



# COACHELLA VALLEY WATER DISTRICT

*Established in 1918 as a public agency*

## ATTACH 9 AGENCY COMMENTS

GENERAL MANAGER

Jim Barrett

ASSISTANT GENERAL MANAGER

Robert Cheng

CLERK OF THE BOARD

Sylvia Bermudez

ASSISTANT GENERAL MANAGER

Dan Charlton

February 15, 2024

**VIA MAIL AND EMAIL AT [AMORENO@COACHELLA.ORG](mailto:AMORENO@COACHELLA.ORG)**

Adrian Moreno  
Development Services Department  
City of Coachella  
53990 Enterprise Way  
Coachella, CA 92236

Dear Mr. Moreno:

Subject: City of Coachella, Development Services Department, Request for Comments, CUP 266,  
[TTM 37040 Coachella Vineyards \(Modification\), APN 697-330-002, -012, -013, -014](#)

This letter supersedes the previous Coachella Valley Water District (CVWD) letter dated March 28, 2018.

This area is designated Zone X on Federal Flood Insurance rate maps, which are in effect at this time by the Federal Emergency Management Agency (FEMA).

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

The City of Coachella (City) shall require mitigation measures to be incorporated into the development to prevent flooding of the site or downstream properties. These measures shall require 100 percent on-site retention of the incremental increase of runoff from the 100-year storm. In addition, flood protection measures shall comply with California Drainage Law and provide that offsite stormwater flows are received onto the property and discharged from the property in a manner that is reasonably compatible with redevelopment conditions. CVWD requests review of said flood protection measures for compliance with California Drainage Law from a regional valley floor drainage perspective.

This area is underlain with agricultural drainage lines. There are CVWD/Private facilities not shown on the development plans. There may be conflicts with these facilities. The City shall withhold issuance of grading permits until CVWD has reviewed the proposed development and related impacts to the CVWD/Private facilities and associated right-of-way and provided the City with written confirmation that there is no interference. The CVWD/Private conflicts include but are not limited to the Avenue 46 East Drain Line and private tile drain system (TD-172). Developer should contact CVWD to obtain drawings of these facilities A permit from CVWD may be necessary for any encroachments or modifications.

The project lies within the East Whitewater River Subbasin Area of Benefit. Groundwater production within the area of benefit is subject to a replenishment assessment in accordance with the State Water Code.

Any entity producing more than 25 acre-feet of water during any year from one or more wells must equip the well(s) with a water-measuring device. A CVWD Water Production Metering Agreement is required to provide CVWD staff with the authority to regularly read and maintain this water-measuring device.

Adrian Moreno  
City of Coachella  
February 15, 2024  
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ATTACH 9 AGENCY COMMENTS


The Sustainable Groundwater Management Act (SGMA) is a law requiring that groundwater basins are managed to achieve sustainability. In accordance with the SGMA, CVWD submitted the Coachella Valley Water Management Plan as an alternative to a Groundwater Sustainability Plan (Alternative Plan) for the Indio Subbasin. On July 17, 2019, the Department of Water Resources (DWR) sent a notification approving the Alternative Plan. The goal of the Alternative Plan is to reliably meet current and future water demands in a cost-effective and sustainable manner. This development lies within the Indio Subbasin and will contribute to the total water demand in the subbasin. The elements and actions described in the Alternative Plan shall be incorporated into the design, construction, and operation of this development to reduce its negative impact on the Indio Subbasin.

This development lies within the City of Coachella's water service area boundary. CVWD and the City have signed a Memorandum of Understanding (MOU) to work together to provide sufficient water supplies for new development. The MOU outlines ways that the City will participate in funding CVWD's acquisition of supplemental water supplies sufficient to offset the impacts of new water demands resulting from development within the City.

The MOU also ensures that the two agencies coordinate on the review and approval of a Water Supply Assessment (WSA) for this development. The City is responsible for preparing and approving the WSA and shall submit the draft WSA to CVWD for review prior to approval. CVWD's review will ensure that the WSA incorporates the goals and objectives of the Alternative Plan.

If you have any questions, please call Tommy Fowlkes, Development Services Supervisor, at extension 3535.

