleaning agents, building maintenance products, paints, solvents, and other related substances is expected to occur within the project in order to carry out the necessary operations for the residential, community, and recreational uses. However, these materials would not be present in sufficient quantities that pose a significant hazard to public health and safety, or the environment. Less than significant impacts are anticipated. The project would handle all hazardous materials in accordance with all applicable federal, state, and local regulations. As noted previously, residential and resort communities do not typically store, use, or handle hazardous materials in large quantities. Therefore, accidental conditions involving the release of hazardous materials are unlikely. The project is required to follow industry regulations related to use and storage of maintenance-related chemicals. Less than significant impacts are expected to result from project implementation.

As previously stated, the GPU EIR determined impacts from transport, use, and disposal of hazardous materials and accidental release of hazardous materials to be less than significant.¹⁷⁸ As the project would have a less than significant impact for the reasons listed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- c) **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant.¹⁷⁹ The GPU lists policies that protect school properties from the release of emissions. Policy 5.3 prohibits the placement of proposed new facilities that will be involved in the production, use, storage, transport or disposal of hazardous

¹⁷⁸ City of Coachella, GPU Draft EIR: Hazardous Materials, at 4.6-9.

¹⁷⁹ *Id.*, at 4.6-11.

80237.00027\45404105.1

80237.00027\45491467.1

materials near existing land uses or new sensitive facilities (like schools, child-care centers, nursing homes, senior housing, etc.) that may be adversely affected by such activities. Policy 6.14 avoids locating new sensitive uses such as schools, child-care centers, multifamily housing and senior housing in proximity to sources of pollution (e.g., I-10, truck routes, busy roadways and agricultural land where pesticides and chemical fertilizers are used regularly) and vice versa.¹⁸⁰ Based upon existing regulations and policies in the GPU, the GPU EIR concluded that environmental impacts on schools from hazardous emissions would result in no significant impacts.

The closest school to the project site is Coral Mountain Academy, located approximately 0.26 miles north of the project. As previously discussed, the project proposes the development of a residential and resort community with recreational amenities. During the construction of the project, the contractor will be required to identify a staging area for storing materials, as well as other practices to prevent any hazardous discharge or release into the environment, in their 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. 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. These standard operational procedures and protocols, as well as the BMPs, will minimize any potential public exposure to hazardous materials. The nature of the project during operation would not involve the use or handling of hazardous substances in quantities or conditions. Therefore, hazardous material-related impacts to schools are expected to be less than significant.

As previously discussed, the GPU EIR determined impacts to school sites would be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- d) **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant.¹⁸¹ At the time the GPU EIR was written, there was one registered site containing hazardous materials pursuant to Government Code Section 65962.5. This site was located approximately 1.40 northeast of the project site, at 1577 First Street, and stored pesticides and fertilizers. Due to the distance of the registered site from the proposed project, no impacts are expected. The GPU also established policies to prevent negative environmental impacts of hazardous materials sites. These include policies that enforce disclosure laws that require facilities to identify the hazardous materials and wastes utilized on a site (Policy 5.1) and the effective response from fire and sheriff departments (Policy 5.2); prohibit the placement of facilities that use, store or transport hazardous materials or waste near sensitive uses (Policy 5.3); and provide continued support of programs and recycling centers that accept hazardous substances (i.e., paint, paint thinner, used waste oil, etc.).

As previously discussed, the project site proposes the development of a mixed-use community on approximately 87 acres west of Van Buren Street, south of Avenue 52, and east of Calhoun Street in Coachella. Previous land uses include agricultural operations, primarily date palm groves and grape vineyards.

Record searches on the project property were performed within multiple database platforms, pursuant to Government Code 65962.5 and its subsections. The resources consulted included GeoTracker, EnviroStor and the EPA Enforcement and Compliance History Online (ECHO).

180 "Where such uses are located in proximity to sources of air pollution, use building design, construction and technology techniques to mitigate the negative effects of air pollution on indoor air quality. For guidance consult with the South Coast Air Quality Management District, CARB's Air Quality and Land Use Handbook, or other more recent scientific studies or tools." City of Coachella, General Plan 2035: Safety Element, at 8-11 (Apr. 22, 2015).

181 City of Coachella, GPU Draft EIR: Hazardous Materials, at 4.6-12.

80237.00027\45404105.1

80237.00027\45491467.1

GeoTracker is a database maintained by the State of California Water Resources Control Board that provides online access to environmental data.¹⁸² It serves as the management system for tracking regulatory data on sites that can potentially impact groundwater, particularly those requiring groundwater cleanup, and permitted facilities, such as operating underground storage tanks and land disposal sites.

EnviroStor is a database maintained by the State of California Department of Toxic Substances Control (DTSC).¹⁸³ The EnviroStor database identifies sites with known contamination or sites for which there may be reasons to investigate further. It includes the identification of formerly contaminated properties that have been released for reuse; properties where environmental deed restrictions have been recorded to prevent inappropriate land uses; and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites.

Moreover, the ECHO database focuses on inspection, violation, and enforcement data for the Clean Air Act (CAA), Clean Water Act (CWA), and Resource Conservation and Recovery Act (RCRA) and also includes Safe Drinking Water Act (SDWA) and Toxics Release Inventory (TRI) data.¹⁸⁴

In May 2025, a search was performed on all three database platforms. The three consulted databases did not list any facilities related to the project site. Two of the three databases, however, recorded sites within a half-mile radius of the project property. The results are described below:

The GeoTracker database search results showed that there are no Underground Storage Tank (UST) and Leaking Underground Storage Tanks (LUST) Cleanup Sites associated with the project or within a half-mile radius of the project property.

The EnviroStor database revealed one facility within a half-mile radius of the project property. The site is registered as a school investigation site for the proposed, West Coachella Elementary School located at Van Buren Street and Avenue 52, north of the project site. As of July 2002, no further action was recommended for the site. Therefore, this site is not expected to impact the project.

The Enforcement and Compliance History Online (ECHO) database did not reveal a facility within the project site or within a half-mile radius of the project.

In addition to the online database searches, a Phase I Environmental Site Assessment (ESA) and Phase II ESA¹⁸⁵ were completed for the project site to determine whether Recognized Environmental Concerns (REC) were identified onsite. In 2008, Moore Twinning completed a Phase I and II ESA to assess potential environmental persistent chemicals (OCPs and arsenic).¹⁸⁶ The results of the 2008 studies revealed detectable concentrations of dichlorodiphenyldichloroethylene (DDE) and dichlorodiphenyltrichloroethane (DDT) in the near surface and attenuated with depth to two deep bgs. However, the environmental concerns associated with these were low and below regulatory threshold.

In June 2024, Sladden Engineering completed a Phase I ESA¹⁸⁷ for the project site, which identified the presence of DDE, DDT and other hydrocarbons due to the previous and ongoing onsite farming/agricultural use along with the findings of the previous environmental reports. Due to these findings, Sladden Engineering

182 California State Water Resources Control Board, *About GeoTracker* (“GeoTracker is the State Board’s Internet-accessible database system used ... to track and archive compliance data ...”) (last updated Aug. 10, 2023), https://www.waterboards.ca.gov/ust/electronic_submittal/about.html.

183 Cal. Dep’t of Toxic Substances Control, *Your EnviroStor* (“EnviroStor is DTSC’s online data-management system for tracking site cleanup, permitting, enforcement and investigation efforts at hazardous-waste facilities and contaminated sites.”) (accessed Nov. 24, 2025), <https://www.envirostor.dtsc.ca.gov/public>.

184 U.S. Env’tl. Prot. Agency, *About the Data | Enforcement and Compliance History Online (ECHO)*, <https://www.epa.gov/enforcement/enforcement-data-and-results> (last visited Nov. 24, 2025).

185 Phase I Environmental Site Assessment, Sladden Engineering (Appendix F.1); Phase II Environmental Site Assessment, Kimly Horn (Appendix F.2).

186 Phase II Environmental Site Assessment, Kimly Horn (Appendix F.2), at 1.

187 Phase I Environmental Site Assessment, Sladden Engineering (Appendix F.1).

80237.00027\45404105.1

80237.00027\45491467.1

recommended that a Phase II shallow soil sampling laboratory testing program be performed.

In November 2024, Kimley-Horn prepared a Phase II ESA¹⁸⁸ to determine the absence/presence of hazardous materials in concentrations of concern by completing soil sampling and testing throughout the site. Kimley-Horn completed soil sampling throughout the site in July 2024, which consisted of 64 discrete soil samples within the 50-acre date grove, 36 discrete soil samples within the 26-acre grape vineyard, and 3 soil samples near the residential structure onsite, for a total of 103 discrete soil samples. Field observations did not discover staining or odors in the samples that would indicate the presence of contaminants. The laboratory results did not identify exceedances of pesticides or arsenic in the agricultural areas, or exceedances of pesticides, arsenic or TPH in the soil near the residential structure. One exceedance of 4,4-DDE was detected in a residential sample adjacent to the water well and fertilizer storage area in the July 2024 sampling event, and one exceedance of Dieldrin was detected in residential sample near the former residence. Therefore, additional samples were collected in September 2024, which determined DDE was below the residential screening level, and Dieldrin exceeded exceedance levels.

The Phase II ESA concluded that the laboratory analytical results do not indicate evidence for significant release(s) associated with the historical agricultural operations conducted at the project site based on the REC identified within the Phase I ESA. Traces of the pesticides: chlordane, endosulfan I and II, endrin, heptachlorepoide, methoxychlor, and toxaphene, and Total Petroleum Hydrocarbons (TPH) were also discovered. The detected levels of pesticides are below the California Regional Water Quality Control Board Environmental Screening Levels (ESL) for residential soil and for the protection of soil and groundwater and would not likely trigger actions if reported to a regulatory agency. Arsenic was detected at concentrations that exceed the ESLs for residential soil; however, the concentrations of arsenic reported in the soil samples collected during this investigation are below the typical Southern California background level of 11 mg/kg per DTSC, Human and Ecological Risk Office (HERO). Areas around the former residential structure indicate exceedances above the residential screening level for 4,4-DDE and Dieldrin. As the property's intent is for a resort development, these de minimis areas should be isolated or removed prior to mass grading. If the property is planned for commercial development versus residential, the detections of 4,4-DDE is below the 8.27 mg/kg screening level and dieldrin is below the 1.6 mg/kg screening level. The location of the former residential structure, where the exceedances were found, would be developed into the proposed Hotel Lagoon and resort cottages.

The GPU includes policies that address soil contamination and require investigation and remediation prior to development. Specifically, Policy 6.10 (Agriculture Soil Quality), which requires testing of land previously used for agricultural purposes and mandates that, if contaminants are present, soils shall be treated and re-tested or, if necessary, removed; and Policy 6.11 (Soil Quality), which also requires soil testing on sites with potential chemical exposure and implementation of a remediation strategy or reduce or eliminate contamination.¹⁸⁹ Consistent with these policies, and applicable federal and state regulations, contaminated soils identified on the project site would be remediated, including removal and disposal of the contaminated soil, per DTSC regulations, prior to grading activities. Therefore, the proposed project would not result in a new or more severe hazardous materials impact than those analyzed in the GPU EIR. Moreover, impacts related to hazardous materials would be addressed through compliance with the GPU policies.

As previously discussed, the GPU EIR determined impacts from existing hazardous material sites to be less than significant. Per the GPU EIR, all future development would be required to comply with applicable federal and state laws and local regulations pertaining to hazardous materials, including but not limited to Title 22 of the CCR, the California Building Code, the California Electrical Code, the Riverside County Department of Environmental Health, and CEQA. As the proposed project would have a less than significant impact for the reasons discussed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

188 Phase II Environmental Site Assessment, Kimly Horn (Appendix F.2).

189 City of Coachella, General Plan 2035: Safety Element, at 08-10 (Apr. 22, 2015).

80237.00027\45404105.1

80237.00027\45491467.1

- e/f) **Less than Significant Impact.** The GPU EIR concluded that impacts related to private airstrips or public airports would be less than significant.¹⁹⁰ No mitigation measures are necessary. The southern portion of the Planning Area is within proximity of the Jacqueline Cochran Regional Airport. Properties within two miles will comply with GPU policies to reduce potential hazards from airports, including requiring the conformance of the airport land use and safety plans (Policy 10.4); coordinating with airport authorities and the City to meet the region's aviation needs (Policy 10.5); and review from the Airport Land Use Commission (Policy 10.6).¹⁹¹

The Jacqueline Cochran Regional Airport is located approximately 2.8 miles southeast of the project site and is not located within the boundaries of the airport's land use compatibility plan. The project site is also not located in the vicinity of a private airstrip. The project will not result in safety hazards or excessive noise for people living or working in the area. No impacts are expected.

As previously discussed, the GPU EIR determined impacts to public and private airports will not be significant. As the proposed project would have no impact due to its distance from a private airstrip or public airport, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- g) **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant.¹⁹² No mitigation measures are required. According to the GPU EIR, development proposed under the GPU would need to comply with existing emergency response plans, as to not interfere with carefully planned evacuation routes or regulations. The GPU Safety Element presents policies to prevent interference with plans, including a commitment for the City to update the Local Hazard Mitigation Plan (Policy 8.1), emergency response (Policy 8.2), disaster response plans (Policy 3.7), fire response (Policy 4.4), medical response (Policy 8.4), emergency exercises (Policy 8.6), as well as providing emergency response training, community training programs, and local preparedness plans (Policies 8.14, 8.15 and 8.17).¹⁹³

The City of Coachella's Technical Background Report to the Safety Element Update analyzes various safety hazards within the City.¹⁹⁴ 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 the closest fire station to the project site, located approximately 1.7 driving miles northeast of the project site at 1377 6th Street. The closest police station to the project site is the Indio Police Department, at 46800 Jackson Street, and is 3.5 driving miles northwest of the project site. Thermal Sheriff Station at 86625 Airport Boulevard is approximately 5 driving miles southeast 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, *Potential Emergency Shelters and Evacuation Routes*, in the Technical Background Report, Avenue 52, immediately north of the project, is the closest City designated evacuation route to the project.

The project lies within the City's Regional Retail District and is surrounded by existing agricultural and residential properties. Implementation of the proposed project would not significantly modify the existing

190 City of Coachella, GPU Draft EIR: Hazardous Materials, at 4.6-14.

191 City of Coachella, General Plan 2035: Community Character, at 04-96 (Apr. 22, 2015).

192 City of Coachella, GPU Draft EIR: Hazardous Materials, at 4.6-15.

193 City of Coachella, General Plan 2035: Safety, at 08-7 – 08-8, 08-12 – 08-14 (Apr. 22, 2015).

194 See City of Coachella, Document Central, <https://www.coachella.org/services/document-central/-/folder-165>.

80237.00027\45404105.1

80237.00027\45491467.1

circulation pattern in the area or adversely impact emergency evacuation procedures as the site is currently bordered by established paved improvements. The proposed project is consistent with the GPU land use and zoning designations. The City's Circulation system was planned to accommodate buildout conditions, and roadway classifications identified in the GPU are intended to address projected traffic volumes.¹⁹⁵

The 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. A Traffic Control Plan may be required as a condition of approval to be implemented throughout all construction activities. This plan will work to reduce potential impacts that may arise due to conflicts with construction traffic. If required, the plan would be submitted to the Fire Department for review prior to development in order to assure that the project does not interfere with emergency access during development. Less than significant impacts are anticipated.

As the project would have a less than significant impact for the reasons discussed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- h) **Less than Significant Impacts.** The GPU EIR concluded the impact of wildfires to be less than significant.¹⁹⁶ No mitigation measures are required. According to the GPU, new developments, whether they are new urban or new agricultural uses, would be required to maintain a protective buffer, such as landscape setbacks, hedgerows, windrows, or canopy trees, that ensures urban and agriculture uses land use conflicts do not occur (Policy 5.8). Additionally, vegetation control methods are required to reduce the hazard of wildland fire (Policy 4.1), and to ensure that fire services such as firefighting equipment and personnel, infrastructure and response times, are adequate for all sections of the City. To that end, continue to regularly evaluate specific fire hazard areas, and adopt reasonable safety standards, such as adequacy of nearby water supplies, fire-retardant roofing materials, fire-equipment accessible routes, clarity of addresses, street signage and street maintenance (Policy 4.4).

The areas of Southern California are susceptible to wildfires all year round due to the region's weather, topography, and vegetation conditions. The Coachella Valley's hot dry summer and autumn weather is ideal to generate the dry vegetation that fuels most wildfires. The California Board of Forestry (CDF) ranks fire hazard of wildland areas of the State using four main criteria: fuels, weather, assets at risk, and level of service. The project site is located on relatively flat topography. The project site and its surroundings are located outside of the Very High Fire Hazard Severity Zone (FHSZ) for Local Responsibility Area and outside of the Very High/High/Moderate FHSZ for State and Federal Responsibility Areas.¹⁹⁷ The project will include the on-site fire protection facilities necessary to satisfy the local Fire Department requirements. The project will also include streets that accommodate fire equipment, with appropriate turnaround radiuses, consistent with Policy 4.4 of the GPU. Additionally, the project will include block walls, perimeter landscaping that is routinely maintained, and setbacks compliant with GPU Policies 5.8 and 4.1. No impacts related to wildland fire are expected.

As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Hazards and Hazardous Materials, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified. The project would not result in the use,

¹⁹⁵ City of Coachella General Plan Update: Mobility Element, at 5-1 and 5-7.

¹⁹⁶ City of Coachella, GPU Draft EIR: Hazardous Materials, at 4.6-18.

¹⁹⁷ Cal Fire Fire Hazard Severity Zone Map (2025) <https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9>.
80237.00027\45404105.1
80237.00027\45491467.1

storage or transport of hazardous materials, or the release of hazardous materials. Moreover, the project would not impact a local school, airport, evacuation/emergency response plan, hazardous materials site, or lands vulnerable to wildfires.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR. The EIR adequately addressed the potential for hazardous material release or use, and impact within the planning area.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR. The database searches and findings within the Phase I and II ESAs are consistent with the findings and assumptions in the GPU EIR.
4. No mitigation measures are required within the GPU EIR. Compliance with the GPU Policies 5.8, 4.1, 4.4, 6.10, and 6.11 and regulations established by the California Department of Public Health, Riverside County Department of Environmental Health, California Building Code, and Electrical Code, and Construction General Permit (SWPPP) ensures that potential impacts to hazards and hazardous materials would remain less than significant.

10. HYDROLOGY AND WATER QUALITY -- Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☐	☐	☒
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☐	☒
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 through the addition of impervious surfaces, in a manner that 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 storm-water 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?	☐	☐	☐	☐	☒

Sources: Flood Insurance Rate Map, FEMA map number 06065C2262H, effective March 6, 2018; 2035 Coachella General Plan, 2015, City of Coachella; Water Quality Control Plan for the Colorado River Basin Region, January 2019; 2020 Coachella Valley Regional Urban Water Management Plan, June 2021)

- a) **Less than Significant Impacts.** The GPU EIR determined that impacts would be less than significant.¹⁹⁸ The EIR found that implementation of the GPU would not violate applicable water quality standards or waste discharge requirements. Federal, state, and local regulations, including the Clean Water Act, the Porter-Cologne Water Quality Control Act, Regional Water Quality Control Plans, and the Safe Drinking Water Act, establish a comprehensive framework that governs pollutant discharges, protects surface and groundwater quality, and requires compliance as a condition of development approval. As the GPU Planning Area grows, all new development projects would continue to be subject to these requirements that prohibit activities that could degrade water quality or impair beneficial uses. The GPU included supporting policies that reinforce

¹⁹⁸ City of Coachella, GPU Draft EIR, Water Quality and Hydrology, 4.7-17.

compliance with existing regulations by limiting pollutant discharges and ensuring that water quality in local waterways meets applicable state and federal standards. Because future development must demonstrate compliance during permitting and ongoing operations, and because violations would trigger corrective actions or cessation of activities, implementation of the GPU would not result in significant impacts related to water quality standards or waste discharge requirements.

General Plan Policies Supporting the Protection of Water Quality and Compliance with State and Federal Standards

Sustainability and Natural Environment Element

Goal 3. Water Resources. Protected and readily available water resources for community and environmental use.

Policy 3.4 - Low Impact Development: Require the use of low-impact development strategies to minimize urban run-off, increase site infiltration, manage stormwater and recharge groundwater supplies.

Policy 3.8 - Groundwater Infiltration: Encourage the use of above-ground and natural stormwater facilities in new development and redevelopment, such as grassy or vegetated swales, permeable paving and rain gardens.

Goal 7. Waterways. Waterways and desert washes that serve a natural, environmental function and provide aesthetically pleasing open space for the community.

Policy 7.1 - Pollution Prevention: Limit the amount and concentration of pollutants released into the City's waterways.

Policy 7.2 - Development Impacts: When considering development applications, require consideration of onsite detainment of stormwater runoff and require the incorporation of appropriate stormwater treatment and control measures, in accordance with the most recent NPDES permit requirements.

Policy 7.3 - Soil Erosion: Require the prevention of water-born soil erosion from sites, especially those undergoing grading and mining activities.

Policy 7.4 - Water Quality: Ensure water quality in the City's waterways meets applicable state and federal standards.

Infrastructure and Public Services Element

Goal 2. Water Supply Facilities. Water supply facilities that meet future growth within the city and assure a high-quality and reliable supply of water to current and future residents.

Policy 2.9 - Water Supply Source Protection: Protect local groundwater resources from localized and regional contamination sources such as septic tanks, underground storage tanks, industrial businesses and urban runoff.

Goal 4. Stormwater Capacity. Sufficient stormwater drainage facilities and services that are environmentally sensitive, accommodate growth and protect residents and property.

Policy 4.5 - New Development: Require the preparation of drainage studies that evaluate adherence to City stormwater design requirements and incorporate measures to prevent on- or off-site flooding with all new development applications."

Policy 4.6 - Stormwater Pollution Prevention: "Cooperate in regional programs to implement the National Pollutant Discharge Elimination System program.

Summary of Regulatory Framework Relevant to Hydrology and Water Quality:

Hydrology refers to the occurrence, distribution, and movement of surface water, including water found in rivers and stormwater drainage systems. Stormwater particularly refers to the surface runoff and drainage resulting from rain events. Stormwater runoff and surface drainage patterns are determined by the soil conditions, topography, and associated gradients of the land. Surface water quality refers to selected physical, chemical, or biological characteristics found in stormwater in relation to existing standards. Groundwater is the

water found underground in the voids in soil, sand, and rock. It is stored in and moves slowly through aquifers. Groundwater supplies are naturally replenished, or recharged, by precipitation that seeps into the land's surface and by replenishment efforts made by local water agencies.

