



CEQA Compliance
Section 15183 Analysis
for
Coachella Valley Apartments
Architectural Review (AR 19-10)
Tentative Parcel Map No. 37833

I. Introduction

The applicant proposes the demolition of 50 existing dwelling units for the construction of a 110-unit affordable housing development on approximately 5.76 acres located at 84-900 Bagdad Avenue. The project is expected to develop in two phases and consists of a combination of two and three-story buildings and a centrally located community center building. The City of Coachella is processing an Architectural Review application and Tentative Tract Map for the project.

This document analyzes the proposed project with respect to its compliance with the California Environmental Quality Act (CEQA), particularly CEQA Guidelines Section 15183, and in the context of consistency with the City of Coachella General Plan and its certified Environmental Impact Report.

CEQA Requirements

CEQA (Public Resources Code Section 21000 et. seq.) and the State CEQA Guidelines require that state and local government agencies evaluate and consider the potential environmental effects of projects over which they have discretionary authority. CEQA Guidelines Section 15183 allows for a streamlined environmental review process for projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its sites.

If the above qualifications are met, as stated in Section 15183(b), “a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

- (1) are peculiar to the project or the parcel on which the project would be located,
- (2) were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,
- (3) are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or

- (4) are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.”

This document has been prepared to satisfy the requirements of CEQA Guidelines Section 15183. It analyzes the potential environmental effects of the proposed project and evaluates whether they were adequately analyzed in a prior EIR such that the above-identified streamlining criteria apply.

General Plan Update Program EIR

The project is consistent with the Coachella General Plan Update 2035 (CGPU), for which an EIR (SCH #2009021007) was certified on April 22, 2015. The CGPU provides a framework for future growth of the City and projects the development reasonably expected to occur during the 20-year buildout period to 2035. The CGPU EIR analyzed the environmental impacts associated with adoption and implementation of the General Plan Update.

The proposed project is permitted in the zoning district where the project site is located and consistent with the land uses, density, and vision of the CGPU. According to the City’s Zoning Map, the project site is within the R-M zone (Residential Multiple Family), which allows for various medium and high population densities that are in conformance with the General Plan (Coachella Municipal Code, Chapter 17.20). Under the CGPU, the project site is within the City’s “Urban Neighborhood” land use designation that provides high density, walkable, and transit-ready neighborhoods with a variety of housing types and supporting land uses such as retail, office, civic and recreational uses. (CGPU, p. 04-19). This designation allows a density of 20 to 38 dwelling units per acre and commercial floor to area ratio (FAR) of up to 0.5. Given the project’s consistency with the CGPU, the City is not required to examine environmental impacts that were already evaluated in the previously certified General Plan EIR.

The CGPU EIR serves as the basis of the analysis contained herein, and the proposed project is evaluated for consistency with the intent of CGPU policies and conformance with development regulations. Information contained in the CGPU EIR is incorporated by reference, and mitigation measures that would apply to the proposed project are identified.

2. Project Description

Project Location

The subject property is located at 84-900 Bagdad Avenue, approximately 0.1 miles west of Harrison Street (APNs 768-210-025 and -026). (Exhibits 1-4).

Existing Conditions

The site is currently occupied by a 50-unit, non-gated multi-family development and centrally located, communal open space (Coachella Valley Apartments). All buildings are single-story with on-site parking provided throughout the complex. Vehicular access is provided by independent driveways along Bagdad Avenue that serve the western and eastern sections of the complex.

Land Use Designations

The subject property is designated “Urban Neighborhood” in the General Plan and “Residential Multiple Family” (RM) on the Zoning Map. The project site is also located in “Subarea 1 – West Coachella Neighborhoods” of the General Plan, as shown in the CGPU’s *Figure 4-24: General Plan Subarea Map*.

Surrounding Land Uses

Surrounding land uses include the following:

- North: Las Flores Family Apartments,
- East: New Life Church Coachella and Plaza Tonala shopping center,
- South: Bagdad Avenue,
- West: Coachella Valley Apartment Homes

Project Description

The proposed project would result in demolition of existing on-site buildings and improvements and development of eight 3-story residential apartment buildings and one single-story administration/community building (Exhibit 5). The apartments would total 136,023± square feet, consisting of 110 one-, two-, and three-bedroom units with balconies. The community building would total 4,755± square feet and include office space, meeting rooms, a laundry room, a computer lab, and maintenance/storage areas. A total of 191 on-site parking spaces will be provided. Open space amenities include half-court basketball, playgrounds (tot lots), outdoor BBQ areas, and a splash pad. Site access will be provided by two driveways along Bagdad Avenue with internal driveways providing connections to all buildings.

The existing apartments have been occupied for decades. At a density of 9 units per acre, the project is currently less dense than was envisioned in the General Plan’s Urban Neighborhood designation. The redevelopment of the site for 110 units, or 20 units per acre, is consistent with the City’s current vision for the site.

Discretionary Actions

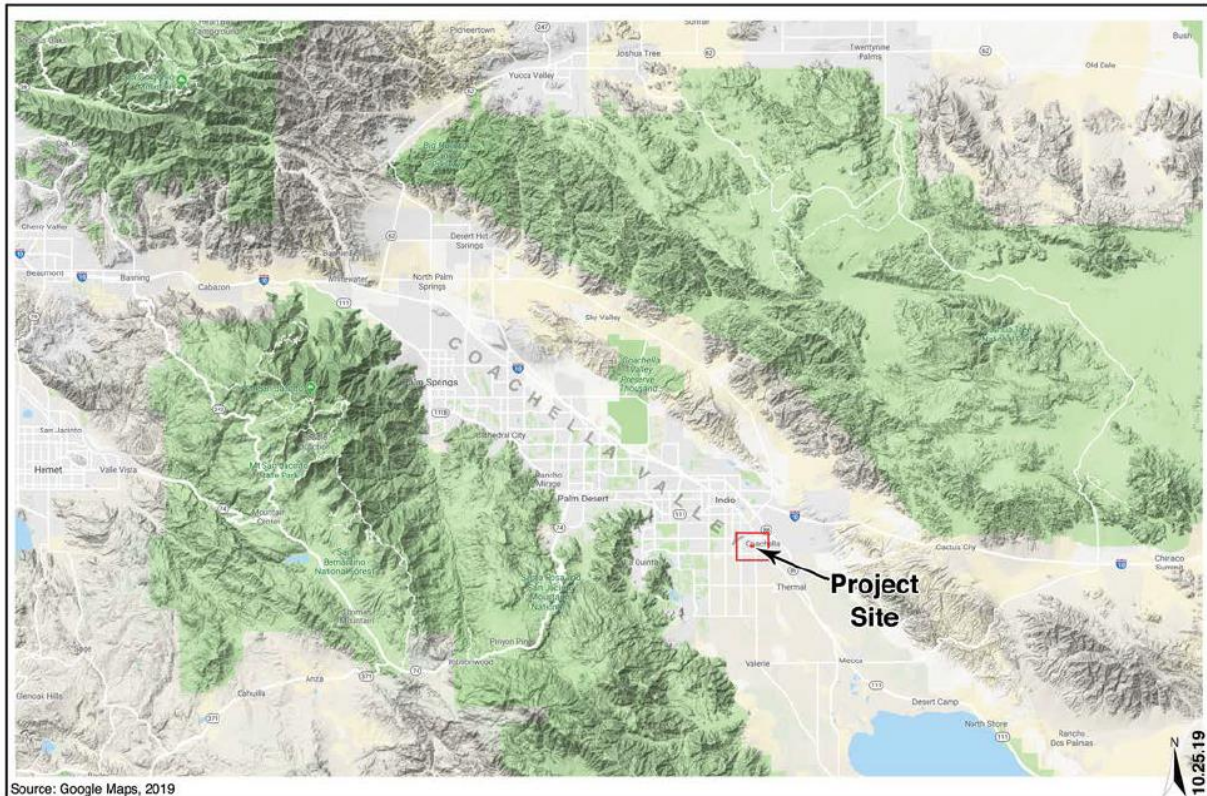
The proposed Project would require approval of an Architectural Review application for site plan and exterior architecture and landscaping review, and a Tentative Parcel Map to allow a lot split.

