

Santa Rosa Business Park

GPA 23-01, EA 23-01

**ADDENDUM TO THE CITY OF COACHELLA
GENERAL PLAN
ENVIRONMENTAL IMPACT REPORT (SCH No. 2009021007)**

Prepared for:

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1. Introduction and Project Background

1.1 Summary

This document is an Addendum to the City of Coachella General Plan Update Environmental Impact Report (CGPU EIR, SCH No. 2009021007). The purpose of this Addendum is to evaluate the potential environmental impacts of amending the land use designation of a 38.8-acre site from Urban Employment Center to Industrial District, and to maintain the current M-H (Heavy Industrial) zoning on the site. Prior to the adoption of the current General Plan, the site was designated for Industrial use. A Tentative Parcel Map was approved for an industrial subdivision in 2006, but has since lapsed. The proposed General Plan Amendment, along with maintaining the current zoning would allow the development of an industrial project similar to that previously approved for the site, referred to herein as the “Project”. In accordance with the California Environmental Quality Act (CEQA), this Addendum analyses the proposed General Plan Amendment (GPA) and buildout of the Project and demonstrates that potential environmental impacts associated with the proposed Project at buildout would be equivalent to or less than the impacts already evaluated in the approved CGPU EIR.

Section 1 of this Addendum provides a detailed description of the City of Coachella’s planning procedures and environmental review process under the California Environmental Quality Act (CEQA). Section 2 described the proposed General Plan Amendment and the Project. Section 3 describes the potential environmental impacts of the proposed Project in the context of the 2015 CGPU EIR.

1.2 Project Location

The Project site consists of one lot in the southern portion of the City of Coachella, Riverside County, California. The 38.8-acre property is located at the southeast corner of the Avenue 54 and Tyler Street intersection. Exhibits 1 to 3 show maps of the Project’s regional location and vicinity.

The Project site consists of Assessor’s Parcel 763-260-001. The site is surrounded by lands designated as Urban Employment Center and Industrial District. Properties to the east and west of the subject property are currently occupied by agricultural uses, property to the north is occupied by commercial/industrial uses, and land to the south is occupied by agricultural and residential uses.

CALIFORNIA

PACIFIC OCEAN



MEXICO

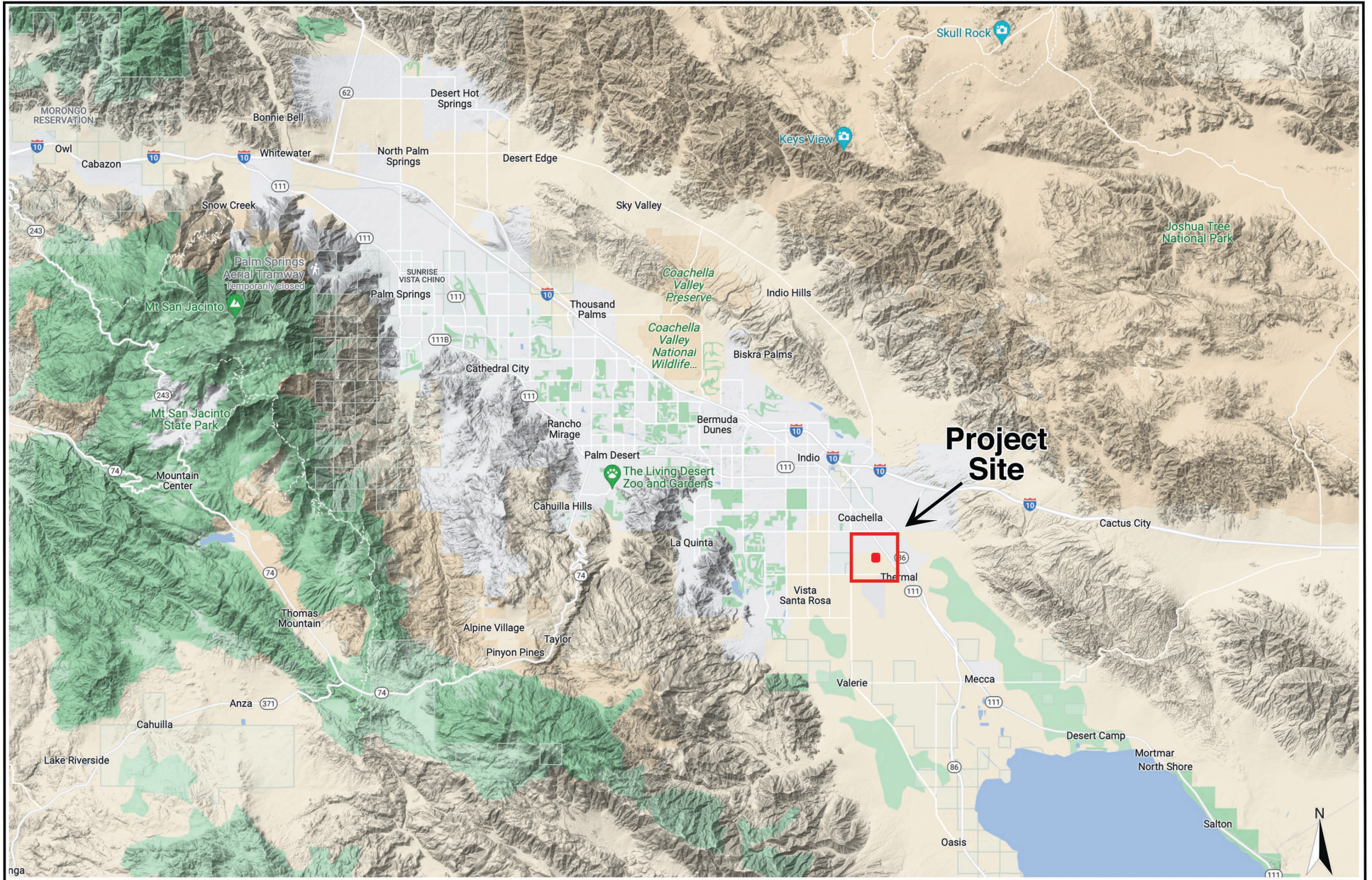


RIVERSIDE COUNTY



01.13.23

Exhibit



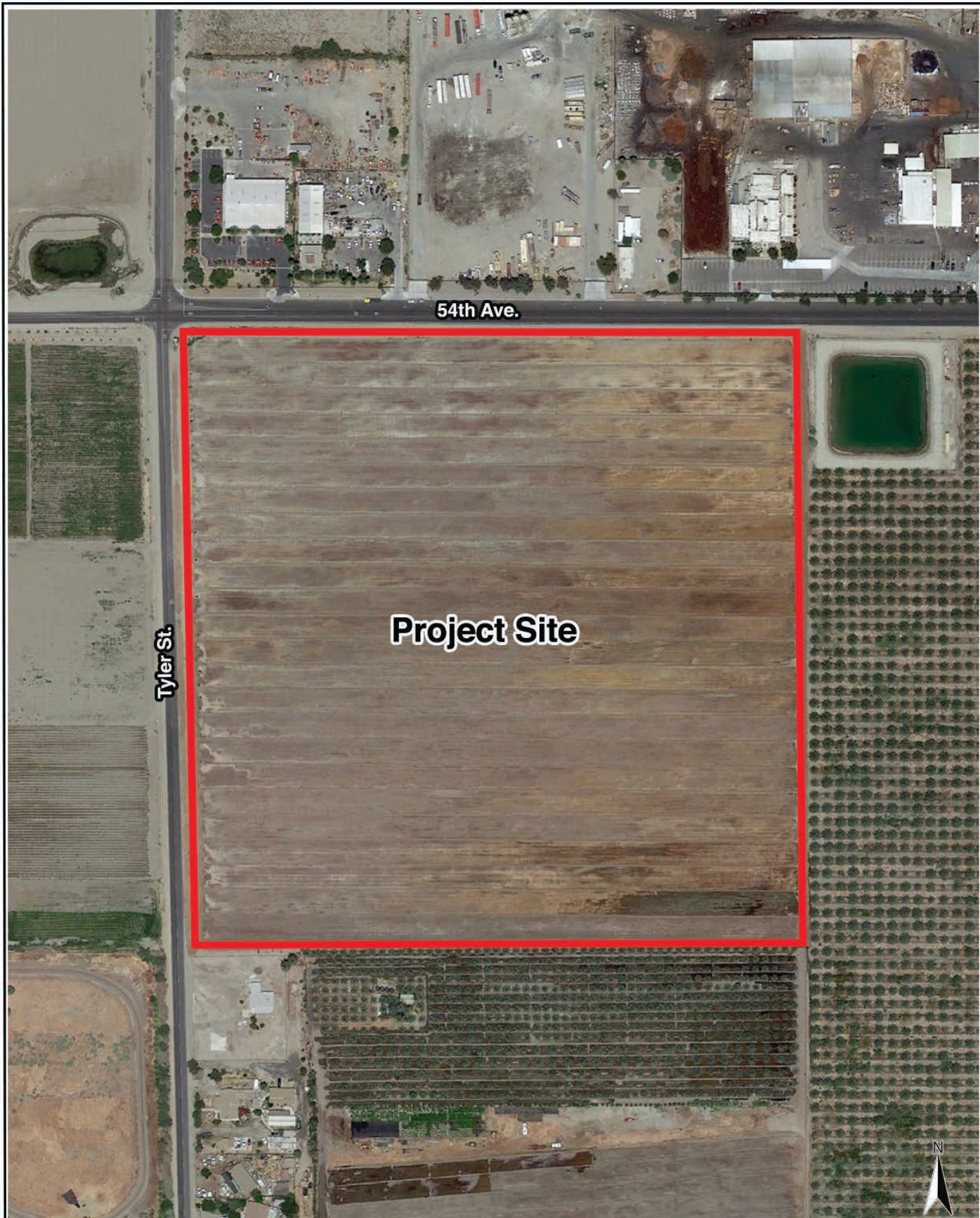
Source: Google Maps, 01.13.2023

01.13.23



**Santa Rosa Business Park
Vicinity Map
Coachella, California**

**Exhibit
2**



Source: Google Earth, 01.13.23

01.13.23

1.3 Existing Conditions and Current Proposal

In 2015, the City of Coachella adopted a General Plan Update to guide development through 2035. The Coachella General Plan Update Environmental Impact Report (CGPU EIR), prepared in 2014, analyzed the change from the existing conditions to the impacts associated with buildout of the land use designations in the CGPU. Analysis of the land use designations included the buildout potential of the 38.8-acre Project under the “Urban Employment Center” designation. This designation allows employment uses such as office and research and development rather than industrial uses such as manufacturing and warehouse. It also allows supporting retail, service, and residential uses.

The subject property was purchased by Santa Rosa Park, LLC in the mid-2000’s. At this time, the owners obtained approval from the City for a 26-lot subdivision map envisioning the site as an industrial park. Due to economic shifts the project was never developed, and the subdivision map expired in December, 2017. A General Plan Amendment (GPA) was submitted in December, 2022, to allow a land use designation change from “Urban Employment Center” (UEC) to “Industrial District” in order to allow industrial land uses, consistent with the previous General Plan land use designation and the current M-H (Heavy Industrial) zoning on the site.

Properties adjacent to the Project site are currently designated as a mix of UEC and Industrial Districts. Land to the east and west of the subject is currently occupied by agricultural uses, property to the north is occupied by commercial/industrial uses, and land to the south is occupied by agricultural and residential uses. All of these uses pre-date the CGPU. The site is currently vacant and undeveloped, primarily covered by scrub and other low vegetation.

The plans for the proposed industrial development are currently not available. For analysis purposes in this EIR Addendum, buildout assumptions have been made for both existing conditions (current General Plan land use) and the proposed Project (General Plan Amendment). The assumed existing and proposed conditions are as follows:

Existing Conditions

The subject property is currently designated as an Urban Employment Center, which allows uses such as office, research and development, live-work, multi-family residential, and support retail. Since no specific project is proposed, the following assumptions were made for analysis purposes:

- Based on a FAR range of 0.5 to 2.0 and a building height range of two to five stories per the GP designation, it is assumed that the site would have 25% lot coverage or a built area of approximately 425,000 square feet.
- Based on the designated residential density ranging from 30 dwelling units per acre (DU/AC) to 65 DU/AC, it is assumed that the existing conditions would apply a density of 45 DU/AC to 35% of the total lot acreage. This would result in 614 residential units.
- Based on the Zoning Code parking requirements of 1 parking stall per 250 square feet of office uses and 1 stall per residential unit, a total of 2,314 parking stalls would be required (1,700 stalls for office, 614 stalls for residential).

- Given the building coverage and parking requirements for these land uses, it is assumed that approximately 25% of the site would be landscaped.
- According to the Department of Finance Table E-5, population estimates for the City of Coachella, the City has an average household size of 4.25 people. Based on 614 units, a population of 2,610 residents on the site would be assumed.

Proposed Project

The Project proposes the site be designated as an Industrial District, which allows uses such as industrial, research and development, as well as support retail and office uses. For analysis purposes, the following assumptions are made:

- Based on a designated site coverage ranging from 25 – 50%, it is assumed that the built area would be 595,000 square feet or approximately 35% coverage.
- Based on the permitted uses for the Industrial District designation, it is assumed that the site will be occupied by 50% manufacturing uses and 50% light industrial uses.
- Based on the parking requirements for the Heavy Industry zone, the Project would require 1 parking stall per 500 square feet for the first 20,000 square feet, and 1 stall per 1,000 square feet for the remaining 575,000 square feet. Assuming the Project would be comprised of one building, this would result in 40 stalls for the first 20,000 square feet, 575 stalls for the remaining square footage, for a total of 615 stalls. Based on average parking stall dimensions of 9 x 18 feet, the required 615 parking stalls would occupy 99,630 square feet. It is important to note that the Project is likely to develop as multiple buildings on multiple lots, similar to the previous approval, and that resulting parking requirements would likely increase.
- It is assumed that 25% of the site will be landscaped.
- Based on the allowed uses for the Industrial District designation, the Project would not result in any residential development, and thus would generate no residential population.

This Addendum was prepared to analyze potential impacts of the proposed Project as compared to those previously identified for the site in the CGPU EIR. This Addendum meets CEQA requirements for the Project to assess potential environmental impacts and set forth mitigation as necessary, on the basis that the buildings to be developed on the site would conform to the City's standards for the Heavy Industrial Zone.

1.4 Purpose of an EIR Addendum

In accordance with CEQA Guidelines Section 15164, a Lead Agency is required to prepare an EIR Addendum to a previously certified EIR if some changes or additions to a project are necessary, but the proposed project modifications do not require preparation of a subsequent EIR, as provided in Guidelines Section 15162. In addition, the proposed modifications cannot result in new or substantially more significant environmental impacts compared with the impacts disclosed in the previously certified EIR.

CEQA Guidelines Section 15162 states that a subsequent EIR would be required for a project if any of the following conditions exist:

1. Substantial changes to the project require major revisions to the previously certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken that require major revisions to the previously certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. The availability of new information of substantial importance, which was not known or could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, shows that i) the project will have one or more significant effects not discussed in the previous EIR, ii) significant effects previously examined will be substantially more severe than shown in the previous EIR, or iii) mitigation measures or alternatives that were previously found not to be feasible or that are considerably different from those analyzed in the previously certified EIR, which would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measure or alternative.

Based on the evaluation of information provided in this EIR Addendum, no new significant impacts would occur as a result of the proposed Project, nor would there be any substantial increase in the severity of any previously identified significant environmental impacts. Therefore, none of the conditions described in Section 15162 of the CEQA Guidelines would apply. As such, an EIR addendum is the appropriate document to comply with CEQA requirements for the proposed Project.