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. The National Pollutant Discharge Elimination System (NPDES) was enacted as a program under the CWA to regulate non-point source discharges from urban land runoff and other diffused sources that were also found to contribute to runoff pollution. Under CWA, the EPA delegated the NPDES program responsibility 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 Water Quality Control Act is the principal law governing water quality regulation for surface waters in California, thus effectuating the delegated provisions of the federal CWA and its NPDES program.¹⁹⁹ It has set forth a comprehensive program to protect water quality and the beneficial uses applicable to surface waters, wetlands, and groundwater and to point and nonpoint sources of pollution. The Porter-Cologne Act establishes that, as a matter of policy, all the waters of the State shall be protected; all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and the state must be prepared to exercise its full power and jurisdiction to protect the quality of water in the state from degradation. The Porter-Cologne Act established the State Water Resources Control Board (SWRCB) and nine California Regional Water Quality Control Boards (RWQCBs), including Region 7, Colorado River Basin Regional Water Quality Control Board, which has jurisdiction in the City of Coachella and project site.

Under this framework, the Colorado River Basin Water Quality Control Plan (Basin Plan) serves as the guiding document prepared, adopted, and maintained to identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. It is worth noting that as defined in Section 13374 of the California Water Code (CWC), the term "Waste Discharge Requirements" (WDRs) is equivalent of the term "permits" and is therefore attained through a regulatory compliance process. Compliance with WDRs is achieved through the appropriate permit registration process under the applicable NPDES program described in this section.

At the regional level, the project is located within the Whitewater River Watershed, which is an arid desert region encompassing approximately 1,645 square miles. Within this watershed, an area of approximately 367 square miles (22 percent), encompassing most of the existing development in the Coachella Valley region, is regulated under the established Whitewater River Region Municipal Separate Storm Sewer System Permit (MS4 Permit). The Riverside County Flood Control and Water Conservation District (RCFC&WCD), Coachella Valley Water District, and the incorporated Coachella Valley cities, including Coachella, have joint permittee responsibility for coordinating the regional MS4 Permit compliance programs and other activities aimed at reducing potential pollutants in urban runoff from land development construction, municipal, commercial, and industrial areas to the maximum extent possible. These public entities are generally in charge of stormwater management within their jurisdiction.

At the City level, Chapter 13.16 (Water Quality Control) of the CMC serves as the local stormwater management standard, aligning with the MS4, NPDES, and CWA programs.

Existing Drainage Conditions:

The project site consists of relatively level terrain that is actively maintained to support and irrigate agricultural fields planted with date palm orchards and grapevines. According to the USDA Natural Resources Conservation Series, Web Soil Survey, the on-site mapped soil series include Gilman fine sandy loam, Indio fine sandy loam,

¹⁹⁹ California Water Code §§ 13000 *et seq.*
80237.00027\45404105.1
80237.00027\45491467.1

Indio very fine sandy loam (It), and Coachella fine sand. The majority of these soils are classified under Hydrologic Soil Group B, which is characterized by moderate runoff potential and moderate infiltration rates. The property's street frontage lacks public or private stormwater infrastructure, such as curbs, gutters, or drainage conveyance lines.

Summary of Regional Groundwater Resource Management:

The project site is located within the domestic water service area of Coachella Water Authority (CWA), the primary domestic water purveyor for the City of Coachella which relies on groundwater as the primary supply.

The Coachella Valley Groundwater Basin is the primary groundwater source for the project region's domestic water purveyors, including CWA. Based on the California Department of Water Resources (DWR), the Coachella Valley Groundwater Basin has an approximate storage capacity of 39.2 million acre-feet (AF) of water within the upper 1,000 feet and is divided into four subbasins: Indio, Mission Creek, Desert Hot Springs, and San Geronio.²⁰⁰ The project site is specifically underlain by the Indio Subbasin, which is also known as the Whitewater River Subbasin. DWR has estimated that the Indio Subbasin contains approximately 29.8 million AF of water in the first 1,000 feet below the ground surface, representing approximately 76 percent of the total groundwater in the Coachella Valley Groundwater Basin.²⁰¹ Local groundwater management is currently taking place under the framework of the 2020 Coachella Valley Regional Urban Water Management Plan (2020 RUWMP), the preparation of which involved the collaboration of the six urban water suppliers in the Coachella Valley, including CWA.²⁰² The 2020 RUWMP describes the region's water supplies and anticipated demands through 2045, along with each agency's programs to encourage efficient water use.

Indio Subbasin is served by the operation and maintenance of three replenishment facilities: 1) the Whitewater River Groundwater Replenishment Facility, 2) the Thomas E. Levy Groundwater Replenishment Facility, and 3) the Palm Desert Groundwater Replenishment Facility.²⁰³ 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.²⁰⁴ According to the CVWD, the primary operator of these facilities, local agencies have percolated over 650 billion gallons of water back into the aquifer.²⁰⁵ Combined with water conservation and efficiency requirements, individual development projects can contribute to groundwater sustainability by implementing the required stormwater retention and retention facilities.

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 to help ensure a sufficient and reliable water supply for development projects within the City and in its SOI.

Summary of City of Coachella Engineering Requirements:

200 California Dept. of Water Resources (DWR), California's Ground Water: Bulletin 118 – Update 2003, Volume 3 – South Coast Hydrologic Region at 160 (2003).

201 Ibid.

202 Coachella Valley Water District, et al., *2020 Coachella Valley Regional Urban Water Management Plan*, at 1-1 (June 30, 2021), <https://www.cvwd.org/DocumentCenter/View/5437/Public-Review-Draft-2020-Coachella-Valley-Regional-Urban-Water-Management-Plan>.

203 Coachella Valley Water District, *Groundwater Replenishment & Imported Water* ("The district currently manages or co-manages four active groundwater replenishment facilities ... Whitewater River Groundwater Replenishment Facility ... Thomas E. Levy Groundwater Replenishment Facility ... Palm Desert Groundwater Replenishment Facility.") (last visited Nov. 24, 2025), <https://www.cvwd.org/162/Groundwater-Replenishment-Imported-Water>.

204 U.S. Geological Survey, *Artificial Groundwater Recharge*, <https://www.usgs.gov/mission-areas/water-resources/science/artificial-groundwater-recharge> (last updated 2016, last visited Nov. 24, 2025).

205 Coachella Valley Water District, *Water News* (Winter 2014), at 1, <https://www.cvwd.org/DocumentCenter/View/1093/2014-Water-News-Winter-PDF> (last visited Nov. 24, 2025).

In the City of Coachella, engineering requirements related to storm drain design, stormwater management, and water quality are primarily established through the City's Engineering Design Manual, Standard Plans, and Standard Specifications, which govern grading, drainage infrastructure, and construction practices. These local requirements operate in conjunction with the City's Municipal Code Chapter 13.16 (Water Quality Control) and Chapter 15.56 (Floodplain Management), which mandate compliance with water quality protection measures, pollutant control practices, adequate drainage, and stormwater discharge regulations. Together, these City-adopted standards form the foundational regulatory framework for evaluating drainage and water quality considerations, supplemented by regional MS4 level criteria that guide hydrology methods, storm drain sizing, and stormwater facility design. Therefore, subsequent references to the City's engineering requirements pertain to ensuring adequate sizing and related design measures that must be incorporated into improvement plans, which are subject to review and approval by the City of Coachella.

Proposed Project

Project implementation will comply with the applicable CWA, NPDES, state, and local regulations designed to prevent violations or impacts to surface water quality standards and waste discharge requirements pertinent to surface or groundwater quality. This form of compliance must be demonstrated to the City and other regulatory entities prior to site disturbance and grading.

During the period of construction, the project proponent must comply with the State's most current NPDES Construction General Permit (2022 CGP), which requires the preparation of a Notice of Intent (NOI) and a project-specific SWPPP, designed to prevent potential adverse impacts to surface water quality, including erosion and siltation, during the period of construction. The NOI and SWPPP are submitted to the SWRCB for approval and permit coverage. The SWPPP is a site-specific compliance plan required to identify a strategy of storm water BMPs in accordance with Section XIV (SWPPP Requirements) of the 2022 CGP. Storm water BMPs refer to a schedule of activities, prohibitions, practices, maintenance procedures, and other management practices to avoid, eliminate, or reduce the pollution of the receiving waters, primarily focused on preventing erosion, siltation, illicit discharge, and contamination. The SWPPP will include such measures as erosion control, sediment control, storm drain inlet protection, proper waste management and pollution prevention. The SWPPP must be prepared concurrently with final engineering design and must meet all NPDES plan review elements for acceptance by the City of Coachella. Compliance and plan implementation during construction will be regulated and enforced as part of the local agency site inspection protocols.

In order to obtain a grading permit, the project proponent is also required to submit and obtain approval for a Project-Specific Water Quality Management Plan (WQMP) in accordance with the current standards of the *Whitewater River Region Water Quality Management Plan for Urban Runoff*, the *Whitewater River Watershed MS4 Permit*, and the City of Coachella's engineering requirements. The WQMP is a compliance plan required to account for the stormwater facilities and management conditions to be followed by the site operator during the life of the project (post-construction). A Preliminary WQMP and Hydrology Report have been prepared for this project in order to meet the City's engineering approval requirements. Based on preliminary engineering, grading and hydrology design, the project site is represented by a single drainage management area (tributary area) covering the entire project site. Stormwater runoff volume resulting from the worst-case 100-year storm event will be conveyed southerly along stabilized surface and piped flows to designated retention facilities, where the stormwater runoff volume will be contained. The proposed method of stormwater retention will involve designated irrigation ponds or basins with available freeboard that has been sized to contain the full stormwater volume generated across the project site. This conclusion is supported by the post-construction runoff calculations in the Preliminary Hydrology Report and the demonstrated volumetric capacity of the proposed retention basins, which together show that the provided storage is sufficient to accommodate the calculated runoff volume. All storm drain and retention facilities will be privately constructed and maintained as part of the project scope. Storm drain inlets connected to this retention facility may be equipped with screening methods to filter out potential trash, organic debris, and other solids. The storm drain outlets may also be configured to allow for adequate screening prior to discharge into the private retention facilities. The provided retention volumetric capacity will comply with the local development requirements for retention and,

in doing so, will also adequately retain the smaller stormwater volume for water quality purposes, as defined by Section 2.3 (Implementation of WQMP Requirements) of the Whitewater River Region WQMP Guidance. As a result, project runoff will be completely contained within the project proponent's facilities and will not result in discharge capable of resulting in downstream hydrologic modifications or a contribution of urban runoff pollutants that would affect surface water quality. As a standard requirement per the City of Coachella's Engineering Requirements, all elements of the WQMP implementation, including maintenance, must be documented during the life of the project. Maintenance implementation will be required based on a standard WQMP Agreement to be executed prior to issuance of a grading permit. The project's engineering plans, hydrology report, and WQMP will be subject to City review and approval to validate MS4 compliance.

In summary, during construction and operation, project implementation will require plan- and permit-based compliance with CWA, NPDES, and local regulations to prevent impacts to water quality standards and the beneficial uses assigned to local receiving waters. Following City engineering review and approval, the stormwater capture and management strategy for on- and off-site runoff will avoid waste discharge violations through the implementation of properly sized retention facilities. Less than significant impacts are expected.

This assessment is consistent with the GPU EIR's finding that future development would be required to demonstrate compliance during permitting and ongoing operations as required by federal, state, and local regulations. Therefore, the project would be consistent with the analysis within the GPU EIR and it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- b) **Less than Significant Impact.** The GPU EIR determined that this impact associated with this threshold would be less than significant. The EIR found that groundwater in the Planning Area had been subject to long-term overdraft because more water was extracted from the Whitewater River Basin than was naturally replenished. This deficit contributed to declining groundwater levels, reduced surface water, land subsidence, degraded water quality, and the potential for saltwater intrusion, all of which could have resulted in significant and irreversible environmental impacts. Historical data evaluated during the GPU EIR preparation showed a steady decrease in basin storage, and projected population growth would have increased demand on the groundwater supply.

Regional planning efforts, including the Coachella Valley Urban Water Management Plan (2010), identified strategies such as groundwater recharge, water conservation, recycled water use, and expanded reliance on Colorado River and State Water Project supplies to stabilize long-term water availability. Goal 3 and Policies 3.1 through 3.10 of the GPU Sustainability and Natural Environment Element included policies promoting greywater use, groundwater recharge, and water-efficient development. Because projected water demands represented a small proportion of the basin's overall capacity and recharge programs were expected to offset future use, the EIR concluded that groundwater supply impacts under the GPU would be less than significant.

The established groundwater replenishment facilities previously described for the Indio Subbasin are not located on or near the project. Therefore, from the aspect of land use and location, project implementation is not deemed to be in conflict with any existing or planned groundwater recharge facility or associated infrastructure.

A project-specific Water Supply Assessment (WSA) has been prepared for the COVA project to evaluate the project's anticipated water demand. The assessment considered the proposed land uses and associated landscaping. This WSA was prepared in compliance with the requirements under SB 610 and SB 1262 by MSA Consulting Inc. in consultation with CWA and the City of Coachella, although pending a formal approval, the WSA is undergoing the last stages of agency review. . The project is anticipated to utilize the CWA Domestic System to provide water to the residential, commercial, amenity, and public Beach Club Lagoon portions of the site. CVWD Canal Water will be utilized for the irrigation and stormwater lake, and subsequently, the open space irrigation. A new well would be constructed to supply the proposed Hotel Lagoon at a location to be determined during final site design. The well would be sited, permitted, and installed in accordance with County of Riverside Department of Environmental Health requirements. Following selection of the well location, a

Registered Well Driller would prepare and submit the required permit application to the County for review and approval. Compliance with the County's well permitting and approval process would ensure that potential impacts to groundwater quantity and quality remain less than significant. The WSA analysis concluded that sufficient water supplies exist, or will exist based on current water planning assumptions, to meet the projected demands of the project, in addition to current and future projected water demands within CWA's service area in normal, single-dry, and multiple-dry years over a 20-year projection. This WSA will be reviewed every five years, or in the event that the water planning assumptions have changed, until the project begins construction to ensure it remains accurate and no significant changes to either the project or available water supply has occurred. The combination of water sources proposed to serve the project is not anticipated to result in a substantial depletion of groundwater supplies or significantly interfere with groundwater recharge in a manner that would hinder the sustainable management of the basin.

Moreover, proposed project aligns with the local and regional groundwater recharge strategies by implementing on-site retention and low impact development improvements as part of the site design. Project's stormwater management design includes a system of on-site retention facilities designed to collect and retain storm water runoff resulting from the controlling 100-year event, in accordance with the City's engineering standards. As such, the entire volume of stormwater runoff generated on-site up to the 100-year event will be contained on-site, contributing to groundwater recharge. As a function of the WQMP, operation of the development will include the required non-structural and structural pollution source control measures that work toward the protection of groundwater quality during the life of the project and under the project owner's responsibility. Non-structural source control measures consist of site operations, activities, and/or programs to be finalized in the WQMP and implemented by the project operator to educate site managers, employees, and users to prevent potential pollutants from being produced, coming into contact with the storm drain system. Structural source control measures consist of physical facility design standards to prevent direct contact between potential pollutants and stormwater runoff. The storm drain and retention system will be privately operated and maintained during the life of the project per a required WQMP agreement to be entered between the project proponent and the City. The proposed facilities are therefore not expected to violate or interfere with the groundwater quality. Regarding groundwater quality, less than significant impacts are anticipated.

Therefore, the project would be consistent with the analysis within the GPU EIR and it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- c) i) **Less than Significant Impacts.** The GPU EIR determined that impacts associated with this threshold would be less than significant.²⁰⁶ The EIR found that altering existing drainage patterns under the GPU had the potential to redirect historic water flows into areas not capable of handling increased runoff, which could have resulted in erosion, over saturated soils, land loss, and changes to stream stability. Such erosion related impacts could have permanently affected ground surfaces, stream channels, and associated ecosystems. Although no intentional relocation of waterways was planned, portions of the Whitewater River were partially channelized and could have been affected by runoff or soil disturbance from adjacent development. Construction activities and localized changes in drainage also had the potential to increase erosion and negatively affect fish, wildlife, structures, and nearby populations.

However, the EIR determined that existing federal and state regulations, including the Clean Water Act, NPDES Program, and Streambed Alteration Agreement requirements, prohibited development that would substantially alter waterways or degrade stream flows.²⁰⁷ Goal 7, Policies 7.1 through 7.6 of the GPU Sustainability and Natural Environment Element also included supporting policies to minimize erosion through sustainable site design and water conscious development practices. With these regulatory protections and existing channelization infrastructure in place, the EIR concluded that impacts related to erosion, sedimentation, or substantial changes in drainage patterns would have been less than significant.

206 City of Coachella, GPU Draft EIR, Water Quality and Hydrology, 4.7-22.

207 City of Coachella, GPU Draft EIR, Water Quality and Hydrology, 4.7-22 – 23.

80237.00027\45404105.1

80237.00027\45491467.1

The project site has been historically maintained to support agricultural uses and does not have any naturally occurring drainage courses or flood-prone patterns. Therefore, development of the site would not result in any alteration or obstruction of a natural river, stream, or other naturally occurring drainage course. As a standard requirement under the local development standards and City of Coachella's Engineering Requirements, the project will implement the necessary street improvements along the parcel frontage to provide adequate street drainage.

Based on the USDA Natural Resources Conservation Service Web Soil Survey, the site soils primarily correspond to Hydrologic Soil Group B, which is characterized for having moderate infiltration rates and moderate runoff potential.²⁰⁸ Given the absence of drainage patterns and slopes, the site soils are not deemed to be prone to existing erosion or siltation in a considerable manner.

As a standard practice, erosion and siltation conditions will be prevented during construction and operation through the required compliance plans. The required SWPPP will include BMPs for proper soil stabilization and perimeter controls to prevent erosion and siltation from being generated by site clearing, grading, and construction activities. Upon completion, all construction related soil disturbance will be properly restored to a stabilized condition consisting of permanent project improvements (structures, hardscape, street pavement, and landscaping) with the properly designed storm drainage system and retention system of adequate capacity according to the City's engineering standards. The storm drainage system and retention facility will be subject to final design review and approval by the City to ensure compliance with the City's engineering standards.

During the life of the project, the ongoing maintenance and operation of facilities will ensure that all permanently improved ground surfaces are adequately maintained. As required by Chapter 13.16 (Water Quality Control) of the CMC and the City of Coachella's Infrastructure Development Standards, all project-related runoff must be adequately handled along engineered conveyances (sheet flow, swales, gutters, or pipes) to the designated retention facilities. Proposed curb and gutter improvements along the project frontage will contribute to adequate drainage in an area that was previously unimproved. The privately constructed and operated on-site storm drain system will be a function of the site plan and final engineering plans subject to City review and approval. Less than significant impacts are anticipated regarding substantial erosion or siltation, on- or off-site.

Therefore, the project would be consistent with the analysis within the GPU EIR and would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- ii) **Less than Significant Impacts.** The GPU EIR determined that impacts associated with this threshold would be less than significant.²⁰⁹ The EIR found that altering existing drainage patterns under the GPU had the potential to redirect flows into areas not capable of accommodating new runoff, which could have resulted in flooding, erosion, and long-term changes to waterway stability and habitat. Such changes could have exposed structures, wildlife, and natural environments to temporary or permanent flood damage. Although no intentional modification of the Whitewater River or Coachella Canal was planned, the partially channelized Whitewater River could have been affected by unintended changes in drainage patterns or increased runoff from development. Because the GPU did not determine site specific drainage designs, localized construction activities and grading could also have contributed to erosion or flooding risks.

However, the EIR determined that existing federal and state regulations, including the CWA, NPDES Program, and Streambed Alteration Agreement requirements, prohibited development that would substantially alter waterways or increase flood hazards. GPU Policies 7.6 (Waterways as Amenities), 10.9 (Preservation of Natural Land Features), and 13.12 (Active Recreational Areas) of the Sustainability + Natural Environment Element, and Policy 4.5 (New Development) of the Infrastructure + Public Services Element, also included policies requiring development to assess and maintain existing drainage patterns, incorporate water conscious design,

²⁰⁸ <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>.

²⁰⁹ City of Coachella, GPU Draft EIR, Water Quality and Hydrology, 4.7-23.
80237.00027\45404105.1
80237.00027\45491467.1

and avoid creating new flood risks. With these regulatory protections and policy measures in place, the EIR concluded that potential impacts related to drainage pattern changes and associated flooding would have been less than significant.

The project's on-site stormwater retention system has been adequately sized to protect the proposed buildings and facilities from flooding conditions up to the controlling 100-year storm event. According to FEMA Flood Insurance Rate Maps (FIRMs) (Panel 06065C2262H), entire project property is located within Zone X, which is designated as an "area of minimal flood hazard."

As a standard Floodplain Management and Water Quality Control requirement under the City's Code of Ordinances, the proposed development includes adequate improvements and storm drain system to handle the relevant hydrologic conditions in a way that prevents inundation to the proposed structures and facilities. The project will introduce impervious surfaces (buildings, hardscape, asphalt, etc.) to the project property, but it will also include the required storm drain system (catch basins, lines, outlets, and retention facilities) to intercept, convey, and retain the controlling storm event stormwater volume from the site, therefore preventing a condition of urban runoff to the local surroundings or to the publicly maintained regional stormwater infrastructure. In adhering to the City's engineering and retention requirements, the proposed development will provide on-site retention facilities sized for the project's stormwater quantities and therefore is not expected to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Less than significant impacts are anticipated.

Therefore, the project would be consistent with the analysis within the GPU EIR, and it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- iii) **Less than Significant Impacts.** The GPU EIR determined that impacts associated with this threshold would be less than significant.²¹⁰ The EIR found that stormwater runoff within the Planning Area increased as development and human activity intensified, carrying pollutants such as litter, oil, fertilizers, and sediments into storm drains and natural waterways. Polluted runoff had the potential to degrade water quality, harm aquatic and riparian habitat, and affect downstream water supplies. Additional development under the GPU could have contributed to increased pollutant loads and placed added stress on the existing drainage system. However, stormwater quality was regulated under the NPDES Program, which established limits for point source discharges and required best management practices for nonpoint source discharges to reduce pollutants in urban runoff to the maximum extent practicable.

The EIR determined that projects within the GPU Planning Area would continue to be required to comply with NPDES permit requirements, ensuring that site runoff would not become a pollutant source to local or regional waterways. However, Policy 7.1 (Pollution Prevention), Policy 7.2 (Development Impacts), Policy 10.9 (Preservation of Natural Land Features), and Policy 13.12 (Active Recreational Areas) of the Sustainability + Natural Environment Element, together with Policy 4.5 (New Development) of the Infrastructure + Public Services Element, address drainage-related impacts through measures that protect water quality, minimize impacts to natural drainage systems and significant land features, and require development to incorporate stormwater treatment, maintain adequate drainage infrastructure, and reduce pollutant discharges. With these regulatory protections and GPU policies in place, the EIR concluded that potential impacts related to stormwater runoff and water quality would have been less than significant.

The City of Coachella is a Permittee of the Whitewater River Watershed Municipal Separate Storm Sewer System (MS4) permit area. Within the City limits, MS4 facilities include a system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) designed for collecting and conveying stormwater. Storm drain facilities can be public or private. Examples of public facilities include pipes, gutters, channels, and basins occurring within the public right-of-way and/or maintained by a public agency. Private facilities are distinguished by being maintained separately

210 *Id.*, at 4.7-24.
80237.00027\45404105.1
80237.00027\45491467.1

by a private entity. As discussed previously, the project site is absent of any private or public storm drain infrastructure.