Exhibit 1

Regional Location Map



Exhibit 2
Area Location



Source: Google Maps, 2019

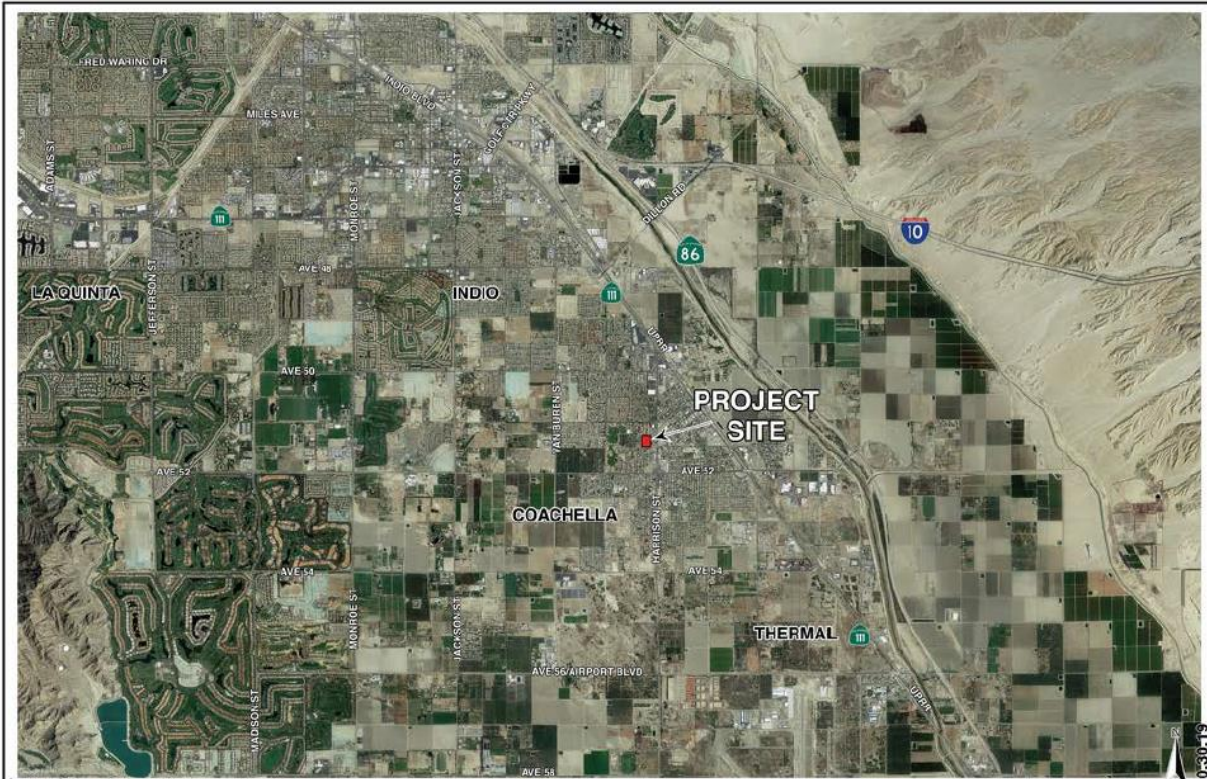


Coachella Valley Apartments
Area Location Map
Coachella, California

Exhibit

2

Exhibit 3
Project Vicinity



Source: Google Earth, 2019



Coachella Valley Apartments
Vicinity Map
Coachella, California

Exhibit
3

Exhibit 4

Project location



Source: Google Earth, 2019

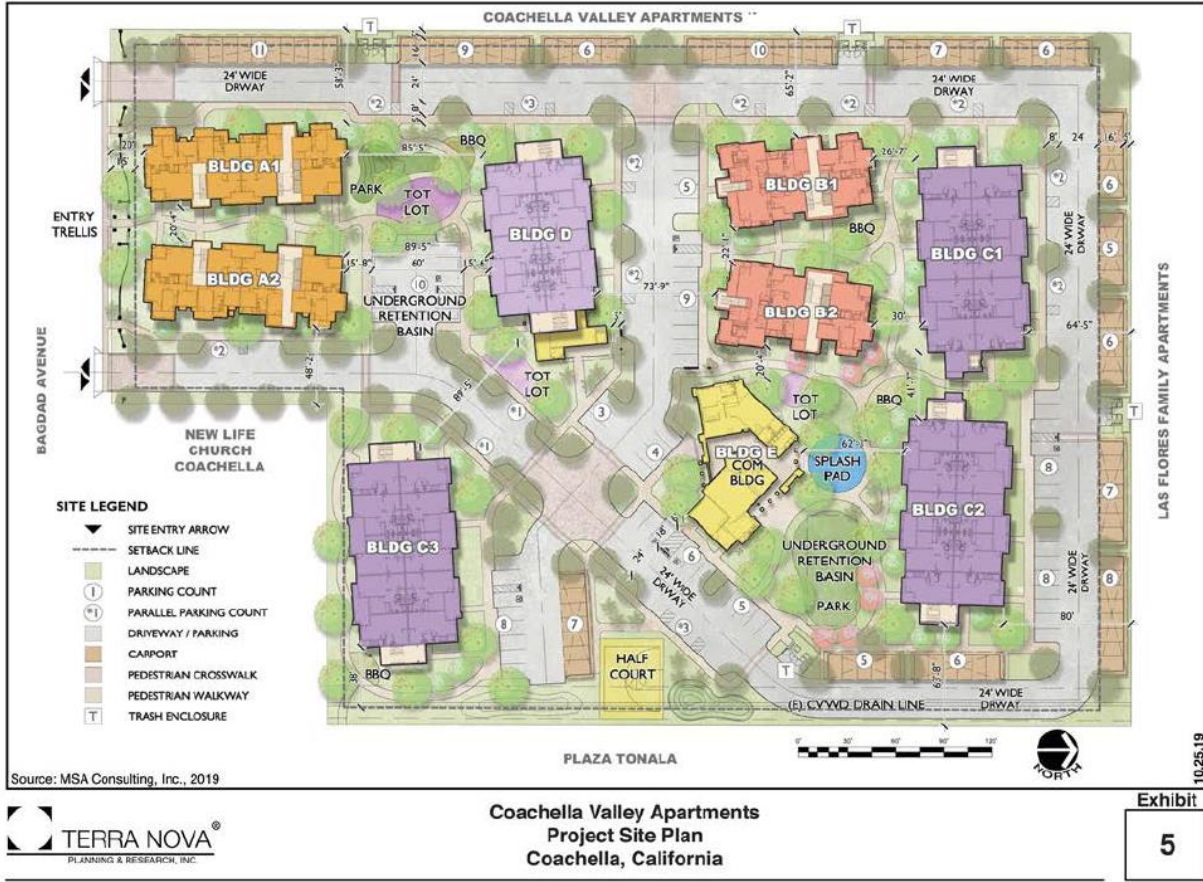


Coachella Valley Apartments
Project Location Map
Coachella, California

Exhibit

4

Exhibit 5
Project Site Plan



3. Environmental Impacts Analysis

INTRODUCTION

The following analysis describes potential environmental impacts of the proposed project, findings of the CGPU EIR, and mitigation measures (if required) that are recommended as appropriate for the proposed project.