Sincerely,



Carrie Oliphant  
Director of Engineering

Enclosure/1/as

cc: Shantel Bacon  
Supervising Environmental Health Specialist  
Riverside County Department of Environmental Health  
Environmental Protection and Oversight Division  
47950 Arabia Street, Suite A  
Indio, CA 92201

Abraham Gottlieb  
8721 West Sunset Boulevard  
Los Angeles, CA 90069

TH: a:\Eng\Dev Svcs\2024\Feb\DRL PZ 24-15491 City of Coachella - Vineyards  
File: 0163.1, 0421.1, 0721.1, 1150.10  
Geo: 050821-3  
PZ 24-15491





# COACHELLA VALLEY WATER DISTRICT

*Established in 1918 as a public agency*

## ATTACH 9 AGENCY COMMENTS

GENERAL MANAGER  
Jim Barrett

ASSISTANT GENERAL MANAGER  
Robert Cheng

March 28, 2018

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

Dear Mr. Lopez:

Subject: Coachella Vineyard RV Resort and Townhouse/Hotel Project Case No. TTM 37040, TPM 37083, CUP 266 and EA 16-01 APN 697-330-002 and 697-330-003

This area is designated Zone X on Federal Flood Insurance rate maps, which are in effect at this time by the Federal Emergency Management Agency (FEMA).

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

The City of Coachella (City) shall require mitigation measures to be incorporated into the development to prevent flooding of the site or downstream properties. These measures shall require on-site retention of the incremental increase of runoff from the 100-year storm.

This area is underlain with agricultural drainage lines. There are CVWD/Private facilities not shown on the development plans. There may be conflicts with these facilities. The City shall withhold issuance of grading permits until CVWD has reviewed the proposed development and related impacts to the CVWD/Private facilities and associated right-of-way and provided City with written confirmation that there is no interference. The CVWD/Private conflicts include but are not limited to Avenue 46 East Drain and Private Tile Drain 172.

Surface and subsurface drainage facilities in the vicinity of this project were designed and constructed for agricultural drainage. CVWD will consider use of these drainage facilities for urban drainage if (1) the surface and subsurface drainage facilities can physically handle the new urban drainage, (2) the area is incorporated into the National Pollutant Discharge Elimination System permit and Waste Discharge Requirements for the discharge of stormwater in the Whitewater River Watershed, which is known as the MS4 Permit and (3) the project is annexed into a future district(s) for recovery of capital and operation/maintenance costs associated with the new urban drainage system.

Mr. Luis Lopez  
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## ATTACH 9 AGENCY COMMENTS

CVWD may need replacement or additional drainage facilities to provide for the orderly expansion of the drainage system. These facilities may include pipelines, channels, pump stations and other facilities. The developer may be required to construct/install these facilities and then convey said facilities to CVWD along with the land and/or easements on which these facilities will be located. The terms and conditions for the planning, design, construction/installation, and conveyance of property interests shall be determined by CVWD pursuant to its rules and regulations as said requirements may be revised from time to time. These sites shall be shown on the tract map as lots and/or easements to be deeded to CVWD for such purpose.

The project lies within the East Whitewater River Subbasin Area of Benefit. Groundwater production within the area of benefit is subject to a replenishment assessment in accordance with the State Water Code.

All water wells owned or operated by an entity producing more than 25 acre-feet of water during any year must be equipped with a water-measuring device. A CVWD Water Production Metering Agreement is required to provide CVWD staff with the authority to regularly read and maintain this water-measuring device.

This development lies within the study area of the 2010 Water Management Plan Update. The groundwater basin in the Coachella Valley is in a state of overdraft. Each new development contributes incrementally to the overdraft. CVWD has a Water Management Plan in place to reduce the overdraft to the groundwater basin. The elements of the Water Management Plan include supplemental imported water, source substitution and water conservation. The plan lists specific actions for reducing overdraft. The elements and actions described in the plan shall be incorporated into the design of this development to reduce its negative impact on the Coachella Valley groundwater basin.