The traditional land development process generally results in the conversion of pervious ground surface (pre-development condition) into a setting with a higher impervious cover, occurring through the introduction of buildings, streets, and hardscape (post-development condition). This conversion generally leads to an increase in post-construction runoff volumes and rates compared to the pre-development condition.

As a standard requirement under the City of Coachella's engineering standards, the project is required to include retention facilities sized to contain stormwater volume resulting from the controlling 100-year storm event. This retention capacity is provided by a surface basin with adequate freeboard to accept and contain the entire volume resulting from the worst-case storm event during the life of the project, as confirmed in the project hydrology report and preliminary WQMP. This approach meets the City's local engineering requirements. The project's engineering plans and retention capacity will be subject to standard City review and approval. Therefore, by complying with the local retention requirements that take into account the existing facilities, the project will prevent a runoff discharge condition into stormwater capable of contributing to or exceeding the MS4 capacity. Less than significant impacts are anticipated.

The project would be consistent with the analysis within the GPU EIR, and it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- iv) **Less than Significant Impacts.** The GPU EIR determined that impacts associated with this threshold would be less than significant.²¹¹ The EIR found that 100 year floods, which had a 1-percent annual probability of occurring, could have significantly increased water volumes within designated flood hazard areas and placed substantial stress on existing drainage systems. Development located within these areas would have been exposed to flood risks, including damage to structures, habitat, and natural environments. Within the Planning Area, flood hazards were primarily associated with the Whitewater River, its tributaries, mountain drainage, and intense summer monsoons. Although the GPU did not propose housing within the riverbanks, portions of the Planning Area west of the Coachella Canal were located within 100-year and 500-year flood zones. Existing channelization along the Whitewater River was engineered to convey flows exceeding the 100-year event, reducing the likelihood of major flooding impacts.

The EIR determined that federal and local regulations, including FEMA floodplain management requirements and Riverside County Ordinance 458, ensured that any development within a floodplain would be subject to strict design and permitting standards to minimize flood risk.²¹² Projects unable to meet these requirements would not have been permitted to build within the flood hazard area. The GPU also included policies promoting open space uses in floodplains, retrofitting of frequently flooded structures, and emergency planning to reduce exposure to flood hazards. Considering existing infrastructure, regulatory protections, and GPU policies, the EIR concluded that potential impacts related to flooding would have been less than significant.

Mudflow potential occurs mainly in the eastern portion of the Planning Area, where little development is set to occur as this land is primarily reserved for open space and very low development. However, with the regulatory framework proposed by the CGPU, projects seeking permits would not be allowed to develop unless CGPU criteria have been met and projects are shown to have little potential to impacts from mudflows. Policy strategies include siting potential hazards and infrastructure needs, monitoring slope failures, learning from past geologic hazards, and planning for emergency response and preparedness. With these safety measures, the potential harm from mudflow inundation can be reduced to ensure safety to structures and people within the Planning Area. The potential for mudflows and seiches within the Planning Area is possible, however the impacts of such events would be minimal due to the designated land use preserves, CGPU policies, and minor water level rise

²¹¹ *Id.*, at 4.7-29.

²¹² *Id.*, at 4.7-33.

80237.00027\45404105.1

80237.00027\45491467.1

from any potential seiches. Impacts from inundation by seiches, tsunamis, or mudflow under the CGPU are considered less than significant.

As previously discussed, the project is absent of any mapped natural drainage courses or designated FEMA zones with flood flow concerns. The proposed development is not situated in an area where flood flows could be impeded, redirected, or increased as a result of project implementation. The site's proposed storm drain system will meet the local MS4 and City requirements by including the properly sized retention facilities. Therefore, less than significant impacts are anticipated.

The project would be consistent with the analysis within the GPU EIR and it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- d) **No Impact.** The GPU EIR determined there would be no impacts relative to this threshold.²¹³ The EIR found that failure of levees or dams could have resulted in sudden inundation of water, mud, or debris, creating both immediate and long-term impacts on structures, infrastructure, and natural environments. Within the Planning Area, flood protection was provided primarily by the channelized and leveed portions of the Whitewater River and by the East Side Dike, which directed mudflows away from developed areas and toward the Coachella Valley Stormwater Channel. Although these facilities were engineered to withstand flows exceeding those associated with a 100 year flood, structural failure from seismic activity or other causes could have exposed nearby housing, infrastructure, and habitat to flooding or mudslides. Floodplain areas, where such risks were greatest, were subject to federal and local regulations requiring strict design and construction standards.

The EIR determined that FEMA floodplain management requirements, Riverside County Ordinance 458, and the permitting process administered by the Coachella Valley Water District and local agencies ensured that development within flood hazard areas would not proceed unless it met engineering and safety criteria intended to minimize risks from levee or dam failure.²¹⁴ The GPU also included policies requiring monitoring of at-risk areas, emergency preparedness planning, and careful review of development proposals near flood-prone or mudflow-susceptible areas. Because projects that did not meet regulatory and GPU requirements would not have been permitted, and because existing infrastructure and policies reduced exposure to inundation hazards, the EIR concluded that impacts related to levee or dam failure would have been less than significant.

FIRMs serve as the basis for identifying potential flood hazards. According to FIRM panel 06065C2262H, effective March 6, 2018, the entire Subject Property is located within Zone X, which 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.

A seiche is primarily defined by free or standing wave oscillations on the surface of water, the causes of which may be wind, atmospheric changes, or seismic activity. Although the project is not located in any mapped seiche zones, such as those associated with large bodies of water, the proposed development will include artificial lagoons and a lake for various uses. The proposed water features have been designed with the necessary freeboard and setbacks to protect on-site structures. This design approach provides resilience against potential seiche-induced wave action resulting from significant seismic or atmospheric events. As a result, any water surface oscillations generated by such events are expected to be effectively contained, preventing off-site releases or inundation-related impacts. Moreover, the project's storm drain system is designed to properly capture the site's urban runoff to prevent any risk of uncontrolled pollutant discharge. Being a proposed residential development, the project site will 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.

²¹³ *Id.*, at 4.7-34.

²¹⁴ *Id.*, at 4.7-33.

Therefore, the project would be consistent with the analysis within the GPU EIR, and it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- e) **Less than Significant Impacts.** The GPU EIR determined that impacts associated with this threshold would be less than significant.²¹⁵ The EIR found that development and increased human activity under the GPU had the potential to degrade water quality within the Planning Area through runoff pollution, contamination, or insufficient groundwater replenishment. Because water is a critical resource for sustaining the community, any decline in potable water quality or degradation of local waterways could have resulted in long-term or irreversible impacts. Water quality within the Planning Area is regulated by the Coachella Valley Water District in coordination with the SWRCB and the Colorado River Basin Regional Water Quality Control Board. In addition, activities that could discharge to waters of the United States are subject to Clean Water Act Section 401 certification, enforced by the U.S. Army Corps of Engineers, ensuring that projects that could not meet water quality standards would not be permitted.

Although development under the GPU could have increased pollutant loads from urban activity, the EIR determined that the existing regulatory framework, combined with GPU policies in the Sustainability + Natural Environment and Safety elements, would ensure compliance with federal, state, and local water quality requirements. These policies required new development to incorporate design features that reduced pollutant discharges, managed stormwater effectively, and protected surface and groundwater resources. Based on these regulations and supporting GPU policies, the EIR concluded that potential impacts on water quality would have been less than significant.

As discussed previously, the project proponent is required to implement a project-specific 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, the project's storm drain system will ensure that urban runoff is adequately retained on-site. Combined with the required water conservation practices, the project is expected to contribute to the groundwater sustainability efforts implemented for the Coachella Valley region. Less than significant impacts are anticipated.

The project would be consistent with the GPU EIR because it would not create new impacts, and there is no new information of substantial importance than that covered in the GPU EIR.

Conclusion:

With regards to the issue area of Hydrology and Water Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified. The project-specific hydrology, water quality, and water supply analyses determined that the Project would comply with applicable federal, State, regional, and local regulations governing water quality, stormwater management, groundwater resources, and flood protection. Compliance with the Construction General Permit, preparation and implementation of a SWPPP and WQMP, City engineering requirements, and implementation of appropriately sized on-site stormwater retention facilities would ensure that impacts related to water quality, groundwater resources, drainage, erosion, flooding, and stormwater management remain less than significant.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR evaluated impacts associated with water quality standards, waste discharge requirements, groundwater supply and recharge, drainage patterns, erosion, stormwater runoff, flooding, flood hazards, and consistency with applicable water quality management programs. The Program EIR concluded that compliance with existing regulatory requirements and implementation of General Plan policies protecting water quality, groundwater resources, and

²¹⁵ *Id.*, at 4.7-26.
80237.00027\45404105.1
80237.00027\45491467.1

stormwater management would reduce these impacts to less-than-significant levels.

3. No substantial new information has been identified which results in an impact more severe than anticipated by the City of Coachella General Plan 2035 Program EIR. Project-specific analyses demonstrate that adequate water supplies are available to serve the Project, stormwater runoff would be fully contained within on-site retention facilities designed in accordance with City standards, and the Project would comply with applicable Clean Water Act, NPDES, MS4 Permit, Water Quality Control Plan, and groundwater management requirements. The Project's hydrology, drainage, and water quality characteristics are consistent with the assumptions and conclusions evaluated in the Program EIR.
4. No mitigation measures were identified in the GPU EIR for hydrology and water quality impacts. Compliance with applicable federal and State water quality regulations, including the Clean Water Act, Porter-Cologne Water Quality Control Act, NPDES permitting requirements, Whitewater River Watershed MS4 Permit requirements, City of Coachella Municipal Code Chapters 13.16 and 15.56, applicable City engineering standards, and General Plan policies related to water quality protection, groundwater recharge, stormwater management, pollutant control, drainage design, and flood protection would ensure that potential impacts related to water quality, groundwater resources, drainage patterns, stormwater runoff, erosion, flooding, and water quality management plans remain less than significant.

11. LAND USE AND PLANNING - Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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?	☐	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☐	☒

Sources: City of Coachella 2035 General Plan Update, 2015; Coachella General Plan Update Environmental Impact Report, 2015; Coachella Municipal Code.

- a) **No Impact.** The GPU EIR concluded this impact to be less than significant.²¹⁶ Under GPU, development would continue to occur in the western portion of the Planning Area, where density and development are most prominent and extend eastward into current agricultural and open space areas. Though the Planning Area will experience a great amount of growth throughout the GPU timeline, development will grow around the existing built environment as an extension of the established City and aim to enhance the existing developed community both socially and physically without dividing communities. This is ensured by the implementation of GPU policies that guide development through 2035, and emphasize community character and an active, connected community.²¹⁷ The GPU Policies include the redevelopment of existing retail into neighborhood centers (Land Use Element Policy 6.6), improved perceived and actual safety in Coachella (Community Health Element Policy 4.3), and encourage urban beautification through landscaping (Community Health Element Policy 4.7). No mitigation measures are required.

The 87-acre project site is characterized by agricultural land and supports dilapidated agricultural structures and an abandoned residential structure. Avenue 52 delineates the project's northern boundary; Van Buren Street delineates the project's eastern boundary; Calhoun Street delineates the project's western boundary; and agricultural land within the unincorporated Community of Vista Santa Rosa delineates the project's southern boundary. The project site is owned by a single entity. The properties to the north, south, east, and west of the project are also owned by entities separate from the project. Therefore, the project site is not anticipated to physically divide an established community. No impacts are anticipated.

As stated above, the GPU EIR determined impacts related to division of an established community to be less than significant. As the project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create a new impact, and there is no new information of substantial importance than identified within the GPU EIR.

- b) **Less than Significant Impact.** The GPU EIR concluded that impacts would be less than significant because the GPU would be consistent with, and supplement, adopted plans and regulations governing land use and development in the Planning Area.²¹⁸ No mitigation is required. The GPU is a policy document and outlines a number of development strategies, land use plans, and regulations to guide the growth of the City through 2035.

²¹⁶ City of Coachella, GPU Draft EIR, Land Use + Planning, at 4.8-9 (2015).

²¹⁷ *Ibid.*

²¹⁸ *Id.*, at 4.8-13.

80237.00027\45404105.1

80237.00027\45491467.1

The GPU outlines a land use program that focuses on the form and character of the built environment. The land use approach of the GPU is structured to provide flexibility to respond to changing market and demographic conditions as well as provide the community with certainty of place type for the different areas of the community. Moreover, the land use designations in the GPU describe the intent of the designation, allowed land uses, development intensity, network and connectivity, street design, parks and open space, and urban form guidelines, to ensure development consistent with the vision of the GPU, with enough variation to manage economic and changes in the community's development direction.²¹⁹

According to the Coachella General Plan Land Use Designations Map,²²⁰ the project site is located within the Regional Retail District land use designation. According to the Coachella GPU, Regional Retail District provides opportunities for a wide range of shopping and entertainment in a variety of urban and suburban formats.²²¹ These include regional shopping centers, mixed designation centers or similar uses. The uses allowed in this designation will cater to regional clientele and provide a unique amenity to all residents of the Coachella Valley and an important revenue source for the City. The primary purpose of the District is to provide for commercial opportunities with residential uses supporting the retail environment.

The project site is primarily surrounded by agricultural properties and scattered residential properties. The table below shows the surrounding land uses and designations.

Table XI-1 Existing Uses and Land Use Designations

Direction	Existing Uses	Land Use Designations
North	Vacant, Agriculture, and Residential	Regional Retail District
East	Residential and Agriculture	Regional Retail District and General Neighborhood
South	Vacant, Agricultural, and Residential	Unincorporated Community of Vista Santa Rosa: Agriculture and Estate Density Residential
West	Agriculture	Unincorporated Community of Vista Santa Rosa: Agriculture

Per the GPU, commercial use (which include commercial and services, general office, and mixed commercial and industrial) occupies approximately 244 acres of the City.²²² This makes up approximately 5 percent of the total area within the City, while vacant land occupies approximately 53 percent. Agricultural land uses occupy 33 percent of the City's area, being the second largest land use classification in the City. Transportation, communications and utilities are the third largest land use, covering approximately 6 percent of the City. As distinguished in the Project Description provided earlier in this document, and as graphically portrayed in the site exhibits, the site of the proposed project is currently characterized primarily by agricultural land.

General Plan Land Use and Zoning Designations

Future development of the project site and all lands within the City of Coachella are subject to land use and other development related goals and policies contained in the recently adopted Coachella GPU, and the codified regulations, standards and other criteria provided in the CMC. The current GPU Land Use designation for the project site is Regional Retail District. Districts are areas of the City that are more single use and automobile-oriented. The Districts include large format retail and commercial areas, industrial areas, and resorts. These areas are critical to the overall economic prosperity of the City but have a lower level of design regulation and pedestrian-orientation than other areas of the City (Coachella General Plan pg. 04-4). Regional Retail Districts provide opportunities for a wide range of shopping and entertainment in a variety of urban and suburban

219 City of Coachella, GPU Draft EIR: Project Description, at 3.0-8 (2015).

220 City of Coachella, General Plan 2035 – Land Use Designations Map, available at <https://www.coachella.org/home/showpublisheddocument/8259/637592601028770000> (last visited Nov. 24, 2025).

221 City of Coachella, General Plan 2035: Land Use + Community Character, at 37 (2015).

222 City of Coachella, GPU Draft EIR: Project Description, tbl. 3.0-1: Existing Land Use Designations at 3.0-15.

80237.00027\45404105.1

80237.00027\45491467.1

formats. These include regional shopping centers, mixed destination centers, or similar uses. The uses allowed in this designation will cater to regional clientele and provide a unique amenity to all residents of the Coachella Valley and an important revenue source for the City. The primary purpose of the District is to provide for commercial opportunities, with residential uses supporting the retail environment. Regional Retail Districts allow for 10 to 15 du/ac, and floor area ratio (FAR) 0.35 to 2.0.

The zone in which the project site lies is Regional Commercial (RC), as designated by the City of Coachella. RC zones are intended to encourage a wide range of shopping and entertainment in a variety of urban and suburban formats. These include regional shopping centers, mixed designation centers or similar uses. The uses allowed in this zone will cater to regional clientele and provide a unique amenity to all residents of the Coachella Valley and an important revenue source for the City.

For planning purposes, the City of Coachella is divided into 17 unique subareas, and every parcel in the City is located in one of these areas. The purpose of the subareas is to define an overall vision and specific policy direction that supplements the General Plan Designations and the citywide goals and policies. The project is located in Subarea 3, Van Buren Corridor, which is predominantly single-family, retail, schools, and vacant land. The vision for this subarea is to be a major sub-regional retail designation that will provide a wide variety of goods and services for Coachella residents, as well as neighboring communities.

The project proposes the development of a resort residential community on approximately 87 acres south of Avenue 52 and west of Van Buren Street. The project proposes a mixed-use development, consisting of a total of 402 units on approximately 28 acres (14.4 du/ac), which is consistent with the General Plan residential density range of 10 to 15 dwelling units per acre.²²³ The private sector also includes complimentary resort features including water amenities, club amenities, health and wellness spaces, sports and recreational amenities, additional areas for events and restaurants, roadways, and open space on the remainder of the site. The public sector of the site is situated on approximately six acres in the northwest corner of the site and will consist of a beach club area, restaurant, sports bar, back-of-house area, and parking garage. The public sector uses have a combined FAR of approximately 0.65, which is consistent with the Regional Retail standard of 0.35 to 2.0.²²⁴ The project is consistent with the existing land use and zoning designations. The public sector uses will require a future City-approved CUP and Entertainment permit, which will be sought once the plans and details for these uses are further defined during project implementation.

A tentative tract map is being prepared to illustrate the lots proposed for the multiple uses for the proposed project. Additionally, the project is required to go through Architectural Review to provide flexibility in the placement and interrelationship of the proposed structures and uses; to provide for the implementation of sound site plan design concepts while maintaining the overall intensity of land use and density of population; to review the site plan of those uses which are not intrinsically objectionable to the predominant use category of the district, but which have inherent characteristics which, if not properly handled, have potentials for becoming detrimental to the health, safety, or general welfare of the public, or to neighboring land uses; to determine whether or not a proposed development will properly comply with the architectural guidelines of the city and the provisions and development standards required by this chapter or as prescribed by the planning director, or other authorized agent; to improve the quality of development and to provide a mechanism whereby the city can insure well-designed development (CMC Section 17.72.010).

Overall, the project will comply with the land use policies provided by the City of Coachella to ensure impacts are less than significant.

223 City of Coachella, General Plan 2035: Land Use + Community Character, Tabel 4-1: General Plan Designations Summary, at 4-56 (2015).

224 Ibid.

80237.00027\45404105.1

80237.00027\45491467.1

Finally, as described throughout this environmental document, all other impacts not requiring mitigation would be less than significant or would have no impact. Therefore, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant. The project would be consistent with the GPU EIR because it would not create new impacts, and there is no new information of substantial importance than that covered in the GPU EIR.

- c) **Less than significant impact.** The GPU EIR concluded this impact to be less than significant.²²⁵ The GPU EIR states the Planning Area is within the jurisdiction of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), which is in place to protect sensitive species within Coachella Valley include migratory birds, and native flora, and protects land within the Mecca Hills, and overlaps with the City of Coachella's Sphere of Influence. Under the GPU land use designations, this land is set aside for open space preservation and is not planned for development. The GPU EIR has addressed the biological resources of the Planning Area and the goals of the CVMSHCP.²²⁶ The 87-acre project site is characterized by agricultural land and support structures as well as an abandoned residential property. The project site is located within the Regional Retail District land use designation. According to the Coachella GPU, Regional Retail District provides opportunities for a wide range of shopping and entertainment in a variety of urban and suburban formats.²²⁷ The site is not designated for open space and is not located in an area protected by the CVMSHCP. Therefore, the project will not result in new impacts as no impacts are anticipated. The project would not create new impacts and there is no new substantial information that was not covered in the GPU EIR.

Conclusion:

With regards to the issue area of Land Use and Planning, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified. The project would not physically divide and established community, or conflict with a land use plan or applicable habitat conservation plan.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR. The EIR adequately addressed the potential for land use and planning related to buildout of the City.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures are required within the GPU EIR. Compliance with GPU Policies 6.6 of the Land Use Element, and Policies 4.3 and 4.7 in the Community Health Element, as well as consistency with the GPU land use designation, Zoning code, and CVMSHCP, ensures that potential impacts would remain less than significant.

²²⁵ City of Coachella, GPU Draft EIR, Land Use + Planning, at 4.8-20 (2015).

²²⁶ City of Coachella, GPU DEIR, at 4.8-20 (2015).

²²⁷ City of Coachella, General Plan 2035: Land Use + Community Character, at 04-38 (2015).

80237.00027\45404105.1

80237.00027\45491467.1

12. MINERAL RESOURCES -- Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☐	☒
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?	☐	☐	☐	☐	☒

Sources: The City of Coachella 2035 General Plan; The City of Coachella 2035 General Plan Environmental Impact Report, 2015; Surface Mining and Reclamation Act.

- a) **Less than Significant Impact.** The GPU EIR determined impacts would be less than significant.²²⁸ Land within City boundaries is classified as MRZ 1, areas where available geological information indicates that little likelihood exists for presence of significant mineral resources. Subarea 17 of the Planning Area contains portions zoned MRZ 2a (PCC), where geologic data indicate that significant measured or indicated mineral resources are present. It is in the MRZ 2a (PCC) area that 2 permitted mining operations occur. The proposed project exists within the MRZ 1 classification area and therefore no impacts to available or known mineral resources are anticipated. This conclusion is consistent with the GPU EIR analysis. The project would be consistent with the GPU EIR because it would not create new impacts, and there is no new information of substantial importance than that covered in the GPU EIR.
- b) **Less than Significant Impact.** The GPU EIR determined that impacts would be less than significant.²²⁹ As stated above, the GPU EIR concluded that land within city boundaries is classified as MRZ 1, areas where available geological information indicates that little likelihood exists for presence of significant mineral resources. Subarea 17 of the Planning Area contains portions zoned MRZ 2a (PCC), where geologic data indicate that significant measured or indicated mineral resources are present. It is in the MRZ 2a (PCC) area that 2 permitted mining operations occur.²³⁰ The proposed project exists within the MRZ 1 classification area and therefore no impacts to available or known mineral resources are anticipated. This conclusion is consistent with the GPU EIR analysis. The project would not create new impacts and there is no new information of substantial importance than that covered in the GPU EIR.

Conclusion:

With regards to the issue area of Mineral Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR adequately addressed the potential impact to mineral resources.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the City of Coachella General Plan 2035 Program EIR.
4. No mitigation measures are required within the GPU EIR for mineral resources. The project specific

²²⁸ City of Coachella, 2035 GPU Draft EIR, Geology and Soils, at 4.5-33.

²²⁹ *Id.*, at 4.5-34.

²³⁰ *Id.*, at 4.5-33.

impacts would be less than significant.