AESTHETICS

The proposed project site is designated “Urban Neighborhood” in the General Plan. The physical character of an “Urban Neighborhood” is defined by mid- to high-density residential mixed-uses, convenient pedestrian access, and high quality public open spaces and streetscapes to create a comfortable living environment for neighborhood residents (CGPU p. O4-19). Desired building types are “Rowhouse/Townhouse, Garden Apartment and Urban Apartment,” with buildings heights of two to three stories (CGPU p. O4-20). Main entrances should be located along the property street frontage and designed to welcome visitors.

The Land Use and Community Character Element of the CGPU sets forth policies intended to preserve the City’s unique visual character, including preservation of the “small-town” identity, cultural diversity, and high quality construction and architecture (CGPU p. 4-85 and 4-86). The proposed project is consistent with the following CGPU policies:

- 2.5 High quality construction and architecture. Require high-quality and long-lasting building materials on all new development projects in the City. Encourage innovative and quality architecture in the City with all new public and private projects. (Land Use and Community Character)

- 6.1 View corridor preservation. Protect and preserve existing, signature views of the hills and mountains from the City. (Sustainability and Natural Environment)

The proposed project would demolish and replace the existing single-story buildings with taller, three-story buildings. Proposed architectural styles, colors, building heights, and site layout are consistent with the intent of the “Urban Neighborhood” designation and are compatible with the existing visual character of multi-family residential developments in the immediate vicinity and along Bagdad Avenue.

Compared to existing site conditions, the proposed project would increase building heights and lot coverage, which could potentially increase light and glare. However, project lighting and glare levels would be compatible with the surrounding urban environment and reduced through compliance with Municipal Code requirements, such as the shielding of lighting fixtures to prevent spillage onto adjacent properties.

In addition to light and glare, increased building heights could potentially impact views of scenic vistas enjoyed by surrounding properties. The most prominent scenic vista within the CGPU Planning Area is of

the Mecca Hills, which are located to the east. The CGPU sets forth policies within the Sustainability + Natural Environment Element that ensure existing and new development are designed to preserve view corridors. The project would not damage scenic resources or have a substantial adverse effect on a scenic vista because neither occur onsite or in the immediate vicinity.

The proposed project is consistent with the “Urban Neighborhood” land use designation assigned by the CGPU and analyzed in the EIR. The EIR determined that development resulting from implementation of the General Plan would have no impact to scenic resources, and have less than significant impacts on scenic vistas, and light intrusion and glare. However, impacts to visual character would result in significant and unavoidable impacts due to the City’s expected high growth rates and development projections. No mitigation measures were required or provided in the EIR; however, the proposed project would be subject to the CGPU policies referenced above and the City’s standard design review process.

Overall, the proposed project would not result in any new impacts or significant findings associated with aesthetics or increase the severity of impacts identified in the EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR as a result of the proposed project.

Determination:

- There is nothing unusual or peculiar to the project or subject parcel that would change or affect the aesthetic impacts analyzed in the CGPU EIR.
- Impacts of the proposed project on aesthetics were analyzed in the certified CGPU EIR because....
- There are no significant off-site or cumulative aesthetic impacts associated with the proposed project that were not addressed in the EIR because....
- There is no substantial new information indicating that the aesthetic impacts of the project would be more severe than those described in the EIR because....

AGRICULTURE AND FORESTRY RESOURCES

Within the CGPU planning area, there are approximately 11,139 acres of agricultural lands, of which 994 acres are currently under Williamson Act contract. The CGPU EIR determined that development resulting from implementation of the General Plan would result in significant and unavoidable impacts regarding the conversion of farmland to non-agricultural uses due to anticipated population growth.

However, the subject property is designated “Urban Neighborhood” in the General Plan and is currently developed as such. Surrounding lands are also developed or designated for residential and or urban uses. There are no farmland zoning designations, Williamson Act contracts, forests, or forest zoning designations on site or in the project vicinity. The proposed project would not result in the loss or conversion of agricultural or forest land.

The proposed project is consistent with the “Urban Neighborhood” land use designation and would not result in any new impacts or significant findings associated with agricultural or forestry resources or increase the severity of impacts identified in the EIR. The impact was adequately addressed in the EIR

and would not change from that identified in the EIR as a result of the proposed project. No impact would occur and no additional mitigation measures are required.

Determination:

- There is nothing unusual or peculiar to the project or subject parcel that would change or affect the impacts to agriculture or forestry lands analyzed in the CGPU EIR, as the subject parcel is currently designated as “Urban Neighborhood” and will continue to be developed with multi-family uses.
- Impacts of the proposed project on agriculture and forestry resources were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative agriculture or forestry impacts associated with the proposed project that were not addressed in the EIR, as the project involves redevelopment of a developed urban site with the same, multi-family, residential use at a density consistent with that analyzed in the CGPU EIR.
- There is no substantial new information indicating that the agriculture or forestry impacts of the project would be more severe than those described in the EIR.

AIR QUALITY

According to the CGPU, the City’s population is intended to grow to a maximum of 135,000 by 2035. By contrast, SCAG’s 2012 Regional Transportation Plan (RTP)/Sustainable Community Strategies (SCS) forecasts that the City will have a population of only 128,700 in 2035. Thus, the CGPU anticipates a maximum of 6,300 more residents than does the 2012 RCP/SCS by this time horizon, or approximately 4.9% more growth (CGPU EIR, p. 4.11-13). However, the CGPU EIR determined that the theoretical buildout of land use designations likely overstates the amount of growth likely to occur, and is therefore generally consistent with RTP/SCS. The proposed project is consistent with this trend because it does not propose the maximum density allowed for the site. Further, the proposed project is consistent with the following CGPU policies:

- 14.1 Sustainable development leadership. Establish the City as a regional leader in sustainable development and encourage compact, higher-density development that conserves land resources, protects habitat, supports transit, reduces vehicle trips, improves air quality, conserves energy and water and diversifies the housing stock in the Coachella Valley. (Land Use and Community Character)
- 11.2 Land use patterns. Promote compact, mixed-use, energy efficient and transit oriented development to reduce air pollutants associated energy and vehicular use. (Sustainability and Natural Environment)
- 11.12 Indoor air quality. Require new development to meet the state’s Green Building Code for indoor air quality performance. (Sustainability and Natural Environment)

- 11.13 Healthy homes. Promote green building practices that support “healthy homes,” such as low VOC materials, environmental tobacco smoke control, and indoor air quality construction pollution prevention techniques.

The CGPU EIR analyzed both short-term and long-term air quality emission impacts associated with buildout of the General Plan on a programmatic level.