This development lies within the City of Coachella's water service area boundary. CVWD and the City have signed a Memorandum of Understanding (MOU) to work together to provide sufficient water supplies for new development. The MOU outlines ways that the City will participate in funding CVWD's acquisition of supplemental water supplies sufficient to offset the impacts of new water demands resulting from development within the City.


The amount paid for supplemental water supplies shall not exceed CVWD's Supplemental Water Supply Charge for similar development types and water requirements in effect at the time paid.

Mr. Luis Lopez  
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The MOU also ensures that the two agencies coordinate on the review and approval of a Water Supply Assessment (WSA) for this development. The City is responsible for preparing and approving the WSA and shall submit the draft WSA to CVWD for review prior to approval. CVWD's review will ensure that the WSA incorporates the goals and objectives of the 2010 Coachella Valley Water Management Plan Update.

If you have any questions, please call Tommy Fowlkes, Development Services Supervisor, extension 3535.

Sincerely,

  
for Carrie Oliphant  
Assistant Director of Engineering

cc: Mark Abbott  
Supervising Environmental Health Specialist  
Riverside County Department of Environmental Health  
Environmental Protection and Oversight Division  
47-950 Arabia Street, Suite A  
Indio, CA 92201

Coachella Vineyard Estates, LLC  
45-920 Meritage Lane  
Coachella, CA 92236

Filepath: RM:s\Eng\DevSvcs\2018\March\DRL PZ 18-8735 Coachella Vineyard RV Resort

File: 0163.1, 0421.1, 0721.1  
Geo. 05-0821-3  
PZ 18-8735





# DESERT SANDS UNIFIED SCHOOL DISTRICT

47-950 Dune Palms Road • La Quinta, California 92253 • (760) 777-4200 • FAX: (760) 771-8505

BOARD OF EDUCATION: Humberto Alvarez, Michael Duran, Tricia Pearce, Linda Porras, Dr. Kallea Watson  
SUPERINTENDENT: Kelly May-Vollmar, Ed.D.

**ATTACH 9 AGENCY COMMENTS**

**February 5, 2024**

**Sent Via Email ONLY**  
[amoreno@coachella.org](mailto:amoreno@coachella.org)

Adrian Moreno, Associate Planner  
City of Coachella, Development Services  
53990 Enterprise Way  
Coachella, ca, 92236

**RE: AR No. 16-03 (Modification), CUP 266, TTM 37040, EA 16-01 Coachella Vineyards (Modification)**

Mr. Moreno,

This is in response to your request for comments on the above referenced project and its effect on public schools.

Please be advised, all actions toward residential and commercial development will result in an impact on our school system. The District's ability to meet the educational needs of the public with new schools has been seriously impaired in recent years by local, state, and federal budgets that have an impact on the financing of new schools.

As you are aware, there is a school mitigation fee that is currently collected on all new development at the time building permits are issued.

Please feel free to call me if you have further questions.

Best Regards,

**PATRICK CISNEROS**  
Director, Facilities Services



# CAL FIRE – RIVERSIDE UNIT RIVERSIDE COUNTY FIRE DEPARTMENT

BILL WEISER – FIRE CHIEF

Office of the County Fire Marshal (East)  
77-933 Las Montañas Rd., Ste. #201, Palm Desert, CA 92211-4131  
Phone (760) 863-8886 Fax (760) 863-7072  
www.rvcfire.org

ATTACH 9 AGENCY COMMENTS

PROUDLY SERVING THE UNINCORPORATED AREAS OF RIVERSIDE COUNTY AND THE CITIES OF:

- BANNING
- BEAUMONT
- COACHELLA
- DESERT HOT SPRINGS
- EASTVALE
- INDIAN WELLS
- INDIO
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- LA QUINTA
- MENIFEE
- MORENO VALLEY
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- SAN JACINTO
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- WILDOMAR

### BOARD OF SUPERVISORS:

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DISTRICT 4
- YXSTIAN GUTIERREZ  
DISTRICT 5

## Planning Case Conditions

**Date:** 2/15/2024

**City Case Number:** AR No. 16-03, CUP 266, TTM 37040, EA 16-01 (Modifications)

**Project Name:** Coachella Vineyards - Ozara

**Planner:** Adrian Moreno

**Reviewed By:** SFM Kohl Hetrick

**Fire Department Permit Number:** FPCUP1800019 / FPEAC1800001

It is the responsibility of the recipient of these Fire Department comments to forward them to all interested parties. The permit number (**as it is noted above**) is required on all correspondence.