2. Proposed Amendments

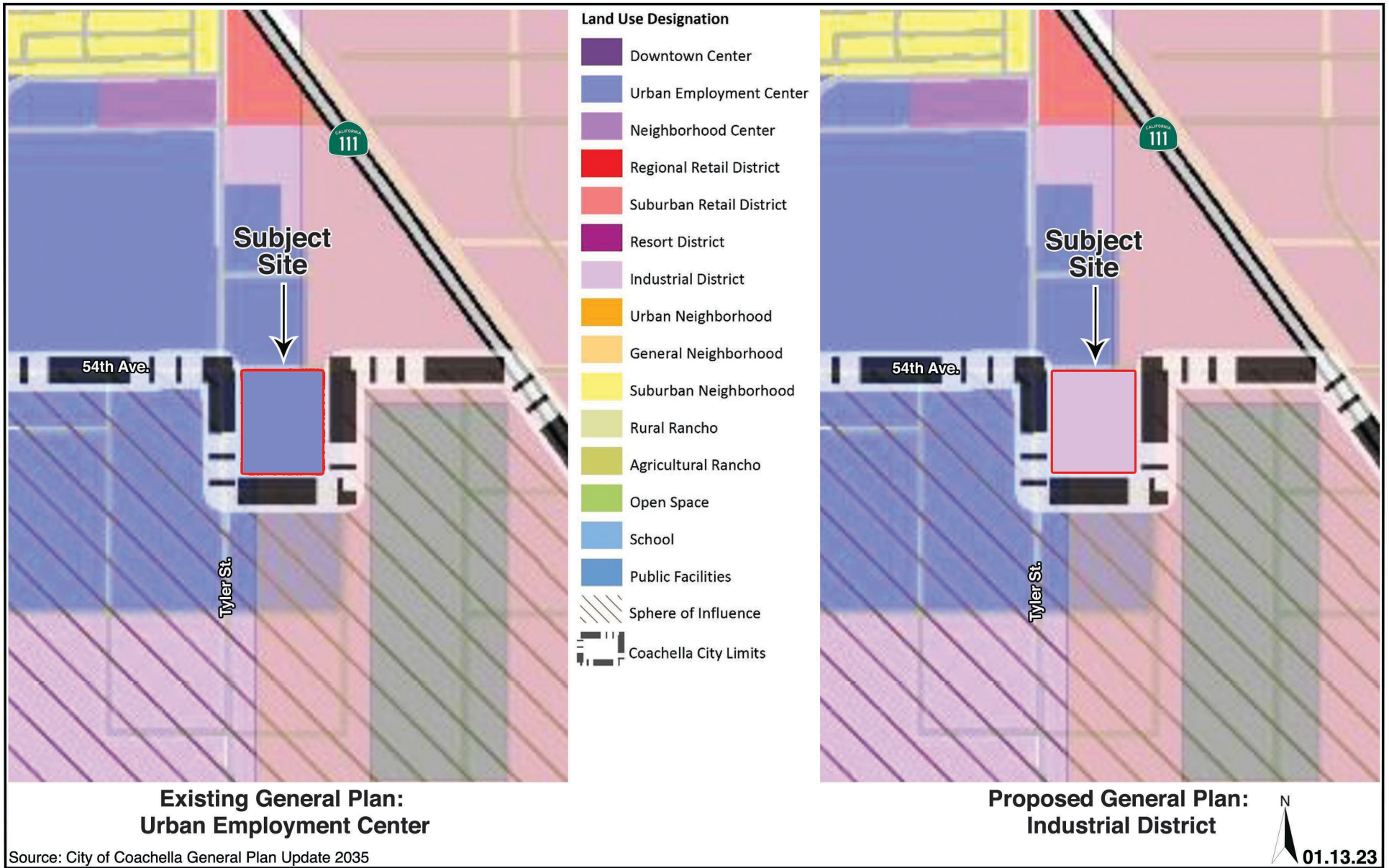
To facilitate development of the Project, the project proponent proposes an amendment to the General Plan Land Use Map that would change the 38.8-acre site’s land use designation from “Urban Employment Center” to “Industrial Center”. Table 1 compares the land use designations for the Project site under the adopted General Plan designation and the General Plan Amendment. The amendment is limited to the 38.8-acre site and no other General Plan amendments or changes are proposed.

As described in Table 1, the Project would result in the development of 595,000 square feet of manufacturing and light industrial space, compared to approximately 425,000 square feet of office and retail space under the current conditions. Under the current Urban Employment Center designation, development of the site could result in 614 residential units or a residential population of approximately 2,610 people.¹ The proposed Project would result in no residential units and therefore no population.

As shown in Exhibit 4, properties adjacent to the subject site in the north, west, and south, are designated for Urban Employment Center, while land to the east is designated for Industrial District. The manufacturing and light industrial uses proposed for the site are therefore consistent with surrounding uses, including properties currently in use for industrial activities to the north and northeast of the subject site.

Table 1 – Land Use Assumptions		
	Existing Conditions	Proposed Conditions
GP Designation	Urban Employment Center	Industrial Center
Zoning	Heavy Industrial Zone	Heavy Industrial Zone
Allowed Land Uses	Office, research and development, live-work, multi-family residential, support retail.	Industrial, research and development, support retail and office.
Max. Building Height	Two to five stories ¹	50 feet ²
Assumptions		
Built Area	425,000 SF office/research and development/retail (assuming 25% lot coverage, up to 3-story residential buildings, 1.0 FAR).	595,000 SF (assuming 35% lot coverage)
Land Uses	425,000 SF office 614 units multi-family residential	297,500 SF manufacturing 297,500 SF general light industrial
Parking	374,868 SF (2,314 stalls)	99,630 SF (615 stalls)
Landscaped Area	425,000 SF (assuming 25%)	425,000 SF (assuming 25%)
¹ As provided in the Urban Employment Center designation.		
² As provided in the Heavy Industrial Zone.		

¹ Based on average of 4.25 persons per household in Coachella, according to E-5 City/County Population and Housing Estimates, California Department of Finance, 2022.



3. Impact Analysis

In accordance with CEQA Guidelines §15162, the following analysis addresses each of the environmental issues analyzed in the certified CGPU EIR as compared to the potential changes in environmental impacts due to the proposed Project. The analyses below are based on the buildout assumptions described in Section 2, Table 1, above. Please note that the CGPU EIR analyzed a “Planning Area” which included lands both within City corporate limits, and within the City’s Sphere of Influence (SOI). The analysis below uses Planning Area when referring to the context of the EIR analysis, and City and/or SOI when appropriate.

3.1 Aesthetics

Summary of findings in the EIR

Scenic vistas and resources:

According to the CGPU EIR, the primary aesthetic and scenic resources in the Planning Area are open spaces to the east (Little San Bernardino Mountains and Mecca Hills), distant mountain ranges in the west (San Jacinto and Santa Rosa mountains), and agricultural open spaces along the west site of the All-American Canal. There are no officially designated State Scenic Highways in the Planning Area. However, according to the CGPU EIR, the historic character of certain sections of old Highway 99 (now Dillon Road between Grapefruit Blvd and Interstate 10), Old Highway 86 (Harrison Street south of Grapefruit Blvd), and Old Highway 111 (Grapefruit Blvd) provide aesthetic resources for the City and the surrounding region. The General Plan Update contains policies to limit the scale of development near scenic resources and to protect existing views of surrounding hills and mountains from the City.

Visual Character:

The CGPU expects growth that will almost double the population and turn Coachella into a medium-sized city. Despite this substantial growth, the City provides land use and development policies in hopes of preserving its unique visual character related to Coachella’s geographic location, agricultural history, and historic architecture. The General Plan Update divides the City into seventeen subareas, each with defined vision and specific policy directions. The Project site is located in subarea 5, Airport District. The CGPU envisions this subarea as one of the City’s primary industrial areas, taking advantage of its excellent access to regional highways and the airport. It proposes that heavy industry be limited to the vicinity of Grapefruit Boulevard and Avenue 54, and aims for 70 to 90 percent of the land in the Airport District to be Industrial District at buildout.

Light and Glare:

According to the CGPU EIR, nighttime glare in Coachella currently only occurs in the western portion of the City near dense neighborhoods. The less developed eastern portions of the City experience very little light pollution and nighttime glare. While buildout of the CGPU would introduce additional sources of light to the Planning Area, dark sky policies in the General Plan and lighting requirements contained in the Zoning Code limit impacts associated with light and glare.

Summary of Impacts:

Analysis of potential impacts to aesthetic resources in the CGPU EIR concluded that development under the CGPU would have no impact to scenic resources, less than significant impacts to scenic vistas as well as light intrusion and glare, and potentially significant and unavoidable impacts to visual character. The potentially significant impacts to visual character are a result of the expected doubling in the City's population by 2035. Despite this potentially unavoidable impact to visual character, the CGPU policies, design guidelines, and development strategies would reduce impacts to aesthetics as much as possible.

Analysis of the proposed Project

The General Plan Amendment would result in a Project consisting of industrial development on 38.8 acres of vacant land in the southern portion of Coachella. On the Project site, the Santa Rosa Mountains are visible to the west and southwest, the San Jacinto Mountains are distantly visible in the northwest, the Mecca Hills and Little San Bernardino Mountains are visible to the northeast and east. While views to the north are partially obstructed by existing industrial development, the prevalence of undeveloped and agricultural land in the area has preserved views of the surrounding mountains in most directions.

While Coachella has no State Scenic Highways, the Project site is located approximately 2,000 feet west of Old Highway 111 (Grapefruit Boulevard), which the City identifies as a scenic route. The proposed industrial development would be consistent with the current use of the industrial sites on the north side of Avenue 54. The proposed Industrial District designation would be consistent with the designation of the lands to the east of the subject site. The subject site is in subarea 5, which the CGPU envisions as an industrial area. Furthermore, the CGPU proposes that heavy industry be focused in the vicinity of Grapefruit Boulevard and Avenue 54. Given these facts, the proposed Project would be a more uniform and consistent fit with the area's current and envisioned character than the existing Urban Employment Center (UEC) designation.

Both the proposed Project and the existing use designated in the CGPU would introduce light and glare into the area. However, both scenarios would be subject to General Plan policies and Municipal Code requirements which reduce the potential impacts to less than significant levels.

The CGPU EIR accounts for potentially significant but unavoidable impacts to the visual character of the Planning Area as the City's population increases substantially. The vicinity of the subject property is sparsely developed, with many properties in the area vacant or being used for agriculture. Buildout of both the existing designation and the proposed amendment would thus intensify development in the area. While the proposed Project could have a higher lot coverage than development under the UEC designation, the latter could result in taller buildings associated with multi-family residential development. The proposed Project is not expected to result in more significant impacts to visual character than development under the existing designation. In both instances, development would be subject to extensive policies, design and development guidelines provided in the CGPU in order to reduce impacts to aesthetics.

Overall, because the Project would result in development similar to sites to the north and consistent with the conditions envisioned for subarea 5 in the General Plan, it is not expected to result in impacts beyond those identified in the CGPU EIR. No significant impacts would occur as a result of the Project, as it occurs in an area near Grapefruit Boulevard and Avenue 54 where heavy industry should be focused, according to the CGPU. While the proposed Project could have significant impacts to the current visual character of the area, these impacts would not be more severe than the potentially significant and unavoidable impacts to visual character accounted for in the CGPU.

3.2 Agriculture and Forestry Resources

Summary of findings in the EIR

Agriculture is identified in the CGPU as a key element of the City's character. There are approximately 11,139 acres of agricultural land in the Planning Area, of which approximately 29% is occupied by agricultural land, and roughly half of which is located in the City's incorporated areas.

The CGPU proposes significant growth for the City of Coachella. As a result, the CGPU EIR found that development under buildout of the General Plan would potentially have significant and unavoidable impacts related to the conversion of farmland to non-agricultural use. Likewise, while almost 10% of the agricultural land in the Planning Area is under Williamson Act contracts, much of this land is designated for urban uses in the GPU. These areas would be rezoned to urban uses with the update of the City's Zoning Code, according to the CGPU EIR.

Buildout of the CGPU would result in urban development adjacent to farmland, which could result in indirect impacts to farmland. The General Plan provides policies, such as the provision of buffers and right-to-farm policies in order to minimize potential impacts resulting from urban uses adjacent to farmlands.

In order to minimize impacts to agriculture, the City has established substantial policies to work in conjunction with the existing regional, state, and federal regulations for the conservation of valuable farmlands. The CGPU identifies certain subareas to protect agricultural activities, and others in which new development should be focused. Subareas 5, 6, 7, 8, 9, 10, and 11 are identified as Priority Growth Areas. The subject property is on Farmland of Local Importance but is also located in subarea 5 which is identified as a high priority development area.

The desert climate in which Coachella is located does not support forest growth. Open space in the Planning Area is primarily occupied by Creosote Bush Scrub and Saltbush Scrub. There is no forestland or timberland in the Planning Area, and there would therefore be no impacts regarding the loss or conversion of these lands.

Analysis of the proposed Project

The CGPU EIR found that buildout of the General Plan would result in significant and unavoidable impacts related to the conversion of farmland to non-agricultural uses. Given that the subject property, which is currently zoned for Heavy Industrial, is designated as Farmland of Local Importance, development of the site under both the existing UEC or proposed Industrial District designations would result in its conversion to non-agricultural land. The subject property is not under a Williamson Act contract, and would therefore have no impacts related to the Act. The site is in subarea 5, which is designated as an area in which new development should be focused. Therefore, development of the site under either the UEC or the Industrial designation would result in the loss of farmland, and impacts associated with the GPA would be equivalent to those analyzed in the CGPU EIR.

Given that there is no forestland or timberland in the Planning Area, there would be no impacts resulting from the conditions proposed in the CGPU or under the proposed Project.

3.3 Air Quality

Summary of findings in the EIR

Coachella is located within the Riverside County portion of the Salton Sea Air Basin (SSAB), under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is responsible for managing and regulating air pollution in the South Coast Air Basin and the Riverside County portion of the SSAB. The Riverside County portion of the SSAB is a non-attainment area for the federal and state standards for ozone and particulate matter (PM₁₀). This area is in attainment of the federal and state standards for carbon monoxide, nitrogen dioxide, sulfur dioxide, and PM_{2.5}.

Air quality plan compliance:

SCAQMD 2012 Air Quality Management Plan (AQMP): According to the SCAQMD, projects that are consistent with the employment and population forecasts upon which an air quality plan is based can be also considered consistent with the air quality plan. The land use and transportation control portions of the AQMP are based on growth projections from the Regional Comprehensive Plan (RCP) prepared by the Southern California Association of Governments (SCAG). The population projected for buildout of the CGPU generally aligns with the population forecasted in SCAG's Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS): the CGPU plans for population growth up to 135,000 residents, and the RTP/SCS forecasts that the City's population will reach 128,700 by 2035.² The CGPU also includes policies promoting walkability, transit access, and other measures to reduce vehicle miles traveled (VMT), which would help to reduce the City's emissions relative to the expected population growth. Overall, the EIR found that the CGPU does not conflict with the 2012 AQMP.

² While the CGPU anticipates 4.9% more population growth than the RTP/SCS, the General Plan estimate is for maximum buildout.

Final 2002 Coachella Valley PM₁₀ State Implementation Plan (SIP): The 2002 Coachella Valley PM₁₀ SIP institutes control measures targeting fugitive dust emissions, including measures addressing fugitive dust from construction and grading, activities on disturbed vacant lands, unpaved roads and parking lots, paved roads, and agricultural activities. The CGPU provides policies which are consistent with these measures, such as construction dust control requirements and mandatory buffers between agricultural operations and new developments.

California Air Resources Board 2005 Air Quality and Land Use Handbook: The Air Quality and Land Use Handbook provides recommendations for the siting of sensitive land uses near major air pollution sources. The CGPU includes policies which are consistent with these recommendations. For example, the CGPU proposes zoning changes to require schools and other sensitive receptors be located more than 500 feet from busy roadways, highways, and known stationary pollution sources.

Overall, given that the CGPU is generally consistent with SCAG's population growth forecast for 2035, and provides policies consistent with applicable control measures and siting of sensitive receptors, the EIR found that the General Plan would have less than significant impacts related to applicable air quality plans.

Construction emissions:

Construction of the development proposed under the CGPU would result in temporary emissions of various air pollutants. The emissions resulting from the development of individual projects would need to be evaluated on an individual basis; instead, the EIR analyses construction emissions using a qualitative approach. The CGPU includes policies prohibiting the siting of air pollution sources near existing sensitive receptors, and limiting the emissions of construction-related emissions. Development in the Planning Area would also be subject to SCAQMD rules, such as Rule 403.1 requiring the preparation of a fugitive dust plan for the construction of projects greater than 5,000 square feet. Furthermore, individual projects would be required to conduct site-specific analysis to ensure compliance with applicable thresholds for construction-related emissions. Given the policies in the CGPU, the rules provided by SCAQMD, and the required project-specific analysis, the CGPU EIR found that construction-related impacts would be less than significant.