13. NOISE -- Would the project result in:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a) Result in exposure of persons to noise levels 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) Result in a substantial temporary or periodic increase in ambient noise levels above levels existing without the project?	☐	☐	☐	☐	☒
d) 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?	☐	☐	☐	☐	☒
e) For a project located within the vicinity of a private airstrip would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☐	☒

Sources: Coachella General Plan, 2015; Coachella General Plan Environmental Impact Report, 2015; Coachella Municipal Code; Federal Transit Administration; Noise Analysis, Urban Crossroads, Inc. 2025 (Appendix H); Traffic Impact Analysis, Fehr and Peers, 2025 (Appendix I).

- a/c) **Less than Significant Impact.** The GPU EIR concluded that this impact would result in less than significant levels.²³¹ Various goals and policies of the proposed GPU, such as Noise Element Policies 1.2 and 3.2, listed below, would assist noise-reduction strategies, while also ensuring that future development would not expose noise-sensitive receptors to noise levels in excess of the City's standards.

1.2 Noise Analysis and Mitigation. Require projects involving new development or modifications to existing development to implement mitigation measures, where necessary, to reduce noise levels to at least the normally compatible range. Mitigation measures should focus on architectural features and building design and construction, rather than site design features such as excessive setbacks, berms and sound walls, to maintain compatibility with adjacent and surrounding uses.

3.2 Traffic Calming. Where roadway noise exceeds the normally compatible range, consider the implementation of traffic calming measures such as reduced speed limits or roadway design features to reduce noise levels through reduced vehicle speeds and/or diversion of vehicle traffic.

Noise is simply defined as "unwanted sound."²³² When interfering with normal activities, causing physical harm, or causing adverse effects on health, sound becomes unwanted. 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

²³¹ City of Coachella, GPU Draft EIR, Noise, at 4.10-16 (2015).

²³² U.S. Env'tl. Prot. Agency, *Clean Air Act Title IV - Noise Pollution*, <https://www.epa.gov/clean-air-act-overview/clean-air-act-title-iv-noise-pollution> (last updated July 18, 2025).

at low frequencies are reduced compared with unweighted decibels, in which no correction is made for audio frequency.²³³ 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.

The State of California requires each city and county to adopt Noise Elements as a part of their General Plan.²³⁴ In addition to the 12 Land Use Categories included in the Noise Element, there are four Community Noise Equivalent Level's (CNEL) used to interpret the compatibility of the 12 Land Use Categories. Zone A (Green) – Clearly Compatible, Zone B (Yellow) – Normally Compatible, Zone C (Orange) – Normally Incompatible, Zone D (Red) Clearly Incompatible.²³⁵ The four zones of compatibility are dependent on the Land Use Categories.²³⁶

According to the Coachella General Plan Noise Element, the predominant noise source in the City is motor vehicles.²³⁷ High volume roadways in the City are Highway 111, State Route 86, and Harrison Street, which generate vehicle noise along these roadways. Other major sources of noise in Coachella include the railway that runs through Coachella along the east side of Highway 111 and factories, processing, and distribution facilities. Other, less significant noise sources in Coachella include aircraft overflights, air conditioning units and other mechanical equipment on buildings, landscaping equipment, and human speech. None of these sources significantly contribute to overall noise levels when compared to traffic noise.

The General Plan states that noise levels are generally low in agricultural and rural areas and higher in more urbanized areas.²³⁸ 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 to the west and east, respectively, 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 project is not situated in proximity to these roadways. Avenue 52, Van Buren Street, and Calhoun Street delineates the project's northern, eastern, and western boundaries, respectively.

In Coachella, Interior and Exterior Noise Standards are between 45 (interior) and 65 (exterior) for Residential, as well as between 45 and 65 dB for Commercial, Industrial and Institutional. Various sources are used to calculate noise level in the City. As part of the development of the Noise Element of the General Plan, noise level measurements were collected at 11 different locations throughout the City. Noise measurements were not taken along the roadway segments adjacent to the project boundaries. The closest noise measurement was taken Harrison Street, one mile east of the project, and one mile northeast of the project. Existing noise measurements at these locations were 68.6 dBA and 68.1 dBA, respectively. The noise measurement collected on Avenue 52 and Shady Lane, approximately 1.50 miles east of the project, was 62.7 dBA.

Future noise throughout the City was provided in Table 4 of the Noise Technical Appendix.²³⁹ The only roadway segment adjacent to the project measured included Van Buren Street from Avenue 52 to Avenue 54. This segment will have a noise level of 74.2 dBA. Avenue 52 from Van Buren Street to Harrison Street (east of the project) is projected to have a noise level of 72.5 dBA.

233 NTi Audio, *Frequency Weightings for Sound Level Measurements* (2025), <https://www.nti-audio.com/en/support/know-how/frequency-weightings-for-sound-level-measurements> (last visited Nov. 24, 2025).

234 Cal. Gov't Code § 65302(f) (West 2024).

235 City of Coachella, Noise Element of the General Plan, at 10-2 (2015), <https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/noise.pdf>.

236 Ibid.

237 *Id.*, at 10-1.

238 Ibid.

239 City of Coachella GPU EIR Noise Technical Appendix, at 8-16 (2015).

80237.00027\45404105.1

80237.00027\45491467.1

Project-Specific Noise Analysis

A project-specific Noise Analysis²⁴⁰ was prepared by Urban Crossroads, Inc. (Urban Crossroads) in September 2025 to determine the noise impacts associated with the development of the proposed project (Appendix H). The Noise Analysis evaluates the future exterior noise environment, potential off-site traffic impacts, the project-related long-term stationary-source operational noise, and project-related short-term construction noise and vibration impacts. The Noise Analysis utilized the following significance criteria matrix to determine whether the project would result in noise impacts (see following table).

Table XIII-1 Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic	Noise-Sensitive ¹	If ambient is < 60 dBA CNEL If ambient is 60 - 65 dBA CNEL If ambient is > 65 dBA CNEL	≥ 5 dBA CNEL Project increase ≥ 3 dBA CNEL Project increase ≥ 1.5 dBA CNEL Project increase	
Off-Site Traffic	Non-Noise-Sensitive ²	If ambient is > 70 dBA CNEL	≥ 3 dBA CNEL Project increase	
On-Site	Noise Sensitive	Exterior Noise Level Criteria Interior Noise Level Standard ³	See Exhibit 3-1 45 dBA CNEL	
Operational	Noise-Sensitive	Residential Exterior Noise Level ⁴ If ambient is < 60 dBA Leq ¹ If ambient is 60 - 65 dBA Leq ¹ If ambient is > 65 dBA Leq ¹	55 dBA Leq ≥ 5 dBA Leq Project increase ≥ 3 dBA Leq Project increase ≥ 1.5 dBA Leq Project increase	45 dBA Leq
Construction	Noise-Sensitive	Noise Level Threshold ⁵ Exterior Noise Level Increase ⁶ Vibration Level Threshold ⁷	80 dBA Leq 20 dBA Leq 0.30 PPV (in/sec)	

¹ FICON, 1992.

² Figure 10- 1 of the City of Coachella General Plan Noise Element

³ California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2

⁴ City of Coachella Municipal Code section 7.04.030(A).

⁵ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.

⁶ Caltrans Traffic Noise Analysis Protocol, April 2020.

⁷ Caltrans Transportation and Construction Vibration Manual, April 2020 Table 19

"Daytime" = 6:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 6:00 a.m.

Existing Noise Level Measurements

To assess the existing noise level environment, 24-hour noise level measurements were taken at five locations in the project area. The receiver locations were selected to describe and document the existing noise environment within the project area. To fully describe the existing noise conditions, long-term noise level measurements were collected by Urban Crossroads on Friday, July 25, 2025. By collecting individual hourly noise level measurements, it is possible to describe the equivalent daytime and nighttime hourly noise levels. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and dataloggers. All noise meters and microphones were equipped with a windscreen during all measurements.

The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing equivalent hourly noise levels surrounding the project site. The measurement locations were selected in compliance with Caltrans and Federal Transit Administration ("FTA") guidance. Collecting noise level measurements at the nearby sensitive receiver locations allows a comparison of the before and after project noise levels and is necessary to assess potential noise increase due to the project's contribution to ambient noise levels, pursuant to CEQA. The exhibit below illustrates the noise measurement locations.

Exhibit XIII-1 Noise Measurement Locations



The table below indicates the noise measurement locations and the daytime (7:00 am to 10:00 pm) and nighttime (10:00 pm to 7:00 am) noise levels, focusing on the equivalent or the hourly energy average sound level (Leq) to describe the existing ambient conditions. The Leq represents a steady-state sound level containing the same total energy as a time-varying signal over a given sample period. The daytime and nighttime equivalent noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number.

Table XIII-2 Ambient Noise Level Measurements

Location ¹	Description	Energy Average Noise Level (dBA L _{eq}) ²	
		Daytime	Nighttime
L1	Located north of the site near the residence at 83876 52nd Ave.	66.2	60.5
L2	Located east of the site near the residence at 84045 52nd Ave.	67.5	61.8
L3	Located south of the site near the residence at 52815 Van Buren St.	66.4	59.1
L4	Located south of the site near the residence at 52480 Calhoun St.	56.4	49.2
L5	Located west of the site near the residence at 83465 52nd Ave.	61.4	52.5

¹ See Exhibit 5-1 for the noise level measurement locations.

² Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2.

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

Receiver Locations

Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. To assess the potential for long-term operational and short-term construction noise impacts, five receiver locations in the vicinity of the project site were identified. The analysis measured distances from the outermost boundary of the active construction area to the nearest noise-sensitive use location, such as building facades or outdoor use areas (e.g., backyards), where individuals are reasonably expected to spend extended periods of time. The receiver locations were selected consistent with the Federal Highway Administration (FHWA), Caltrans and FTA guidelines.

Exhibit XIII-2 Receiver Locations



The proposed project is located on approximately 87 acres south of Avenue 52, west of Van Buren Street, and east of Calhoun Street. The project site currently operates as agricultural land, with date palm groves and vineyards and a vacant residential structure. The site is surrounded by agricultural properties, scattered residential, and vacant lots. The project proposes to develop a residential and resort community with various amenities, including two lagoons and a lake feature. The following discussion analyzes the project's potential short- and long-term noise impacts generated by construction and operation of the project.

Construction

Construction of the project site is expected to generate short-term noise increases compared to the existing levels. A temporary incremental increase in noise levels along local roadways is expected to occur during the transport of workers and equipment to and from the site. Noise increases will also be generated by the actual on-site construction activities. Equipment used during the construction phases would generate both steady state and episodic noise that would be heard both on and off the project site.

The FTA's *Transit Noise and Vibration Impact Assessment Manual* recognizes that construction projects are accomplished in several different stages and outlines the procedures for assessing noise impacts during construction.²⁴¹ Each stage has a specific equipment mix, depending on the work to be completed during the stage. As a result of the equipment mix, each stage has its own noise characteristics; some stages have higher continuous noise levels than others, and some have higher impact noise levels than others. The project construction activities are expected to occur in the following stages:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

Project-related construction noise was predicted using reference construction equipment noise levels from the FHWA published the Roadway Construction Noise Model (RCNM), which includes a national database of construction equipment reference noise emission levels. According to the EPA, FTA, and FHWA, the overall construction noise level is governed primarily by the noisiest pieces of equipment. The quieter pieces do not affect the overall level, but they do reduce the magnitude of the fluctuations in the noise level. Therefore, a rough estimate of the noise level need to only include the noisiest pieces of equipment expected at the site. The table below shows the combined noise levels for the loudest construction activities expected for each stage, consistent with FHWA and FTA guidance for detailed construction noise assessment, assuming all equipment operates simultaneously.

Table XIII-3 Construction Reference Noise Levels

Construction Stage	Reference Construction Equipmnet ¹	Reference Noise Level @ 50 Feet (dBA L _{eq})	Composite Reference Noise Level (dBA L _{eq})	Reference Power Level (dBA L _w)
Site Preparation	Tractor	80.0	82.9	114.5
	Front End Loader	75.0		
	Dozer	78.0		
Grading	Tractor	80.0	84.2	115.9
	Grader	81.0		
	Compactor (ground)	76.0		
Building Construction	Crane	73.0	82.1	113.7
	Generator	78.0		
	Gradall	79.0		
Paving	Paver	74.0	77.8	109.5
	Dump Truck	72.0		
	Roller	73.0		
Architectural Coating	Man Lift	68.0	76.2	107.8
	Compressor (air)	74.0		
	Generator (<25kVA)	70.0		

¹ FHWA Road Construction Noise Model.

Construction projects involve various stages, and activities frequently shift from one location to another. For example, during site preparation and grading, noise-generating activities may concentrate in an area for a short period to remove an obstruction, while the majority of the grading involves the equipment moving back and forth in a predictable pattern throughout the site; building construction and foundation work generally concentrate near the building footprint, while paving generally involves a predictable pattern of movement

241 FTA Transit Noise and Vibration Impact Assessment Manual, at 172 (2018), available at https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.
80237.00027\45404105.1
80237.00027\45491467.1

throughout the site. Therefore, construction activities are best evaluated as multiple moving point sources within the construction area since the speed and power of the equipment varies, and the equipment constantly changes position in terms of its distance and direction relative to the receivers. The noise analysis evaluates construction noise under worst-case operating conditions consistent with regulatory guidance. Specifically, overall construction noise is governed by the loudest equipment types, rather than all equipment equally; assumes that the loudest pieces of equipment are operating simultaneously, representing peak activity conditions; and assumes that multiple crews may operate concurrently, resulting in combined noise levels equivalent to more than a dozen (e.g., 12+) of the loudest heavy construction equipment types operating at once. This approach effectively captures the potential for overlapping operations during peak construction periods, therefore, modeling worst-case simultaneous equipment operation.

Using the reference construction equipment noise levels and the CadnaA (Computer Aided Noise Abatement) noise prediction model, calculations of the project construction noise level impacts by phase at the nearby sensitive receiver locations were completed. Construction impacts are based on the loudest activity and the highest noise level calculated at each receiver location. The highest construction noise levels are expected to range from 54.6 to 63.6 dBA Leq at the nearby receiver locations (see table below).

Table XIII-4 Construction Equipment Noise Level Summary

Receiver Location ¹	Construction Noise Levels (dBA Leq)					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels ²
R1	61.9	63.2	61.1	56.8	55.1	63.2
R2	60.2	61.5	59.4	55.1	53.4	61.5
R3	62.3	63.6	61.5	57.2	55.5	63.6
R4	62.0	63.3	61.2	56.9	55.2	63.3
R5	53.3	54.6	52.5	48.2	46.5	54.6

¹ Construction noise source and receiver locations are shown in Exhibit 9-1.

² Construction noise level calculations based on distance from the project site boundaries (construction activity area) to nearby receiver locations. CadnaA construction noise model inputs are included in Appendix 9.1.

To evaluate whether the project will generate potentially significant short-term noise levels at the nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA Leq is used as a reasonable threshold to assess the daytime construction noise level impacts. The noise analysis determined that project construction noise would not exceed the reasonable daytime 80 dBA Leq significance threshold at any receiver location (see table below). Therefore, the noise impacts due to project construction noise are considered less than significant.

Table XIII-5 Construction Noise Level Compliance

Receiver Location ¹	Construction Noise Levels (dBA Leq)		
	Highest Construction Noise Levels ²	Threshold ³	Threshold Exceeded? ⁴
R1	55.1	80	No
R2	53.4	80	No
R3	55.5	80	No
R4	55.2	80	No
R5	46.5	80	No

¹ Construction noise source and receiver locations are shown in Exhibit 9-1.

² Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations, as shown in Table 9-2.

³ Construction noise level thresholds as shown in Table 4-1.

⁴ Do the estimated Project construction noise levels exceed the construction noise level threshold?

Moreover, the project construction activities will contribute to noise level increases ranging from 0.1 to 2.5 dBA Leq during the daytime hours at the nearest receiver locations. The unmitigated construction noise analysis

shows the nearest receiver locations will not exceed the 20 dBA Leq noise level increase significance threshold during project construction activities (see table below). Therefore, temporary project-related construction noise level increases will result in a less than significant impact.

Table XIII-6 Daytime Construction Noise Level Increases

Receiver Location ¹	Typical Project Construction Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Increase Criteria ⁷	Increase Criteria Exceeded?
R1	55.1	L1	66.2	66.5	0.3	20	No
R2	53.4	L2	67.5	67.7	0.2	20	No
R3	55.5	L3	66.4	66.7	0.3	20	No
R4	55.2	L4	56.4	58.9	2.5	20	No
R5	46.5	L5	61.4	61.5	0.1	20	No

¹ Construction noise source and receiver locations are shown in Exhibit 9-1.

² Typical Project daytime construction noise levels as shown in Table 9-3.

³ Reference noise level measurement locations as shown in Exhibit 5-A.

⁴ Observed daytime ambient noise levels as shown in Table 5-1.

⁵ Represents the combined ambient conditions plus the Project construction activities.

⁶ The noise level increase expected with the addition of the proposed Project construction activities.

⁷ Caltrans Traffic Noise Analysis Protocol.

Finally, as a standard requirement, the project is expected to abide by the CMC regulations on construction hours, which limit activities to the less sensitive times of the day. The restriction on hours of construction would keep any such construction activities exceeding 72 VdB at the nearest sensitive receptor from significantly interfering with people's sleep. Section 7.04.070 of the CMC specifically exempts noise sources associated with construction, erection, demolition, alteration, repair, addition to or improvement of any building, structure, road or improvement to realty, provided that such activities take place during daytime hours, as follows:

October 1st through April 30th

Monday – Friday: 6:00 a.m. to 5:30 p.m.
Saturday: 8:00 a.m. to 5:00 p.m.
Sunday: 8:00 a.m. to 5:00 p.m.
Holidays: 8:00 a.m. to 5:00 p.m.

May 1st through September 30th

Monday – Friday: 5:00 a.m. to 7:00 p.m.
Saturday: 8:00 a.m. to 5:00 p.m.
Sunday: 8:00 a.m. to 5:00 p.m.
Holidays: 8:00 a.m. to 5:00 p.m.

To maintain normal noise levels during construction and vehicle movement on/off the project site, the project will abide by the construction hours established by the City to avoid high noise levels. Less than significant impacts are anticipated.

Operation

Operation of the project will include a mix of residential, resort, and recreational uses. Residential units will consist of single family residential dwellings, while resort units will consist of condo hotel units and suites. The resort component will also consist of restaurants, bars, clubs, and event spaces. Recreational amenities include a 9.4-acre Hotel Lagoon, 2.5-acre lake, 0.4-acre Beach Club Lagoon, fitness and spa buildings, various sports courts (pickleball, tennis, basketball, etc.), and a children's play area. Project-related operational noise sources

will include the operation of the residential, resort and recreational uses, grounds maintenance equipment, heating, ventilation and air conditioning (HVAC) units, and vehicular traffic accessing the site. The vehicle mix will be comparable with existing vehicles on surrounding roads.

To estimate the project operational noise impacts, reference noise level measurements were collected from similar types of activities or equipment to represent the noise levels expected with the development of the project. The reference activities and noise level measurements are discussed as follows:

Individual Air Conditioning Units: To assess the noise levels created by the air conditioning units, reference noise levels were taken from equipment specifications for a 2- to 5-ton residential packaged air conditioning unit (Carrier 50VR-A). At a uniform reference distance of 50 feet, the units would generate a reference noise level of 44.4 dBA Leq. The air conditioning units were modeled 3 feet above ground level, operating 45 minutes per hour during the daytime and nighttime, which represents the typical maximum operating time for properly sized AC systems.

Commercial Air Conditioning Units: The noise level measurements describe a single mechanical rooftop air conditioning unit. The reference noise level represents a Lennox SCA120 Series 10-ton model packaged air conditioning unit. At the uniform reference distance of 50 feet, the reference noise level is 59.2 dBA Leq. The air conditioning units were modeled 5 feet above the ground level, operating 45 minutes per hour during the daytime and nighttime, which represents the typical maximum operating time for properly sized AC systems.

Basketball/Volleyball Activity: To describe the noise levels associated with tennis court activities, Urban Crossroads collected a reference noise level measurement. The measured reference noise level at the uniform 50-foot reference distance is 52.1 dBA L50 for basketball and volleyball court activity. The basketball and volleyball court activity noise levels include eight people playing basketball, the sound of the ball hitting the ground, gates closing, and background park noise sources including people talking. Noise associated with basketball and volleyball court activities is expected to occur for the entire hour (60 minutes).

Outdoor Activity: To describe the outdoor common area, courtyards, and activity areas, a reference noise level was found by modeling an outdoor event with 500 people present, averaging 66 dBA Leq over the outdoor area. At 50 feet, the reference noise level is 59.9 dBA Leq at a noise source height of 5 feet. The reference noise level measurement includes music and speaking. Outdoor common area activities are limited to daytime hours only.

Children's Play Area Activity: To describe the noise levels associated with children's play area activities, Urban Crossroads collected a reference noise level measurement. The measured reference noise level at the uniform 50-foot reference distance is 57.8 dBA L50 for children's play area activity. The children's play area activity noise levels include children playing on swing sets and play structures with background park noise sources, such as parents talking on phones and with other parents. Noise associated with children's play area activities is expected to occur for the entire hour (60 minutes).

Pool/Spa Activity: To describe the noise levels associated with pool and spa activities, Urban Crossroads collected a reference noise level measurement. The measured reference noise level at the uniform 50-foot reference distance is 63.0 dBA L50 for pool and spa activity. The pool activity noise levels include kids playing, running, screaming, splashing, playing with a ball, and parents talking. Noise associated with pool and spa activities is expected to occur for the entire hour (60 minutes).

Pickleball Court Activity: To describe the noise levels associated with pickleball court activities, Urban Crossroads collected a reference noise measurement. The measured reference noise level at the uniform 50-foot reference distance is 64.8 dBA L50 for pickleball court activity. Pickleball court activity noise levels include the constant talk of the players, the "pop" sound of rackets hitting pickle balls, metal gates closing, and background park noise sources, including people talking. Noise associated with pickleball court activities is expected to occur for the entire hour (60 minutes).

Tennis Court Activity: To describe the noise levels associated with the tennis court activities, Urban Crossroads, collected a reference noise level measurement. The measured reference noise level at the uniform 50-foot reference distance is 49.6 dBA L50 for tennis court activity. The tennis court activity noise levels include an instructor and student playing tennis, the instructor giving constant verbal feedback, the sound of rackets hitting tennis balls, metal tennis court gates closing, and background park noise sources, including people talking. Noise associated with tennis court activities is expected to occur for the entire hour (60 minutes).

To fully describe the exterior operational noise levels from the project, Urban Crossroads developed a noise prediction model using the CadnaA computer program. CadnaA calculates the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of the noise level at each receiver and the partial noise level contributions by noise source.

Using the reference noise levels to represent the project operations that include ground mounted air conditioning units, Urban Crossroads calculated the operational source noise levels that are expected to be generated at the project site and the project-related noise level increases that would be experienced at each of the sensitive receiver locations. The table below shows the project operational noise levels during the daytime hours of 7:00 a.m. to 10:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 44.4 to 49.9 dBA Leq.

