



# IID

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September 25, 2019

Mr. Luis Lopez  
Director  
Development Services Department  
City of Coachella  
1515 6th Street  
Coachella, CA 92236

SUBJECT: Zona Central Project in Coachella, CA (CZ 18-10 & EA 18-04)

Dear Mr. Lopez:

On September 13, 2019, the Imperial Irrigation District received from the City of Coachella Development Services Department, a request for agency comments on the conceptual land use plan for the Zona Central project (Change of Zone No. 18-10, Environmental Assessment No. 18-04). The City of Coachella proposes to amend the official zoning map by changing the zoning on approximately 206.2 acres of vacant agricultural land and partially-developed land in the Manufacturing Service zone to provide consistency in the policies of the City of Coachella General Plan 2035 and specifically in its Land Use & Community Character Element and its Housing Element. The land is located south of Avenue 50, west of Tyler Street, approximately ¼ mile north of Avenue 52 in Coachella, CA.

The Imperial Irrigation District has reviewed the project information and has the following comments:

1. IID will not begin any engineering or estimate costs to provide electrical service for any project within the Zona Central area until the owner/developer submits a customer project application, detailed loading information, panel sizes, project schedule and estimated in-service date. The application is available for download at the district website <http://www.iid.com/home/showdocument?id=12923>.
2. However, based on the information provided, IID has performed a preliminary assessment of the development area and has determined that there will be a substantial impact to the IID electrical system as the area develops; the cumulative impact of office, R&D, retail and services uses and possibly a college or university, in addition to multi-family residential uses potentially located on the edges of the Zona Central area, significantly increase the electrical demand on district's system.
3. The environmental analysis in the Initial Environmental Study does not address, even conceptually, the level of adequacy of the existing electrical utility infrastructure to service the development area; neither in the *Project Description* section (Chapter 2, section 2.3) nor in the *Utilities and Services Systems* section (Chapter 3, section XVII) of the IES. Electrical service is a factor of utmost importance in the implementation and success of any new project. The deficient assessment of a project's potential impact on this resource

could adversely affect the capability of the district to provide electrical service in an efficient and timely manner.

4. Chapter 3, section XVII, titled *Utilities and Services Systems*, of the IES should be amended to reflect a "Potentially Significant Impact" with the following mitigation measures:
  - a) Based on preliminary information received, it is anticipated that the additional power load for the development of the Zona Central area will require the acquisition, design and construction of a substation, transmission and distribution line extensions, distribution getaways and distribution feeders all of which shall be at the expense of the developer. A minimally-dimensioned substation site of 315 ft. by 315 ft. will be required at a location approved by IID. Additional requirements include grading, fencing, applicable permits, zoning change, landscaping (if required by the City), and all rights-of-way and easements for the substation site and access rights for both ingress and egress, as well as for power line facilities (transmission and distribution), all of which shall be at the expense of the developer.
  - b) Underground distribution line extensions will be required to serve the Zona Central area as well, including such items as all rights-of-way and easements for the line extensions and any line relocations or reconfigurations needed, all of which shall be at the expense of the developer.
5. Once the district is provided with the required information as stated in comment no. 1, IID can carry out a thorough assessment to determine the specific requirements to supply electrical service to a project. Likewise, IID will determine the availability of temporary construction power from existing power lines based on construction schedules and or phasing.
6. For additional information regarding electrical service for a project, the applicant should be advised to contact the IID Energy - La Quinta Division Customer Operations, 81-600 Avenue 58 La Quinta, CA 92253, at (760) 398-5841 and speak with the project development planner assigned to the area.
7. It is important to note that IID's policy is to extend its electrical facilities only to those developments that have obtained the approval of a city or county planning commission and such other governmental authority or decision-making body having jurisdiction over said developments.
8. The applicant will be required to provide rights-of-way and easements for any power line extensions needed to serve the project.
9. Line extensions are made in accordance with IID Regulations:  
No. 2 (<http://www.iid.com/home/showdocument?id=2540>),  
No. 13 (<http://www.iid.com/home/showdocument?id=2553>),  
No. 15 (<http://www.iid.com/home/showdocument?id=2555>) and  
No. 20 (<http://www.iid.com/home/showdocument?id=2560>).
10. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed

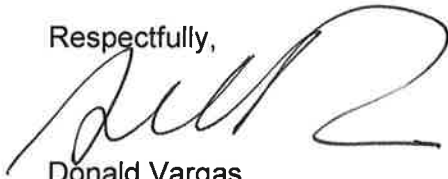
new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at <http://www.iid.com/departments/real-estate>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.

11. Relocation of existing IID facilities to accommodate the project and/or to accommodate street widening improvements imposed by the City will be deemed project-driven and all costs, as well as securing of rights of way and easements for relocated facilities, shall be borne by the applicant.
12. Public utility easements over all private and public roads and an additional ten (10) feet in width on both side of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of electrical infrastructure.
13. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**
14. Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. The State CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. CEQA case law has established general principles on project segmentation for different project types. For a project requiring construction of offsite infrastructure, the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713.

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

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

Respectfully,



Donald Vargas  
Compliance Administrator II

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