Long-term emissions:

Development under the CGPU would generate long-term emissions from mobile sources and stationary sources. Similar to construction emissions, operational emissions are assessed through project-specific review and would require mitigation measures if applicable thresholds are exceeded. In order to assess operational emissions at a programmatic level, the EIR compared the population growth expected from the CGPU with the SCAG growth forecast upon which the AQMP is based. The projected growth from buildout of the CGPU is generally consistent with the regional forecast, and the policies in the CGPU are consistent with the control measures provided by SCAQMD and CARB recommendations. Likewise, the long term emissions expected from Coachella in 2030 represent a small portion of the regional emissions for that year. Given these facts, the EIR concluded that the CGPU would have less than significant impacts related to long-term emissions.

Carbon monoxide hot spots:

Carbon monoxide (CO) hot spots are areas with elevated CO levels resulting from congested intersections. The Coachella Valley is in attainment of state and federal CO standards, and CO is not expected to be a major air quality concern for the area. Given that severely congested intersections have the potential to create a hotspot, the 13 intersections identified in the CGPU circulation element as operating below LOS D should be screened for compliance with state CO standards. None of the 13 identified intersections are in the Project vicinity. Furthermore, the policies and recommended improvements in the CGPU would reduce potential congestion and support the use of alternative modes of transportation. Therefore, the EIR concluded that additional traffic after mitigation and implementation of CGPU policies would not degrade conditions at intersections to the extent that mobile-source emissions exceed the state standards and create CO hot spots.

Analysis of the proposed Project

Air quality plan compliance:

When the CGPU EIR was prepared, the relevant air quality and land use plans were the SCAQMD 2012 AQMP, the Coachella Valley PM₁₀ State Implementation Plan, and the SCAG 2012-2035 RTP/SCS. Since then, the 2022 AQMP and the 2020-2045 RTP/SCS have been adopted. The PM₁₀ SIP remains current.

According to the population growth forecast in the 2020-2045 RTP/SCS, Coachella will have a population of 129,300 by 2045, which is 600 more residents than estimated for 2035 in the 2012-2035 RTP/SCS report. Both forecasts are below the maximum population of 135,000 residents estimated for buildout of the CGPU. As discussed in the EIR, despite the discrepancy with the population forecast in the RTP/SCS, the growth projections in the CGPU are considered to be generally consistent with the AQMP.

Buildout of the subject property under the current land use designation in the CGPU would result in 614 housing units or a population of 2,610 residents. The Project under the proposed GPA would result in no housing units, and thus a total City-wide population of 132,390, or approximately 2,610 below the CGPU projection. The proposed conditions would therefore be more closely aligned with SCAG growth forecast, and, like the existing conditions, would be consistent with the AQMP.

The proposed Project would be subject to project-level CEQA review for construction and operational emissions. The CGPU EIR provided programmatic analysis on CGPU policies and SCAQMD rules on future projects in the City, but deferred quantitative maximum daily emissions analysis for individual projects during the buildout of the General Plan. Project-level emissions were quantified using the buildout assumptions shown in Table 2.

Table 2 – CalEEMod Buildout Assumptions		
	Existing Conditions	Proposed Project
General Plan Designation	Urban Employment Center	Industrial District
Site Acreage	38.8 acres	38.8 acres
CalEEMod Land Use Assumptions	Office Park: 425,000 SF Apartments Low Rise: 614 units	General Heavy Industry ² : 297,500 SF Manufacturing: 297,500 SF
Residential Population	2,610 ¹	0
Construction Duration	4 years	4 years
¹ Based on 4.25 average household size per Department of Finance, Table E-5, City of Coachella 2022. ² Project proposes general light industrial, however heavy industrial required as CalEEMod input due to square footage above 50,000 square feet.		

For analysis purposes, it is assumed that development under the current Urban Employment Center designation would result in 425,000 square feet of office space and 614 units of low-rise multi-family residential. It is assumed the proposed Project would result in the development of 297,500 square feet of general light industrial and 297,500 square feet of manufacturing uses.

Construction emissions:

Criteria pollutant emissions were estimated using CalEEMod Version 2020.4.0. The proposed Project would result in the development of the 38.8-acre site, assuming that earthwork materials would be balanced on-site with no import-export, and standard dust control measures would be applied. It is assumed that construction of the development under both the existing and proposed conditions would take approximately 4 years.

Table 3 – Construction Criteria Pollutant Emissions Comparison (lbs/day)						
Max. Daily Emissions ¹	CO	NO_x	ROG	SO_x	PM₁₀	PM_{2.5}
Existing Conditions²	52.05	34.56	54.46	0.12	9.08	5.15
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold?	No	No	No	No	No	No
Proposed Project¹	43.90	34.56	13.14	0.09	9.08	5.15
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold?	No	No	No	No	No	No
Source: CalEEMod Version 2020.4.0.						
¹ PM10 and PM2.5 emissions assume standard dust control measures.						
² Values shown represent the average of winter and summer emissions.						

Based on these assumptions, Table 3 shows the projected construction emissions for buildout of the site. Buildout of the site under both the existing and proposed conditions would not exceed the SCAQMD thresholds for CO, NO_x, ROG, SO_x, PM₁₀, or PM_{2.5}. Buildout of the proposed Project would result in lower construction emissions of CO, ROG, and SO_x than construction under the current designation; and would result in approximately the same emissions of NO_x, PM₁₀ and PM_{2.5}.

Buildout of the site under both existing and proposed conditions would be subject to CGPU policies as well as SCAQMD rules and regulations. Given that emissions projected for construction of the Project are within the SCAQMD thresholds, and are equal to or less than those resulting from buildout of the site under current conditions, construction of the Project would not increase the severity of impacts identified in the EIR.

Long-term emissions:

Operational emissions are those emitted by the Project long-term, and include area, energy, and mobile sources. The buildout assumptions in Table 2 were used for CalEEMod inputs, and trip generation rates were sourced from the Institute of Transportation Engineers (ITE) trip generation manual (11th edition). The below table shows the unmitigated criteria pollutant emissions during operations of the existing and propose land uses at buildout.

Table 4 – Operational Criteria Pollutant Emissions Comparison (lbs/day)						
Max. Daily Emissions	CO	NO_x	ROG	SO_x	PM₁₀	PM_{2.5}
Existing Conditions¹	231.91	32.90	50.50	0.43	43.67	12.51
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold?	No	No	No	No	No	No
Proposed Project¹	117.76	20.38	27.78	0.29	29.86	8.38
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold?	No	No	No	No	No	No
Source: CalEEMod Version 2020.4.0.						
¹ Values shown represent the average of winter and summer emissions.						

As shown in Table 4, neither buildout scenario would exceed the SCAQMD daily thresholds for CO, NO_x, ROG, SO_x, PM₁₀, or PM_{2.5}. During operation, the proposed Project would result in lower daily emissions than development under the current conditions across all criteria pollutants. Similar to findings in the EIR, impacts related to criteria pollutant emissions would be less than significant with adoption and implementation of the CGPU policies and programs and enforcement of current SCAQMD rules and regulations.

Impacts on nearby sensitive receptors:

SCAQMD’s Localized Significance Threshold (LST) Look-Up Table was used to determine if buildout of the site would have the potential to generate significant adverse local air quality impacts. The nearest sensitive receptor to the site is a residence approximately 100 feet south of the subject property. Therefore, based on the Project’s size and proximity to sensitive receptors, the 5-acre site table at a distance of 25 meters was used for analysis purposes. As shown in Table 5, below, neither the existing conditions or the proposed conditions would exceed the LST threshold for construction or operational emissions. The impacts to nearby sensitive receptors would therefore be less than significant under both existing conditions and with implementation of the GPA.

Table 5 – Localized Significance Threshold (lbs/day)				
Existing	CO	NOx	PM10	PM2.5
Construction	52.05	34.65	9.08	5.15
LST Threshold ¹	2,292	304	14	8
Exceeds?	No	No	No	No
Operational - Area	52.87	5.79	0.7	0.7
LST Threshold	2,292	304	4	2
Exceeds?	No	No	No	No
Proposed	CO	NOx	PM10	PM2.5
Construction	43.9	34.65	9.08	5.15
LST Threshold ¹	2,292	304	14	8
Exceeds?	No	No	No	No
Operational - Area	0.06	0.0005	0.0002	0.0002
LST Threshold	2,292	304	4	2
Exceeds?	No	No	No	No
¹ Based on SCAQMD LST Threshold for 5-acres or greater site 25 meters from sensitive receptor.				

Carbon monoxide hotspots:

As discussed in Section 3.15, Transportation, at buildout the proposed Project would result in fewer daily trips than the current conditions. Therefore, the proposed Project is expected to generally reduce intersection volume assumptions analyzed in the EIR, thereby reducing the risk of CO hot spots. Impacts will remain less than significant under proposed Project conditions.

Nuisance odors:

The CGPU does not specifically discuss odors, however it does focus on potential impacts to sensitive receptors and strategies such as land use compatibility to minimize impacts related to odors. Under the current UEC designation, office buildings, research and development facilities, residential buildings, and supporting service and retail uses are permitted. These land uses could generate some temporary odors, but they are not expected to be objectionable long term. Office and commercial operations in UEC designated areas are required to contain all operations within the associated buildings, and buildings must be outfitted with industry standard air filtration systems. Residences could generate some odors from standard household activities such as cooking, however these odors would also be temporary in nature and would disperse with space.

The Project proposes industrial uses, which could generate some odors. According to the CGPU, the Industrial District designation is intended to accommodate commercial and industrial businesses that may generate more odors than would be appropriate on sites designated for UEC. The corresponding industrial zone allows a broad range of uses that could include outdoor uses. However, no uses are proposed in conjunction with the General Plan Amendment, and further review under CEQA would be undertaken by the City based on site-specific plans and use proposals when they are brought forward. This review could result in site- and project-specific conditions of approval or mitigation measures to alleviate use-specific odors. Furthermore,

pursuant to the Coachella Municipal Code (CMC) Section 3.10.010(D)(13), any nuisance odors found to be in violation of the CMC would be subject to a \$500 fine. Therefore, while the proposed Project could potentially result in more nuisance odors than permitted under the UEC designation, impacts resulting from both the UEC and Industrial District designations would be less than significant.

Summary of Impacts:

Overall, impacts are expected to be similar to, if not less than, those previously identified in the CGPU EIR. Implementation of the General Plan Amendment and proposed Project would not result in any new impacts related to air quality or increase the severity of a previously identified significant impact analyzed in the EIR.

3.4 Biological Resources

Summary of findings in the EIR

Sensitive species:

According to the CGPU EIR, most sensitive species in the Planning Area are concentrated in the mostly undeveloped eastern portion. The EIR identified 31 special status wildlife species and 10 special status plant species with potential to occur in the Planning Area.

One insect, three reptiles, ten birds, and three mammals were identified as having varying potential to occur in the Planning Area. While most of these species are likely to occur in the eastern portion of the Planning Area, the Coachella Valley Round-Tailed Ground Squirrel and Crissal Thrasher have potential to occur in subareas 5, 6, and 7. Development in these areas would result in current vacant and agricultural lands being replaced by industrial, commercial, and civic uses. Given the potentially resulting impacts, the EIR required the addition of a new policy to the CGPU: Policy 9.8 of the Sustainability and Natural Environment Element requires preconstruction surveys in subareas 5, 6, and 7 to determine if there is occurrence of sensitive species in the project area. If such species are present, mitigation measures may be prescribed by a qualified biologist and approval from applicable resource agencies may be required prior to the issuance of permits.

Two of the plant species with potential to occur in the Planning Area have been seen in the vicinity, but not in the Planning Area itself. The other eight sensitive plant species are expected to occur in undeveloped areas which are planned to remain undeveloped under the CGPU, including subareas 13, 16, and 17. Various policies in the CGPU provide measures to protect sensitive plant and wildlife species in the Planning Area. Impacts are expected to be less than significant with mitigation.

Riparian or other sensitive habitat:

The Planning Area has limited riparian habitat or other sensitive habitat. The development proposed under the CGPU would therefore not have significant impacts to such habitat.

Wetlands along the Whitewater River, which runs between subareas 1, 5, 6, 7, 9, 10, and 11, would be impacted by increased development under the CGPU. The General Plan provides measures to minimize the potential impacts in these areas, including regarding sensitive habitat and water quality. The CGPU EIR determined that impacts to riparian or other sensitive habitats are expected to be less than significant.

Native species migration:

The degradation of habitat relied on by migratory species can threaten the sustainability of native resident species and migratory wildlife corridors. According to the EIR, two migratory species are known to reside seasonally within the Planning Area: Golden Eagle (*Aquila chrysaetos*) and Swainson's Hawk (*Buteo swainsoni*). These species migrate through undeveloped areas, grasslands, and agricultural lands in Coachella and the SOI. The CGPU proposes the efficient use of land, with some areas designated for higher density development, while other areas are to be preserved as natural open space. Subareas on the eastern side of the Planning Area, namely subarea 13, 17, and 16, are designated for open space and agriculture. Therefore, while the growth expected from buildout of the CGPU could result in the loss of forage areas used by migratory species, the significant areas designated for open space in the General Plan would reduce potential impacts. Habitat restoration and management policies in the CGPU further protect the habitat of migratory species. Impacts were expected to be less than significant.

Conflicts with local policies or ordinances protecting biological resources:

The Planning Area is within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) area. The CVMSHCP seeks to balance environmental protection and economic development objectives by protecting areas of unfragmented habitat while helping to streamline development in areas with low conservation value. According to the CGPU EIR, there are few sensitive or threatened species within the Planning Area. The only CVMSHCP Conservation Land in the Planning Area is in subarea 17, on the eastern side of the SOI, which is preserved as open space. The CGPU provides policies to ensure that the City adheres to the CVMSHCP.

The City is required to assess development impacts fees on new development to mitigate potential impacts to species covered by the CVMSHCP. The collection of these fees would ensure that impacts would be less than significant.

Analysis of the proposed Project

The 38.8-acre subject property would be fully disturbed and developed under either the current or proposed General Plan land use designation. Under the existing UEC designation, mixed-use development including office, residential, and support retail would be allowed on the site with a permitted floor area ratio (FAR) of 0.5 to 2.0. Under the proposed Industrial District designation, industrial as well as support retail and office uses would be allowed on the site, with the permitted FAR ranging from 0.1 to 2.0. Both scenarios would result in development of the subject site and potential habitat loss as a result. The proposed Project would thus not change impacts to biological resources compared with those expected from implementation of the CGPU.

The Project site is within subarea 5, which the CGPU EIR identified as an area in which the Coachella Valley Round-Tailed Ground Squirrel and Crissal Thrasher may occur. However, the prescribed mitigation measure, Policy 9.8 of the Sustainability and Natural Environment Element in the General Plan, would mandate a preconstruction survey to determine if these sensitive species are present on the site, regardless of the land use designation on the site. If such species are determined to be present, then subsequent measures may be prescribed by a biologist, and approval from applicable resource agencies may be required prior to the issuance of permits. Implementation of this Policy would ensure that development under both the CGPU and the proposed amendment would have less than significant impacts to sensitive species.

The EIR also identified development in subarea 5 as having potential impacts on riparian habitats due to proximity to the Whitewater River. However, because the subject site is approximately one mile southwest of the river, and Grapefruit Boulevard runs in the intervening space between the site and the river, no riparian or other sensitive habitat is expected on the property. The property is also not located in or near a CVMSHCP Conservation Area. Regardless of whether the site is developed under the UEC or Industrial District designation, the development would be subject to payment of mitigation fees towards the CVMSHCP. Both development scenarios would thus have less than significant impacts related to riparian or other sensitive habitat, as well as to local policies protecting biological resources.

The subject site currently contains low vegetation, such as shrubs, which may provide limited nesting and foraging habitat for migratory birds protected under the Migratory Bird Treaty Act (MBTA). While not explicitly discussed in the EIR, any project, regardless of land use designation, would be required to avoid any ground disturbance during nesting season or conduct pre-construction surveys for bird species prior to the issuance of grading permits to comply with the MBTA.

Overall, the proposed Project would not result in any new significant impacts, nor would it increase the severity of impacts identified in the CGPU. Compliance with the CGPU policies and adherence to existing federal, state, and City regulations would ensure that impacts remain less than significant.

3.5 Cultural/Tribal Cultural Resources

Summary of findings in the EIR

Historical resources:

A records search conducted at the Eastern Information Center (EIC) in 2008 found 176 recorded cultural resources in the Planning Area, including 68 historic-period sites or structures, 96 prehistoric sites, 10 that are both prehistoric and historic, and two of unknown age. Of the eligible historic resources, only the Coachella Valley Water District Building is registered as a Historical Landmark, located along Highway 111 and Grapefruit Boulevard. The CGPU EIR identified subarea 2 and the northeastern corner of subarea 5 as highly sensitive areas of historical sites.