Additional information is available at our website: [www.rvcfire.org](http://www.rvcfire.org)

Questions should be directed to the Riverside County Fire Department, Office of the Fire Marshal at 77933 Las Montañas Suite 201, Palm Desert, CA 92211 (760) 863-8886.

OFM Review of CUP 266, TTm37040, EA 16-01, AR No. 16-03 (Modifications):

The modifications and historical Fire Conditioning has been reviewed for compliance. Corrections to some of the details is required prior to Fire Clearance and Final Conditioning.

- 1) Fire Apparatus Access Roads shall provide a minimum clear width of 24-foot FL to FL. Conceptual Grading Plans showed some areas at 22-feet.
- 2) Landscaping impacts observed:
  - a. Landscaping and tree installations adjacent to Fire Apparatus Access Roads shall be placed so that at mature growth, plant material does not impact the minimum clear width of the roadway of 24-foot and the clear height requirement of 13'-6". Not simply a matter of tree trimming maintenance.
  - b. Landscaping shall provide a minimum 36-inch radius and 36-inch-wide unobstructed traversable path to all fire protection equipment (Hydrants, BF, OS&Y, PIV, FDC, etc). \*Notation and detail will suffice.
- 3) Hotel High Rise: Identify the location of the required Fire Command Control Room as detailed in CFC Section 508 as amended by Coachella Municipal Code. Ordinance amendments:
  - a. K. FIRE COMMAND CENTER.
    - i. 1. Section 508.1 of the California Fire Code is deleted in its entirety and replaced with the following: 508.1 General. Where required by other sections of this code and in all buildings classified as high-rise buildings by the California

Building Code, in buildings greater than 300,000 square feet in area and in Group I-2 occupancies having occupied floors located more than 75 feet above the lowest level of fire department vehicle access, a fire command center for fire department operations shall be provided and comply with Sections 508.1.1 through 508.1.8.

- ii. 2. Section 508.1.1 of the California Fire Code is deleted in its entirety and replaced with the following: 508.1.1 Location and access. The fire command center shall be located adjacent to the main lobby and shall be accessible from fire department vehicular access or as approved by the fire code official. The room shall have direct access from the building exterior at the lowest level of fire department access.
  - iii. 3. Section 508.1.3 of the California Fire Code is amended to add the following: Exception: A fire command center solely required because a building is greater than 300,000 square feet in area shall be a minimum of 96 square feet (9 m<sup>2</sup>) with a minimum dimension of 8 feet (2438mm).
  - iv. 4. Section 508.1.6 of the California Fire Code is amended to add the following: Exception: A fire command center solely required because a building is greater than 300,000 square feet in area shall comply with NFPA 72 and contain the features set forth in Section 508.1.6 subsections 5, 8, 10, 12, 13 and 14. The features set forth in Section 508.1.6 subsections 1, 2, 3, 4, 6, 7, 9, 11, 15, 16, 17, 18 and 19 shall be required when such building contains systems or functions related to these features.
  - v. 5. A new Section 508.1.8 is added to Section 508 of the California Fire Code to read as follows: 508.1.8 Fire command center identification. The fire command center shall be identified by a permanent easily visible sign stating “Fire Dept. Command Center,” located on the door to the fire command center. (4) In the northeast corner of the project is identified an Emergency Vehicle Access Only element. Identify if gate secured. \*Shall provide for free egress of guests/resident vehicles. May restrict for only Fire/Emergency Access.
- 4) Provide an updated “Will Serve” letter from the responsible Water Utility provider identifying that they will provide a minimum fire flow to the project sight in the amount of 4,000 gallons-per-minute at a minimum residual water pressure of 20-psi for a minimum duration of 4-hours of that flow. If the water utility is not able to provide this amount of fire flow, pressure or duration – they should identify the capability of the water services that they can provide.
- a. Regional water supply pressures have been observed to be of low pressure/flow. On-site water storage and fire pumping may be required.