Long-Term Impacts

The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Coachella Valley, including the City of Coachella. Under state law, the SCAQMD is required to prepare an overall plan for air quality improvement, known as the Air Quality Management Plan (AQMP), for the South Coast Air Basin and the Riverside County portion of the Salton Sea Air Basin, for which the project is located. Projects that are consistent with the projections of employment and population forecasts identified in the Regional Comprehensive Plan (RCP) prepared by the Southern California Association of Governments (SCAG) are considered consistent with the AQMP growth projections, since the RCP forms the basis of the land use and transportation control portions of the AQMP.

In addition, buildout of the General Plan would not conflict with applicable air quality plans due to numerous policies provided in the Land Use + Community Character Element, Mobility Element, and Sustainability + Natural Environment Element, which are consistent with the intent of the California Air Resources Board (ARB) Air Quality and Land Use Handbook. The proposed project is consistent with the intent and buildout of the General Plan, and therefore would not conflict with applicable air quality plans.

Short-Term Impacts

The EIR determined that construction-related emission impacts would be less than significant due to applicable CGPU policies (Sustainability + Natural Environment Element) and SCAMD rules regarding construction activities and sensitive receptors. Applicable state and local standards regarding construction would be applied during development of the proposed project, ensuring short-term impacts are less than significant.

Existing vs. Proposed Development

The existing 50-unit multi-family development is equal to a land use density of 9 units per acre. The proposed 110 residential units will increase the site’s land use density to 20 units per acre. The CGPU EIR analyzed maximum potential buildout emissions, meaning the project site was analyzed for 38 units per acre. Although the proposed project will result in an increased land use density compared to existing conditions, the project would emit fewer emissions than the maximum density analyzed under the CGPU EIR. Therefore, the proposed project would result in less than significant impacts and no new mitigation measures are required with compliance of existing CGPU policies and SCAQMD regulations.

Hotspots

Although CO is not expected to be a major air quality concern in the Coachella Valley in the near future, elevated CO levels can occur at or near intersections that experience severe traffic congestion. The CGPU EIR found that buildout of the General Plan could potentially have a significant impact on air quality standards, specifically CO hotspots, if increased traffic at certain intersections were not alleviated. Based on analysis of the traffic study prepared for the CGPU EIR, impacts related to CO hotspots would be reduced to less than significant levels with implementation of mitigation measures set forth in EIR Section 4.8 Circulation, which are designed to provide additional capacity at intersections operating at LOS E or F. No new mitigation is required for the proposed project.

The proposed project is consistent with the “Urban Neighborhood” land use designation assigned by the CGPU and analyzed in the EIR. The EIR determined that development resulting from implementation of the General Plan would result in less than significant impacts to air quality with mitigation, and cumulative impacts would be less than significant. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcel that would change or affect the air quality impacts analyzed in the CGPU EIR. Uniformly applied development policies, including construction policies, will apply to the project and the project would not increase air quality impacts analyzed in the CGPU EIR.
- Impacts of the proposed project on air quality resources were analyzed in the certified CGPU EIR, as the project is less dense than that analyzed in the CGPU EIR.
- There are no significant off-site or cumulative air quality impacts associated with the proposed project that were not addressed in the EIR because....
- There is no substantial new information indicating that air quality impacts of the project would be more severe than those described in the EIR.

BIOLOGICAL RESOURCES

The subject site is located in an urbanized area and is currently developed with 50 multi-family residential units. The project site is located within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan (CV MSHCP) but is not within or in the vicinity of a Conservation Area, as defined by the Plan.

The site is currently developed and does not contain sensitive species populations, habitat capable of supporting sensitive species, riparian habitat, federally protected wetlands, migratory wildlife corridors, or wildlife nursery sites. As such, the proposed project would not result in habitat modifications affecting sensitive species, interfere with the movement of native wildlife species, or conflict with local policies or ordinances protecting wildlife species. It should be noted that the CGPU EIR required mitigation measures for sensitive species for projects proposing development within subareas 5, 6, and 7 of the General Plan (CGPU EIR, p. 4.3-26). The proposed project is located within subarea 1, will not disturb vacant land, and will therefore have no impact on sensitive species.

The proposed project is consistent with the “Urban Neighborhood” land use designation assigned by the CGPU and analyzed in the EIR. The EIR determined that development resulting from implementation of the General Plan would result in less than significant impacts to biological species, and local policies or ordinances protecting biological resources. The project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcel that would change or affect the impacts to biological resources analyzed in the CGPU EIR.
- Impacts of the proposed project on biological resources were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative biological resource impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that biological resource impacts of the project would be more severe than those described in the EIR.

CULTURAL RESOURCES

The subject property has been developed for many years as a 50-unit multi-family residential development. The site has been previously disturbed by grading, excavation, construction, and paving.

The CGPU EIR determined that development of the site resulting from implementation of the General Plan would result in less than significant impacts to historical resources, archaeological resources, paleontological resources, tribal cultural resources, and cumulative impacts; however, it could result in potentially significant impacts on human remains (CGPU EIR p. 4.4-21 through 4.4-23). The following CGPU policy was added to Chapter 7 as a Mitigation Measure to ensure potential impacts to human remains were avoided or reduced:

In areas where there is a high chance that human remains may be present, require proposed projects to conduct surveys to establish occurrence of human remains, if any. If human remains are discovered on proposed project sites, the project must implement mitigation measures to prevent impacts to human remains in order to receive permit approval.

No other mitigation measures were required to assure that impacts associated with cultural resources remain less than significant. The proposed project is consistent with the following CPGU policies:

- 10.4 Mitigation and preservation of cultural resources. Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources.

- 10.5 Grading. Require that proposed projects that involve a significant amount of grading shall have an archaeological and paleontological survey conducted before construction.

The EIR determined that, with mitigation, potentially significant impacts to human remains would be reduced to a less than significant level. Because the proposed project would occur on a previously disturbed/developed site, no impacts to cultural resources are anticipated. Demolition of the existing project, and construction of the proposed project, would result in grading and excavation for the new foundations required for the project's buildings.

The proposed project is consistent with the "Urban Neighborhood" land use designation assigned by the CGPU and analyzed in the EIR. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcel that would change or affect the impacts to cultural resources analyzed in the CGPU EIR.
- Impacts of the proposed project on cultural resources were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative cultural resource impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that cultural resource impacts of the project would be more severe than those described in the EIR.

ENERGY

The proposed project would demolish the existing 50-unit multi-family residential development on the site and replace it with a 110-unit multi-family residential development. The proposed land use would consume electricity and natural gas for daily operations, including heating, cooling, ventilation, cooking, and lighting. The project would also result in the consumption of transportation fuels by vehicles and equipment during the two construction phase and vehicles accessing the site over the long-term. New structures would be required to comply with Title 24 Building Energy Efficiency Standards which address efficiency of buildings, appliances, insulation and roofing, lighting, and water and space heating and cooling equipment. The project would not have excessive energy requirements or result in the wasteful or inefficient use of finite energy resources.

The proposed project is consistent with the "Urban Neighborhood" land use designation assigned by the CGPU and analyzed in the EIR. The proposed project is consistent with the following CGPU Sustainability and Natural Environment Element policies:

- 2.6 Energy performance targets – new construction. Require new construction to exceed Title 24 energy efficiency standards by 15 percent and incorporate solar photovoltaics.
- 11.2 Land use patterns. Promote compact, mixed-use, energy efficient and transit-oriented development to reduce air pollutants associated energy and vehicular use.