Historical resources in the City are protected by an existing ordinance in §15.98.190 of the Municipal Code, which prevents destruction of, or impacts to, Class 1 historical resources. Additionally, federal and states regulations prevent the removal or destruction of any historic resources in the Planning Area. Policies in the CGPU also ensure the preservation and documentation of historic resources, as well as coordination with local tribes. The EIR found that compliance with applicable policies and regulations will ensure that impacts to historic resources would be less than significant.

Unique archaeological resources:

The 2008 records search at the EIR found 159 archaeological resources in the Planning Area, none of which are designated by any state or national register, but which may be eligible. The area's long history as home to Native American populations has resulted in numerous archaeological significant sites in Coachella and the SOI. The Mecca Hills, Thermal Canyon, and washes north of Thermal Canyon have archaeologically significant sites and artifacts. Possible sites occur on land along the west of the Whitewater River and within the downtown core of Coachella.

State regulations and CGPU policies protect unique archaeological resources from potential impacts. These provisions include requirements that any findings of archaeological sites or objects be reported immediately. As such, the EIR concluded that impacts to unique archaeological resources would be less than significant.

Paleontological resources:

According to the CGPU EIR, the eastern portion of the Planning Area has a high sensitivity for paleontological resources, while the western and southern portions have a low sensitivity. Much of the eastern portion of the Planning Area is designated as Open Space in the CGPU. Existing policies, as well as policies provided in the CGPU, provide protection for potential paleontological resources occurring in the western and southern portions of the Planning Area, which are mostly designated for future development. Section 5097.5 of the California Public Resources Code prohibits the removal or destruction of any resources without presentation of findings and preservation of the resource, or prior determination that the resource does not merit reporting. The CGPU also requires immediate reporting of any paleontological artifacts found within the Planning Area. Given that the most paleontologically sensitive areas will be conserved as open space, and compliance with applicable policies in regulations for development is required in other parts of the Planning Area, the EIR determined that impacts would be less than significant.

Human remains:

While there is potential for human remains to occur in the Planning Area on Tribal Lands, a Sacred Lands Search through the Native American Heritage Commission would be required to identify the exact location. In order to protect potential human remains from unlawful extraction, the CGPU EIR did not use information from the Sacred Lands Search in its assessment of cultural resources. The CGPU provides policies requiring compliance with the California Native American Graves Protection and Repatriation Act. The EIR added a mitigation measure requiring surveys in areas where there is a high chance of human remains occurring to determine whether any such remains are present. If human remains are discovered, then further mitigation measures must be implemented to prevent impacts. The EIR determined that adherence to applicable policies and implementation of the mitigation measure will ensure impacts would be less than significant.

Analysis of the proposed Project

The subject property is currently vacant. According to the EIR, no archeological resources have been identified on the subject site (EIR Figure 4.4-1). The site is approximately one mile east of Augustine Tribal Land, on which the nearest archeological resources have been identified. The site is located in a medium sensitivity zone for historic resources (EIR Figure 4.4-2), and in an undetermined sensitivity zone for paleontological resources (4.4-3). Overall, while no cultural resources are known to exist on the subject property, this does not guarantee that no such resources are present. Regardless of whether development occurs pursuant to the existing UEC designation or the proposed Industrial District designation, cultural resources have the potential to be impacted if present on the site because the site would be disturbed in either case. However, given that impacts would be of no greater severity than those expected in the EIR, implementation of the applicable CGPU policies and mitigation measures would ensure that impacts would be less than significant. Namely, any archaeological or paleontological resources, or human remains that are discovered on the site must be reported immediately and may be subject to further mitigation measures. Additionally, any development would be required to comply with state and local regulations pertaining to the protection of cultural resources. Impacts would be less than significant with mitigation, and impacts associated with the proposed Project would be equivalent to those of any project under the UEC designation.

3.6 Geology/Soils

Summary of findings in the EIR

The City is located in the eastern portion of the Coachella Valley, a low desert bound by mountains. The Coachella Valley forms the northern portion of the Salton Trough, a depression resulting from dynamics related to the San Andreas Fault system. Most of the Planning Area is relatively flat, gently sloping from northwest to southeast, towards the Salton Sea. The mountains surrounding the Coachella Valley include the Little San Bernardino Mountains to the northeast, the San Bernardino Mountains to the northwest, and the San Jacinto and Santa Rosa Mountains to the southwest. Major features in the vicinity of the Planning Area include the Mecca Hills to the south and the Indio Hills to the north.

Most of the soils found in the Planning Area were developed from alluvial fans, valley fill, or lacustrine basins in the Coachella Valley, or from hilly terrain such as the Mecca Hills.

Fault rupture:

Three designated Alquist-Priolo Earthquake fault zones traverse the Planning Area. According to the Alquist-Priolo Earthquake Fault Zoning Act, structures for human occupancy cannot be placed over the trace of an active fault and must be set back (generally 50 feet) from the fault. Given that the City's location makes it potentially vulnerable to fault rupture, the CGPU provides policies to identify and avoid resulting threats. These policies, including plan review, earthquake resistant building and infrastructure, as well as emergency planning and awareness programs, would work in conjunction with state regulations to ensure that future development will not be

constructed without sufficient seismic upgrades or in the vicinity of a fault. Given these measures, the EIR found that impacts would be less than significant.

Seismic ground shaking:

The fault zones in the Planning Area, including the San Andreas Fault, are active and capable of producing strong ground shaking. The San Andreas, San Jacinto, and Whittier-Elsinore fault zones are capable of generating ground shaking up to a 7.9 magnitude in the Planning Area. According to the Ground Shaking Risk map (Figure 4.5-4) in the EIR, the Project site is located in an area estimated to have a ground shaking risk of 170 – 180%.

While older, unreinforced masonry buildings are the most vulnerable to collapse during severe ground shaking, very few such structures occur in the Planning Area. Regulations in the California Building Code prevent newer structures from risk of collapse from ground shaking. The CGPU provides additional policies which are more stringent than the Building Code in order to reduce potential impacts. The City will evaluate proposed projects for CGPU consistency during the development application review stage. Given the local and state regulations in place, and the plan review to be conducted by the City, the EIR found that impacts related to seismic ground shaking would be less than significant.

Ground failure and liquefaction:

Most of the Planning Area, including the Project site, has a high liquefaction risk (EIR Figure 4.5-5). The City, as well as state and federal agencies, has regulations for development design and location which reduce impacts from seismic-related ground failure. The City would also analyze individual projects during the development permit review process to assess building design and compliance with applicable codes, and potentially requiring special studies. In accordance with the Seismic Hazards Mapping Act, all projects in state-delineated Seismic Hazard Zones for liquefaction must be evaluated by a Certified Engineering Geology or Registered Civil Engineer, and special studies and/or mitigation measures may be required. These state and CGPU policies ensure that non-compliant structures cannot be built, and thus, according to the EIR, impacts would be less than significant.

Landslide:

According to the EIR, most of the Planning Area has a relatively low potential for landslides, rockfall, and debris flows. In accordance with the CGPU, the development permit review stage would ensure that proposed structures would not be sited in hazardous areas, and enact additional construction and design safety precautions. The EIR found that given compliance with the current regulatory framework and CGPU policies, impacts would be less than significant.

Subsidence:

The entire Planning Area is subject to active subsidence, which is a potential hazard to current and future development in the City. Policies in the CGPU limit development in high risk areas, and require site-specific studies and design strategies to determine and address risk on a project-specific basis. Projects are required to comply with CGPU policies in order to be approved by the City, and as such, the EIR found that impacts would be less than significant.

Expansive soils:

According to the EIR, portions of the Planning Area are subject to expansive soil hazards, including the vicinity of the Jacqueline Cochran Regional Airport and along the Southern Pacific Railroad tracks. The California Building Code provides requirements for construction on expansive soils. Additionally, all building proposals are required to conduct geotechnical and engineering geological investigations by a state-certified professional. Given that projects must comply with the Building Code and prepare geotechnical investigation reports in order to receive approval from the City, impacts related to expansive soils would be less than significant.

Erosion:

The risk of soil erosion in the Planning Area ranges from low to very high. The area surrounding the Project site has a high erosion potential (EIR Figure 4.5-8), as is common on the valley floor. Areas underlain by unconsolidated sediments throughout the Planning Area are subject to water and wind erosion, which can be accelerated by activities such as vegetation removal, drainage modification and slope construction. The City of Coachella requires that new projects develop plans for temporary and permanent erosion control. These plans must comply with the project's Storm Water Pollution Prevention Plan (SWPPP) and Best Management Practices. The CGPU proposed further policies to address erosion impacts. The EIR found that because only projects complying with CGPU, SWPPP, and other City policies can be approved, impacts related to erosion would be less than significant.

Analysis of the proposed Project

The Project site is relatively flat and far from mountainous or hillside terrain. The site is thus no subject to landslide risk. The Coachella area, including the Project site, is in proximity to the San Andreas, San Jacinto, and Whittier-Elsinore faults, and is thus at risk of severe ground shaking. According to the EIR, the subject property has a ground shaking risk of 170 – 180%. The site is not, however, on or near an Alquist-Priolo Fault Zone, and is thus not at risk of fault rupture.

According to the EIR, the Project site, like much of the Planning Area, had a high liquefaction and subsidence risk. The area surrounding the subject property is also identified in the EIR as having a potentially high risk of expansive soils and erosion.

While the Project site is subject to some risks associated with seismic activity and soils, the risk would be the same whether the site is developed under the current UEC designation of the proposed Industrial District. In both cases, development would be subject to site plan review and regulations required by the state, the City, and in the CGPU, to ensure that impacts would be less than significant. It could be argued that the proposed Industrial District designation would have a lower potential of exposing people to soil and geologic hazards because it would be occupied only during business hours, while the residential units permitted under the current UEC designation would be occupied on a 24-hour basis. Regardless, structures built on the Project site will be required to adhere to the existing regulations and CGPU policies to reduce and mitigate potential impacts, including the preparation of site-specific geotechnical analysis prior to obtaining development permits. Any development would also be subject to the California

Building Code's seismic standards, which are designed specifically for seismic hazard areas, to ensure integrity and resistance to potential hazards. Development would also be required to implement Best Management Practices and erosion control under the MS4 permit enforced by the City.

Overall, the proposed Project would be at risk of the same soil and geologic hazards as development under the current designation. Any development on the site would be subject to the same measures required by the state and the City to ensure that impacts remain less than significant. Therefore, implementation of the proposed Project and General Plan Amendment would not result in any new adverse impacts, nor would it increase the severity of significant impacts previously identified in the EIR.

3.7 Greenhouse Gas Emissions

Summary of findings in the EIR

Assembly Bill 32 (AB 32) establishes the statewide goal of reducing GHG emissions to 1990 levels by 2020, and requires the California Air Resources Board (CARB) to prepare Scoping Plans to outline emissions reduction strategies in order to meet the 2020 deadline.

The City of Coachella evaluates air quality and greenhouse gas impacts using significance criteria from the South Coast Air Quality Management District (SCAQMD). At the time that the EIR was written, neither the City nor the SCAQMD had a quantitative threshold for analyzing the impacts of construction-related GHG emissions, nor did either agency have an adopted threshold for the analysis of plan-level impacts. For the purposes of the EIR, the City used a proposed SCAQMD general plan threshold of 6.6 MT CO₂e per service population per year (MTCO₂e/SP/YR), which is based on statewide GHG inventories and the emissions reduction goals of AB 32. The City also proposed a GHG reduction target of 49% below 2010 service population emissions by 2035, or 4.2 MTCO₂e/SP/YR in its Climate Action Plan, which was prepared and adopted in conjunction with the CGPU.

Greenhouse gas emissions:

The City's Climate Action Plan (CAP) includes an analysis of GHG reduction strategies from state programs. The City also proposed GHG reduction strategies in the CGPU, including those pertaining to energy efficiency, energy generation, land use and transportation, solid waste, vegetation and open space, and water. The CAP found that the emissions reduction resulting from both state and federal, as well as CGPU, policies would result in a total a 338,046 MTCO₂e, or an annual per service population emissions value of 6.2 MTCO₂e in 2020. This was below the SCAQMD threshold of 6.6 MT CO₂e/SP/YR. However, by 2035, the measures described above would reduce emissions by 639,630 MTCO₂e, resulting in a service population value of 5.4 MT CO₂e, which exceeds the City's target of 4.2 MT CO₂e/SP/YR.

While exceeding the City's target would result in potentially significant impacts, implementation of additional emission reduction measures in the CAP would mitigate these impacts. Such measures, which go beyond those in the CGPU, include the adoption of a commercial energy conservation ordinance, installation of solar photovoltaic on existing buildings, and water use and conservation strategies. At the time that the CGPU EIR was written, the City had not yet adopted the CAP, and as a result, implementation of the measures contained in it was not guaranteed. The EIR therefore found that impacts were potentially significant but mitigable. However, given that the CAP has since been adopted, and the stringent emissions reduction policies contained in it would be in effect, it is assumed that impacts would be less than significant.

Conflict with greenhouse gas reduction plans:

The CGPU includes GHG emissions reduction measures for development pursuant to AB 32 reduction targets. As discussed in Section 3.15, Transportation, the CGPU includes policies which are consistent with the SCAG Regional Transportation / Sustainable Communities Strategy (RTP/SCS). The 2012-2035 RTP/SCS set forth per capita GHG reduction goals of 8% by 2020 and 13% by 2035. Based on the GHG emission estimates included in the Climate Action Plan, implementation of the CGPU in combination with state reduction measures would result in a reduction in annual GHG emissions from 8.2 MT CO₂E/SP in 2010 to 6.2 MT CO₂E/SP in 2020 and 5.4 MT CO₂E/SP in 2035, or per service population reductions of approximately 25% by 2020 and 34% by 2035. While per service population and per capita measures of GHG emissions are not identical, the projected reductions are generally consistent with the reduction goals set forth in the RTP/SCS.

Overall, the EIR found that the CGPU emissions reduction policies would reduce GHG emissions in all sectors described in the CARB Climate Change Scoping Plan, and would not obstruct its implementation, and therefore buildout of the CGPU would be consistent with the statewide targets per AB 32. Impacts were therefore found to be less than significant.

Analysis of the proposed Project

As mentioned above, the City evaluates GHG impacts using significance criteria from the SCAQMD. In absence of an established threshold for plan-level emissions analysis, the EIR evaluated the emissions expected from buildout of the CGPU on a per service population basis. However, the SCAQMD does provide thresholds for the analysis of individual projects.

On December 5, 2008, SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 MT CO₂e/year that applies to stationary sources (industrial uses) only where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document³ that also recommended a threshold for all projects using a tiered approach.

³ Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, prepared by SCAQMD, October 2008.

It was recommended by SCAQMD staff that a project’s greenhouse gas emissions would be considered significant if it could not comply with at least one of the following “tiered” tests:

- **Tier 1:** Is there an applicable exemption?
- **Tier 2:** Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
- **Tier 3:** Is the project below an absolute threshold (10,000 MT CO₂e/yr for industrial, projects and 3,000 MT CO₂e/yr for non-industrial projects)? A project’s construction emissions are averaged over 30 years and are added to the project’s operational emissions.
- **Tier 4:** Is the project below a (yet to be set) performance threshold?
- **Tier 5:** Would the project achieve a screening level with off-site mitigation?

Two of the above tiered tests can be used to evaluate the GPA buildout scenarios: Tier 2 and Tier 3. Under Tier 3, the existing and proposed conditions would be subject to different absolute thresholds: 3,000 MT CO₂e for non-industrial development under the UEC designation, and 10,000 MT CO₂e for development under the Industrial District designation. CalEEMod was used to project the emissions for both scenarios using the buildout assumptions described Section 3.3, Air Quality.

Table 6 – GHG Emissions – Existing Conditions		
Construction	Phase	MTCO₂e per year
	2023	364.54
	2024	1,318.79
	2025	1,292.08
	2026	1,340.28
	2027	601.01
Construction total		4,916.68
Operations	Source	MTCO₂e per year
	Area	20.68
	Energy	1,142.04
	Mobile	5,655.25
	Waste	340.81
	Water	357.49
Construction: 30-year amortized ¹		163.89
Operations total		7,680.16
SCAQMD threshold ²		3,000.00
Exceeds?		Yes
Source: CalEEMod Version 2020.4.0. ¹ Given that there are currently no quantitative thresholds for construction-related GHG emissions, the SCAQMD recommends averaging construction emissions over 30 years and adding to a project’s operational emissions. ² Based on the SCAQMD Tier 3 threshold of 3,000 MT CO ₂ e per year for non-industrial projects.		