- 5) Historical Fire Planning Conditioning for the Environmental Impacts of this project does not appear to have been captured in the Mitigated Negative Declaration. Communication and discussion with the assigned Division Chief and the Fire Planning Division is required to verify continued impacts and any mitigations. The existing comments to these impacts are:
- a. ADVERSE IMPACTS: The proposed project will have a cumulative adverse impact on the Fire Department's ability to provide an acceptable level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, traffic and population. The project proponents/developers will be expected to provide for a proportional mitigation to these impacts via capital improvements and/or impact fees.
  - b. STRATEGIC PLANNING: The proposed project will contribute to a cumulative adverse impact on the Fire Department's ability to provide an acceptable level of service. These impacts include a rising number of emergency and public service calls due to the increased presence of structures, traffic and population. This project is situated in a location outside the service area of the existing City of Coachella fire station and will not have acceptable response times from that facility. Currently the closest fire station serving this area is FS 87 in the City of Indio which would not provide an acceptable response time to this facility. Therefore, an additional fire station with engine and crew is required to serve the area and will be needed prior to occupancy. As a part of the City's fire protection contract, it has a cost share agreement for the services of an Aerial Ladder Truck. This will assist in providing the enhanced service requirements that a high-rise structure needs. Specific to the capital equipment needs, it is recommended that the City and project proponent discuss the funding needs of the fire department Aerial Ladder Truck which will service this high-rise structure, in anticipation of its scheduled replacement. While Developmental Impact Fees (DIF) might assist in the one-time mitigation for capital projects, considering ongoing governmental funding challenges, we encourage our administrative staff and legislative bodies to review and determine if mitigations are necessary for ongoing fiscal impacts to our operational services. If not already in place, we recommend that a Transient Occupancy Tax be put into initiated to help offset the costs of operational impacts.

**Should you have any questions, or if some items are unclear, please phone our office at 760-863-8886 and speak with Supervising Fire Marshal Kohl Hetrick to assist you with these conditions.**

Kohl Hetrick  
Supervising Fire Marshal / Office of the County Fire Marshal

Riverside County Fire Department



# IID

*A century of service.*

February 15, 2024

Mr. Adrian Moreno  
Associate Planner  
Development Services Department  
City of Coachella  
1515 6th Street  
Coachella, CA 92236

SUBJECT: Modified Coachella Vineyards Project; AR No. 16-03 (Modified), CUP 266, TTM 37040, EA 16-01 (Modified) in Coachella, CA

Dear Mr. Moreno:

On February 5, 2024, the Imperial Irrigation District received from the City of Indio Development Services Department, a request for agency comments on the modified Coachella Vineyards project; Architectural Review No. 16-03 (modified), Conditional Use Permit No. 266, Tentative Tract Map No. 37040 and Environmental Assessment No. 16-01 (modified). The applicant, Abraham Gottlieb, proposes the development of a 48-acre site that includes a 188-space RV Park/Subdivision, 100 two-bedroom townhouses and an 11-story, 200-room hotel and associated facilities at the northeast corner of Vista Del Norte and Tyler Street in Coachella, California (APNs 697-330-002, -012, -013, -014). The proposed modification to the original approved project includes modification to the overall site plan including changes to project layout, design, open space, circulation, and facilities. The modification also includes an 8-story parking structure, and includes a new proposed retail plaza with 4 retail buildings. The proposed modification changes the portion of the project that proposes the 100 two-bedroom townhouses and an 11-story, 200-room hotel and associated facilities, and does not propose any modifications to the 188-space RV Park/Subdivision portion of the project at the northern parcel (APN 697-330-002).