The EIR determined that development resulting from implementation of the General Plan would result in less than significant impacts associated with energy consumption. No mitigation measures were required or provided. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcel that would change or affect the energy impacts analyzed in the CGPU EIR.
- Impacts of the proposed project on energy resources were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative energy impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that energy impacts of the project would be more severe than those described in the EIR.

GEOLOGY AND SOILS

The proposed site is located in a seismically active region. However, no active faults or Alquist-Priolo Earthquake Fault Zones traverse the site, and no ground rupture would occur onsite. Construction regulations and guidelines are currently in place for new structures, to prevent collapse from ground shaking, subsidence, lateral spreading and liquefaction. These regulations ensure that structures are built with proper reinforcement to a level and engineering standard that is most recent, to prevent structure failure. Demolition and construction activities would be required to comply with City storm management discharge requirements and a stormwater pollution prevention plan (SWPPP), as necessary, to minimize erosion impacts.

The proposed project is consistent with the “Urban Neighborhood” land use designation assigned by the CGPU and analyzed in the EIR. The EIR determined that development resulting from implementation of the General Plan would result in less than significant impacts associated with geology and soils. No mitigation measures were required or provided. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR as a result of the proposed project.

Determination:

- There is nothing unusual or peculiar to the project or subject site that would change or affect the impacts associated with geology or soils analyzed in the CGPU EIR.
- Impacts of the proposed project on geology and soils were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative geology/soils impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that geology/soils impacts of the project would be more severe than those described in the EIR.

GREENHOUSE GAS EMISSIONS

Buildout of the CGPU would generate new GHG emissions, directly and indirectly. According to the CGPU EIR, implementation of the City's Climate Action Plan (CAP) would result in an annual per service population emissions value of 6.2 MT CO₂E in 2020, which is below the SCAQMD recommended threshold of 6.6 MT CO₂E per service population per year.

The City of Coachella has set a more stringent target of 49% below 2010 per service population emissions by 2035, or 4.2 MT CO₂E per service population per year. The EIR determined that buildout of the General Plan would result in 5.4 MT CO₂E per service population per year, which exceeds the City's reduction target. The EIR set forth a mitigation measure requiring the implementation of additional CAP reduction measures to ensure the City's reduction target is met by 2035 (CGPU EIR, p. 4.12-15). Impacts were found to be less than significant after mitigation.

The proposed project will result in an increased land use density compared to existing conditions; however, the project would emit fewer emissions than the maximum density analyzed under the CGPU EIR. Therefore, the proposed project would result in less than significant impacts and no new mitigation measures are required with compliance of existing CGPU policies and mitigation measures, including:

- 1.6 Climate-appropriate building types. Seek out and promote alternative building types that are more sensitive to the arid environment found in the Coachella Valley. Courtyard housing and commercial buildings can be designed to provide microclimates that are usable year round, reducing the need for mechanically cooled spaces and reducing energy consumption. (Sustainability and Natural Environment)
- 2.2 Passive solar design. Require new buildings to incorporate energy efficient building and site design strategies for the desert environment that include appropriate solar orientation, thermal mass, use of natural daylight and ventilation, and shading. (Sustainability and Natural Environment)
- 4.4 Reducing GHG emissions. In consulting with applicants and designing new facilities, prioritize the selection of green building design features that enhance the reduction of greenhouse gas emissions. (Sustainability and Natural Environment)

The proposed project is consistent with the "Urban Neighborhood" land use designation assigned by the CGPU and analyzed in the EIR. The EIR determined that development associated with implementation of the General Plan would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs after mitigation. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the General Plan EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the impacts to greenhouse gas emissions analyzed in the CGPU EIR.

- Impacts of the proposed project on greenhouse gas emissions were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative greenhouse gas emission impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that greenhouse gas impacts of the project would be more severe than those described in the EIR.

HAZARDS AND HAZARDOUS MATERIALS

Demolition of the existing units has the potential to result in the release of hazardous materials, as the project was built prior to the prohibition of asbestos use in building materials. According to the Phase 1 Environmental Site Assessment (ESA) prepared for the proposed project, the potential for asbestos to occur in the existing building exists (see Appendix A). Existing regulations and policies regarding hazardous materials are designed to help reduce future potential risk and environmental impacts to a minimum by requiring safe transport, use, and disposal of hazardous waste. The proposed project will be subject to these regulations, as are all projects which were built prior to 1976, and demolition of the existing buildings will require appropriate investigation and remediation, as required in the Phase 1 ESA. The implementation of this standard requirement will assure that impacts are no greater than those analyzed in the CGPU EIR.

Similar to the existing on-site conditions, the proposed project would require the transport, use, storage, and disposal of limited quantities and types of hazardous materials typically used in residential developments, such as solvents and cleaners. The subject site is not included on a list of hazardous materials sites, and proposed land uses would not generate a significant public hazard involving the release of hazardous materials. The site is not located within an airport land use compatibility plan, and the project would not create an associated safety hazard to people residing or working in the project area. Temporary construction traffic plans would be approved by and coordinated with the City and Police and Fire Departments to assure that the project would not physically interfere with emergency response plans.

The proposed project is consistent with the following Safety Element policies of the CGPU:

- 5.10 Household hazardous waste collection. Increase awareness in the community about proper disposal/collection of leftover household products, especially those that contain corrosive, toxic, ignitable, or reactive ingredients that are considered to be "household hazardous waste." Require special care for disposal or collection of products, such as paints, cleaners, oils, batteries and pesticides that contain potentially hazardous ingredients.
- 5.11 Hazardous materials disposal. Continue to support the operation of programs and recycling centers that accept hazardous substances, such as paint, paint thinner used waste oil, etc., such as the City's Drop-Off facility.

The proposed project is consistent with the "Urban Neighborhood" land use designation assigned by the CGPU and analyzed in the EIR. The EIR determined that development resulting from implementation of the General Plan would result in less than significant impacts associated with hazards and hazardous

materials. No mitigation measures were required or provided. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcel that would change or affect the hazardous materials impacts analyzed in the CGPU EIR, as standard requirements requiring safe transport, use, and disposal of hazardous waste would reduce any impact related to potential asbestos containing material on site.
- Impacts of the proposed project on hazards and hazardous materials were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative hazardous materials impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that hazardous materials impacts of the project would be more severe than those described in the EIR.

HYDROLOGY AND WATER QUALITY

The City currently enforces Federal, state, and local water quality regulations to monitor water quality and prevent degradation of water quality from various activities. The site is currently developed, and the project would not change drainage patterns such that substantial siltation, erosion, or flooding would occur. Two underground retention basins are proposed as part of the project to further reduce potential impacts from flooding and contain storm flows on-site.

The project is consistent with the following Sustainability and Natural Environment Element policies:

- 7.1 Pollution prevention. Limit the amount and concentration of pollutants released into the City's waterways.
- 7.4 Water quality. Ensure water quality in the City's waterways meets applicable state and federal standards.

Impacts from demolition, grading, and other construction activities would be temporary and minimized through adherence to a project-specific stormwater pollution prevention plan (SWPPP) and best management practices (BMP). The subject property is in "Zone X: Areas with Reduced Flood Risk Due to Levee" on Flood Insurance Rate Maps (FIRM) prepared by the Federal Emergency Management Agency (FEMA), and as such, the project would not expose people or structures to a significant risk associated with flooding.