As shown in Table 6, development under the existing conditions could exceed the SCAQMD threshold for non-industrial projects. Given that the existing conditions are those analyzed in the CGPU EIR, it is assumed that mitigation measures provided in the CGPU, CAP, and state plans would be required to ensure that impacts related to GHG emissions would be less than significant.

As shown in Table 7, development under the GPA would result in approximately 28% lower GHG emissions than the current conditions. Development under the GPA would also result in emissions below the SCAQMD threshold of 10,000 MT CO₂E for industrial projects.

Table 7 – GHG Emissions – Proposed Project		
Construction	Phase	MTCO₂e per year
	2023	337.69
	2024	1,051.03
	2025	1,034.59
	2026	1,023.17
	2027	495.38
Construction total		3,941.85
Operations	Source	MTCO₂e per year
	Area	0.0113
	Energy	1,546.66
	Mobile	3,141.46
	Waste	371.04
	Water	343.32
Construction: 30-year amortized ¹		131.40
Operations total		5,533.88
SCAQMD threshold ²		10,000.00
Exceeds?		No
Source: CalEEMod Version 2020.4.0. ¹ Given that there are currently no quantitative thresholds for construction-related GHG emissions, the SCAQMD recommends averaging construction emissions over 30 years and adding to a project's operational emissions. ² Based on the SCAQMD Tier 3 threshold of 10,000 MT CO ₂ e per year for industrial projects.		

Development of the GPA would result in emissions below both the SCAQMD Tier 3 threshold and below those expected from buildout of the CGPU. Given that the EIR found that the CGPU would not conflict with applicable greenhouse gas reduction plans, it can be assumed that the lower GHG emissions projected for buildout of the GPA would also comply with applicable plans. It can therefore be concluded that the General Plan Amendment would not result in any new adverse impacts related to greenhouse gas emissions, nor would it increase the severity of significant impacts previously identified in the EIR. To the contrary, the proposed GPA could result in a reduction in GHG emissions when compared to the land uses analyzed in the CGPU EIR.

3.8 Hazards and Hazardous Materials

Summary of findings in the EIR

Transportation of hazardous materials:

Regional highways traversing the Planning Area, namely State Route 86, State Route 111, and Interstate 10, are potential routes for the transport of hazardous materials. Due to the associated risks, the transport of hazardous materials is subject to federal regulations as well as multiple policies in the CGPU. The additional commercial and industrial land uses under the CGPU could increase the frequency and/or volume of hazardous materials through the Planning Area. However, the EIR found that the required policies, including vehicle inspections, licensing, and response plans, would ensure that impacts are less than significant.

Hazardous materials and emissions:

The mostly likely occurrence of impacts resulting from buildout of the CGPU and related hazardous materials would be on industrial lands in the Planning Area. Given the extensive framework of state and federal laws regulating the safe use, storage, disposal, and cleanup of hazardous materials and waste, the EIR concluded that associated impacts would be less than significant.

While the CGPU does not address site-specific development, it does address potential conflicts between schools and hazardous materials in the Planning Area. The Coachella Valley Unified School District and Desert Sands Unified School District oversee existing and future schools in the area. CGPU policies, such as mandatory buffers between sensitive receptors and hazardous materials sites, would ensure that environmental impacts on schools from hazardous emissions would be less than significant.

Hazardous materials sites:

The State Water Resource Board GeoTracker database listed 34 sites with reported releases when the EIR was written, though all but ten of those sites are closed and require no further action based on existing land use. While the City had at least 20 sites listed under the California Department of Toxic Substances (Cortese List) over the decade preceding the CGPU EIR, there was only one site actively listed (pursuant to Government Code §65962.5) at the time that the EIR was written. Future development on the registered site, the Foster-Gardner Inc. property, is prohibited from including any hospitals, schools, day-care centers, agriculture, or groundwater use, in accordance with a deed restriction filed with Riverside County. Given that uses are restricted on the one listed hazardous waste site in the Planning Area, and policies in the CGPU would reduce potential impacts associated with future hazardous waste sites, the environmental impacts resulting from the CGPU would be less than significant.

Public airports and private airstrips:

There are no private airstrips in the vicinity of the Planning Area, and therefore no associated impacts. The Jacqueline Cochran Regional Airport is located south of the CGPU Planning Area, and the northern reaches of the Airport Influence Area Boundary zone intersect with the City

boundaries. The CGPU subarea 5, Airport District, allows primarily industrial uses with some retail uses in order to comply with the Airport Land Use Compatibility Plan. These land uses are intended to reduce the potential impacts of the airport on people working or living in the area. The EIR found that these regulations and policies would ensure that impacts on the population within two miles of the airport are less than significant.

Emergency response plans:

Policies in the CGPU Safety Element ensure that the General Plan is consistent with the City's Fire and Emergency Medical Services Master Plan (2007) and Emergency Operations Plan (2007). The EIR found that impacts related to emergency response plans are therefore less than significant.

Wildland fires:

Wildland fires are discussed in Section 3.18, Wildfires, of this document.

Analysis of the proposed Project

The Project site is located in the southern portion of the Planning Area, within the influence area of the Jacqueline Cochran Airport. Surrounding properties are mostly occupied by industrial, commercial, or agriculture/vacant land, however some residential buildings occur to the south of the site. According to the SWRCB GeoTracker database, there are two LUST cleanup sites within 5,000 feet of the Project site, however both cases have been completed and closed. According to the DTSC EnviroStor database, there are no cleanup sites within 5,000 feet of the subject site. However, two military evaluation sites do occur on the Jacqueline Cochran airport property, within 10,000 feet of the subject site.

Construction on the subject site, whether under existing or proposed conditions, would likely necessitate the storage and use of hazardous materials on site, including paints, solvents, and fuels. The Project and its contractor would be subject to existing federal, state, and local laws and regulations requiring the appropriate use, storage, transportation, and disposal of hazardous materials and wastes.

The General Plan Amendment proposes that the site be developed under the Industrial District designation instead of Urban Employment Center. The proposed light industrial and manufacturing land uses could involve the use, storage, and transportation of hazardous materials. Similar to the use of hazardous materials during construction, the use, storage, transportation and disposal of such materials during Project operations would be subject to existing federal, state, and local laws and regulations. Consistent with the findings in the CGPU EIR, any development on the site, because of these regulations, would result in less than significant impacts.

The subject site is more than a mile from any schools, the nearest of which is Valley View Elementary School, approximately 1.11 miles northwest of the property.

The subject site is currently zoned for Heavy Industry, is surrounded by other industrial uses, and is within the Airport District. Given that the Project would be subject to existing laws regulating hazardous materials and that no schools are located in the vicinity of the site, impacts are expected to be less than significant. Therefore, implementation of the proposed Project and General Plan Amendment would not result in any new adverse impacts or increase the severity of previously identified significant impacts in the EIR.

3.9 Hydrology/Water Quality

Summary of findings in the EIR

Water quality standards:

While development under the CGPU will result in substantial population growth, and resulting development and supporting infrastructure could negatively affect existing waterways, federal, state, and local policies are in place to prohibit activity that would impact water quality. The Clean Water Act, the Porter-Cologne Water Quality Control Act, and Regional Water Quality Control Plans preserve water quality by granting permits, which would be required for development under the CGPU. There are also policies contained in the CGPU to prevent negative impacts to water quality, particularly by limiting the pollutants that can be discharged into water bodies. The EIR found that existing regulatory requirements would ensure that development under the CGPU does not violate any water quality or waste discharge requirements. The EIR thus found that impacts would be less than significant.

Groundwater supplies:

The Planning Area currently receives water supplies from the Whitewater River Basin, specifically the Lower Whitewater River Basin. Groundwater levels in the Lower Whitewater River Basin have dropped from 168,300 AF to 145,000 AF in 2011. Water overdraft has the potential to create long term impacts to regional water supply.

In 2010, water demand in the Planning Area was 2,838 million gallons per year, or 191 gallons per capita per day. With buildout of the CGPU, water demand is projected to be 8,878 million gallons per year, or 181 gallons per capita per day. The Coachella General Plan Update Water Supply Assessment concluded that there would be sufficient water supply for the projected buildout population. Additionally, the 2010 Coachella Valley Urban Water Management Plan (CVUWMP) provides strategies to conserve water, increase water supply in the Basin, and to increase and diversify water supply. The EIR concluded that provided that implementation of the CVUWMP occurs concurrently with the incremental growth expected from buildout of the CGPU, impacts on groundwater supplies would be less than significant.

Erosion, polluted runoff, and water quality:

Waterways in the Planning Area, namely the Whitewater River and the Coachella Canal, are not planned or expected to change in existing stream flow under the CGPU. While water runoff or erosion from land use development under the CGPU could have impacts to waterways, the Clean Water Act prohibits development that would alter waterways from erosion or runoff.

Development permits for projects under the CGPU would not be granted if activities would substantially divert or affect the flows of waterways or drainages.

Development under the CGPU also has the potential to cause impacts from polluted runoff. The National Pollution Discharge Elimination System (NPDES) program, implemented by the Colorado River Basin Regional Water Quality Control Board (RWQCB), regulates both point source and non-point source pollution. Development in the Planning Area would be subject to these regulations and would require NPDES permits, ensuring that site runoff is not a pollutant source. Policies in the CGPU also aim to reduce the impacts of runoff. The existing regulatory framework ensures that volumes of stormwater discharge are limited, and that stormwater runoff is treated prior to discharge.

Water quality in the Planning Area is controlled by the Coachella Valley Water District, the State Water Resources Control Board (SWRCD) and the Colorado River Basin RWQCB. Any activity that may discharge into Waters of the U.S. is also regulated by the Clean Water Act, and must obtain a Water Quality Certificate from the US Army Corps of Engineers. While development under the CGPU could increase the potential for water quality degradation, the existing regulatory framework, as well as supporting CGPU policies, would ensure that safe water quality is preserved.

Overall, the EIR found that these existing regulations would ensure that impacts relating to causing erosion or sedimentation, polluted runoff, and water quality, would be less than significant.

Flooding, 100-year flood area:

Alterations to drainage patterns, streams, or rivers in the Planning Area as a result of development under the CGPU could result in flooding. As previously stated, the CGPU includes no plans to change the Whitewater River or Coachella Canal, or existing stream flow. It does, however, include policies to prevent potential drainage-related impacts.

The CGPU does not plan for housing to be developed on 100-year flood hazard areas, which occur on the banks of the Whitewater River in the Planning Area. There is, however, a large portion of the Planning area within the 500-year flood zone, or 100-year flood zone with average depths of less than 1 foot or with drainage areas less than 1 square mile, and areas that are protected by levees from 100-year flood. As required by FEMA for land within flood zones, the City has implemented Riverside County Ordinance 458 for projects within floodplains. Development proposals for sites on floodplains will be required to comply with the Ordinance and will be subject to a plan review in order to receive a Floodplain Permit.

The CGPU provides policies to reduce impacts related to flooding and development on floodplains. Given the existing regulations and proposed CGPU policies, the EIR found that impacts related to flooding would be less than significant.

Levee and dam failure:

The Whitewater River and East Side Dike protect the Planning Area from a 100-year flood and mudflow from the mountains, respectively. The levee and channelized portions of the Whitewater River are managed by the City' Engineering department. Levees, channels and dikes in the unincorporated parts of the Planning Area are managed by Riverside County Flood Control District (RCFCD).

The existing regulatory framework, including Riverside County Ordinance 458, would reduce potential impacts for housing located on floodplains, the areas that would be most at risk in case of levee or dam failure. The CGPU also provides policies requiring the City to carefully monitor and mitigate development in areas at risk of impacts from flooding from infrastructure failure, and create disaster plans to protect users of critical facilities. Given that development cannot occur if projects do not meet regulatory and CGPU requirements, the EIR found that impacts would be less than significant.

Seiche, tsunami, or mudflow:

Given the nearest ocean to the Planning Area is over 100 miles away, there is no potential impact from tsunamis. Likewise, the closest large body of water, the Salton Sea, is over 10 miles away from the Planning Area, thus presenting no risk of seiche.

Parts of the Planning Area located below the Mecca Hills are at risk of potential landslides or soil shifts. CGPU subareas 13 and 14 are susceptible to such risks and allow development. However, several policies in the CGPU would reduce potential impacts, including the requirement for soil and mudflow potential analysis prior to the issuance of permits. The eastern portion of the Planning Area would also be at risk of mudflows, however little development is planned for this area. Any development proposed for this area would be required to meet impact reduction criteria prior to permitting. Overall, the EIR found that impacts from seiches, tsunamis, or mudflow would be less than significant.

Analysis of the proposed Project

Development of the subject property could result in a mixed-use office and residential development under the existing designation, or a light industrial and manufacturing development under the proposed GPA.

The two development scenarios would have the same impacts related to hydrology. Development of the site would increase the quantity of impervious surfaces in the City under both existing and proposed buildout scenarios. The Project site is located within FEMA Zone X, which corresponds to "areas of 500-year flood; areas of 100-year flood with average depths of less than 1 foot or with drainages areas less than 1 square mile; and areas protected by levees from 100-year flood".⁴ The City will require that any project design a storm management system which prevents both on- and off-site flooding, regardless of the land use designation in place.

⁴ Coachella General Plan Update 2035, Figure 4.7-2: Flood Hazards.

The Project would be required to comply with all City regulations under the MS4 permit, including the implementation of Best Management Practices and erosion control to prevent surface and ground water pollution. Buildout of the site would be required to comply with all applicable regulations and policies in the CGPU regarding the protection of local hydrology and water quality, regardless of whether the development includes office and residential or industrial uses. Implementation of the same regulatory framework and policies analyzed in the EIR would ensure that overall impacts are similar to those identified in the EIR. Therefore, implementation of the proposed GPA would not result in any new adverse impacts or increase the severity of previously identified significant impacts identified in the EIR.

Water demand is addressed in Section 3.17, below.

3.10 Land Use and Planning

Summary of findings in the EIR

The Planning Area covers 45,300 acres, 18,530 acres of which is in the incorporated City of Coachella, comprised of agricultural, residential, industrial, commercial, and open space land uses. Agricultural land makes up the largest share of land in the Planning Area, comprising approximately 33% of the total land in the Planning Area. Buildout of the CGPU would transform Coachella into a mid-sized city, with the population expected to grow from 40,704 residents in 2010 to 135,000 residents by 2035.

Most of the City's population density is concentrated on the west side of Highway 111/Grapefruit Boulevard. The majority of civic and commercial buildings in Coachella are also located in the western portion of the City. The eastern portion of the Planning Area is mostly occupied by open space and agricultural land. Under the CGPU, this general development pattern would continue, preserving existing communities, though some development would extend eastward into current agricultural and open space areas.

The EIR found that the CGPU complies with other plans and policies which regulate parts of the Planning Area, including the CVMSHCP, the Jacqueline Cochran Airport Master Plan, as well as the Regional Housing Needs Assessment and Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP). Numerous policies in the CGPU, across the Land Use, Mobility, Community Health and Wellness, Sustainability and Natural Environment, Safety, Infrastructure and Public Services, and Noise Elements ensure that the General Plan is consistent with other applicable plans and regulations.

The EIR also found that Planning Area is also currently governed by the Zoning Code which was developed with the Coachella General Plan 2020, the plan preceding the CGPU. The existing Zoning Code is currently inconsistent with the land use designations in the CGPU, and will need to be updated in order to be consistent. Since the completion of the CGPU, the City is now undertaking a Zoning update for General Plan consistency. Under this program, sites will be assigned consistent zoning to their General Plan designation.

Analysis of the proposed Project

The proposed General Plan Amendment would change the 38.8-acre site's current Urban Employment Center (UEC) designation to Industrial District. The proposed designation would accommodate commercial and industrial businesses that may generate more noise, light, odors, or truck traffic than would be appropriate in the UEC. The UEC designation also allows for multi-family residential uses, which are not envisioned for the Industrial District.

As stated above, buildout of the CGPU using the current land use designations would result in a City-wide population of 135,000 residents by 2035. Based on the assumptions described in Section 2, Table 1, of this document, the current UEC designation for the subject site would contribute an estimated 614 residential units or 2,610 residents, to the City's population. In contrast, development of the subject site under the Industrial District designation would result in no additional population, resulting in a City-wide population of 132,390 in 2035. Development of the site under the Industrial District designation could thus result in approximately 2% fewer residents in 2035 than currently expected for buildout of the CGPU.