Table XIII-7 Daytime Project Operational Noise Levels

Noise Source ¹	Operational Noise Levels by Receiver Location (dBA Leq)				
	R1	R2	R3	R4	R5
Residential Air Conditioning Units	44.5	42.4	41.8	41.7	38.4
Commercial Air Conditioning Unit	35.1	38.8	20.9	19.2	15.0
Basketball/Volleyball Activities	43.9	41.8	40.4	42.9	39.7
Outdoor Activity Area	41.0	34.4	21.0	20.1	16.0
Children's Play Area	42.9	41.2	40.9	43.1	40.5
Pool/Spa Activities	39.6	43.5	29.6	27.2	22.5
Total (All Noise Sources)	49.9	48.9	46.0	47.4	44.4

¹ See Exhibit 8-1 for the noise source locations. CadnaA noise model calculations are included in Appendix 8.2.

Project operational noise levels during the nighttime hours of 10:00 p.m. and 7:00 a.m. are indicated in the table below. The nighttime hourly noise levels at the existing off-site receiver locations are expected to range from 16.5 to 39.2 dBA Leq. The differences between the daytime and nighttime noise levels are largely related to the estimated duration of noise activity.

Table XIII-8 Nighttime Project Operational Noise Levels

Noise Source ¹	Operational Noise Levels by Receiver Location (dBA Leq)				
	R1	R2	R3	R4	R5
Residential Air Conditioning Units	43.6	41.4	40.8	40.7	37.5
Commercial Air Conditioning Unit	0.0	0.0	0.0	0.0	0.0
Basketball/Volleyball Activities	0.0	0.0	0.0	0.0	0.0
Outdoor Activity Area	0.0	0.0	0.0	0.0	0.0
Children's Play Area	0.0	0.0	0.0	0.0	0.0
Pool/Spa Activities	0.0	0.0	0.0	0.0	0.0
Total (All Noise Sources)	43.6	41.4	40.8	40.7	37.5

¹ See Exhibit 8-1 for the noise source locations. CadnaA noise model calculations are included in Appendix 8.2.

Project Operational Noise Level Compliance

To demonstrate compliance with local noise regulations, the unmitigated project-only operational noise levels are evaluated against exterior noise level thresholds based on the City of Coachella exterior noise level standards at nearby receiver locations. The table below shows that the mitigated operational noise levels associated with the project will not exceed the City of Coachella daytime and nighttime exterior noise level standards at the existing nearby noise-sensitive receiver locations. Therefore, the mitigated operational noise impacts are considered less than significant at the nearby noise-sensitive receiver locations.

Table XIII-9 Operational Noise Level Compliance

Receiver Location ¹	Project Operational Noise Levels (dBA Leq) ²		Noise Level Standards (dBA Leq) ³		Noise Level Standards Exceeded? ⁴	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	49.9	43.6	50.0	45.0	No	No
R2	48.9	41.4	50.0	45.0	No	No
R3	46.0	40.8	50.0	45.0	No	No
R4	47.4	40.7	50.0	45.0	No	No
R5	44.4	37.5	50.0	45.0	No	No

¹ See Exhibit 7-1 for the receiver locations.

² Proposed Project unmitigated operational noise levels as shown on Tables 8-2 and 8-3.

³ Exterior noise level standards, as shown in Table 4-1.

⁴ Do the estimated Project operational noise source activities exceed the noise level standards?

"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

Project Operational Noise Level Increases

To describe the project operational noise level increases, the project operational noise levels are combined with the existing ambient noise level measurements for the nearby receiver locations that may be potentially impacted by project operational noise sources. Noise levels that would be experienced at receiver locations when project-source noise is added to the daytime and nighttime ambient conditions are presented in the tables below.

Table XIII-10 Daytime Project Operational Noise Level Increases

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Increase Criteria ⁷	Increase Criteria Exceeded?
R1	49.9	L1	66.2	66.3	0.1	1.5	No
R2	48.9	L2	67.5	67.6	0.1	1.5	No
R3	46.0	L3	66.4	66.4	0.0	1.5	No
R4	47.4	L4	56.4	56.9	0.5	5.0	No
R5	44.4	L5	61.4	61.5	0.1	5.0	No

¹ See Exhibit 7-1 for the receiver locations.

² Total Project daytime operational noise levels as shown in Table 8-2.

³ Reference noise level measurement locations as shown in Exhibit 5-A.

⁴ Observed daytime ambient noise levels as shown in Table 5-1.

⁵ Represents the combined ambient conditions plus the Project activities.

⁶ The noise level increase expected with the addition of the proposed Project activities.

⁷ Significance increase criteria as shown in Table 4-1.

Table XIII-11 Nighttime Operational Noise Level Increases

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Increase Criteria ⁷	Increase Criteria Exceeded?
R1	43.6	L1	60.5	60.6	0.1	5.0	No
R2	41.4	L2	61.8	61.8	0.0	5.0	No
R3	40.8	L3	59.1	59.2	0.1	5.0	No
R4	40.7	L4	49.2	49.8	0.6	5.0	No
R5	37.5	L5	52.5	52.6	0.1	5.0	No

¹ See Exhibit 7-1 for the receiver locations.

² Total Project nighttime operational noise levels as shown in Table 8-3.

³ Reference noise level measurement locations as shown in Exhibit 5-A.

⁴ Observed daytime ambient noise levels as shown in Table 5-1.

⁵ Represents the combined ambient conditions plus the Project activities.

⁶ The noise level increase expected with the addition of the proposed Project activities.

⁷ Significance increase criteria as shown in Table 4-1.

As indicated in the tables above, the project will generate daytime operation noise increases ranging from 0.0 to 0.7 dBA Leq and nighttime operational noise level increases ranging from 0.0 to 2.4 dBA Leq at the nearest receiver locations. Project-related operational noise level increases would not exceed the operational noise level increase significance criteria (see Table XIII-1). Therefore, project-related operational noise level increases at the sensitive receiver locations will be less than significant.

Off-Site Transportation Noise Analysis

The project is anticipated to generate 2,144 weekday trips per day. The project would access Calhoun Street, Van Buren Street, and Avenue 52. Approximately 30 percent of the traffic is expected on Van Buren Street and Avenue 52, with the remaining 40 percent using Calhoun Street. Based on the City of Coachella traffic counts on these roads: Calhoun Street has an average daily traffic (ADT) volume of 3,893, Van Buren Street has an ADT volume of 3,799, and Avenue 52 has an ADT volume of 8,316. To generate a 3 dBA increase in traffic noise would generally require a substantial increase in truck traffic relative to the overall mix of vehicles, or a doubling of traffic volumes. The project would not result in the generation of substantial truck trips, and the increase in daily traffic volumes is not expected to generate a perceptible noise level increase (i.e., less than 3 dBA CNEL) at sensitive land uses along affected roadways. Therefore, due to the low traffic volumes generated by the project, the off-site traffic noise levels generated by the project are considered less than significant.

Overall, impacts will be less than significant.

As previously discussed, the GPU EIR determined impacts to be less than significant. As the proposed project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- b) **Less than Significant Impact.** The GPU EIR concluded that vibration impacts will be less than significant.²⁴² Groundborne vibration can be described as perceptible rumbling, movement, shaking or rattling of structures and items within a structure. Groundborne vibration can generate a heightened disturbance in residential areas. These vibrations can disturb residential structures and household items while creating difficulty for residential activities such as reading or other tasks. Although groundborne vibration is sometimes perceptible in an outdoor environment, it does not result in the degree of disturbance that is experienced inside a building. Groundborne vibration can be measured in terms of amplitude and frequency or vibration decibels (VdB).

242 City of Coachella, GPU Draft EIR, Noise, at 4.10-20 (2015).
80237.00027\45404105.1
80237.00027\45491467.1

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized in the table below. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential for human response (annoyance) and building damage using the following vibration assessment methods defined by Caltrans.

Table XIII-12 Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Vibratory Roller	0.210

Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual

Project vibration impacts were estimated using the vibration source level of construction equipment provided in the table above and the construction vibration assessment methodology published by the FTA. At distances ranging from 3 to 207 feet from project construction activities, construction vibration velocity levels are estimated to range from less than 0.01 to 5.05 PPV in/sec (see table below). Based on the maximum acceptable continuous vibration threshold of 0.30 PPV (in/sec), the typical project construction vibration levels will not exceed the vibration thresholds at any receivers. Therefore, the project-related vibration impacts are considered less than significant during typical construction activities at the project site.

Table XIII-13 Project Construction Vibration Levels

Location ¹	Distance to Const. Activity (Feet) ²	Typical Construction Vibration Levels PPV (in/sec) ³						Thresholds PPV (in/sec) ⁴	Thresholds Exceeded? ⁵
		Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level		
R1	104'	0.00	0.00	0.01	0.01	0.02	0.02	0.30	No
R2	130'	0.00	0.00	0.01	0.01	0.02	0.02	0.30	No
R3	59'	0.00	0.01	0.02	0.02	0.06	0.06	0.30	No
R4	56'	0.00	0.01	0.02	0.03	0.06	0.06	0.30	No
R5	834'	0.00	0.00	0.00	0.00	0.00	0.00	0.30	No

¹ Construction noise source and receiver locations are shown in Exhibit 9-1.

² Distance from receiver building facade to Project construction boundary (Project site boundary).

³ Based on the Vibration Source Levels of Construction Equipment (Table 9-5).

⁴ Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19, p. 38.

⁵ Does the peak vibration exceed the acceptable vibration thresholds?

"PPV" = Peak Particle Velocity

It should be noted that vibration levels at the site of the closest sensitive receiver are unlikely to be sustained during the entire construction period but will occur only during the times that heavy construction equipment is operating adjacent to the project site perimeter. Moreover, construction at the project site will be restricted to the daytime hours, consistent with City of Coachella requirements, eliminating potential vibration impacts during the sensitive evening and nighttime hours.

After construction, the nature of the proposed residential property would not typically involve activities expected to generate excessive vibration or groundborne noise. All activities within the project will be required to adhere to the City's Noise Ordinance. Less than significant impacts are anticipated.

Overall, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- d/e) **Less than Significant Impact.** The GPU EIR concluded that this impact would be less than significant.²⁴³ The project is located approximately 2.8 miles from the Jacqueline Cochran Regional Airport and is located outside of the 70, 65 and 60 CNEL noise contours associated with this facility. Furthermore, the Jacqueline Cochran Regional Airport Land Use Plan does not identify the project as being located within its planning area. Less than significant impacts are expected.

As previously discussed, the GPU EIR determined impacts to be less than significant. As the proposed project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Noise, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified. The project would not result in substantial increased noise and groundborne vibration, or impact an airport.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR. The GPU EIR adequately addressed the potential for noise impacts related to buildout of the City.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR. The project-specific Noise Analysis conducted by Urban Crossroads, Inc. is consistent with the findings and assumptions of the EIR.
4. No mitigation measures are required within the GPU EIR. Compliance with GPU Policies 1.2 and 3.2, as well as Section 7.04.070 of the CMC and the City's Noise Ordinance ensures that potential impacts to noise would remain less than significant.

²⁴³ *Id.*, at 4.10-22 (2015).
80237.00027\45404105.1
80237.00027\45491467.1

14. POPULATION AND HOUSING – Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a) Induce substantial unplanned 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 people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☐	☒

Sources: Coachella 2035 General Plan Update, 2015; Coachella General Plan Update Environmental Impact Report, 2015; Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025.

- a) **Less than Significant Impact.** The GPU EIR determined impacts would be less than significant.²⁴⁴ The GPU EIR stated that growth under the GPU would more than double the Planning Area population at the time the GPU EIR was written. Based on the 2025 California Department of Finance population and housing estimates, the City of Coachella's current total population is approximately 44,384 with an average household size of 4.19 persons per household (pph).²⁴⁵ The GPU EIR analyzed future growth in Chapter 4.13, *Population and Housing*.²⁴⁶ Figure 4.13-2 in the EIR forecasts a population of 135,000 by year 2035.²⁴⁷ The current population is approximately 33 percent of the projected 2035 population of 135,000. The GPU EIR states that the GPU has been prepared to respond to the growth demand projected for Coachella as described by Southern California Association of Governments (SCAG) and the Riverside County Center for Demographic Research. Per the GPU EIR, the City has enough undeveloped land to accommodate generations of growth and has long anticipated growing into a mid-sized City.²⁴⁸ Additionally, the GPU provided goals and policies that assist development within the City to account for the projected population and employment growth. Goal 1 in the GPU's Land Use and Community Character Element focuses on development regulations that reinforce the City's desire to grow from a small town to a medium sized city in a sustainable and orderly manner.²⁴⁹ Policies that support this goal establish the orderly growth of the City related to the City limits, annexation areas, sphere of influence, planning area, subareas, general plan land use designations, and specific plans (Policies 1.1 to 1.6).²⁵⁰ Goal 2 focuses on the successful transformation of Coachella from a small town into a medium-sized, full-service City that is a major economic center for the Coachella Valley.²⁵¹ Policies 2.1 through 2.18 support Goal 2 by outlining guiding principles for population and employment growth, the City's character and identity, urban design as identity, natural context, high-quality construction and architecture, architectural diversity, climate-appropriate design, growth and development evaluation, infill development, contiguous development plan, new growth, high priority development areas, growth expansion areas, reserve development areas, steep slopes, range of uses, parks and open space, and open space conservation.²⁵² The GPU EIR concluded that buildout of the GPU would induce growth relative to economic expansion, population growth, precedent setting action, and encroachment into open space. However, comprehensive programs for growth management provided in the

²⁴⁴ City of Coachella, GPU Draft EIR, Population and Housing, at 4.13-8.

²⁴⁵ E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2026, Department of Finance, 2025.

²⁴⁶ <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2026/>.

²⁴⁷ City of Coachella, GPU Draft EIR, Population and Housing.

²⁴⁸ *Id.*, at 4.13-2.

²⁴⁹ *Id.*, at 4.13-9.

²⁵⁰ City of Coachella, Land Use + Community Character Element of the General Plan, at 4-85 (2015),

<https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/noise.pdf>.

²⁵¹ *Ibid.*

²⁵² *Id.*, at 4-86.

²⁵³ *Ibid.*

GPU minimize inappropriate development patterns and environmental impacts.²⁵³

The project proposes the development of 162 residential units and 240 condo hotel units, for a total of 402 units. The project also proposes various water amenities, including a 9.4-acre Hotel Lagoon, 2.5-acre lake, and 0.4-acre Beach Club Lagoon. Additional amenities include restaurants, a hotel lounge, pool bar, beach bar, fitness and spa area, sport court (i.e., tennis, pickleball, padel, basketball), and event spaces. At buildout, the project will include various amenity spaces and 402 units.

The project proponent determined that the residential units and condo hotel units would function as short-term, long-term, or time-share properties. With this, it is expected that the project will have an annual population of 2,050. The 2,050 population is an average of the projected residents and guests at the site throughout the year. See Table XIV-1, below. Guests of the project would include hotel guests as well as guests of short-term rental properties.

Table XIV-1 Combined Weekday and Weekend Daily Annualized Population

Program Area	Visitor Type	Average Population
Private	Residents	950
Public	Guests	1,100
Project Total		2,050

The addition of 2,050 people in the City could increase the current population by approximately 4.6 percent, to 46,434 people, which is still below the projected 2035 population forecast of 135,000. Although the project would contribute to growth within the City of Coachella, significant growth to population, housing, and employment is already anticipated in the City's GPU and GPU EIR. Although the project does include residential units and resort cottages, the project proponent has determined that a majority of these units would be used as second homes, timeshares, short term rentals, and long-term rental properties.

The project is located within the Regional Retail District land use designation, as established in the City of Coachella General Plan. Regional Retail Districts allow 10 to 15 dwelling units per acre. The project site is approximately 87 acres, therefore, up to 1,290 dwelling units are allowed within the project site, potentially resulting in 5,455 people.

In addition, this projected increase is a conservative figure because it assumes that the project's future residents will not be current residents of Coachella. However, it is anticipated that some of the project's residents will be existing residents from within the City and/or from neighboring incorporated and unincorporated areas. Additionally, the hotel guests will not lead to permanent residents of the project.

In 2017, 9.4 percent of jobs in the City of Coachella were in the leisure (hospitality) sector, and 8.1 percent were in the retail sector.²⁵⁴ As previously stated, the project is located within the City's Regional Retail District land use designation. Regional Retail Districts are intended to provide opportunities for a wide range of shopping and entertainment in a variety of urban and suburban formats. These include regional shopping centers, mixed destination centers, or similar uses. The uses allowed in this designation will cater to regional clientele and provide a unique amenity to all residents of the Coachella Valley and an important revenue source for the City. The primary purpose of the District is to provide for commercial opportunities, with residential uses supporting the retail environment. The nature of the Regional Retail District will require the need for employees, and employee growth has been analyzed in the General Plan.

²⁵³ City of Coachella, GPU Draft EIR: Population and Housing, at 4.13-12.

²⁵⁴ Southern California Association of Governments, *Profile of the City of Coachella, Local Profiles Report 2019*, at 27-28 (May 2019), https://sustain.scag.ca.gov/sites/default/files/2024-05/coachella_localprofile.pdf.

The project's proposed hotel, commercial, and amenity uses will generate an average of 330 employees. See Table XIV-2, below. The project will not result in unplanned employment, and jobs created at the project will be absorbed by new and existing residents of the City and surrounding jurisdictions.

Table XIV-2 Combined Weekday and Weekend Daily Annualized Employees

Program Area	Visitor Type	Average Employee
Private	Employees	210
Public	Employees	120
Project Total		330

The proposed project lies adjacent to the existing paved roadways Avenue 52 (north), Van Buren Street (east), and Calhoun Street (west). Extensions of these roadways are not proposed as part of project implementation. However, according to the GPU, Avenue 52, along the project frontage, is designated as a primary arterial with bicycle facility; Van Buren Street along the project frontage is a major arterial with bicycle facility; and Calhoun Street along the project frontage is designated as a collector with bicycle facility.²⁵⁵ The proposed project shall build out the street frontages consistent with the City's circulation standards in order to accommodate residents, guests, and staff, and future buildout of the General Plan. These rights-of-way will not indirectly induce unplanned population growth because the roadways currently exist and buildout of Avenue 52, Van Buren Street, and Calhoun Street are projected in the City's General Plan circulation system.

Currently, the project site is not served by public water or sewer facilities. Therefore, the project will connect to existing water and sewer mains. Existing water mains occur on Van Buren Street, approximately 0.26 miles north of the project, and Avenue 52, approximately 0.26 miles east of the project. The project will connect to these mains and extend 12-inch public lines 0.26 miles south from the existing Van Buren Street main, and 0.26 miles west from the existing Avenue 52 main. The project will extend a total of approximately 2,760 feet of 12-inch public water lines to the project. Public 12-inch water lines will occur within the public beach and resort main streets. Public 8-inch water lines will occur throughout the project within the residential areas.

Existing sewer lines exist at the Avenue 52 and Van Buren Street intersection, the Fredrick Street and Avenue 53 intersection, and Avenue 64. The project will connect to the existing 12-inch sewer main at the Avenue 52 and Van Buren Street intersection and extend approximately 174 feet of 12-inch public sewer lines to the project. The proposed public sewer line will connect to a private sewer forcemain, which will connect to private 8-inch sewer mains throughout the site.

The project site is connected to existing electrical facilities in the area. Overhead power lines occur north of the project (along Avenue 52), east of the project (along Van Buren Street), and west of the project (along Calhoun Street).

The project is not anticipated to result in an indirect growth inducing impact because the proposed water and sewer lines will result in projected buildout of this area of Coachella. Therefore, approval and development of this project is not expected to significantly increase growth in the City. Less than significant impacts are expected.

As previously discussed, the GPU EIR determined impacts from population growth to be less than significant. As the proposed project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increased impacts, and there is no new information of substantial importance than identified within the GPU EIR.

²⁵⁵ City of Coachella, Mobility Element of the General Plan, Figure 5-1, at 5-7 (2015), <https://www.coachella.org/home/showpublisheddocument/8415/637818911636900000>.
80237.00027\45404105.1
80237.00027\45491467.1

- b) **Less than Significant Impact.** The GPU EIR concluded this impact to be less than significant because the GPU does not propose displacing existing housing or people.²⁵⁶ No mitigation is required. The site once existed as an agricultural field, but agricultural production has now stopped. A residential home is located on the project site; however, the residence has been abandoned and is a dilapidated state. Due to the residence's dilapidated state, it does not currently provide housing. Therefore, removal of the residence would not displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere. Less than significant impacts are anticipated.

The GPU EIR determined impacts from displacement of housing to be less than significant. As the proposed project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Population and Housing, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified. The project would not induce substantial growth or would displace people or housing.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR. The EIR adequately addressed growth related to the buildout of the City.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures are required within the GPU EIR. The project specific impacts would be less than significant.

²⁵⁶ City of Coachella, GPU Draft EIR, Population and Housing, at 4.13-12.
80237.00027\45404105.1
80237.00027\45491467.1

15. PUBLIC SERVICES –	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:	☐	☐	☐	☐	☒
I. Fire Protection?	☐	☐	☐	☐	☒
II. Law Enforcement?	☐	☐	☐	☐	☒
III. Schools?	☐	☐	☐	☐	☒
IV. Parks?	☐	☐	☐	☐	☒
V. Medical and Healthcare Facilities?	☐	☐	☐	☐	☒

Sources: Coachella 2035 General Plan, 2015; Coachella General Plan Environmental Impact Report, 2015; City of Coachella Website.

- a) **Less than Significant Impact.** Impacts related to fire protection were determined to be less than significant by the GPU EIR.²⁵⁷ 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 currently operate 106 fire stations that serve approximately two million residents, over 7,000 square miles of Riverside County.²⁵⁸ The City of Coachella has one fire station, Battalion 6, Coachella Fire Station No. 79, located at 1377 6th Street and approximately 1.5 driving miles, a four-minute drive, northeast of the site. According to the Coachella GPU EIR, Fire Station No. 79 is staffed by 18 full-time personnel, 10 volunteer firefighters, and 10 explorer cadets. Six firefighters are always on duty.²⁵⁹ The Station is equipped with two Type 1 fire engines which includes a staff of three persons 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. Other nearby stations include Indio Fire Station No. 86 (approximately 6 minutes north), and La Quinta Fire Station No. 70 (approximately 6 minutes west).

The project would be consistent with the existing land use designation for the site. Therefore, the anticipated population growth at the site has been accounted for and is consistent with the analysis in the GPU EIR, which found impacts to fire protective services to be less than significant. The proposed project would be consistent with planning projections for future fire protection facilities within the city. Furthermore, the project would be required to pay development impact fees (DIFs) that would contribute the project's fair share towards the funding of future fire protection facilities. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is not new information of

257 City of Coachella, 2035 GPU Draft EIR, Public Services, at 4.15-35.

258 Riverside County Fire Dep't, *Emergency Command Center (ECC)*, <https://rvcfire.org/our-departments/operational-support/ecc> (last visited Nov. 24, 2025).