The City's ground water supply comes from the Whitewater River Basin, specifically, the East (Lower) Whitewater River Subbasin. The Lower Whitewater River Basin is regionally managed by the Coachella Valley Water District (CVWD) who has statutory authority to replenish and assess local groundwater supplies per County Water District Law (CGPU p. 4.16-44). According to the CGPU, the Lower Whitewater River Basin currently meets demands of the General Plan buildout. In addition to water

districts' regional management efforts, the CGPU provides numerous policies addressing water supply and conservation (See CGPU EIR, p. 4.7-18 through -21). Therefore, impacts to groundwater supplies at CGPU buildout were determined to be less than significant.

The proposed project is consistent with the "Urban Neighborhood" land use designation assigned by the CGPU and analyzed in the EIR. The EIR determined that development resulting from implementation of the General Plan would result in less than significant impacts associated with hydrology and water quality. No mitigation measures were required or provided. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcel that would change or affect the impacts to hydrology or water quality analyzed in the CGPU EIR.
- Impacts of the proposed project on hydrology and water quality were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative hydrology impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that hydrology impacts of the project would be more severe than those described in the EIR.

LAND USE AND PLANNING

The proposed project would demolish and replace an existing 50-unit multi-family development with a new 110-unit multi-family development. The project would be compatible with surrounding land uses and would not physically divide an established community or result in physical features that constitute a barrier through the community.

The proposed project is consistent with the "Urban Neighborhood" land use designation assigned by the CGPU and analyzed in the EIR, which allows 20 to 38 dwelling units per acre. The project site is also located in "Subarea 1 – West Coachella Neighborhoods" as shown on the *General Plan Subareas Map* (CGPU Figure 4-24). The "vision" for Subarea 1 is to encourage improvements to existing neighborhoods and connectivity to adjacent areas. The proposed project is consistent with this vision and the following Subarea 1 policies:

1. Encourage the infill of vacant and underutilized parcels with neighborhood patterns that support walkability, exemplify great urban neighborhoods as described by the General Plan designations and expand the range of housing available.
2. Retrofit existing neighborhoods with a variety of improvements including improved connections to adjacent neighborhoods and commercial districts, pedestrian-friendly streets, parks and open spaces.
5. Encourage and facilitate the development of new parks and related recreational opportunities.

The subject site is within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan; the project would not conflict with the plan insofar as the site is fully disturbed.

The EIR determined that development resulting from implementation of the General Plan would result in less than significant land use impacts. No mitigation measures were required or provided. The project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the land use impacts analyzed in the CGPU EIR.
- Impacts of the proposed project on land use were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative land use impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that land use impacts of the project would be more severe than those described in the EIR.

MINERAL RESOURCES

The proposed project site is currently developed for multi-family residential and is located in an urbanized area. The site is located within Mineral Resource Zone-1 based on USGS mapping, which is defined as an “area where adequate geologic information indicates that no significant *mineral deposits* are present, or where it is judged that little likelihood exists for their presence” (CGPU EIR p.4.5-18, Figure 4.5-9: Mineral Resources). The proposed project would not result in the loss of availability of a known or locally important mineral resource.

The proposed project is consistent with the “Urban Neighborhood” land use designation assigned by the CGPU and analyzed in the EIR. The EIR determined that development resulting from implementation of the CGPU would result in less than significant impacts to mineral resources, since the site is currently urbanized and does not provide for mineral resource extraction. No mitigation measures were required or provided. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the impacts to mineral resources analyzed in the CGPU EIR.
- Impacts of the proposed project on mineral resources were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative mineral resource impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that mineral resource impacts of the project would be more severe than those described in the EIR.

NOISE

Automobile traffic is the most significant source of noise in the City. According to the CGPU EIR, locations that would be exposed to the greatest noise levels are those located in proximity to high volume roadways, such as I-10, SR 86S, Dillion Road, and some segments of Grapefruit Boulevard and Avenue 52. The proposed project is not located within proximity to these roadways. In addition, proposed building and site design would shield residents (sensitive receptors) from intrusive noise levels via setbacks and noise barriers such as landscaping and walls. Temporary impacts from construction, including groundborne noise and vibration, are currently regulated by Section 7.04.070 of the Coachella Municipal Code (CMC) provided that such activities take place during the appropriate daytime hours.

The proposed project is consistent with the following Noise Element policies of the CGPU:

- 1.2 Noise Analysis and Mitigation. Require projects involving new development or modifications to existing development to implement mitigation measures, where necessary, to reduce noise levels to at least the normally compatible range shown in the City's Land Use/Noise Compatibility Matrix in Figure 10-1. Mitigation measures should focus on architectural features, building design and construction, rather than site design features such as excessive setbacks, berms and sound walls, to maintain compatibility with adjacent and surrounding uses.
- 1.6 Land Use and Community Design. Except in cases where noise levels are in the clearly incompatible range as shown in the City's Land Use/Noise Compatibility Matrix shown in Figure 10-1, prioritize the building design and character policies in the Land Use and Community Design Element over those in the Noise Element to ensure that new development meets the design vision of the City.
- 2.2 Noise Control. Minimize stationary noise impacts on sensitive receptors and noise emanating from construction activities, private developments/residences, landscaping activities, night clubs and bars and special events.

The proposed project is consistent with the "Urban Neighborhood" land use designation assigned by the CGPU and analyzed in the EIR. The EIR determined that development resulting from implementation of the CGPU would result in noise impacts that are less than significant with adherence to applicable policies set forth in the CGPU. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the noise impacts analyzed in the CGPU EIR.
- Impacts of the proposed project on noise were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative noise impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that noise impacts of the project would be more severe than those described in the EIR.

POPULATION AND HOUSING

According to the EIR, the CGPU Planning Area is expected to grow to a total population of 135,000, by 2035. The proposed project would result in the development of 110 multi-family dwelling units. Based on the City average of 4.79 persons per household¹, it could generate a population of approximately 527 residents, which constitutes $\pm 0.4\%$ of the Planning Area's population projection for Coachella. The proposed project in and of itself would provide housing for this population, and therefore impacts would be less than significant.

The project could result in the temporary displacement of people and housing during demolition of the existing development and construction of the new development. However, the applicant is required by State law to relocate displaced low income households, and project buildout would increase the housing supply by 60 units, thus resulting in less than significant impacts.

The project would occur on a site that has been previously developed and, therefore, would not require the extension of roads, utilities, or other infrastructure that could induce population growth.

The proposed project will provide 110 units of affordable housing, 60 of which will be new units, and 50 of which will be replacement units. The project is consistent with the following Housing Element policies:

- 1.6 Services and Facilities. Require that adequate public and private services and facilities are or will be provided to all new residential developments as a prerequisite for their approval.
- 3.1 Conservation Techniques. Encourage the use of energy-conserving techniques in the siting and design of new housing.
- 6.7 New Assisted Units. Promote the construction of new assisted housing units in the city for lower-income households, including those with extremely low income.
- 7.2 Preservation Cooperation. Work closely with nonprofit organizations and public agencies involved in the provision of affordable housing to preserve existing lower-income rental units in the city.