IID has reviewed the project information has the following comments:

1. Based on the preliminary information provided to the IID, the additional power load to service the proposed development will require the acquisition, design, and construction of a new substation with two (2) 28 MVA 92/13.2 kV transformer banks in addition to two (2) new 92kV transmission line extensions to serve the new substation from existing transmission lines running along along Tyler Street. A standard 315' by 315' site will be mandatory which should include the appropriate grading, fencing, permits, zoning change, environmental compliance documentation, landscaping (if required by the City), and all rights-of-way and easements for the substation, and access rights for both ingress and egress, as well as for power line facilities.
2. The applicant will be required to extend a minimum of one (2) feeder (conduit and cable) from the new substation to the proposed development. In addition, the applicant will be required to install the necessary conduit/vault systems following the Permanent Plan of Service as well as distribution getaways conduit systems from the new substation.

3. It is important to note that a detailed feasibility/impact study will be developed once a customer project application and approved plans and loading calculations are received. This detailed information will allow IID to perform an accurate assessment and provide a full report of any potential impacts and mitigation measures. The conditions of service could change as a result of the additional studies. The cost of any additional technical assessment/study shall be borne by the applicant.
4. IID will not begin any engineering studies to provide electrical service to the project until the applicant submits a customer project application (available for download at <http://www.iid.com/home/showdocument?id=12923> and detailed loading information, panel sizes, project schedule and estimated in-service date. Applicant shall bear all costs associated with providing electrical service to the project, including but not limited to the construction of the new substation facilities, transmission line extensions, distribution getaways, distribution feeder breakers, feeder backbones and distribution overhead and/or underground line extensions, which, based on current year IID rates, are estimated to be \$24 Million (subject to change without notice); as well as the cost of any other related upgrades and applicable permits, zoning changes, landscaping (if required by the City) and rights-of-way and easements.
5. The applicant shall bear the cost of the substation infrastructure to serve the development but may be eligible for reimbursement from a third party user or third party users for a portion of the costs pursuant to existing IID regulations and/or approval by the IID Board of Directors.
6. The applicant should be advised that pursuant to IID process, the standard time frame for the implementation of a new substation (engineering, equipment procurement and construction) requires a minimum of 24 months. As a result, the applicant should adjust the project's in-service dates accordingly. The procurement of the new substation banks will commence upon receipt of the customer project application for the substation bank acquisition including payment for the full cost of the required equipment.
7. Line and feeder extensions to serve the project will be made in accordance with IID Regulations:
  - No. 2 (<http://www.iid.com/home/showdocument?id=2540>),
  - No. 13 (<http://www.iid.com/home/showdocument?id=2553>),
  - No. 15 (<http://www.iid.com/home/showdocument?id=2555>)
8. For additional information regarding electrical service for the project, the applicant should be advised to contact the IID Energy - La Quinta Division Customer Operations, 81-600 Avenue 58 La Quinta, CA 92253, at (760) 398-5841 and speak with the project development planner assigned to the area.
9. It is important to note that IID's policy is to extend its electrical facilities only to those project that have obtained the approval of a city or county planning commission and such other governmental authority or decision-making body having jurisdiction over said developments.

10. The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project as well as the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties.
11. Public utility easements over all private public roads and additional ten (10) feet in width on both side of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure.
12. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at <https://www.iid.com/about-iid/departments-directory/real-estate>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
13. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and/or distribution lines, ancillary facilities associated with the conveyance of energy service; the acquisition and dedication of real property, rights of way and/or easements for the siting and construction of electrical utility substations, electrical transmission and/or distribution lines and ancillary facilities associated with the conveyance of energy service, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA) documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**
14. Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. The State CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is

intended to provide the maximum protection of the environment. CEQA case law has established general principles on project segmentation for different project types. For a project requiring construction of offsite infrastructure, the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713.

15. Applicant should be advised that landscaping can be dangerous if items are planted too close to IID's electrical equipment. In the event of an outage, or equipment failure, it is vital that IID personnel have immediate and safe access to its equipment to make the needed repairs. For public safety, and that of the electrical workers, it is important to adhere to standards that limit landscaping around electrical facilities. IID landscaping guidelines are available at <https://www.iid.com/energy/vegetation-management>.

Should you have any questions, please do not hesitate to contact me at (760) 482-3609 or at [dvargas@iid.com](mailto:dvargas@iid.com). Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas  
Compliance Administrator II