Both the existing and the proposed designations are compatible with the area surrounding the subject property. Lands to the west, north, and south of the property are currently designated for UEC, while land to the east is designated for Industrial District. The subject property, and generally the area between Tyler Street and Highway 111/Grapefruit Boulevard, is in a transition area between these two land use designations. The site would thus generally be consistent with the character of surrounding uses under the UEC or Industrial District designation.

The site and surrounding lands are in Subarea 5, Airport District as identified in the General Plan. The vision for the Airport District is that the area "will continue to evolve into one of the primary industrial areas of the City." The proposed GPA is consistent with that vision.

Adjacent properties are currently occupied by industrial and agricultural uses which are independent of each other. The proposed Project would not physically divide an established community under either designation. If the subject site were to be designated as Industrial District, the UEC-designated property immediately to the south (APN: 763-270-001) which is outside the City limits but within the City's Sphere of Influence, would be surrounded on three sides by Industrial District lands. The site design of this southern property would play an important role in emphasizing its connection with the UEC lands immediately to the west. Parking lots and other setbacks could be positioned so as to provide a buffer between this site and the Project site, and mixed-use development should be oriented towards Tyler Street and neighboring UEC sites to the west.

Development of the proposed Project would be in accordance with the General Plan Policies and the Municipal Code. The proposed Amendment would comply with the existing Heavy Industrial zoning for the site, which the UEC designation in the CGPU currently conflicts with. The proposed Amendment also complies with the General Plan policy directions for subarea 5, which state that heavy industry should be focused in the vicinity of Grapefruit Boulevard and Avenue 54.

Development of the proposed Project, like development under the existing CGPU designation, would comply with other applicable regulations, including payment of the CVMSHCP development impact fee. The Project would provide internal circulation consistent with the zoning requirements.

Overall, implementation of the proposed Project and General Plan Amendment would not result in any new significant impacts or increase the severity of a previously identified significant impacts as previously analyzed in the EIR.

3.11 Mineral Resources

Summary of findings in the EIR

The California Mineral Land Classification System developed by the State Geologist identifies Mineral Resource Zones (MRZs) under the Surface Mining and Reclamation Act (SMARA). The western portion of the Planning Area, including all land west of the Whitewater River, is identified as being in Mineral Resource Zone-1. MRZ-1 indicates that, based on available geological information, there is little likelihood for the presence of significant mineral resources. Most of the eastern portion of the Planning Area is in MRZ-3, which indicates that the area has known mineral deposits that may qualify as mineral resources.

Portions in the southeast of the Planning Area, in subarea 17, are zoned MRZ-2, which indicates that significant mineral resources are present. This area is designated for open space, and permits two existing mining operations to occur: The Coronet Concrete – Palm Desert Rock Sand Mine, and Coachella Valley Aggregates – Fargo Canyon Mine. The EIR thus found there to be no expected loss of mineral availability from development in the CGPU, since urban development would occur in MRZ-1 areas primarily.

State regulations protect sensitive mineral resources and prohibit the removal of mineral resources in California. The CGPU includes polices to encourage the cycling of resources and ensure land use compatibility to protect mineral resources. Given that the mineral resources occurring in the Planning Area are in designated open space lands, and other policies supporting the protection of mineral resources, the EIR found that no impacts are expected to occur as a result of the CGPU.

Analysis of the proposed Project

The Project site and the surrounding area is located in Mineral Resource Zone-1 (MRZ-1) which indicates little likelihood for the presence of significant mineral resources. The subject property and surrounding sites are intended for industrial, office, research and development, and support retail uses, as well as residential uses in the case of sites designated for UEC.

No mining would be allowed on the site under both the existing or proposed land use designations. Given the Project site location in the MRZ-1 and existing CGPU policies and state laws to protect mineral resources elsewhere, no impact on mineral resources would occur on the Project site regardless of the land use designation. Overall, impacts are expected to be the same as those identified in the CGPU EIR. Implementation of the proposed Project and General Plan Amendment would not result in any new adverse impacts or increase the severity of previously identified impacts in the EIR.

3.12 Noise

Summary of findings in the EIR

Ambient noise levels and noise standards:

Vehicular traffic is the most significant source of noise in Coachella, and thus areas in proximity to high-volume roadways are expected to experience the greatest noise increases resulting from buildout of the CGPU. Modeling conducted for the EIR found that by 2035, peak noise levels along I-10, SR-86S, and Dillon Road, as well as parts of Grapefruit Boulevard and Avenue 52, are expected to exceed 75 dBA CNEL. Existing or future sensitive uses near these roads are thus expected to be exposed to noise levels exceeding the City's 65 dBA CNEL exterior noise standard for residential uses. The CGPU Noise Element includes policies requiring project-specific noise analysis for new developments. The Noise Element also provides policies to ensure noise compatibility between land uses and promote traffic calming measures where possible roadway noise exceeds the City's standard.

Construction noise resulting from development under the CGPU would expose sensitive receptors to substantial temporary or period ambient noise increases. In addition to policies in the CGPU, the City's Municipal Code includes provisions to limit the impacts of such noise, including limiting construction activity to daylight hours and minimizing stationary noise impacts on sensitive receptors. According to the EIR, these requirements and policies would ensure that construction noise impacts do not create a significant adverse effect on sensitive receptors.

Overall, the EIR found that while future development under the CGPU may increase ambient noise levels, implementation of the CGPU and Municipal Code would ensure that noise levels do not exceed the City's adopted noise standards, and that impacts would be less than significant.

Groundborne noise and vibration:

The two primary sources of groundborne vibration in Coachella are temporary construction activities and permanent traffic on roadways and railways. Construction of developments proposed under the CGPU would generate groundborne vibration, which could result in vibration levels exceeding the FTA vibration impact threshold if sensitive receptors are located close enough to potential construction sites. However, Section 7.04.070 of the Coachella Municipal Code requires that construction and related activities must take place during daytime hours, as follows:

October 1st through April 30th

Monday to Friday: 6:00 am to 5:30 pm
Saturdays: 8:00 am to 5:00 pm
Sundays: 8:00 am to 5:00 pm
Holidays: 8:00 am to 5:00 pm

May 1st through September 30th

Monday to Friday: 5:00 am to 7:00 pm
Saturdays: 8:00 am to 5:00 pm
Sundays: 8:00 am to 5:00 pm
Holidays: 8:00 am to 5:00 pm

These restrictions would keep any construction activities exceeding 72 VdB at the nearest sensitive receptor from significantly interfering with people's sleep. To ensure that no physical damage to nearby buildings occurs as a result of construction vibration, the City reviews projects for their potential for construction vibration prior to the issuance of permits.

Vehicular traffic and train traffic also produce groundborne vibration. Impacts associated with vibration from vehicular traffic would be reduced by the same CGPU policies that would reduce general traffic noise, such as traffic calming and land use computability. Vibration levels from trains would not increase significantly as a result of the CGPU, and would continue to be intermittent. Overall, the EIR concluded that development under the CGPU would be subject to the City's standards and review process, ensuring that the development would not expose persons to or generate excessive groundborne vibration or noise levels. Impacts would be less than significant.

Airport noise:

The only airport within two miles of Coachella is the Jacqueline Cochran Regional Airport, whose airport land use plan overlaps with parts of the southern portion of the Planning Area. The City has designated these areas as airport compatibility zones in order to reflect the airport land use plan, and the CGPU designates this area as Subarea 5- Airport District. The subarea is intended to be comprised of 70 to 90 percent Industrial uses and up to 20 percent Suburban Retail District. Residential uses or other noise sensitive receptors are not permitted, and therefore noise-sensitive receptors would not be subject to excessive noise from the airport. Finally, ALUC reviewed the GPA, and found the proposed Industrial District designation compatible with the Airport Land Use Plan.

According to the EIR, these land use designations, and other policies in the CGPU, would ensure that people residing or working in the Planning Area would not be subject to excessive noise levels from the airport, and that impacts would be less than significant.

Analysis of the proposed Project

Under the existing Urban Employment Center (UEC) designation, buildout could include a mix of office, research and development, residential, and supporting retail uses. The proposed GPA would result in an Industrial District designation, and it is assumed that buildout would result in

light industrial and manufacturing uses. As discussed in Section 3.15, Transportation, maximum buildout of the proposed GPA would result in approximately 35% fewer daily trips than the existing designation. The decreased traffic suggests that there would not be an increase in long-term noise levels on the surrounding roads. While buildout of the proposed Project would result in industrial uses which may generate more noise than buildout of the current designation, both developments would be subject to noise policies in the CGPU and the Coachella Municipal Code, which the CGPU EIR states were sufficient to assure less than significant impacts.

Construction noise would be expected to be similar under both the current and proposed land use designations. Both would result in construction of the entire site, and both are estimated to have a construction duration of approximately 4 years. Development under either designation would be subject to project-level noise analysis in conjunction with the preparation of building plans. Construction activities would be required to comply with the permitted construction hours defined in the Coachella Municipal Code §7.04.070, and would be temporary in nature. Therefore, given their occurrence during daytime hours and temporary duration, construction impacts would be less than significant, consistent with the conclusion in the EIR. Likewise, in terms of groundborne noise and vibration due to construction, the development of the subject site would be subject to the same construction hours and would be subject to the City's review on potential vibration impacts prior to the issuance of building permits. Therefore, construction-related groundborne noise and vibration resulting from the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impacts in the EIR.

Operation of the site at buildout could result in higher noise levels from the proposed industrial designation than the current UEC designation. However, operational noise in either scenario would be subject to policies in the Noise Element of the CGPU as well as the City's noise ordinance requirements. Development of the site would be subject to project-level noise analysis and subject to review by the City, requiring mitigation measures to ensure compliance with the City's noise standards. These policies and reviews would ensure that the Project's operational noise would not result in any new impacts or increase the severity of previously identified significant impacts as previously analyzed in the EIR.

The existing UEC designation would introduce sensitive residential receptors into Subarea 5, which is contrary to the intent of the General Plan in terms of limiting noise exposure within the airport influence area. The GPA and Project do not propose any residential uses. Therefore, while the site is within the airport compatibility zone for the Jacqueline Cochran Regional Airport and within 3,000 feet of the railroad, there would be no sensitive receptors on site. According to the EIR Table 4.10-5 Coachella Land Use/Noise Compatibility Matrix, clearly compatible noise levels for industrial sites is up to 70 CNEL, and normally compatible noise levels are 85 CNEL or more. Noise levels on the subject site under the proposed Industrial District designation would therefore be within the City's standards.

Overall, with implementation of CGPU policies and Municipal Code, the Project and GPA would not result in any new impacts or increase the severity of a previously identified significant impact.

3.13 Population, Employment, and Housing

Summary of findings in the EIR

Population growth:

From 2005 to 2010, the population of Coachella increased by almost one third, from 30,879 to 40,704. With buildout of the CGPU, the population is expected to grow to a total of 135,000 by 2035. In 2010, the City had 9,903 housing units, of which 8,998 were occupied. The City's average household size was 4.51, which is higher than the average number of people per occupied housing unit statewide (2.96) and countywide (3.2). This indicates the potential for overcrowding. As defined by SB 244, the City has five vulnerable communities, including Shady Lane which is less than 0.5 miles west of the subject site.

At the time that the CGPU EIR was written, the City had approximately 5,831 jobs. The largest share of jobs in Coachella were in the agriculture sector (29.7%), followed by retail (14.7%) and transportation, warehousing, and utilities (12.6%). As of 2012, Coachella had an unemployment rate of 20%, which is higher than the statewide rate (11%) and the countywide rate (12.7%).

By buildout of the General Plan in 2035, the City expects an additional 33,469 residential units, 3,746,701 square feet of office space, and 5,220,111 square feet of industrial space. These projections generally align with the SCAG's 2012 RTP/SCS forecast that Coachella will have a population of 128,700 in 2035, which is only 4.9 percent less than the CGPU projections (135,000 residents by 2035). While both the local and regional projections indicate significant population growth, the CGPU provides a comprehensive program for managing this growth, in order to minimize inappropriate development patterns and environmental impacts. Given the CGPU's consistency with regional forecasts and provision of comprehensive policies to manage the expected population growth, the EIR determined that impacts would be less than significant.

Displacement of housing:

The CGPU does not propose the displacement of housing or people. However, vulnerable communities might be subject to displacement if land increases in value, particularly because the uses may be unpermitted. The CGPU expected to offset any such displacement through the development of 45,000 new housing units, absorbing any displaced residents. State regulations also provide protections for the displacement of housing and communities. The City's existing Housing Element also provides policies to accommodate population growth while protecting housing needs for vulnerable populations such as farmworkers and low-income residents. Given the CGPU's policies and programs, and existing protections in State law, the EIR determined that impacts related to the displacement of housing or people would be less than significant.

Analysis of the proposed Project

Under the existing UEC designation, buildout of the 38.8-acre site would generate housing and jobs. The UEC designation permits a residential density of 30 to 65 dwelling units per acre. Based on the buildout assumptions described in Section 2, Table 1, of this document, buildout of the

site would result in 614 multi-family units, which, based on the City's average household size of 4.25,⁵ represents a residential population of approximately 2,610 people. Under the buildout assumptions for the UEC designation, development of the subject property would also result in the addition of 425,000 square feet of office, research and development, and supporting retail space.

Under the conditions proposed in the General Plan Amendment, development of the site would generate jobs but no housing. Based on the buildout assumptions described in Section 2, Table 1, development under the proposed Industrial District designation would result in 595,000 square feet of built area for industrial uses. The industrial jobs generated by the proposed Project could attract new residents to the City, however given the City's high unemployment rate there is likely existing demand for jobs from current residents. Additionally, any population growth resulting from the jobs created by the Project would likely be less than that resulting from the current designation, which would result in 2,610 new residents from the residential units in addition to the jobs created by the office and retail uses on site. As such, it can reasonably be concluded that the conditions associated with the General Plan Amendment and proposed Project would result in a slightly smaller buildout population than expected in the CGPU.

For the reasons stated above, implementation of the proposed Project would not result in any new significant impacts related to unplanned population growth as analyzed in the EIR. While the proposed development would not increase the City's housing stock, it would also result in less population growth than expected in the CGPU.

Given that the subject property is currently vacant, neither development scenario would result in the displacement of people or housing. The site is near the Shady Lane area, which is designated as a Vulnerable Community according to SB 244. Development of the site and any required street improvements would not negatively impact the Shady Lane community. Given the Project site location and existing CGPU policies and state laws to protect vulnerable populations, impacts associated with population and housing would be less than significant, and consistent with the findings of the CPGU EIR.

3.14 Public Services

Summary of findings in the EIR

Fire protection:

The City of Coachella contracts with the California Department of Forestry and the Riverside County Fire Department (RCFD) for fire protection services. The RCFD is administered and operated by the California Department of Forestry and Fire Protection. The Coachella Fire Service is a "Full Service" agency, providing fire protection, emergency medical, emergency management, and public assistance services to citizens within its jurisdiction.

⁵ California Department of Finance Table E-5, City of Coachella, 2022.

The Planning Area is served by two fire stations: Battalion 6 Coachella Fire Station #79, which serves the incorporated City, and the City of Indio Fire Department, which serves unincorporated areas in the Planning Area. According to the City of Coachella Fire and Emergency Master Plan (2007), the required level of service is a response time of less than five minutes and a staffing ratio of 1 firefighter per 1,000 residents. The existing fire station stations currently have response times longer than given minutes, and a service ration of 0.4 firefighters per 1,000 residents. The City is thus currently under-serving residents. The development and population growth expected to result from the CGPU would further increase demand for addition fire stations in the Planning Area. The City of Coachella Fire and Emergency Medical Services Master Plan identified a need for at least three additional fire stations, which are suggested to be added in the southern and west portion of the Planning Area where the majority of urban development is planned.

The CGPU provides policies proposing increases in level of service and fire protection facilities, while also promoting conscious development and land use in order to mitigate potential negative impacts from fire protection facilities. Policies related to sustainable site design, energy conservation and noise compatibility are also provided in the CGPU in order to reduce impacts related to fire protection facilities and other public service buildings. The EIR found that impacts would therefore be less than significant.