The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The EIR determined that development resulting from implementation of the CGPU would result in less than significant impacts to population and housing. No mitigation measures were required or provided. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

¹ Report E-5: Population and Housing Estimates for Cities, Counties, and the State 2019, California Department of Finance. Released May 1, 2019.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the impacts to housing analyzed in the CGPU EIR.
- Impacts of the proposed project on population and housing were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative population/housing impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that population/housing impacts of the project would be more severe than those described in the EIR.

PUBLIC SERVICES

The project will demolish the existing 50-unit multi-family residential development and develop 110 new multi-family residential units, thus marginally increasing the existing population on-site. The CGPU EIR analyzed the population increase within the Planning Area, and the development of fire and law protection facilities, school facilities, parks and recreation, medical facilities, and library facilities is proposed to continue to meet growing demands and maintain recommended levels of service.

The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The EIR determined that development resulting from implementation of the CGPU would result in less than significant impacts to fire protection, law enforcement services, school facilities, parks and recreation, medical facilities, and library facilities. No mitigation measures were required or provided. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the public service impacts analyzed in the CGPU EIR.
- Impacts of the proposed project on public services were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative public services impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that public services impacts of the project would be more severe than those described in the EIR.

RECREATION

The proposed project would result in additional population which would increase the demand for parks and recreational services and facilities. Its estimated buildout population of 527 residents (see Population and Housing, above) is limited compared to the projected buildout population of the CGPU planning area, and impacts to recreational resources would be less than significant. The project proposes an onsite basketball court, playgrounds, open space areas, and a splash pad that would provide recreational opportunities for residents, further reducing impacts to recreation facilities. The proposed project is consistent with the following Sustainability and Natural Environment Element policies:

- 13.7 Recreation centers. Locate more public and private health clubs and recreation centers in Coachella in partnership with the Desert Recreation District, community based organizations and private businesses. Explore regulatory or financial incentives in the zoning code and development approval process to encourage the location of private/non-profit recreation facilities (e.g., gyms, yoga or dance studios, martial arts, etc.).
- 13.8 Diverse recreation programs. Ensure that recreation programs are affordable and meet the diverse needs in the community for users such as seniors, youth, non- English speaking groups and special needs groups.

The proposed project is consistent with the “Urban Neighborhood” land use designation assigned by the CGPU and evaluated in the EIR. The EIR determined that development resulting from implementation of the CGPU would result in less than significant impacts to recreational services and facilities. No mitigation measures were required or provided. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the impacts to recreational facilities analyzed in the CGPU EIR.
- Impacts of the proposed project on recreation were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative recreation impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that recreation impacts of the project would be more severe than those described in the EIR.

TRANSPORTATION

Roadway Congestion and Level of Service Standards

Regarding roadway congestion and level of service, buildout of the General Plan would result in significant and unavoidable impacts to regional roadways, including SR 86S and Grapefruit Boulevard. All other roadways within the City would have a less than significant impact with mitigation. In addition to CGPU policies designed to promote alternative modes of transportation and traffic calming design, mitigation measures also include updating the Development Impact Fee (DIF) program to establish a plan and funding mechanism for roadway and intersection improvements identified as having a significant impact (CGPU EIR, p. 4.9-28).

Regional facilities are impacted by both by the proposed General Plan land uses and also by the growth in areas outside of Coachella. As such, the impact to these facilities cannot be fully mitigated and the impact remains significant and unavoidable.

Traffic Patterns and Traffic Hazards

The CGPU contains policies related to the design of transportation facilities that limit hazardous conditions, including emergency response/safety plans. Impacts at General Plan buildout would be less than significant, and no mitigation is required. The CGPU will have no direct or indirect impact upon any existing air traffic patterns or facilities.

Alternative Modes of Transportation

The CGPU identifies and encourages alternative mode improvements that support travel by walking, bicycling, and transit. The EIR finds impacts to be less than significant.

Proposed Project

The proposed project is consistent with the following Mobility Element policies:

- 3.2 Pedestrian improvement prioritizations. Prioritize pedestrian improvements in existing areas of the City with supportive land use patterns and those facilities that provide connectivity to other modes of travel such as bicycling and transit.
- 3.4 Pedestrian connections for development. Require that all development or redevelopment projects provide pedestrian connections to the external pedestrian network.
- 5.4 Transit accessible development. Encourage new large residential or commercial developments to locate on existing and planned transit routes.

The project site is currently accessed by the existing roadway network, and no new roads are proposed or would be required to serve the proposed project. The project would demolish existing development and redesign all onsite circulation patterns. During construction, machinery and workers' vehicles would be present onsite. Construction staging plans would be subject to City approval to assure that construction does not adversely impact existing traffic operations, emergency access, or surrounding properties, particularly sensitive receptors (i.e, residential development).

Once the project is operational, it will generate vehicle, pedestrian, and bicycle traffic associated residential uses. The site is located in proximity to the downtown area and well-served by the existing network of sidewalks, and transit service (the nearest SunLine Transit Agency bus stop is 0.10 miles east at Harrison Street and Bagdad Avenue) that offer opportunities for multi-modal transportation and can be expected to reduce the number of project-generated vehicle trips. The project proposes 191 on-site parking spaces with seven designated as handicapped spaces. There will be 99 covered spaces with carports prepped for photovoltaic panels in the future.

The proposed project is consistent with the "Urban Neighborhood" land use designation assigned by the CGPU and evaluated in the EIR. The EIR traffic analysis was based on the City-wide Traffic Study prepared by Urban Crossroads in 2007. Traffic data was collected throughout the General Plan planning area, including the immediate vicinity of the proposed project. As previously discussed, the EIR determined that development resulting from implementation of the CGPU would result in less than significant impacts to a local roadway congestion, local roadway performance standards, air traffic

patterns, design hazards, emergency access, and public transit/bicycle/pedestrian facilities. However, impacts to regional roadways would remain significant and unavoidable due to local and regional growth. No feasible mitigation measures were identified, and the City adopted a statement of overriding considerations in its approval of the General Plan and EIR.

The proposed project is consistent with the “Urban Neighborhood” land use designation assigned by the CGPU and evaluated in the EIR. The project increases the density of the site, but proposes a density that is less than the maximum density allowed on the property. As a result, the number of trips considered in the CGPU EIR was higher than that which will result from the proposed project. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the traffic impacts analyzed in the CGPU EIR.
- Impacts of the proposed project on transportation were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative transportation impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that transportation impacts of the project would be more severe than those described in the EIR.

TRIBAL CULTURAL RESOURCES

The CGPU Planning Area contains tribal lands belonging to the Augustine and Cabazon tribes. The project would result in demolition of the existing 50-unit residential development and redevelopment of a 110-unit residential development. Because the site has been previously disturbed by construction and development activities, there is a low chance for the discovery or disturbance of tribal cultural resources during development of the proposed project. Nonetheless, project development could result in damage to previously unknown resources or human remains. The Sustainability + Natural Environment Element of the CGPU sets forth policies addressing the protection and preservation of archaeological resources, which would include tribal cultural resources, as described under Cultural Resources, above.

In addition, a mitigation measure was prescribed in the EIR requiring that a policy be added to Chapter 7 of the CGPU stating: “In areas where there is a high chance that human remains may be present, require proposed projects to conduct survey to establish occurrence of human remains, if any. If human remains are discovered on proposed project sites, the project must implement mitigation measures to prevent impacts to human remains in order to receive permit approval.” There is a low probability that human remains are present on the project site due to previous site disturbance and location within the City’s urban core.