259 City of Coachella, 2035 GPU Draft EIR, Public Services, at 4.15-2.

substantial importance than identified within the GPU EIR.

- b) **Less than Significant Impact.** The GPU EIR determined that impacts related to Law Enforcement were anticipated to be less than significant.²⁶⁰ 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 in Thermal, approximately 4.8 driving miles southeast of the subject property. Per the City's 2035 General Plan EIR, the Coachella Police Department has 36 sworn officers and two non-sworn personnel, for a total of 38 positions.²⁶¹ Twenty-four 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.

The project would be consistent with the existing land use designation for the site and therefore would accommodate anticipated population growth and would be consistent with planning projections for future police protection facilities within the city. Furthermore, the project would be required to pay DIFs that would contribute the project's fair share towards the funding of future police protection facilities. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- c) **Less than Significant Impact.** The GPU EIR determined that impacts associated with Schools were anticipated to be less than significant.²⁶² proposed project lies within the Coachella Valley Unified School District. Although the project does include residential units and condos, the project proponent has determined that a majority of these units would be used as second homes, timeshares, short term rentals, and long-term rental properties. This determination reduces the likelihood that all or most of these units would create new students for the local school district. In addition, the project would be required to follow the Coachella Valley Unified School District (CVUSD) statutory school facility fees on new residential and commercial/industrial construction. The project would be consistent with the existing land use designation for the site and therefore would accommodate anticipated population growth and would be consistent with planning projections for future schools within the city. Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, and impacts would be less than significant.

The project would be consistent with the existing land use designation for the site and therefore would accommodate anticipated population growth and would be consistent with planning projections for future school facilities within the city. Furthermore, the project would be required to pay CVUSD statutory school facility fees that would contribute the project's fair share towards the funding of future school facilities. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than that identified within the GPU EIR.

- d) **Less than Significant Impact.** The GPU EIR determined that impacts to Parks would be less than significant.²⁶³ The Coachella Valley Recreation and Park District (CVRPD) provide park and recreational services to the City. Per the City of Coachella website, there are eight public parks located within the City of Coachella. The GPU EIR proposed policies that address reductions in potential environmental impacts to park facilities from the buildout of the General Plan. These include Policies 2.13, 2.17, 2.18, 3.6, 4.7, 5.16, 8.2, 8.4, and 9.5 of the Land Use and Community Charter, Policies 8.1 and 8.5 of the Community Health and Wellness Element, Policies 2.8, 2.9, 3.7, 3.8, and 13.1 through 13.25 of the Sustainability + Natural Environment Element, Policy 3.6 of

²⁶⁰ *Id.*, at 4.15-38.

²⁶¹ *Id.*, at 4.15-8.

²⁶² *Id.*, at 4.15-40.

²⁶³ *Id.*, at 4.15-43.

80237.00027\45404105.1

80237.00027\45491467.1

the Safety Element, and Policies 1.8 and 2.17 of the Infrastructure + Public Services Element.²⁶⁴

The proposed project would be consistent with the existing land use designation for the site and therefore would accommodate anticipated population growth and would be consistent with planning projections for impacts to park facilities within the city. The project would be required to pay DIFs to contribute to the project's fair share funding of future facilities. Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, and impacts would be less than significant.

The project would be consistent with the existing land use designation for the site and therefore would accommodate anticipated population growth and would be consistent with planning projections for future park and recreational services within the city. Furthermore, the project would be required to pay DIFs that would contribute the project's fair share towards the funding of future park and recreational services. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- e) **Less than Significant Impact.** The GPU EIR determined that impacts to Medical and Healthcare Facilities would be less than significant.²⁶⁵ Demand for medical facilities will increase as population increases, and this additional development within the Planning Area may result in environmental impacts. The GPU accommodates future development of medical facilities within several land uses and outlines policies to promote sustainable design practices, improve street connectivity, and efficient development. These policies include Policies 8.1, 8.2, and 14.1 of the Land Use and Community Charter, Policies 1.1, 1.2, 1.6, 2.3, 2.6, 2.7, 2.11, 2.14, 3.1, 3.7, and 3.8 of the Sustainability + Natural Environment Element, Policies 9.4, 9.9, 9.10, and 9.11 of the Community Health + Wellness Element, and Policy 8.3 of the Mobility Element.²⁶⁶

The Proposed Project would be consistent with the existing land use designation for the site and therefore would accommodate anticipated population growth and would be consistent with planning projections for future facilities within the City. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Public Services, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR adequately addressed impacts to public services.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the City of Coachella General Plan 2035 Program EIR..
4. No mitigation measures are required within the GPU EIR for public services. Compliance with the above listed General Plan policies ensures that potential impacts to public services would remain less than significant.

²⁶⁴ City of Coachella, 2035 GPU Draft EIR, Public Services, at 4.15-44.

²⁶⁵ *Id.*, at 4.15-49.

²⁶⁶ *Id.*, at 4.15-49.

80237.00027\45404105.1

80237.00027\45491467.1

16. RECREATION –	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☐	☒

Sources: Coachella 2035 General Plan, 2015; Coachella General Plan Environmental Impact Report, 2015; City of Coachella Website.

- a-b) **Less than Significant Impact.** The GPU EIR did not specifically analyze Recreation. Impacts to recreation were analyzed within Section 15, Public Services, of the GPU. Impacts to Parks were anticipated to be less than significant by the GPU EIR.²⁶⁷ As previously stated, the GPU EIR proposed policies that address reductions in potential environmental impacts to park facilities from the buildout of the General Plan. These include Policies 2.13, 2.17, 2.18, 3.6, 4.7, 5.16, 8.2, 8.4, and 9.5 of the Land Use and Community Charter, Policies 8.1 and 8.5 of the Community Health and Wellness Element, Policies 2.8, 2.9, 3.7, 3.8, and 13.1 through 13.25 of the Sustainability + Natural Environment Element, Policy 3.6 of the Safety Element, and Policies 1.8 and 2.17 of the Infrastructure + Public Services Element.

The proposed project would include the development of residential units and condo hotel units. The residential and condo components of the proposed project will primarily operate under fractional ownership, timeshare, second homes, and/or short-term and long-term rental models. This will significantly reduce any use of regional parks or recreational facilities. The project also proposes the development of various water amenities, including a 9.4-acre Hotel Lagoon, 2.5-acre lake, and 0.4-acre Beach Club Lagoon. The Beach Club Lagoon will be open to the public for use, providing the community with additional recreational space. Additional amenities include restaurants, a hotel lounge, pool bar, beach bar, fitness and spa area, sport courts (i.e., tennis, pickleball, padel, basketball), and event spaces. The private recreational amenities will provide residents with on-site recreation options. This will reduce impacts on regional recreational facilities because residents will be inclined to utilize the facilities on-site. At buildout, the project will include approximately 279,000 square feet of amenity spaces. The impact to existing recreation facilities associated with the project is not expected to be substantial due to the amenities, both public and private, provided on the project site and its consistency with land use designations. The anticipated population growth and subsequent impact on recreational facilities associated with the project has been accounted for in the GPU EIR. Therefore, less than significant impacts are anticipated. The project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Recreation, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR adequately addressed the potential impacts

²⁶⁷ City of Coachella, 2035 GPU Draft EIR, Public Services, at 4.15-43.
80237.00027\45404105.1
80237.00027\45491467.1

to recreation.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the City of Coachella General Plan 2035 Program EIR..
4. No mitigation measures are required within the GPU EIR for recreation. Compliance with General Plan Policies 2.13, 2.17, 2.18, 3.6, 4.7, 5.16, 8.2, 8.4, and 9.5 of the Land Use and Community Charter, Policies 8.1 and 8.5 of the Community Health and Wellness Element, Policies 2.8, 2.9, 3.7, 3.8, and 13.1 through 13.25 of the Sustainability + Natural Environment Element, Policy 3.6 of the Safety Element, and Policies 1.8 and 2.17 of the Infrastructure + Public Services Element ensures that potential impacts to public services would remain less than significant.

17. TRANSPORTATION – Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☐	☒
b) Conflict with the Riverside County Transportation Commission (RCTC) Congestion Management Program (CMP), including, but not limited to Level of Service standards and travel demand measures, or other standards established by the RCTC for designated roads or highways?	☐	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) or impede emergency vehicle access?	☐	☐	☐	☐	☒
e) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☐	☒

- a) Sources: Coachella 2035 General Plan, 2015; Coachella General Plan Environmental Impact Report, 2015; Cova Transportation Analysis Report, Fehr and Peers, November 2025 (Appendix I). **Significant and Unavoidable Impacts.** The 2015 GPU EIR concluded that regional roadways are projected to face significant and unavoidable congestion due to the GPU and overall growth in the Coachella Valley.²⁶⁸ These impacts stem from both the City's proposed General Plan land uses and development occurring outside Coachella, as these regional facilities serve broader travel demands. As a result, full mitigation is not feasible for impacted regional roadways.

²⁶⁸ City of Coachella, 2035 GPU Draft EIR, Traffic, at 4.9-33.
80237.00027\45404105.1
80237.00027\45491467.1

Future conditions also show I-10 operating at LOS E/F and SR-86 South at LOS F, creating substantial congestion within the Planning Area. Because the necessary mitigation measures fall outside the City of Coachella's jurisdiction, these regional impacts remain significant and unavoidable.

Impacts to City (local) roadways are anticipated to be less than significant with mitigation. Mitigation consists of payment of DIFs to be used for the physical improvements identified in the GPU EIR.²⁶⁹

The proposed project is located on approximately 87 acres at the southwest corner of Van Buren Street and Avenue 52 in the City of Coachella. The western boundary of the property is formed by Calhoun Street. Primary access to the proposed project, as well as emergency access to the site will be provided on Van Buren Street, Avenue 52 and Calhoun Street. Existing on-street bike lanes are located on Van Buren Street. No sidewalks are found in the vicinity.

The project is located within the Regional Retail District land use designation, as established in the City of Coachella GPU. Regional Retail Districts allow 10 to 15 dwelling units per acre and a commercial FAR of 0.35 to 2.0.

Project Summary

The project proposes to develop a mixed used development with both private and public components. The two primary sectors are described as follows:

- **Private Sector:** Includes 162 single family recreational home dwelling units and 240 condo-hotel recreational home units, both of which would operate under fractional ownership, timeshare, second home, and short term and long-term rental models. These land uses will be complemented by significant on-site resort amenities (i.e. dining, entertainment, recreation).
- **Public Sector:** Includes a beach club, restaurant, and an event tent. These subareas are expected to operate with a typical weekday capacity of 500 persons and a weekend capacity of 1,500. The public sector components will generally be operated between 11:00 AM and 2:00 PM, with the highest level of activity occurring in the evening between 7:00 PM and 8:00 PM, and on weekends.

The proposed project is designed so that the combined resort features of dwelling units, dining, amenities, outdoor/recreational spaces, and entertainment, create a self-contained destination. The project expects to include high internal trip capture, with most guests staying onsite for lodging, recreation, dining, and entertainment. The public facing restaurants, beach club, and event spaces are largely anticipated to serve onsite guests.

Private sector access will be provided by an entry/exit driveway on Avenue 52 and a driveway on Van Buren Street. Public sector access points are aligned perpendicular to Calhoun Street and Avenue 52. There is an additional right in/right out entrance for back of house staff on Van Buren Street.

The Transportation Analysis Report (TA) (Appendix I) was prepared to provide an overview of Project characteristics, such as trip generation, distribution and assignment that explains how Project traffic will interact with the surrounding transportation network. Additionally, the TA includes a VMT screening assessment for informational purposes.

Intersection operations analysis was based on the procedures contained in the Transportation Research Board (TRB) *Highway Capacity Manual* (HCM), 7th Edition.²⁷⁰ This methodology is considered the state of the practice methodology for evaluating intersection operations. The traffic modeling and signal timing optimization software package Synchro (Version 12) was utilized to analyze signalized intersections. The level

²⁶⁹ *Id.*, at 4.9-29.

²⁷⁰ Transportation Research Board, *Highway Capacity Manual, 7th Edition: A Guide for Multimodal Mobility Analysis* (Nat'l Acad. of Scis., Eng'g & Med. ed., 2022).

80237.00027\45404105.1

80237.00027\45491467.1

of service and capacity analysis performed by Synchro takes into consideration optimization of signalized intersections within a network. Unsignalized intersections are also evaluated using methodology described in the HCM. The LOS rating is based on the weighted average control delay expressed in seconds per vehicle.

The following parameters are consistent with the *County of Riverside Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled* (2020)²⁷¹ and HCM for use in the LOS analysis:

- Measured Peak Hour Factors (PHF) were utilized in the Existing (2025) and Opening Year (2030) Scenarios.
- Signal timing information for study intersections 6, 8, 9, 10, 11, and 12 were provided by the City of Coachella. Signal timing information for study intersections 13 and 14 were provided by Caltrans. These signal timings were used for the Existing (2025) and Opening Year (2030) Plus Project Scenarios.
- A standard heavy vehicle factor of 2% was used for all analysis scenarios.

Traffic counts were collected in May 2025 during morning peak period (7:00 to 9:00 AM) and evening peak period (4:00 PM to 6:00 PM) at the study intersections. Counts were collected during fair weather, while school was in session, and during a typical (non-holiday) weekday.

A Big Data source, Streetlight, was reviewed to compare May travel patterns against Spring travel patterns in the City to verify that peak season travel was accurately accounted for. Streetlight data indicated that March 2025 traffic volumes were approximately 15% higher than those observed in May 2025. Streetlight traffic volumes data were collected within the immediate Census Block Groups to the project site – extending about 5 miles in all directions. A cumulative average of all block groups showed a 15% decline between March and May. Traffic counts were thus adjusted to scale collected May 2025 traffic counts to the peak seasonal volumes of March by a factor of 15%.

The potential impacts to traffic and circulation were evaluated for each of the following conditions:

- Existing (2025) Conditions
 - Existing (2025) traffic volumes, lane geometries and traffic signal timing.
- Opening Year (2030) Plus Project Conditions
 - Existing (2025) traffic volumes.
 - Opening Year (2030) volumes (ambient growth rate of 2% per year)
 - Project Traffic
- Opening Year (2030) Plus Project Plus Cumulative Project Conditions
 - Opening Year Volumes (2030)
 - Project Traffic
 - Cumulative Projects within a 5-mile radius of the project.

Based on the City-approved scoping agreement, the study area consists of the following 14 study intersections:

1. West Driveway 1 / Calhoun Street
2. West Driveway 2/ Calhoun Street
3. Calhoun Street/Avenue 52
4. North Driveway 1/Avenue 52
5. North Driveway 2/Avenue 52
6. Van Buren Street/Avenue 52
7. East Driveway/Van Buren Street

²⁷¹ County of Riverside, *Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled* (April 2026), https://riversideca.gov/publicworks/sites/riversideca.gov/publicworks/files/pdf/2026/Traffic-Impact-Analysis-Guidelines-for-Vehicle-Miles-Traveled-and-Level-of-Service-Assessment_Riverside_04152026.pdf.
80237.00027\45404105.1
80237.00027\45491467.1

8. Calhoun Street/Avenue 50
9. Van Buren Street/Avenue 50
10. Calhoun Street/Avenue 48
11. Van Buren Street/Avenue 49
12. Dillon Road/Avenue 48
13. SR-86 SB Ramps/Dillon Road
14. SR-86 NB Ramps/Dillon Road

Future Traffic Conditions

Trip generation estimates for the private sector components were sourced from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (12th Edition, 2025) land use codes. The intended land use characteristics (ownership and use) were considered to apply the ITE land use code with the most representative overlap. The estate lots, zero lot line lots, bungalow lots, VIP suites and the condo hotel units will be a majority (>75%) fractional ownership second homes that will be used for short-term and long-term rental, ITE code 260 “Recreational Homes” was applied. The condo hotel units may be sold as individual, one-bedroom units or up to four-bedroom; and area expected to operate like recreational home ITE characterized units.

Trip generations for the public sector (beach club and restaurant) used the most comparable ITE land use code that represented the best matched time of day distribution for the planned components; calculations were based on seats to match the developer’s weekday and weekend peak person capacity assumptions. The event tent was calculated using assumptions, which similarly derived from the peak capacity.

The project is positioned to achieve significant internal capture (33%) of trips between the onsite uses with the expectation that a majority of onsite guests will stay on the property once they arrive. Many of guests’ daily needs would be accommodated by the resort lodging, recreation, dining, and entertainment options without leaving the property. A significant share of the public facing restaurant, beach club, and event space are anticipated to be used by onsite guests.

The ITE *Trip Generation Manual* (12th Edition, 2025) trip generation rates were queried to determine trip generation for the proposed project.²⁷²

Table XVII-1 Project Trip Generation Rates¹ Weekday

Land Use	ITE LU Code	Quantity ²	Weekday Peak Hour Trips		Daily
			AM Peak Hour	PM Peak Hour	
			Total	Total	
Private					
Single Family Residential	260	DU	0.28	0.31	3.68
Condo Hotel	260	DU	0.28	0.31	3.68
Public					
Beach Club	445	Seats	0.09	0.08	1.76
Restaurant	931	Seats	0.15	0.37	2.60
Event Tent	Custom	Seats	0.09	0.28	1.76

Table XVII-2 Projected Trip ITE Trip Generation Results Weekday²⁷³

Land Use	ITE LU Code	Quantity ²	Weekday Peak Hour Trips		Daily
			AM Peak Hour	PM Peak Hour	
			Total	Total	
Private					
Single Family Residential	260	165 DU	46	51	607
Condo Hotel	260	244 DU	68	76	898

²⁷² Institute of Transportation Engineers, *Trip Generation Manual*, 12th ed. (2025), available at <https://www.ite.org/technical-resources/topics/trip-and-parking-generation-v2/trip-generation-info>.

²⁷³ The Projected Trip ITE Trip Generation Results Weekday analysis was prepared using an earlier project description with 409 units. The currently proposed Project includes 402 units, representing a reduction in development intensity relative to the analyzed scenario.

Private Subtotal			114	127	1,505
Public					
Beach Club	445	100 Seats	9	8	176
<i>Beach Club with Internalization³</i>			<i>116</i>	<i>6</i>	<i>116</i>
Restaurant	931	200 Seats	30	74	520
<i>Restaurant with Internalization³</i>			<i>343</i>	<i>20</i>	<i>343</i>
Event Tent	NA	200 Seats	18	56	352
<i>Event Tent with Internalization³</i>			<i>232</i>	<i>12</i>	<i>232</i>
Private Subtotal			38	91	692
Weekday Total			152	218	2,197

1. Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, 12th Edition (2025)
2. KSF = Thousand Square Feet; DU = Dwelling Units
3. Internalization of 33% was applied.

Project Trip Distribution and Assignment

The project trip distribution reflects the likely approach and departure routes to the project site. Trip geographic distribution would be as follows: 60% north, 5% south, 10% east, and 25% west. Access to the project site will be provided from Calhoun Street, Avenue 52, and Van Buren Street. Project trips would utilize Van Buren Street or Calhoun Street to access the project, with most trips travelling to/from I-10 via Dillon Road. There are six total project driveways: two along Calhoun Street (one full access and one right in right out only), one full access driveway along Avenue 52, one full access driveway along Van Buren Street and a right in/right out access for back of house. Calhoun Street would represent 40%, Avenue 52 30% and Van Buren Street 30% of entry/exit trip percentages for the project.

Opening Year (2030) Plus Project Traffic Conditions

Opening Year (2030) intersection operations were evaluated using the HCM methodology. Opening year lane configurations and intersection control types changed as documented in the TA including adjacent roadway improvements and as summarized below:

- The project will implement an additional lane in the direction adjacent to the project on the north and west side,
- The project will implement two lanes in the direction adjacent to the project on the east side of the project, and
- Additional lanes were added based off SCAG RTP.

Table XVII-3 below illustrates that under the Plus Project (2030) Conditions, all but two intersections are expected to operate at LOS D or better. The two intersections are:

3. Calhoun Street and Avenue 52
6. Van Buren Street and Avenue 52.

Table XVII-3 Intersection Analysis for Opening Year (2030) Plus Project Traffic Conditions

ID - Study Intersection	Traffic Control ¹	AM Peak Hour		PM Peak Hour	
		Delay ²	LOS	Delay ²	LOS
1. West Driveway 1/Calhoun Street	SSSC ¹	1	A	1	A
2. West Driveway 2/Calhoun Street	SSSC	1	A	1	A
3. Calhoun Street/Avenue 52	AWSC ¹	95	F	156	F
4. North Driveway 1/Avenue 52	SSSC	1	A	1	A
5. North Driveway 2/Avenue 52	SSSC	1	A	1	A
6. Van Buren Street/Avenue 52	Signal ¹	56	E	34	C
7. East Driveway/Van Buren Street	SSSC	1	A	1	A
8. Calhoun Street/Avenue 50	Signal	29	C	25	C
9. Van Buren Street/Avenue 50	Signal	34	C	35	C

10. Calhoun Street/Avenue 48	Signal	42	D	34	C
11. Van Buren Street/Avenue 49	Signal	29	C	44	C
12. Dillon Road/Avenue 48	Signal	25	C	24	D
13. SR-86 SB Ramps/Dillon Road	Signal	12	B	14	B
14. SR-86 NB Ramps/Dillon Road	Signal	22	C	16	B

1. Signal = Traffic Signal; AWSC = All Way Stop Control; SSSC = Side Street Stop Control
2. Deficient intersection operations are noted in bold text (below LOS D)
3. Delay estimates above 250 seconds are out of bounds of the Syncro software

Opening Year 2030 Cumulative Projects

The City identified a list of Cumulative projects within a five-mile radius of the proposed project to be analyzed with the Plus Project conditions at opening (2030). The intersection analysis identified five intersections that would be deficient at the 2030 scenario.

- Calhoun Street and Avenue 52 (Intersection 3)
- Van Buren Street and Avenue 52 (Intersection 6)
- Van Buren Street and Avenue 48 (Intersection 11)
- Dillon Road and Avenue 48 (Intersection 12)
- SR-86 and Southbound Ramps and Dillon Road (Intersection 13)

The TIA identified improvements to bring the operationally deficient intersections to acceptable levels (LOS D or better), which will require a traffic signal, traffic signal timing updates, and/or converting a turn lane to a shared turn lane through. The Project's fair share contribution toward these improvements was also identified. The five intersections, intersection improvements and fair share contributions are discussed subsequently.

Opening Year (2030) Improvements

Feasible measures were identified to improve intersection operations at deficient intersections to an acceptable LOS (LOS D or better).

Calhoun Street and Avenue 52 (Intersection 3) – This intersection is expected to operate at LOS E and F during AM and PM peak hour under Opening Year (2030) Plus Project and Cumulative Projects. A traffic signal is warranted and recommended at Calhoun and Avenue 52 to improve operations. Signal warrant analyses for project driveways (Intersections 1 and 2, 4 and 5, and 7) indicate that signals are not warranted. Detailed signal warrant analysis are provided in Appendix G of the TA.