Law enforcement:

Incorporated portions of the Planning Area were under the jurisdiction of the City of Coachella Police Department, and unincorporated areas were served by the Riverside County Sheriff's Department. The City of Coachella Police Department operates a substation from the Riverside County Sheriff's Department, located at 82-695 Dr Carreon Boulevard. Response times from this facility are about three minutes for emergency calls. As of the writing of the EIR, the Department had two non-sworn personnel and 36 sworn officers, of which 24 are dedicated to regular patrol and 12 are dedicated to special assignments.

The City is currently underserved by law enforcement: while the recommended service rate is 1.3 staff per 1,000 residents, Coachella is currently operating at a service ratio of 0.64 sworn officers per 1,000 residents. The population growth facilitated by the CGPU would generate additional demand for law enforcement services. The CGPU provides policies both to reduce impacts associated with facility development and to improve response times, such as policies to improve street connectivity. The EIR recommends that that development of additional law enforcement facilities should undergo development review to assess and mitigate potential negative impacts from any project. Overall, the EIR determined that impacts regarding law enforcement facilities and service levels would be less than significant.

Libraries:

The City receives public library services from the Riverside County Library System, which provides access to all 33 libraries and two bookmobiles in the system. There is one public library in the City's boundaries, located at 1538 Seventh Street.

Parks and Recreation:

Recreation was not a separate section in the CGPU EIR, and is instead discussed under the Public Services section, alongside parks.

As of the writing of the EIR, the Planning Area had 60.2 acres of parks, and 109 acres of parkland and open space, offering recreation facilities such as baseball fields, soccer fields, swimming pools, playgrounds, picnic areas, and basketball courts. The City's required park space to population ratio is 3 acres per 1,000 people. The Planning Area had a deficit of 61.91 acres at the time that EIR was written, and would require an additional 333.8 acres of parkland to adequately serve the projected population of 135,000 residents. The CGPU provides numerous policies to reduce the potential environmental impacts resulting from the development of additional parks. It also requires that new parkland is provided concurrently with new development, ensuring that the City will meet the parks level of service. Given these policies, the EIR determined that impacts from new and expanded parks and open space facilities would be less than significant.

Schools:

The Planning Area is served by two school districts: Desert Sands Unified School District (DSUSD) and the Coachella Valley Unified School District (CVUSD). While the north and northwestern portion of the Planning Area is served by DSUSD, the majority of Coachella and the SOI is served by CVUSD. When the EIR was written, CVUSD operated 14 elementary schools (K-6), 3 middle schools (7-8), and 3 high schools (9-12), and had three schools in the planning stages. The population growth expected to result from buildout of the General Plan would increase demand on schools, requiring additional schools for all ages. The CGPU includes provisions to reduce potential impacts associated with the development of new school facilities, including policies related to siting, design, and operations. The EIR determined that impacts would be less than significant.

Medical core:

The Planning Area currently has seven medical facilities providing routine health services. The nearest hospitals are John F. Kennedy Memorial Hospital in Indio and Eisenhower Medical Center in Rancho Mirage. The population growth facilitated by the CGPU could require additional hospital and medical facilities in order to maintain the existing level of service. Policies in the CGPU include sustainable development practices which would help reduce impacts from the development of additional facilities. Additionally, it recommends that medical facilities be built concurrently with other development. Based on the policies provided in the CGPU and the overall limited scale of medical facilities, the EIR determined that related impacts would be less than significant.

Analysis of the proposed Project

Both the existing and proposed land use designations for the subject property exist in the CGPU and were analyzed in the EIR. Under either designation, development of the subject site would be required to comply with CGPU policies and review by fire and police departments to ensure adequate safety and emergency access.

The current UEC designation would, under the buildout assumptions in Section 2, Table 1, result in 614 additional housing units or 2,610 new residents. Some new residents could also be drawn to the City by the jobs associated with the approximately 425,000 square feet of office and supporting retail space expected for the site under this designation. As discussed in the EIR, the CGPU would result in less than significant impacts to public services. Given that the proposed Industrial District designation would not include any residential units, it can be assumed that it would result in less population growth, and therefore less additional demand on public services, than development expected under the CGPU. Overall, implementation of the proposed Project and General Plan Amendment would not result in any new adverse impacts or increase the severity of previously identified significant impacts in the EIR.

3.15 Transportation

Summary of findings in the EIR

The City's transportation network consists of the regional highway system, the local street system, local and regional transit routes, and bicycle and pedestrian facilities. Regional access to Coachella is provided by Interstate 10, and State Route 86, 86S, and Grapefruit Boulevard/State Route 111 provide connectivity with neighboring cities.

Roadway congestion and level of service standards:

The increase in housing and employment in Coachella resulting from buildout of the CGPU would result in additional vehicular trips on both City and regional roadways, potentially resulting in congestion.

Level of Service (LOS) are letter grades from A (minimal delay) to F (excessive congestion) that describe the performance of a roadway or intersection. The City's previous General Plan applied LOS D as the performance threshold for roadway segments and intersections. Based on this threshold, the EIR identified 13 intersections and five roadway segments that currently operate at a deficient LOS. At the time the EIR was drafted, the roadway segments near the site including Avenue 54 east and west of Tyler Street, as well as Grapefruit Boulevard north and south of Avenue 54, were all operating at LOS C or better. However, the EIR found that with the development expected from buildout of the CGPU, eight intersections and ten roadway segments in the City would operate at a level worse than LOS D.

To mitigate potentially significant impacts associated with congestion on local roadways, the City planned to update its Development Impact Fee to fund roadway improvements. Such improvements include the addition of signals to intersections and the widening of roadway segments. The CGPU also includes policies to reduce overall vehicle usage which would also help to reduce impacts to local roads.

Regional roadways in the Planning Area such as I-10 and SR 86 South are under the jurisdiction of the Riverside Congestion Management Program (CMP). According to 2011 data from the CMP Update for Riverside County, these facilities are operating at LOS C or better. However, buildout of the CGPU and development in areas outside of the City would result in these routes operating at LOS E or worse.

While the CGPU Circulation Element provides policies that would help reduce congestion on both local and regional routes, the EIR does not expect that these measures would fully mitigate impacts to less than significant levels. Impacts would therefore be significant and unavoidable.

Air traffic patterns:

The EIR found that the CGPU fully incorporates the Airport Land Use Plan for the Jacqueline Cochran Regional Airport, and thus would have no direct or indirect impact on air facilities or air traffic patterns. Impacts would be less than significant.

Traffic hazards:

The CGPU provides policies to prevent hazardous conditions, and ensure pedestrian and cyclist safety. General congestion reduction measures in the CGPU, as well as plans to expand the roadway network, would ensure that emergency vehicles have adequate access. The EIR found that there would be no hazards or impediments to emergency vehicle access resulting from the CGPU., and impacts would be less than significant.

Non-motorized transportation:

The CGPU provides plans to provide nearly 200 miles of roadways with in-street bicycle lanes and over 50 miles of off-street bicycle facilities, as well as the addition of sidewalks with street improvements. Policies in the plan also encourage improvements to transit service and the accessibility of transit stops. Given these policies, the EIR found that the CGPU would have less than significant impacts to non-motorized transportation.

Analysis of the proposed Project

The daily trips generated by development under the current and proposed General Plan designations was calculated using the ITE Trip Generation Manual, 11th Edition. The buildout assumptions for the existing UEC land use, described in Section 2, Table 1, of this document, assume development of the site would result in 425,000 square feet of office space and 614 units of multi-family residential. The Project proposes 297,000 square feet of manufacturing space and 297,500 square feet of general light industrial space.

As shown in Table 8, development under the existing designation would result in 8,788 daily trips. The proposed Project would result in a total of 3,070 daily trips, or 5,718 fewer daily trips than would result from the current designation.

Table 8 – Trip Generation Comparison								
Buildout Scenario ¹	ITE	Land Use	Unit	Trip Type	Trip Rate	Entry	Exit	Daily Total
Existing GP LU	710	General Office Building	425,000 SF	Passenger	10.84	2,304	2,303	4,607
				Truck	0.10	21	22	43
	220	Multi-Family Housing	614 Units	Passenger	6.74	2,069	2,069	4,138
Total:						4,394	4,394	8,788

Table 8 – Trip Generation Comparison								
Buildout Scenario ¹	ITE	Land Use	Unit	Trip Type	Trip Rate	Entry	Exit	Daily Total
Proposed Project	140	Manufacturing	297,500	Passenger	4.75	707	706	1,413
				Truck	0.45	67	67	134
	110	General Light Industrial	297,500	Passenger	4.87	724	725	1,449
				Truck	0.25	37	37	74
Total:						1,535	1,535	3,070
Proposed Project Variance from Existing:						-2,859	-2,859	-5,718

¹ Based on the buildout assumptions described in Section 2 – Table 1 of this document.

When the EIR was written, the roadway segments near the Project were all operating at an acceptable LOS, including Avenue 54 east and west of Tyler Street, as well as Grapefruit Boulevard north and south of Avenue 54. The EIR found that ten roadway segments would operate below LOS D after buildout of the CGPU, including Harrison Street at Avenue 54, which is approximately 1 mile west of the subject site. While the General Plan offers mitigation measures to ensure that impacts related to LOS would be less than significant, it can also be assumed that because the proposed Project would generate fewer trips than the existing designation, it would have less severe impacts to LOS. It is therefore assumed that because the proposed Project would generate 5,718 fewer daily trips than expected from buildout under the existing UEC designation, it would not result in any new impacts to LOS than those identified in the EIR.

The Project would be subject to the same policies in the ALUP and CGPU as development under the current designation. ALUC found the GPA compatible with the ALUP. It can therefore be assumed that the Project would pose no hazards to pedestrians and cyclists, would provide sufficient access to emergency vehicles, and would have no impacts to operation of the nearby airport.

Overall, the proposed General Plan Amendment and the Project would not result in any new impacts related to transportation and it would likely decrease the severity of transportation impacts disclosed in the EIR.

3.16 Utilities and Energy

Summary of findings in the EIR

Energy was not a standalone topic required by the CEQA guidelines at the time of preparation of the CGPU EIR. Water, wastewater, and storm drain facilities and capacities are discussed in Section 3.18.

Energy consumption and efficiency:

Imperial Irrigation District (IID) provides electricity to the Planning Area. Usage in 2010 demanded 220,782,340 kWh and is expected to increase to 1,099,608,548 kWh by 2035.

Southern California Gas Company (SoCalGas) provides natural gas to the Planning Area. In 2010, commercial, public, and residential natural gas usage was 3,823,723 therms, which is expected to increase to 17,009,166 therms with buildout of the CGPU by 2035.

As the population in the Planning Area triples from 40,000 to 135,000 with buildout of the CGPU, energy consumption will increase. The CGPU and the City’s CAP provide energy reduction strategies for the Planning Area, such as requirements for energy efficient buildings and transportation patterns, as well as water conservation measures. Table 9 shows the potential energy and natural gas use reductions resulting from implementation of the CAP and CGPU policies.

Table 9 – Electricity and Natural Gas Use Projected		
	2010	2035
Electricity (kWh)	220,782,340	1,099,608,548
Potential reduction	-	174,028,014
Natural Gas (Therms)	3,823,732	17,009,166
Potential reduction	-	1,921,802

Source: Table 4.14-3 and Section 4.14 of the CGPU EIR.

Based on the potential reductions shown in the above table, the EIR found that while total energy use will increase with buildout of the CGPU, the substantial reductions would ensure that energy use is not wasteful. Impacts would therefore be less than significant.

Natural gas, electricity, and telecommunications infrastructure:

Buildout of the CGPU will place increased demand on natural gas, electricity, and telecommunications infrastructure, requiring expansion in order to meet the increased need from population growth. The expansion of such infrastructure may result in impacts such as disruption to wildlife migration patterns and birds’ flight path, aesthetic views of visual resources, potential halted level of service from disasters, and leaks or damages in infrastructures from earthquakes or other natural disasters. However, the CGPU Infrastructure and Public Services Element provides strategies and policies to mitigate these potential impacts. Given these policies, and that growth under the CGPU would be incremental, the EIR concluded that impacts related to infrastructure would be less than significant.

Landfills and solid waste regulations:

Solid waste generated by the City of Coachella is taken to the Coachella Valley Transfer Station, which is operated by a Joint Power Authority between the City of Coachella and the City of Indio. Riverside County is the permitted owner of the facility, however Burrtec Waste Industries is the practical owner and operator. The Coachella Valley Transfer Station currently receives and average of 328 tons of waste per day, and it has a capacity of 1,100 tons per day.

The Lamb Canyon Landfill and Badlands Landfill, owned by Riverside County, also service the Planning Area. The Lamb Canyon Landfill is currently permitted to receive 3,000 tons of trash per day and has a total capacity of 34,292,000 cubic yards. The Badlands Landfill is currently permitted to receive 4,000 tons of trash per day.

Based on the population growth expected to result from buildout of the CGPU, and an average disposal weight of 4.5 pounds per resident per day, the City could generate up to 131,800 tons of solid waste per year by 2035. This would equate to approximately 360 tons per day. Based on the capacities of the transfer station and two landfills servicing the Planning Area, the EIR found that there would be sufficient capacity for the additional waste to be generated under the CGPU.

Additionally, policies are provided in the CGPU to reduce solid waste in landfills, which, paired with state regulations, will help slow the filling of landfills. The CGPU policies will not conflict with the regulatory framework for solid waste, and future projects under the CGPU will be required to comply with the applicable regulations on solid waste. Based on these policies and regulations, as well as the existing landfill capacity, the EIR found that impacts would be less than significant.

Analysis of the proposed Project

Energy consumption and efficiency:

Buildout under both the existing and proposed designation would require electricity during construction. Electricity demand would vary depending on the phase of construction, and would be used for outdoor security and worksite lighting, operation and charging of electronic equipment, and powering temporary worksite trailers. Electricity demand for construction would be temporary, not wasteful, and would cease upon completion, regardless of the land use.

Construction, under either buildout scenario, would not consume natural gas. If the subject property requires the installation of new natural gas connection, then it would be required in both scenarios. The use of natural gas during construction would not be wasteful, inefficient, or unnecessary.

At buildout, operation under both the Urban Employment Center designation or Industrial District would require energy, though the quantity and end use of that energy would differ. Table 10 shows the quantities of electricity and natural gas expected to be consumed on an annual basis under the existing and proposed buildout conditions.

Table 10 – Electricity and Natural Gas Use: Existing and Proposed		
	Electricity (kWh/yr)	Natural Gas (kBTU/yr)
Existing		
Apartments Low Rise	2,560,350	92,895.28
Office Park	4,071,500	12,285.43
Total	6,631,850	105,180.71
Proposed		
General Light Industry ¹	2,951,200	96,203.96
Manufacturing	2,951,200	96,203.96
Total	5,902,400	192,407.92
Source: CalEEMod Version 2020.4.0		
¹ For analysis purposes in CalEEMod, General Heavy Industry had to be used instead of General Light Industry because the proposed square footage is above 50,000 square feet.		

As shown in the above table, the proposed industrial development would consume less electricity but more natural gas than would be required under the current conditions. However, buildout under either designation would be subject to the City’s CAP and CGPU policies, which would ensure that energy use would not be wasteful, inefficient, or unnecessary. Both developments would also be subject to the most recent California Building Code, including the Energy Code and CALGreen. Operations of the site under both scenarios is expected to have less than significant impacts on energy use and consumption, and would therefore not exceed the severity of impacts previously analyzed in the EIR.

Transportation energy:

During construction, construction equipment, material hauling vehicles, and worker commutes would consume gasoline and diesel fuels. It is assumed that construction equipment and material hauling vehicles would primarily consume diesel, while working commutes would primarily consume gasoline. It is also assumed that most construction workers would live locally, minimizing the length of commutes and fuel consumption. Overall, the use of petroleum and diesel fuel during construction would be temporary and would not be wasteful or inefficient.

During operation, development under the existing conditions would consume gasoline for the operation of personal vehicles for residents and employees working in the offices and retail outlets on the site. Development under the proposed conditions would likely consume both gasoline, for employee commutes, and potentially diesel for heavy duty vehicles required for industrial operations. Table 11 shows the vehicle miles travelled (VMT) expected from both development scenarios.