The proposed project is consistent with the “Urban Neighborhood” land use designation assigned by the CGPU and evaluated in the EIR. The EIR determined that, with mitigation, development resulting from implementation of the CGPU would result in less than significant impacts to tribal cultural resources.

Although not discussed in the CGPU EIR due to recent legislation, mandatory compliance with AB 52 and SB 18 will also ensure impacts to tribal resources are mitigated. The EIR determined that, after mitigation, impacts of General Plan implementation on tribal cultural resources would be less than significant.

The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the impacts to Tribal Resources analyzed in the CGPU EIR.
- Impacts of the proposed project on tribal cultural resources were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative impacts to tribal cultural resources associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that tribal cultural resources impacts of the project would be more severe than those described in the EIR.

UTILITIES AND SERVICE SYSTEMS

The proposed project would remove existing development from the subject property and eliminate its demand for water supplies, water and wastewater treatment facilities, and stormwater drainage facilities, and replace it with new development and new demand for utilities and facilities. The subject property is located in an urban area, and the project would not require the extension of utility infrastructure other than onsite connections. No new water supply entitlements would be required to serve the project, although water demand is expected to increase marginally as a result of the additional 60 apartments. The new construction, however, will be substantially more water-efficient than the existing decades-old irrigation system and apartment fixtures. Existing wastewater treatment facilities have enough capacity to serve the project, and the project would be required to manage its stormwater drainage in accordance with the requirements of the City and other agencies. The proposed project will generate solid waste to a somewhat greater degree than the existing project, insofar as additional units will be constructed. However, the project will be required to conform to existing regulations regarding waste diversion and recycling.

The proposed project is consistent with the “Urban Neighborhood” land use designation assigned by the CGPU and evaluated in the EIR. The proposed project is at the low end of the potential units projected on the property in the General Pan, and will therefore have a lower impact on utilities and service systems than what was analyzed for this site in the EIR. The EIR determined that development resulting from implementation of the CGPU would result in less than significant impacts to utilities and service systems. No mitigation measures were required or provided. The proposed project would not result in any new

impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the impacts on utilities and service systems analyzed in the CGPU EIR.
- Impacts of the proposed project on utilities and service systems were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative utilities/service systems impacts associated with the proposed project that were not addressed in the EIR.
- There is no substantial new information indicating that utilities/service systems impacts of the project would be more severe than those described in the EIR.

WILDFIRE

Most of the hillsides in the eastern and northeastern half of the City are located within a Local Responsibility Area (LRAs) with a moderate fire hazard. The subject parcels are in the City's urban core and surrounded by development, and there are no undeveloped lands in the project vicinity where wildfires are likely to occur. The project would result in new residential structures and an increased density, which could increase the potential for urban fires. However, the project would be subject to standard plan checks and inspections provided by the Riverside County Fire Department, and adherence to CGPU policies, which would to assure that potential fire hazards are reduced to less than significant levels, including:

- 4.2 Construction materials. Require the use of fire-resistant building construction materials to reduce the hazard of structure fires, within the developed areas of the City and at the urban-wildland interface. (Safety)
- 7.8 Development impacts. Require new development in the City to mitigate project-related impacts to police and fire services. (Infrastructure and Public Services)

The proposed project is consistent with the "Urban Neighborhood" land use designation assigned by the CGPU and evaluated in the EIR. The EIR determined that development resulting from implementation of the CGPU would result in less than significant wildfire impacts. No mitigation measures were required or provided. The proposed project would not result in any new impacts or significant findings or increase the severity of impacts identified in the CGPU EIR. The impact was adequately addressed in the EIR and would not change from that identified in the EIR.

Determination:

- There is nothing unusual or peculiar to the project or subject parcels that would change or affect the impacts of wildfire analyzed in the CGPU EIR.
- Impacts of the proposed project on wildfire were analyzed in the certified CGPU EIR.
- There are no significant off-site or cumulative wildfire impacts associated with the proposed project that were not addressed in the EIR.

- There is no substantial new information indicating that wildfire impacts of the project would be more severe than those described in the EIR.

4. Findings

As demonstrated in the analysis herein, the proposed project is consistent with the land use designations and development densities assigned to the subject parcels in the General Plan. It is consistent with the findings of the Coachella General Plan Update EIR that was certified in 2015. Potential project-related impacts, including cumulative and off-site impacts, were fully addressed in the EIR, and applicable mitigation measures were provided to reduce project-specific impacts. There are no significant off-site or cumulative impacts that are peculiar to the project or its site that have not already been fully addressed in a previous environmental analysis or that cannot be substantially mitigated through the application of uniformly applied standards and policies. Applicable mitigation measures have been cited, and they will be implemented through project design, compliance with regulations and ordinances, or conditions of approval. Implementation of the project would not result in any new or altered impacts beyond those addressed in the EIR. There is no substantial new information that would result in more severe impacts than those anticipated by the EIR. Therefore, in accordance with CEQA Guidelines §15183, the project qualifies for an exemption from additional environmental review, and no further analysis of the project is required. Findings are summarized in the following table.

| Compliance with CEQA Section 15183 | | | | | |
|---|--|--|--|---|--|
| Environmental Resource Topic | (b)(1) Impacts potentially peculiar to the project or parcel? | (b)(2) Impacts analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan, with which the project is consistent? | (b)(3) Potentially significant off-site or cumulative impacts not discussed in the prior EIR? | (b)(4) Substantial new information showing a more severe adverse impact than in the prior EIR? | (c) Impact is not peculiar to parcel or project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards? |
| Aesthetics | No | Yes | No | No | Yes |
| Agriculture & Forestry Resources | No | Yes | No | No | Yes |
| Air Quality | No | Yes | No | No | Yes |
| Biological Resources | No | Yes | No | No | Yes |
| Cultural Resources | No | Yes | No | No | Yes |
| Energy | No | Yes | No | No | Yes |
| Geology & Soils | No | Yes | No | No | Yes |
| Greenhouse Gas Emissions | No | Yes | No | No | Yes |
| Hazards & Hazardous Materials | No | Yes | No | No | Yes |
| Hydrology & Water Quality | No | Yes | No | No | Yes |
| Land Use & Planning | No | Yes | No | No | Yes |
| Mineral Resources | No | Yes | No | No | Yes |
| Noise | No | Yes | No | No | Yes |
| Population & Housing | No | Yes | No | No | Yes |
| Public Services | No | Yes | No | No | Yes |
| Recreation | No | Yes | No | No | Yes |
| Transportation | No | Yes | No | No | Yes |
| Tribal Cultural Resources | No | Yes | No | No | Yes |
| Utilities & Service Systems | No | Yes | No | No | Yes |
| Wildfire | No | Yes | No | No | Yes |

5. References

Coachella General Plan Update 2035, prepared by Raimi + Associates, adopted April 22, 2015.

Coachella General Plan Update 2035 Draft Environmental Impact Report (SCH#2009021007), prepared by Raimi + Associates, July 2014.

City of Coachella Municipal Code.

City of Coachella Zoning Map.

Phase I Environmental Site Assessment, prepared by Terra Nova Planning & Research, Inc., January 2019.

Appendix

Appendix A: Phase I Environmental Site Assessment