Van Buren Street and Avenue 52 (Intersection 6) – This intersection is expected to operate at LOS E and F during AM and PM peak hour under Opening Year (2030) Plus Project and Cumulative Projects. To improve intersection operations, optimizing splits and increasing cycle lengths would improve to acceptable conditions. Communication with Coachella Valley Sync is not needed because intersection 6 is uncoordinated.

Van Buren Street and Avenue 48 (Intersection 11) – This intersection is expected to operate at LOS E during PM peak hour under Opening Year (2030) Plus Project and Cumulative Projects. To improve intersection operations, convert southbound right lane to a shared southbound right through.

Dillon Road and Avenue 48 (Intersection 12) – This intersection is expected to operate at LOS E and F during AM and PM peak hour under Opening Year (2030) Plus Project and Cumulative Projects. To improve intersection operations, optimizing the traffic signal timing would improve to acceptable conditions.

SR-86 and Southbound Ramps and Dillion Road (Intersection 13) – This intersection is expected to operate at LOS E during PM peak hour in Opening Year (2030) Plus Project and Cumulative Projects. To improve intersection operations, optimizing the traffic signal timing would improve to acceptable conditions.

The project will be required to pay a fair share of contribution towards the improvements at the five intersections recommended above. Fair Share calculations were performed for the deficient intersections and are as follows:

- Calhoun Street and Avenue 52 (Intersection 3) – 18.6%
- Van Buren Street and Avenue 52 (Intersection 6) – 23.1%
- Van Buren Street and Avenue 48 (Intersection 11) – 13.2%
- Dillon Road and Avenue 48 (Intersection 12) – 8.9%
- SR-86 and Southbound Ramps and Dillion Road (Intersection 13) – 7.0%

Table XVII-4 below illustrates that at the Opening Year (2030) Plus Project and Cumulative Projects and proposed improvements, all intersections are expected to operate at LOS D or better.

Table XVII-4 Intersection Analysis for Opening Year (2030) Plus Project and Cumulative Projects with Improvements

ID - Study Intersection	Traffic Control ¹	AM Peak Hour		PM Peak Hour	
		Delay ²	LOS	Delay ²	LOS
1. West Driveway 1/Calhoun Street	SSSC ¹	1	A	1	A
2. West Driveway 2/Calhoun Street	SSSC	1	A	1	A
3. Calhoun Street/Avenue 52	AWSC ¹	34	C	28	C
4. North Driveway 1/Avenue 52	SSSC	1	A	1	A
5. North Driveway 2/Avenue 52	SSSC	1	A	1	A
6. Van Buren Street/Avenue 52	Signal ¹	55	D	45	D
7. East Driveway/Van Buren Street	SSSC	1	A	1	A
8. Calhoun Street/Avenue 50	Signal	36	D	33	C
9. Van Buren Street/Avenue 50	Signal	36	D	38	D
10. Calhoun Street/Avenue 48	Signal	45	D	37	D
11. Van Buren Street/Avenue 49	Signal	34	C	52	D
12. Dillon Road/Avenue 48	Signal	53	D	50	D
13. SR-86 SB Ramps/Dillon Road	Signal	34	C	53	D
14. SR-86 NB Ramps/Dillon Road	Signal	34	C	53	D

1. Signal = Traffic Signal; AWSC = All Way Stop Control; SSSC = Side Street Stop Control
2. Deficient intersection operations are noted in bold text (below LOS D) Delay estimates above 250 seconds are out of bounds of the Syncro software

LOS Conclusion

The analysis prepared traffic forecasts for the following scenarios and evaluated operations at study intersections. The following results were identified:

- Existing (2025) Conditions, **one intersection operates at D or worse**
- Opening Year (2030) Plus Project, **two intersections operate at D or worse**
- Opening Year (2030) Plus Project Plus Cumulative, **five intersections operate at D or worse**

Improvements for the five impacted intersections were identified in the TIA to bring all intersections to acceptable LOS. The project's fair share contribution to these improvements was calculated. Following implementation of project improvements, payment of Fair Share Contributions and DIFs. The proposed project is not expected to have a significant adverse impact on the area transportation network relative to LOS.

The project would be consistent with the GPU land use designation; therefore, the project would not induce substantial unplanned population growth in the area as development of the site was accounted for within the GPU. Additionally, the project would not generate additional vehicle trips that were not accounted for in the GPU EIR. The project will be required to pay DIFs. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than that identified within the GPU EIR.

Program, Plan, Ordinance, and Policy Review

The GPU includes policies related to circulation; an impact is considered significant if the project conflicts with an adopted policy within the Mobility Element (ME) of the General Plan. Policies applicable to the Project include:

ME-1.5 Require that the City consider improvements to add roadway capacity only after considering improvements to other modes of travel.

- The improvements identified in Chapter 6 do not include roadway widenings that would increase capacity. Instead, signal timing adjustments are recommended to improve traffic flow and intersection operations.

ME-2.3 Periodically review and update designated truck routes to ensure efficiency and limit negative impacts on residential areas and other sensitive land uses.

- The project is not expected to generate heavy vehicle trips to or from the site.

ME-3.4 Require that all development or redevelopment projects provide pedestrian connections to the external pedestrian network.

- The project includes construction of new sidewalks along the project frontage on Calhoun Street, Avenue 53, and 52nd Avenue, improving pedestrian connectivity.

ME-4.1 Require that the City provide additional bicycle facilities along all roadways in the City which are built or reconstructed in the City except in those instances in which there is insufficient right-of-way or other physical limitations.

- The project proposes construction of bicycle facilities along the project frontage on Calhoun Street, Avenue 53, and 52nd Avenue.

ME-5.4 Encourage new large residential or commercial developments to locate on existing and planned transit routes.

- The project site is currently not served or planned to be served by any public transit services. The City will continue to monitor development patterns and transit demand and will adjust service as needed to support travel options.

ME-6.1 Require that new development pay for its fair share of construction costs for new and/or upgraded transportation infrastructure needed to accommodate this development.

- Chapter 6 outlines required intersection improvements and the project's fair share contribution. The project will also widen its adjacent roadway frontage consistent with the City's General Plan buildout.

ME-8.3 Prioritize connections between the City's bicycle and pedestrian network to regional facilities such as the CV Link and other regional trail facilities.

- The project includes construction of bicycle facilities that enhance connectivity and contribute to the City's overall regional bicycle and pedestrian network.

Congestion Management Plan Transportation Uniform Mitigation Fee Program

The County Congestion Management Plan (CMP) establishes a minimum standard of LOS E for designated regional roadways. The Transportation Uniform Mitigation Fee (TUMF) program identifies network backbone and local roadways that are needed to accommodate growth. The regional program ensures that developments

pay their fair share and that funding is in place for the construction of facilities needed to maintain an acceptable level of service for the transportation system. The TUMF is a regional mitigation fee program and is imposed and implemented in every jurisdiction in Riverside County. The Project will be required to pay TUMF.

The project proponent will be required to contribute DIFs and participate in the TUMF program and pay a fair share contribution to five study area roadways. Following the payment of required fees such as TUMF and DIF and fair share contribution, less than significant impacts are anticipated relative to the CMP.

The proposed project will not conflict with adopted program plans, ordinances, or policies regarding the circulation system, including public transit, roadway, bicycle, or pedestrian facilities. Less than significant impacts are anticipated. Therefore, the project would be consistent with the analysis in the GPU PEIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than that identified within the GPU EIR.

Vehicle Miles Travelled (VMT)

The current recommended metric in the CEQA guidelines for transportation impacts is VMT per capita per SB 743. The legislative intent of SB 743 is to balance the needs of congestion management with statewide goals for infill development, promotion of public health through active transportation and reduction of GHG emissions. This discussion is presented for informational purposes.

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 greenhouse gas mitigation measures. The CAPCOA report²⁷⁴ recognizes that land use planning provides the best opportunity to influence GHG emissions through a reduction in overall VMT.

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.

Goals for reducing GHGs 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.

As described throughout the EIR, and in accordance with State legislation, the GPU and CAP include policies and measures aimed at improving sustainability, including minimizing VMT and reducing GHG emissions. These policies included Neighborhood Site Enhancements: GP policies and actions include focusing on pedestrian safety, improving the connections between neighborhoods and commercial areas for pedestrians and cyclists, and providing traffic calming measures. Examples of these GP policies include M 1.1, M 1.2, M 1.5, M 2.1, M 2.2, M 3.1, M 3.2, and M 3.3. Other policies address Transit Service. Providing access to transit for City residents and employees can reduce automotive use. There are currently five Sunline Transit Bus Routes that provide access to the City. As part of this measure, the City would coordinate with Sunline Transit to increase transit service throughout the City. Examples of these policies include M 5.1, M 5.2, M 5.3, M 5.4, M 5.5, M 5.7 and M 8.1

²⁷⁴ CAPCOA, Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Fehr and Peers, February 14, 2022, available at https://www.caleemod.com/handbook/full_handbook.html
80237.00027\45404105.1
80237.00027\45491467.1

The proposed multimodal circulation network within the City would reduce dependence on fossil fuel energy sources by reducing VMT per capita in the City and promote development of Complete Streets. Specifically, the GPU provides a mix of land uses and supports a compact, transit-oriented development pattern consistent with state and regional planning goals.

Methodology

The City of Coachella utilizes the December 2020 County of Riverside Transportation Analysis Guidelines (County's TA Guidelines). The County's TA Guidelines set forth screening criteria under which Projects are not required to submit detailed VMT analysis. This guidance for determination of non-significant VMT impact is primarily intended to avoid unnecessary analysis and findings that would be inconsistent with the intent of SB 743. VMT screening criteria for development projects include the following:

- **Transit Priority Area (TPA):** Presumed less than significant VMT impact for projects located in TPAs (1/2 mile of a rapid transit station or high-frequency bus route).
- **Low VMT Area Screening:** Presumed less than significant VMT impact for projects located in low VMT generated model traffic analysis zones (TAZs). These TAZs generate total daily VMT/SP that is less than the City baseline level.
- **Project Type Screening:** Local serving retail projects (per OPR's Technical Advisory less than 50,000 square feet), local essential services (i.e. day care, Police, Medical), small projects (i.e. DU <110 Units, general office less than 165 thousand square feet (TSF), parks) and affordable housing projects are assumed to have a less than significant VMT impact.

Project Screening

- The proposed project is not located in a TPA, within ½ mile of a rapid transit station or high frequency bus route. These services are currently not available in the Coachella Valley.
- The proposed project is not located in a low VMT generated model TAZ.
- The proposed project does not include local serving retail or local essential services, nor is it considered a small project or an affordable housing project.

The proposed project does not satisfy any of the screening criteria. Therefore, to determine if the project would result in a significant transportation impact relative to VMT, a full VMT modeling and forecasting assessment was completed.

VMT Analysis

VMT forecasts were prepared using the Riverside County Travel Demand Model (RIVCOM) version 4.0.1. Given the seasonal fluctuations in tourism in the Coachella region, and the increased weekend programming at the public facing elements of the project, an average daily service population (SP) was calculated to represent the project in the typical weekday model. This figure serves as a midpoint between the lowest and highest levels of employment and guest population that is reflective of the annualized demand.

The trip generation model was evaluated to confirm that employment categories—such as retail, arts and entertainment, and other services—appropriately reflect the nature of the Project. The model produced trip estimates approximately 50 percent higher than the project's own forecast, largely due to an underestimation of the internal capture expected. To maintain a conservative approach, no modifications were made to the model's forecasts. As noted in Table XVII-5, the projected total Annualized averages were estimated to be 2,050 Resident Guests and Guests and 330 Employees.

Table XVII-5 Project Service Population (SP)

Program Area	Visitor Type	Annualized Average	
		Population	Employment
Private	Resident Guests	950	-
	Employees	-	210

Public	Employees	-	120
	Guests	1,100	-
	Project Total	2,050	330

Source: Fehr & Peers, 2025

VTM estimates were prepared under the following conditions:

- No Project (2045)
- Cumulative (2045) Plus Project

The No Project conditions model runs were utilized to calculate the project-generated threshold of significance, and the county-wide boundary VMT without the project, and the city-wide boundary VMT without the project. The Plus Project conditions model runs were used to determine project related VMT.

County Estimates

Table XVII-6 presents the project VMT findings compared to the county-wide thresholds. The Cumulative (2025) Plus Project scenarios, including the Project VMT per SP, the project VMT Boundary per SP and the total net regional change would each be below the County Average.

Table XVII-6 County-wide and Project VMT Estimates

Scenario	Project	County-wide Cumulative No Project (Threshold)	Delta	Threshold Exceeded
OD VMT per Employee	22.64	28.41	(5.78)	No
Boundary VMT	80,751,251	80,760,223	(8,972)	No
Boundary VMT / SP	17.78	17.79	(0.01)	No
Total Net Regional VMT Change ²⁷⁵			(1,906)	No

City Estimates

Table XVII-7 presents the project VMT findings compared to the city-wide thresholds. The Cumulative (2025) Plus Project scenarios, including the project VMT per SP, the Project VMT Boundary per SP and the total net regional change would each be below the City Average.

Table XVII-7 City-wide and Project VMT Estimates

Scenario	Project	City-wide Cumulative No Project (Threshold)	Delta	Threshold Exceeded
OD VMT per Employee	22.64	28.41	(5.78)	No
Boundary VMT	80,751,251	80,760,223	(8,972)	No
Boundary VMT / SP	17.78	17.79	(0.01)	No
Total Net Regional VMT Change ²⁷⁶	--	--	(1,906)	No

Conclusions

Since the project-level VMT estimates for the project would be below the established significance thresholds for both the county-wide no project and city-wide cumulative no project, the project is expected to result in less than significant impacts relative to VMT.

The project is consistent with the GPU and will not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all

²⁷⁵ RIVCOM, 2025.

²⁷⁶ Ibid.

80237.00027\45404105.1

80237.00027\45491467.1

modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. The project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- b) **Significant and Unavoidable Impact.** The GPU EIR concluded that similar to City roadways, growth in the City would create additional vehicular trips that will travel on regional roadways such as I-10 and SR 86 South. These facilities are within the jurisdiction of the Riverside County CMP, which is responsible for monitoring their operations. The incremental vehicular traffic associated with the buildout of the General Plan could create additional congestion on these CMP roadways. As mentioned previously, City policies cannot fully mitigate regional impacts as development outside of the city contributes to increase traffic volumes on these facilities impacts to these regional facilities are expected to be significant and unavoidable (Page 4.9-33).

Congestion Management Plan

The CMP requires a LOS E or better for regional roadways.²⁷⁷ As noted previously the generation, distribution, and management of project traffic is not expected to conflict with the CMP; no CMP roadways were identified in the vicinity of the project. The project and background traffic will not exceed City level of service standards or travel demand measures, or other standards established by the City or Riverside County Transportation Commission (RCTC) for designated roads or highways.

The TUMF program identifies network backbone and local roadways that are needed to accommodate growth. The regional program was put into place to ensure that developments pay their fair share and that funding is in place for the construction of facilities needed to maintain an acceptable level of service for the transportation system. As mentioned previously, the TUMF is a regional mitigation fee program implemented in every jurisdiction in Riverside County. The Project will be required to pay TUMF.

The project is consistent with the analysis in the GPU EIR because it would not generate additional vehicle trips that were not accounted for in the GPU EIR. The project will be required to pay DIF and TUMF. Therefore, proposed project would not conflict with the RCTC CMP, including but not limited to level of service standards and travel demand measures, or other standards established by the RCTC for designated roads or highways.

The project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than that identified within the GPU EIR.

- c) **Less than Significant Impact.** The GPU EIR concluded that impacts to air traffic patterns would be less than significant.²⁷⁸ The GPU was determined to not have any direct or indirect impact upon any existing air facilities. The GPU fully incorporated the Airport Land Use Plan, which limits any impacts which might occur. See Section 9 Hazards and Hazardous materials for further discussion.

The project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks, and impacts would be less than significant. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is not new information of substantial importance than identified within the GPU EIR.

- d) **Less than Significant Impact.** The GPU EIR concluded that the impacts relative to increasing hazards due to design features or incompatible uses or impeding of emergency vehicle access would be less than significant.²⁷⁹

²⁷⁷ Riverside County Transportation Commission, *Riverside County Congestion Management Program*, at 4-1 (2011).

²⁷⁸ City of Coachella, 2035 GPU Draft EIR, Traffic, at 4.9-34.

²⁷⁹ *Id.*, at 4.9-34

80237.00027\45404105.1

80237.00027\45491467.1

The project would construct adjacent improvements to Avenue 52, Van Buren Street, and Calhoun Street. These roadway improvements would be designed and constructed consistent with all applicable *City of Coachella Infrastructure Development Standards*²⁸⁰ as well as Fire Department roadway requirements. Private sector access will be provided by an entry/exit driveway on Avenue 52 and a driveway on Van Buren Street. Public sector access points are aligned perpendicular to Calhoun Street and Avenue 52. These driveways will be designed to incorporate proper stacking, sight distance and intersection control (e.g. left turn pockets) features.

Prior to construction, both the Fire Department and Police Department will review the project site plan to ensure safety measures are addressed, including emergency access. The project is not anticipated to result in inadequate emergency access.

Freeway Off-Ramp Queueing Assessment

Storage capacity for all SR-86 northbound and southbound off-ramps in the study area were evaluated using HCM 7th Edition methodologies. Existing storage capacities were compared against 95th percentile queue estimates prepared using the Synchro 12 software.

The following two intersections were included in the off-ramp queueing analysis for the Opening (2030) scenarios:

- 13. SR-86 SB Ramps and Dillion Road
- 14. SR-86 NB Ramps and Dillion Road

No movements are forecasted to exceed existing storage capacity under Opening Year (2030) Plus Project and Cumulative Projects. The queueing analysis summary in Table 6.2 presents results for one scenario Opening Year with Project and Cumulative Projects only. This scenario has higher traffic volumes than Opening Year with Project which queues are not reported since lower traffic volumes typically result in shorter queues. Detailed queueing worksheets are provided in Appendix F of the TA.

The project's pedestrian access points will be located with adequate visibility, and project-generated traffic will be consistent with existing traffic in the area. No offsite roadway improvements are proposed as part of the project.

A Traffic Control Plan may be required as a condition of approval to be implemented throughout all construction activities. This plan will work to reduce potential impacts that may arise due to conflicts with construction traffic. Impacts will be less than significant.

The project is consistent with the existing land use designation and will provide an internal circulation system without sharp curves or dangerous intersections that is subject to review and approval by the City Traffic Engineer and the Fire Department during standard City review processes. Therefore, the project would not substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses, and impacts would be less than significant. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

- e) **Less than Significant Impact.** The GPU concluded impacts associated with non-motorized transportation including public transit, bicycle, or pedestrian facilities would be less than significant.²⁸¹

Public Transit

²⁸⁰ City of Coachella Infrastructure Development Standards, February 22, 2008, available at <https://www.coachella.org/home/showpublisheddocument/1392/635176274076400000>.

²⁸¹ City of Coachella, 2035 GPU Draft EIR, Traffic, at 4.9-35.

80237.00027\45404105.1

80237.00027\45491467.1

SunLine buses are wheelchair accessible and include bicycle racks accommodating two or three bicycles. The potential use of local bus services by future project residents is not expected to conflict with or substantially increase the demand for this transit service. Project implementation is not anticipated to interfere with the existing service or performance at bus stop facilities. Less than significant impacts are anticipated.

If future demand warrants, expansion of available services may be appropriate. Transit services are monitored by both the City and SunLine. Additional services are periodically considered in response to the anticipated increase in use.

The use of local bus services by project users is not expected to conflict with or substantially increase the demand for this transit service. Project implementation is not anticipated to interfere with the existing service or performance at bus stop facilities. The proposed project would not impact pedestrian or bicycle mobility. Therefore, the project would be consistent with the analysis in the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than that identified within the GPU EIR.

Bicycle Facilities:

- Class I – Bike Path or Bike Trail: Class I facilities are bicycle trails or paths that are off-street and separated from automobiles. They are a minimum of eight feet in width for two-way travel and include bike lane signage and designated street crossings where needed.
- Class II – Bike Lane: Class II Bike Lanes can be either located next to a curb or parking lane. If located next to a curb, a minimum width of five feet is recommended. They are designated for the use of bicycles and include signage and lane lines and pavement markings.
- Class III – Bike Routes: This is a street for shared use by motor vehicles and bicyclists. While bicyclists have no exclusive use or priority, signage – both by the side of the street and stenciled on the roadway surface – alerts motorists to bicyclists sharing the roadway space and denotes that the street is an official bike route.
- Class IV – Separated Bikeway: Class IV bicycle facilities, sometimes called cycle tracks or separated bikeways, provide a right-of-way designated exclusively for bicycle travel adjacent to a roadway and are protected from vehicular traffic via separations (e.g., grade separation, flexible posts, inflexible physical barriers, on-street parking).

Class II Buffered Bike Lanes are located on Van Buren Street in the Project vicinity. Avenue 50 and Avenue 48 have existing Class II Bike Lanes, and portions of Avenue 52 (east of Van Buren Street). Otherwise, all other roadways within the project vicinity have either no bicycle facilities or have a narrow striped shoulder. There are no Class I, Class III, or Class IV facilities located in the project vicinity.

The City of Coachella updated their Active Transportation Plan in 2020, which proposes the following planned bicycle facilities near the study area:

- Class II Bike Lane along Dillon Road
- Class II Bike Lane on Calhoun Street between 50th Avenue and city limits

Existing on-street bike lanes are located on Van Buren Street. The proposed project is not anticipated to impact existing facilities. Less than significant impacts are expected.

Pedestrian Facilities: The project site is in an area with some developed pedestrian network to the north. All local roads adjacent to the project that act as borders do not have sidewalks. Some study intersections provide marked crosswalks, along Avenue 50 and Avenue 48. No sidewalks are found in the vicinity of the project.

The project's pedestrian access points will be located with adequate visibility, and project-generated traffic will be consistent with existing traffic in the area. No offsite roadway improvements are proposed as part of the project.

The project is consistent with the GPU and would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, and impacts would be less than significant. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Transportation, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures are required within the GPU EIR. The project specific impacts would be less than significant.