Table 11 – Vehicle Miles Traveled (VMT): Existing and Proposed		
General Plan Designation	Land Use	Annual VMT
Existing – Urban Employment Center	Apartments Low Rise	9,049,202
	Office Park	7,691,166
	Total	16,740,368
Proposed – Industrial District	General Light Industry	5,055,374
	Manufacturing	4,975,257
	Total	10,030,631
Difference		- 6,709,737
Source: CalEEMod 2020.4.0		

As shown in the above table, the proposed development would produce almost 60% fewer VMT than would be produced by development under current conditions. Future regulatory and technological advancements will likely decrease the intensity of energy use per VMT, which would help further reduce transportation energy consumption. The Project is therefore not expected to result in new impacts or increase the severity of impacts previously analyzed in the EIR, and would have less than significant impacts on transportation energy.

Natural gas, electricity, and telecommunication infrastructure:

Development under both the existing and proposed designation would require connections to natural gas, electricity, and telecommunications. If any of these utilities are not currently available on the subject site, then the installation of new connections would be required in both scenarios. The EIR acknowledges that the expansion of such infrastructure would be required under buildout of the CGPU, and that environmental impacts could occur as a result of the expansion. However, the CGPU Infrastructure and Public Services Element provides strategies and policies to mitigate these potential impacts, and development at the site under either scenario would be required to comply with these strategies and policies.

Therefore, while new connections to natural gas, electricity, and telecommunications infrastructure may be required, the Project is not expected to result in new impacts or increase the severity of impacts previously analyzed in the EIR.

Landfills and solid waste regulations:

The Lamb Canyon Landfill has a remaining capacity of 19,242,905 cubic yards (CY) as of 2015, and the Badlands Landfill has a remaining capacity of 7,800,000 CY as of 2020.⁶ As shown in Table 12, the proposed industrial uses are estimated to produce approximately 43% less solid waste per year than would be produced under the current designation. The 521.22 tons per year estimated to be produced by the Project, accounting for the 50% diversion mandate by the California Integrated Waste Management Act of 1989, would equate to approximately 3,474.80 CY.⁷ This would represent approximately 0.013% of the total 27,042,905 CY of the combined remaining capacity of the Lamb Canyon and Badlands Landfills.

Table 12 – Estimated Solid Waste Disposal: Existing and Proposed				
Land Use	Estimated Solid Waste Generation Rates ¹	Proposed	Solid Waste Disposal (pounds per day)	Solid Waste Disposal (tons per year)
Existing				
Apartments Low Rise	12.23lbs/household /day	614	7,509.22	1,370.43
Office Park	6lbs/1000 sq ft /day	425,000	2,550.00	465.38
Total (after 50% diversion)				917.90
Proposed				
General Light Industry	5/lbs/1000 sq ft /day	297,500	1,487.50	271.47
Manufacturing	1.42lbs/100 sq ft /day	297,500	4,224.50	770.97
Total (after 50% diversion)				521.22
Difference				- 396.68
¹ Estimated Solid Waste Generation Rates by CalRecycle, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates				

⁶ CalRecycle Sanitary Waste Information System, Lamb Canyon <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2246?siteID=2368> and Badlands <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367>.

⁷ Assumes that 1 CY of uncompacted mixed (residential, institutional, commercial) solid waste is equivalent to 300 lbs. "Volume to Weight Conversion Factors," US EPA Office of Resource Conversion and Recovery. April 2016.

Overall, given that buildout of the proposed GPA would result in lower solid waste generation than the existing designation, and would constitute a marginal increase compared to the remaining capacity of the regional landfills, impacts would be less than significant. The proposed development is therefore not expected to result in new impacts or increase the severity of impacts previously analyzed in the EIR.

3.17 Water Supply and Wastewater

Summary of findings in the EIR

Water supplies:

Domestic water services are provided to the Planning Area by the Coachella Water Agency (CWA), a City department. CWA cooperates closely with the Coachella Valley Water District (CVWD), and signed a Memorandum of Understanding with CVWD in 2009 to ensure a sufficient and reliable water supply for the Planning Area. The water demand expected from buildout of the CGPU was generally accounted for in CVWD's regional water supply planning efforts.

The EIR conducted water supply and demand analysis based on the City of Coachella 2010 Urban Water Management Plan (UWMP), CVWD's 2010 Urban Water Management Plan, CVWD's 2010 Coachella Valley Water Management Plan Update (CVWMP), and its 2011 and 2012 CVWMP Subsequent Programmatic EIR (SPEIR). The water demands associated with the CGPU were analyzed in CVWD's 2010 CVWMP and its 2011 SPEIR. The 2010 CVWMP identifies programs and projects to ensure that sufficient and sustainable water supplies will be available to meet the needs of the growth projected in the Coachella Valley, including the CGPU Planning Area, for at least the next 30 years.

The Coachella Valley Groundwater Basin contains approximately 25-million-acre feet of groundwater, as well as additional storage space that will continue to be utilized for storage of millions of acre feet of supplemental supplies that occur in normal and above-normal years. Those surplus supplies would be stored for later use during dry periods. Therefore the 2010 CVWMP and 2011 SPEIR determined that the total projected water supplies available to the Lower Whitewater River Subbasin area during normal, single-dry and multiple-dry periods through 2045 are sufficient to meet current and projected water needs.

According to the CGPU, new developments in the City must be consistent with the goals of the 2010 CVWMP, including policies on indoor and outdoor water conservation, such as xeriscaping, potential future use of recycled water, and other sustainable design features. Future development projects under the CGPU above certain sizes will be required to prepare a Water Supply Assessment as required by SB 610, and any future approval of a development agreement or tentative tract map within the Planning Area which includes a subdivision must be conditioned on obtaining a Written Verification from the Coachella Water Authority, as required by SB 221.

The CWA fully participates in the 2010 CVWMP and CVWD replenishment assessment programs, which established a comprehensive and managed effort to eliminate the overuse of local groundwater supplies. The CGPU EIR showed that the total projected water supplies available to the CWA will be sufficient to meet the water demand of CGPU buildout including from agricultural and manufacturing uses during a normal year, single-dry year, and multiple-dry year from 2010 to 2035. Given the City's participation in regional water planning efforts and implementation of water conservation programs, the EIR concluded that the CGPU will have less significant impacts on water supply and additional water facilities.

Wastewater treatment and facilities:

Wastewater treatment in the Planning Area must comply with regulations provided by the Colorado River Basin Regional Water Quality Control Board (RWQCB). The Coachella Sanitary District manages wastewater treatment facilities and implements the regulations imposed by the Colorado River Basin RWQCB. In order to operate, the facilities managed by the Coachella Sanitary District must comply with all Colorado River Basin RWQCB requirements and provide annual reporting. In addition to the regulatory system imposed by the RWQCB, the CGPU contains additional policies to require adequate wastewater treatment capacity before the completion of new development. These policies will ensure development under CGPU will not result in overuse of wastewater treatment facilities in a manner that exceeds requirements outlined by the applicable RWQCB regulations.

While the majority of the Planning Area is served by the City's Sanitary District, Valley Sanitary District (VSD) provides supplemental wastewater treatment to the remaining SOI area. The Coachella Sanitary District's Wastewater Treatment Plant (WWTP) is located in the southern City on Avenue 54, with a current capacity of approximately 2 mgd. The Coachella Sanitary District (CSD) also operates a 12-acre Agricultural Wash Water Treatment Facility primarily to manage the flows from several agricultural processing facilities. According to the EIR, buildout of the CGPU will require a WWTP capacity of 18 mgd, likely necessitating the construction of a new WWTP or expansion of the existing WWTP. Environmental impacts resulting from new or expanded WWTPs would have the potential to impact local waterways from new sludge and water discharge. Otherwise, the site development impacts of the WWTP would be similar to other development under the CGPU and were analyzed in the EIR.

The CGPU contains policies to reduce potential impacts including service standards, sewer master plan, facility design, and fair-share costs. The CGPU also proposes the use of development impact fees to develop infrastructure such as a recycled irrigation program. The potential environmental impacts of new wastewater facilities will be assessed by the City on a project-by-project basis, and mitigation measures will be implemented as necessary. Given that the potential environmental impacts of new wastewater facilities will be analyzed on a project-by-project basis, the EIR determined that the existing regulatory framework would ensure that impacts on wastewater treatment are less than significant.

Stormwater:

The City of Coachella receives flood protection from the Coachella Valley Water District (CVWD) which provides regional flood protection by intercepting and conveying regional flood flows through the Coachella Valley to the Salton Sea. The regional stormwater conveyance system consists of the Whitewater River/Coachella Valley Stormwater Channel (CVSC) and related tributary stormwater facilities. Portions of the CVSC has been channelized to handle flood flows of up to 80,000 cubic feet per second and the channel drains into the Salton Sea. As discussed in Section 3.9, Hydrology, the Whitewater River/CVSC is constructed to hold more than the 100-year flood volume within the City of Coachella, and is expected to adequately support stormwater drainage for development under the CGPU. However, site-specific and City-wide stormwater drainage facilities would be needed as development occurs.

The CGPU provides explicit direction to reduce impacts associated with local stormwater flows by requiring continual monitoring, maintenance, and concurrent upgrades to system capacity through the Infrastructure + Public Utilities and Sustainability + Natural Environment Elements. Given the existing regional facility capacity and City policies including fair-share costs, development impacts fees, and monitoring that help prevent impacts related to inadequate capacity of stormwater drainage facilities, the EIR determined that impacts of new or expanded stormwater drainage facilities under the CGPU are considered less than significant.

Analysis of the proposed Project

Water supplies:

According to the EIR, the Planning Area had a water demand of 8,709.5 acre feet (AF) in 2010, which is expected to increase to 27,276 with buildout of the CGPU in 2035. The EIR determined that the Coachella Water Authority would have sufficient water supplies to meet project demand through 2035 in a normal, single dry, and multiple dry year.

Using water demand calculation tables from CVWD and the buildout assumptions described in Section 2, Table 1, of this document, water demand for development of the site under the existing and proposed conditions was estimated. As shown in Table 13, development under the existing UEC designation would require 199.46 acre-feet per year (AFY) of water for indoor and outdoor uses. The proposed Industrial District designation would result in indoor and outdoor water demand of 30.30 AFY, which is more than 80% less than would be required under the current conditions.

Furthermore, the 30.30 AFY of water demand associated with the proposed development would represent approximately 0.1% of the total water demand expected at buildout of the CGPU. Given that the Project would constitute a nominal portion of the total water demand expected from buildout of the CGPU, and that CWA would have sufficient supplies for the total demand of the Planning Area after buildout, it can be assumed that there would be sufficient supplies for the Project. Therefore, no new impacts would be expected to occur.

Table 13 – Water Demand: Current and Proposed General Plan					
Current Conditions					
Planning Area	Indoor Area (ft ²)	Maximum Interior Floor Space Per Unit	Water Demand Factor ¹	Water Demand (gpd)	Water Demand (AFY)
Office	425,000	425,000	12	13,972.60	15.65
Planning Area	Estimated Dwelling Units	Estimated Occupants per Home ²	Gallons per Day (gpd) per Occupant	Water Demand (gpd) ³	Water Demand (AFY)
Residential	610	2,610	55	142,587.50	159.72
Planning Area	Landscaped Area (square feet)	ETo (in/yr)	ETAF	Water Demand (gpd)	Water Demand (AFY)
Site-wide	425,000	66.2	0.45	21,505.93	24.09
Total (current):				178,066.03	199.46
Proposed GPA Conditions					
Planning Area	Indoor Area (square feet)	Maximum Interior Floor Space Per Unit	Water Demand Factor ⁴	Water Demand (gpd)	Water Demand (AFY)
Industrial	595,000	297,500	3.4	5,542.47	6.21
Planning Area	Landscaped Area (square feet)	ETo (in/yr)	ETAF	Water Demand (gpd)	Water Demand (AFY)
Site-wide	425,000	66.2	0.45	21,505.93	24.09
Total (proposed):				27,048.40	30.30
Source: CVWD WSA-WSV Water Demand Calculation Tables					
¹ AWWARF Commercial and Institutional End Uses of Water.					
² Department of Finance, Table E-5, City of Coachella 2022.					
³ CA Indoor Water Use Standard					
⁴ AWWARF Commercial and Industrial End Uses of Water, 2000.					

Wastewater treatment and facilities:

The City of Coachella 2015 Sewer System Master Plan evaluated the existing system capacity of the Coachella Sanitary District (CSD), identified existing and future deficiencies resulting from development through 2040, and recommended phased improvements. The plans modeled sewer flow rates based on land use categories, including General Commercial uses at 600 gallons per day per acre (gpd/ac), High Density Residential (0-20 Du/Ac) at 2,400 gpd/ac, and Light Industrial at 400 gpd/ac. Given the buildout assumptions for the existing UEC designation, the subject property could include the General Commercial and High Density Residential land use categories. This would result in wastewater flow rates of 600 gpd/ac for the office uses and 2,400 gpd for the residential uses. The GPA proposes manufacturing and general light industrial land uses, which would result in wastewater flow rates of 400 gpd/ac.

Table 14 – Wastewater Generation: Current and Proposed Conditions				
38.8-Acre Site	Land Use Assumptions ¹	Sewer Master Plan Land Use Category ²	Wastewater Flow Rate (gpd/ac)	Estimated Wastewater Generation
Current Conditions	Office	General Commercial	600	58,200 gpd ³
	Multi-Family Residential (30 to 65 Du/Ac)	High Density Residential (0-20 Du/Ac)	2,400	
Proposed GPA Conditions	Manufacturing	Light Industrial	400	15,520 gpd
	General Light Industrial			

¹ Based on buildout assumptions described in Section 2, Table 1, of this document.
² Based on land use categories in Table 4-2 of the City of Coachella 2015 Sewer System Master Plan.
³ Based on a wastewater flow rate of 1,500 averaged from flow rates for general commercial and high density residential.

Table 14 shows the estimated wastewater that would be generated by the current and proposed conditions. Since the Sewer System Master Plan does not provide a flow rate for mixed use developments, the 600 gpd/ac for General Commercial and 2,400 gpd/ac for High Density Residential was averaged, resulting in a flow rate of 1,500 gpd/ac for the mixed-use development of the 38.8-acre site. The above wastewater generation estimates show that the proposed Light Industrial development would generate less wastewater than would be generated under the existing designation.

The EIR found that buildout of the CGPU would require expansion of CSD’s wastewater treatment capacity and the construction of a new or expanded WWTP. Regardless of the type of development on the site, the site would receive sewer service per the 2015 plan, and CSD would need to expand the WWTP capacity to meet service needs with buildout of the CGPU. As shown in the above analysis, the proposed GPA would generate lower wastewater flows than the current designation. Therefore, impacts on wastewater facilities would be considered less than those considered in the EIR, and less than significant, and would result in no new or increases in severity of impacts compared to those identified in the CGPU EIR.

Stormwater:

Under either the existing or proposed General Plan designation, development of the site will be subject to the same regulatory framework discussed in the EIR for drainage control and storm drain facilities. The City of Coachella Municipal Code Section 13.16.047 requires compliance with best management practices (BMPs) consistent with the California Stormwater Best Management Practice Handbooks or the Riverside County Stormwater Program’s "Report of Waste Discharge". The Project will be required to submit a water quality management plan (WQMP) to the City engineer for approval prior to obtaining a grading or building permit (Municipal Code Section 13.16.340). These standard requirements will ensure that the Project will have less than significant impacts on the storm drain facilities. No new or increased severity of impacts would occur compared to those identified in the EIR.

3.18 Wildfire

Summary of findings in the EIR

Wildfire was not a standalone topic require by the CEQA Guidelines when the CGPU EIR was prepared. However, the EIR included brief discussions of wildland fires under Section 4.6 Hazardous Materials and Section 4.15 Public Services. The EIR found that the CGPU would facilitate new development in the Planning Area, some of which would be in an urban-wildland interface. Development in these areas is exposed to the threat of wildfire. The EIR determined that careful planning under the CGPU and compliance with federal, state, and local agencies' regulations, including the California Wildland Fire Coordinating Group, supplemented by CGPU policies that require fire suppression techniques and fire-resistant materials to reduce vulnerability of new structures to fire, would reduce impacts relating to wildland fires to less than significant levels.

Analysis of the proposed Project

The California Department of Forestry and Fire Protection (CalFire) has mapped areas of significant fire hazards through its Fire and Resources Assessment Program (FRAP). According to the FRAP, there are no state responsibility areas or very high fire hazard severity zones in the City or surrounding areas. Development of the site under both the existing EUC designation or under the proposed Industrial District designation would be subject to the same CGPU policies and fire department requirements for fire safety and emergency access. There would be no impacts related to wildfires resulting from the existing conditions or the proposed General Plan Amendment and Project. There would be no new or increased severity of impacts.