18. UTILITIES AND SERVICE SYSTEMS – Would the project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
a. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service or to meet performance objectives for Natural Gas, Electricity, or Telecommunication?	☐	☐	☐	☐	☒
b. Would the project result in wasteful energy consumption?	☐	☐	☐	☐	☒
c. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☐	☒
d. Would the project comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☐	☒
e. Will the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☐	☒
f. Will the proposed project 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).	☐	☐	☐	☐	☒
g. Would the project require or result in the construction of new water treatment or collection facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☐	☒
h. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☐	☒

i. Would the project require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? Would the project result in a 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?	☐	☐	☐	☐	☒
j. Would the project 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?	☐	☐	☐	☐	☒

Sources: The City of Coachella 2035 General Plan, 2015; City of Coachella 2015 Sewer System Master Plan, 2015; Coachella Valley Regional Urban Water Management Plan, 2015; Riverside County Countywide Integrated Waste Management Plan, 1996; Countywide Integrated Waste Management Plan Five Year Review Report, 2023; Coachella Water Authority Water Master Plan, 2017; California Department of Finance Population and Housing Estimates, 2025

- a) **Less than Significant Impact.** Development of the General Plan would result in incremental development with concurrent utility infrastructure. The GPU EIR determined impacts would be less than significant.²⁸² Though the construction of natural gas, electricity, and telecommunication infrastructure has the potential to cause negative environmental impacts on the Planning Area, strategies and policies outlined in the Infrastructure + Public Services Element present approaches to reduce environmental impacts. Furthermore, all future infrastructure projects will be required to undergo project-level environmental review to evaluate potential impacts and identify mitigation measures as necessary. The GPU Policies are as follows: ²⁸³

- 6.1 Private utilities.** Work with private and quasi-public utilities to ensure the adequate provision of energy and telecommunications service that meets the needs of the community
- 6.2 Range of access.** Work with service providers to ensure access to and availability of a wide range of state-of-the-art telecommunication systems and services for households, businesses, institutions and public agencies throughout the city.
- 6.3 Expanding service.** Work with utility companies to retrofit areas that are not served by current telecommunication technologies and shall provide strategic long-range planning of telecommunication facilities for newly developing areas, as feasible.
- 6.4 Innovation.** Encourage local industries, higher educational institutions and other entities to support innovation in the design and implementation of state-of-the-art telecommunication technologies and facilities.
- 6.5 Co-location of facilities.** Encourage compatible co-location of telecommunication facilities and work with utility companies to provide opportunities for siting telecommunications facilities on City-owned property and public right-of-ways.
- 6.6 Smart communities.** Establish requirements for the installation of state-of-the-art internal

²⁸² City of Coachella, 2035 GPU Draft EIR, Public Utilities, at 4.14-9.

²⁸³ City of Coachella, General Plan 2035: Infrastructure & Public Services, at 09-8 (Apr. 22, 2015).

80237.00027\45404105.1

80237.00027\45491467.1

telecommunications technologies in new large-scale planned communities, office and commercial developments (e.g., wiring of all new housing and businesses).

- 6.7 High-voltage lines.** Coordinate with the electrical utilities on the location of future high voltage corridors and the effects produced by high voltage electrical facilities in power corridors and electrical substations.
- 6.8 Utility line undergrounding.** Require undergrounding of all new publicly owned utility lines, encourage undergrounding of all privately owned utility lines in new developments and work with electricity and telecommunications providers to underground existing overhead lines.
- 6.9 Utility siting standards.** Coordinate with the appropriate utility purveyors to develop local standards for the location and design of natural gas, electrical and telecommunications facilities where such improvements are visible along street frontages.
- 6.10 Transmission corridors.** Encourage the shared use of major transmission corridors and other appropriate measures as a means of preserving the aesthetic resources of the City and to lessen the visual impact of such development. The City shall work with the appropriate agencies in developing these corridors for recreational use.

The project exists within the service area of SoCal Gas for natural gas services, although all residential buildings will be fully electrified, eliminating the use of natural gas for a portion of the project.

As discussed in Section 6: Energy, the proposed project has received a will-serve letter from IID for electricity service that is conditioned on an additional electric substation and distribution facilities being constructed in the general project area. The project has designated a potential on-site location for a substation as a contingency measure but based on current electrical infrastructure planning in the area, it is expected that the new substation will be constructed off-site in the area with new distribution conduits (if required) to be constructed in existing public road rights-of-way to serve the project. The project will contribute financially to a fair share contribution for a regional substation. The future IID substation is expected to serve multiple projects in the area, both within and outside the City of Coachella, and as an independent project, it will be subject to its own environmental review under CEQA once the substation project and location have been determined. The project would also incorporate solar generation and battery storage systems to help offset electricity demand from the regional grid. These systems would reduce reliance on off-site energy sources and support overall energy efficiency. In the future, the project may consider implementing a microgrid or geothermal system to further offset demand on the grid; however, these features are not part of the current project proposal and are not evaluated as a component of the project at this time.

The project exists within the service area of Frontier for telecommunication. All connections of these utilities are located adjacent to the project's boundary, with the exception of the proposed future IID substation. The environmental impacts associated with the construction or relocation of natural gas, electric power, or telecommunication facilities is anticipated to be less than significant.

The GPU EIR found impacts to natural gas, electricity, and telecommunication facilities to be less than significant. For the above reasons, the project would have less than significant impacts and is consistent with the analysis of the GPU EIR. The project does not create new impacts or increase impacts, and no new information is of substantial importance.

- b) **Less than Significant Impact.** The GPU EIR determined that impacts would be less than significant.²⁸⁴ Energy is further discussed in Section 6 (Energy) of this analysis. However, the proposed project has received a will-serve letter from IID and is expected to contribute towards a new area substation and distribution conduits (if required) to provide electrical power to the project site. The project would also incorporate solar generation and

284 City of Coachella, 2035 GPU Draft EIR, Public Utilities, at 4.14-12.
80237.00027\45404105.1
80237.00027\45491467.1

battery storage systems to help offset electricity demand from the regional grid. As previously discussed in Section 6, the proposed photovoltaic systems will provide 50 percent of electricity for single-family homes, condos and townhomes, movie theaters, and restaurants. These systems would reduce reliance on off-site energy sources and support overall energy efficiency. In the future, the project may consider implementing a microgrid or geothermal system to further offset demand on the grid; however, these features are not part of the current project proposal and are not evaluated as a component of the project at this time. Electrical improvements will take place within the boundaries of the project and will not result in significant environmental impacts.

As discussed in Section 6, the GPU EIR found impacts to energy to be less than significant. The project would have less than significant impacts and is consistent with the analysis of the GPU EIR. The project does not create new impacts or increase impacts, and no new information is of substantial importance.

- c-d) **Less than Significant Impact.** The GPU EIR determined impacts to be less than significant.²⁸⁵ The GPU states that regulatory measures, such as AB 939 and SB 1374, are anticipated to slow the filling of landfills and extend the timeline for reaching capacity. AB 939 emphasized conservation of natural resources through reduction, recycling, and reuse of solid waste. SB 1374 outlines reporting policies to the California Integrated Waste Management Board (CIWMB) and requires a 50 to 75 percent diversion of construction and demolition waste materials to landfills. Policies outlined within the Infrastructure and Public Services element of the GPU will ensure that projects meet solid waste requirements.

Solid waste disposal and recycling services for the City of Coachella is provided by Burrtec. Solid waste and recycling collected from the proposed project will be hauled to the Coachella Valley Transfer Station, which has a 1,100 tons per day capacity.²⁸⁶ Waste from this transfer station is then sent to a permitted landfill or recycling facility outside of the Coachella Valley. These include Badlands Sanitary Landfill, El Sobrante Sanitary Landfill, and Lamb Canyon Sanitary Landfill. Cal-Recycle data indicates the Badlands Sanitary Landfill has 4,900,000 cubic yards of remaining capacity, the El Sobrante Landfill has a remaining capacity of 121,083,583 tons of solid waste, and Lamb Canyon Sanitary Landfill has a remaining solid waste capacity of 14,540,000 cubic yards.²⁸⁷

As previously discussed, approximately 87 acres will be developed with a mixed-use residential development. The estimates for solid waste generation can be seen in Table XVIII-1.

Table XVIII-1 Solid Waste Generation²⁸⁸

Land Use	Rate	Unit	Solid Waste (pounds per day)	Solid Waste (tons per day)
Single Family	7.8lbs/unit/day	165 units	1,287	0.64
Hotel	2lbs/room/day	244 units	488	0.24
Commercial	13lbs/1000 sq.ft./day	256,000 sq.ft.	3,328	1.66
Total				2.54

Source: CalRecycle. Estimated Solid Waste Generation available at
<https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>

The project would generate an average of approximately 2.54 tons of solid waste per day. This estimate does not account for any required solid waste reductions. The projects proposed solid waste generation is 0.2% of the Coachella Valley Transfer station's daily receipt allotment of 1,100 tons per day. The project would be served by a landfill with sufficient capacity to meet the demands of solid waste generated by the project.

²⁸⁵ City of Coachella, 2035 GPU Draft EIR, Public Utilities, at 4.14-14 and 4.14-16.

²⁸⁶ *Id.*, at 4.14-5

²⁸⁷ CalRecycle SWIS Facility/Site Search (2025), <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>.

²⁸⁸ The Solid Waste Generation analysis was prepared using an earlier project description with 409 units. The currently proposed Project includes 402 units, representing a reduction in development intensity relative to the analyzed scenario.

80237.00027\45404105.1

80237.00027\45491467.1

The project will comply with all applicable solid waste statutes and guidelines. Policies for solid waste reduction are outlined in the Infrastructure and Solid Waste Element of the GPU. Furthermore, all development is required to comply with the mandatory commercial and multi-family recycling requirements of Assembly Bill 341 (AB 341).²⁸⁹ Less than significant impacts are expected relative to applicable solid waste statutes and regulations.

The GPU EIR found impacts to landfill capacity and solid waste regulations to be less than significant. For the reasons stated above, the project was determined to be consistent with the analysis of the GPU EIR. The project does not create new impacts or increase impacts, and no new information is of substantial importance.

- e-f) **Less than Significant Impact.** The GPU EIR determined that impacts would be less than significant.²⁹⁰ According to the GPU, the City of Coachella is supplied water by the Coachella Water Authority (CWA) in cooperation with the Coachella Valley Water District (CVWD). The water demands associated with the GPU have been accounted for as part of the CVWD regional water supply planning efforts, specifically within the 2020 Coachella Valley Regional Urban Water Management Plan (RUWMP), which is heavily reliant on land use and population projections within the City and its sphere of influence. The GPU EIR indicates that the City of Coachella has adequate water supplies to meet demands during normal, single-dry, and multiple-dry years throughout the 20-year planning period based on growth projections under the current adopted general plan.

The existing land use designation for the Proposed Project is Regional Retail District, characterized by regional shopping centers, mixed destination centers or similar uses, providing commercial opportunities, with residential uses. The Proposed Project is consistent with the existing land use designation and is anticipating a development intensity equal to what was accounted for in the GPU EIR, meaning that impacts to water supply will be equivalent at the project site to what was previously anticipated and analyzed in the GPU EIR. The project proposes a mixed-use development, consisting of a total of 402 units on approximately 28 acres (14.4 du/acre), which is consistent with the General Plan residential density range of 10–15 dwelling units per acre. Furthermore, within the RUWMP, the 2025 population within the City of Coachella was estimated to be 66,478. The current population of the City is 44,050 persons (2025 Department of Finance Population and Housing Estimates) which is below the RUWMP population estimates. The proposed project has anticipated that a majority of residential units would operate under fractional ownership, timeshare, second homes, and/or short-term and long-term rental models, and would therefore significantly reduce any impacts to water supply when compared to impacts typically associated with permanent residency. It is estimated that the project will have an annualized average population of 950 residential guests and 1,100 public guests, for a projected total of 2,050 guests. At full buildout, the project would not cause a substantial increase to the City's population estimates projected in the City's General Plan and RUWMP.

Pursuant to SB 610 and SB 221, any future "projects" within the City or its SOI that are defined within Water Code section 10912 will require the preparation of a Water Supply Assessment (WSA). A WSA has been prepared for the project and is undergoing CWA review and approval. The proposed development will implement water conservation measures to reduce impacts to public water supplies. Water fixtures within residential and commercial buildings will be low-flow, with a 30% reduction in water use for toilets, showerheads, and faucets.

According to the WSA and RUWMP, the project will account for 1.2 percent of the projected water demand of CWA through the year 2045. As previously discussed, the RUWMP indicates that Coachella has adequate water supplies to meet demands during normal, single-dry, and multiple-dry years throughout the 20-year planning, indicating adequate water supply for the project. The City's Landscape Development Guidelines, including drought-tolerant landscape materials and efficient irrigation systems, will be implemented. Water installation and connection fees in place at the time of development will be collected by CWA. In addition, the proposed development will also be required to pay the CVWD Replenishment Assessment Charge (RAC) through CWA. The RAC supports CVWD's groundwater replenishment program and covers a portion of the costs of replenishing the aquifer, including the cost of importing water for that purpose. Less than significant impacts

²⁸⁹ See CALRecycle, Mandatory Commercial Recycling, <https://calrecycle.ca.gov/Recycle/Commercial>.

²⁹⁰ City of Coachella, 2035 GPU Draft EIR, Water Supply and Wastewater, at 4.16-75.

80237.00027\45404105.1

80237.00027\45491467.1

to available groundwater and water supplies are expected.

The GPU EIR found impacts to water supply to be less than significant and due to consistency with the City's land use designation and preparation of a WSA, the proposed project is consistent with the analysis of the GPU EIR. The project does not create new impacts or increase impacts, and no new information is of substantial importance.

- g) **Less than Significant Impact.** The GPU EIR determined that impacts were anticipated to be less than significant.²⁹¹ Water facilities serving the City are planned and managed through regional planning efforts by the City and the Coachella Valley Water District. Existing and planned facilities are expected to provide sufficient capacity to meet projected water demand associated with buildout of the City and its sphere of influence. Future development will continue to rely on the regional groundwater basin, supplemented by imported and recycled water supplies and supported by ongoing recharge and conservation programs. With implementation of the existing and planned water supply facilities and management programs, sufficient infrastructure is expected to be available to serve projected growth under normal and dry-year conditions.

The City of Coachella is currently supplied water by the CWA. CWA provides over 8,000 municipal water service connections and over 2,128 million gallons ("MG") of water to customers in their service area. The current water supply source is groundwater from the Indio Sub-basin and is drawn from CWA owned and operated wells. 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.

The residential and commercial components of the project are anticipated to utilize domestic water supplied by CWA and the 9.4-acre Hotel Lagoon will be supplied by a private, on-site well. Presently, an existing well occurs on-site, located adjacent to the existing irrigation pond. The existing well does not possess the infrastructure to supply the Hotel Lagoon and will be capped in accordance with [County of Riverside Department of Environmental Health](#) standards. The location of the new well-site will be determined in the final site design, but it will occur adjacent to the Lagoon. Well capping, placement, and permitting will be done in accordance with the [County of Riverside Department of Environmental Health](#). Once a location is determined for the new well, a Registered Well Driller will be contracted to prepare the application for submittal to the Department of Environmental Health. Application approval by the County of Riverside will ensure that impacts to groundwater quantity and quality are not significant.

For domestic water supply, the project would connect to existing 12-inch water mains along Avenue 52 and Van Buren Street, northeast of the project. A 12-inch public water main is proposed to encompass the site along Calhoun Street, Avenue 52, and Van Buren Street in order to reach the existing water main. An 8-inch water main will be constructed internally to connect the project to the proposed 12-inch main. The project would connect to an existing 12-inch sewer main along Avenue 52. As previously mentioned, the project will comply with the existing water management program in place, such as adherence to the City's Landscape Development Guidelines. The infrastructure and design components for the project will be consistent with CWA requirements pertaining to landscaping and irrigation, domestic water systems, stormwater facilities, and general development. Requirements include utilizing water efficient irrigation and drought tolerant plants, adhering to standardized pipeline sizes and design standards, and stormwater facility compliance. The project will be reviewed by CWA and City staff to assure compliance with all current and applicable requirements. The proposed development will be expected to implement water conservation measures to reduce impacts to public water supplies. As previously discussed, water fixtures within residential and commercial buildings will be low-flow, with a 30% reduction in water use for toilets, showerheads, and faucets. Additionally, water installation and connection fees in place at the time of development will be collected by CWA.

²⁹¹ *Id.*, at 4.16-85.
80237.00027\45404105.1
80237.00027\45491467.1

The GPU EIR found impacts to water facilities to be less than significant and due to proximity to existing infrastructure, the proposed project is consistent with the analysis of the GPU EIR. The project does not create new impacts or increase impacts, and no new information is of substantial importance.

- h-i) **Less than Significant Impact.** The GPU states that the City's existing wastewater treatment facilities currently provide a capacity of approximately 4.5 MGD, which is insufficient to meet projected long-term demand associated with population growth under the GPU.²⁹² To support the anticipated population growth, wastewater treatment capacity may need to increase, potentially requiring expansion of existing facilities or construction of new treatment plants. Development of additional wastewater infrastructure could result in environmental impact. However, the site development impacts caused by the construction of additional wastewater infrastructure are very similar to those of any land development effort and fall within the broad, programmatic analysis of the development of the City under the GPU analyzed in the EIR. Future wastewater facility expansions would undergo project-level environmental review to evaluate potential impacts and identify mitigation measures as necessary.

The City of Coachella is currently served by the Coachella Sanitary District (CSD) for wastewater treatment. In 2010, the City upgraded the capacity of the Avenue 54 Wastewater Treatment Plant (WWTP) to 4.5 MGD, with a current average daily discharge of approximately 2.7 MGD. According to Table 4-4 Land Use Type with Model Flow Load Field of the City's 2015 Sewer System Master Plan, the current land use designation for the project site (general commercial) has an estimated unit flow rate of 600 gpd/acre.²⁹³ Excluding proposed open space and proposed street acreage, the project is anticipated to have 55.5 acres of facilities with the capacity to generate wastewater. Considering the estimated flow rate of 600 gpd/acre, the proposed project is estimated to generate wastewater at a rate of 0.33 MGD, which represents approximately 7% of the WWTP's treatment capacity of 4.5 MGD. However, the proposed project has anticipated that a majority of residential units will operate under fractional ownership, timeshare, second homes, and/or short-term and long-term rental models, and would therefore significantly reduce rates of wastewater production when compared to impacts typically associated with permanent residency.

The proposed project would connect to the existing 12-inch sewer mains at the intersection of Avenue 52 and Van Buren Street, the intersection of Fredrick Street and Avenue 53, and Avenue 64. The project will connect to the existing 12-inch sewer main at the Avenue 52 and Van Buren Street intersection and extend approximately 174 feet of 12-inch public sewer lines to the project. The proposed public sewer line will connect to a private sewer forcemain, which will connect to private 8-inch sewer mains throughout the site. The project will be required to undergo review by CSD and City staff to ensure wastewater capacity and compliance with the current wastewater treatment requirements. Additionally, sewer installation and connection fees in place at the time of development will be collected by the City. No new or expanded treatment facilities are expected as a result of project implementation, nor is the project expected to exceed wastewater capacity. Therefore, less than significant impacts to wastewater facilities are expected.

The GPU EIR found impacts to wastewater facilities to be less than significant and due to proximity to existing infrastructure and the required payment of installation and connection fees, the proposed project is consistent with the analysis of the GPU EIR. The project does not create new impacts or increase impacts, and no new information is of substantial importance.

- j) **Less than Significant Impact.** The GPU requires the city to properly manage stormwater facilities, coordinate stormwater facilities with CVWD, and requires the implementation of adequate infrastructure with new development. Based on these conditions, the impact of the GPU build-out on stormwater facilities is considered less than significant. The project's proposed stormwater facilities are within the project's current footprint. The proposed onsite storm drain system includes the 2.5-acre irrigation pond, which has been preliminarily sized to provide enough storage for the 100-year controlling storm event. The project does not require any off-site storm

²⁹² *Id.*, at 4.16-92.

²⁹³ City of Coachella 2015 Sewer System Master Plan, 2015
80237.00027\45404105.1
80237.00027\45491467.1

water facilities or expansion of existing facilities, and impacts would be less than significant.

The GPU EIR found impacts to stormwater facilities to be less than significant²⁹⁴ and due to the utilization of on-site retention, the proposed project is consistent with the analysis of the GPU EIR. The project does not create new impacts or increase impacts, and no new information is of substantial importance.

Conclusion:

With regards to the issue area of Utilities and Service Systems, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed in the City of Coachella General Plan 2035 Program EIR. The Program EIR adequately addressed the potential impacts to utility and service systems.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the City of Coachella General Plan 2035 Program EIR.
4. No mitigation measures are required within the GPU EIR for utility and service systems. Compliance with above listed General Plan policies ensures that potential impacts to utility and service systems would remain less than significant.

294 City of Coachella, 2035 GPU Draft EIR, Water Supply and Wastewater, at 4.16-94.
80237.00027\45404105.1
80237.00027\45491467.1

19. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the GP EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the GP EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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 resources, 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?	☐	☐	☐	☐	☒

Sources: The City of Coachella 2035 General Plan, 2015; Cal Fire Fire Hazard Severity Zones Map, 2025; CALFIRE Fire Hazard Severity Zone Maps; Coachella Local Hazard Mitigation Plan, 2022.

The GPU EIR did not specifically address Wildfires. The topic of wildfire was analyzed within the GPU EIR within Section 4.8 Hazards and Hazardous Materials. The guidelines for determining significance stated that the proposed GPU would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four threshold questions above. The GPU EIR addressed wildfire in their analysis; however, it was not called out as a separate environmental topic. This section was not included in the original GPU EIR and is provided here for informational purposes.

According to Coachella’s Local Hazard Mitigation Plan, fires are considered a medium mitigation priority that would result in negligible damages/injuries with a 1 percent to 10 percent likelihood.²⁹⁵

- a-d) **Less than Significant Impact.** The project site currently includes agricultural fields, with date palm groves and grape vineyards. The date palm grove is still in operation; however, the grape vineyards have been abandoned. The project site is surrounded to the north, east, and west by existing, paved rights-of-way, Avenue 52, Van Buren Street, and Calhoun Street (respectively). Existing agricultural lands and residential properties are located south of the project.

²⁹⁵ City of Coachella, Coachella Local Hazard Mitigation Plan (2022), <https://www.coachella.org/home/showpublisheddocument/10470/638816255571400000>.
80237.00027\45404105.1
80237.00027\45491467.1

According to Cal Fire's Fire and Resource Assessment Program the proposed project site is not located within a Moderate, High, or Very High Fire Hazard Severity Zone.²⁹⁶ As a result, the project is not expected to impair an adopted emergency response plan or emergency evacuation plan. No impacts are anticipated.

Wildfire risk is related to a number of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents), and topography (degree of slope). Steep slopes contribute to fire hazards by intensifying the effects of wind and make fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point. The project site is not expected to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

The project provides development of infrastructure (water, sewer, and storm drainage). The proposed improvements would allow for decrease fire risk relative to existing conditions. The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As a result, the project is not expected to require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

The project site will connect to an existing network of city streets. The project proposes connections to Van Buren Street, Calhoun Street, and Avenue 52, as well as improvements to the street frontages (including curb and gutter). The proposed improvements would allow for greater emergency access relative to the existing conditions. Landslides include rockfalls, deep slope failure, and shallow slope failure. Factors such as the geological conditions, drainage, slope, vegetation, and others affect the potential for landslides. One of the most common causes of landslides is construction activity that is associated with road building. The project site is relatively flat; therefore, the potential for a landslide in the project site is essentially non-existent. As a result, the project is not expected to 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 and no impact is expected to result from the project.

No impact is expected to result from the project. Overall, less than significant impacts are anticipated. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not create new impacts or increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion:

With regards to the issue area of Wildfire, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures are required within the GPU EIR. The project specific impacts would be less than significant.

²⁹⁶ CAL FIRE, Fire Hazard Severity Zones, <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>.
80237.00027\45404105.1
80237.00027\45491467.1