

Memo

To: Luis Lopez, Community Development Director
Ron Goldman, Planner

From: Matthew Fagan

CC: N/A

Date: April 24, 2020

Subject: Vista Del Agua – Environmental Impact Report (SCH# 2015031003) Discussion of Alternatives to Shadow View Boulevard as Either Primary or Secondary Access to the Vista Del Agua Project

The purpose of this memo is to further describe access options to the Vista Del Agua project that do not include utilizing Shadow View Boulevard as either primary or secondary access to the Project site and explain why such access options not viable access options to serve the Project given their infeasibility, failure to meet Project objectives, and failure to avoid or reduce significant impacts as compared to the Project. This memo will reiterate the 3 alternatives discussed in the EIR and will also explore an additional alternative (Alternative 4), not discussed in the EIR, which is being addressed in response to written and verbal comments. The purpose of this Alternative was to explore an option whereby no portion of the Shadow View Specific Plan, including Shadow View Boulevard would be needed for either primary, or secondary access to the Vista Del Agua Project.

The following three (3) alternatives were analyzed in the EIR:

- **Alternative 1: No Project/No Build Alternative** (Draft EIR, pp. 5-3 to 5-13)
- **Alternative 2: Reduced Residential Density Alternative** (Draft EIR, pp. 5-13 to 5-17)
- **Alternative 3: Vista del Sur Access Alternative** (Draft EIR, pp. 5-18 to 5-21)

The following is Alternative 4 (not analyzed in the EIR):

- **Alternative 4: Tyler Street Southerly Extension from Avenue 47 to 800' south of Avenue 49 (Primary Access) and Extension of Vista Del Sur to Dillon Road (Secondary Access)**

Background: Extension of Shadow View Boulevard

The locations of the off-site improvements analyzed in the EIR were developed and coordinated based upon the publicly available information contained in the City's General Plan Circulation Element, as well as the Shadow View Specific Plan. Thus, the EIR reasonably assumes the construction of Shadow View Boulevard, based on that roadway's inclusion in various, long-standing planning documents.

The Shadow View Specific Plan shows Shadow View Boulevard as a proposed street crossing the Shadow View Specific Plan area (see Shadow View Specific Plan, p. 3-11 [Exhibit 3-5]). The Shadow View Specific Plan also includes Shadow View Boulevard cross sections, indicating that Shadow View Boulevard will ultimately be constructed to a 120-foot right of way (see Shadow View Specific Plan, p. 3-12 [Exhibit 3-6]). Finally, the Shadow View Specific Plan shows Shadow View Boulevard as a road to be constructed by the residential developer of Shadow View (see Shadow View Specific Plan, pp. 3-9 and -10). As shown in the Specific Plan, improvements are anticipated to take place on privately owned property of the Shadow View Owners.

Further, the City of Coachella General Plan 2035 shows Shadow View Boulevard as part of the City's Circulation Element, as an arterial street (see General Plan, p. O5-7 [Figure 5-1], and p. O5-3 [Table 5-1, Street Typologies]). General Plan Figure 5-1 illustrates that Shadow View Blvd is designated as a Major Arterial with Bicycle Facility (to be developed to a 118-foot right-of-way with six travel lanes) and is planned to connect Dillon Road easterly to Avenue 48.

City administrative practice allows minor re-alignments of Section-Line streets. Shadow View Boulevard is currently aligned with the Avenue 48 section line and the old section-line street easement will be adjusted to connect northwesterly to Dillon Road, pursuant to the General Plan.

Lastly, Tentative Tract Map 34993, which approved the residential villages subdivision for Shadow View, showed the street alignment through the Shadow View properties but the owners let the tentative map expire. (See City Resolution No. 2007-73 for Tentative Tract Map No. 34865 [adopted September 12, 2007].) Shadow View Boulevard is described as running from Dillon Road to the intersection of Tyler Street and Avenue 48 on this Tentative Map.

Construction of Shadow View Boulevard has already been analyzed under the California Environmental Quality Act as part of the Coachella General Plan 2035 Program EIR, which was certified by the City Council on April 22, 2015 via Resolution 2015-03.

Thus, the extension of Shadow View Boulevard, as proposed by the Project, is consistent with the City's plan for its ultimate development. As explained below, each of the four alternatives analyzed in the EIR or developed in response to comments, is not feasible to provide primary access to the Project site.

Alternative 1: No Project/No Build Alternative

Description: Under Alternative 1, the Project would not be constructed, and the Project site would remain in its current undeveloped condition. No new development would occur on the site, and no ground-disturbing activities would be undertaken, although it is likely the site will ultimately be developed in the future since the General Plan Update (2015) envisions change in this area. (Draft EIR, p. 5-12.) ***It should be noted that the No Project/No Build Alternative could continue to utilize Tyler Street and/or Vista Del Sur as primary and/or secondary access and would not require the construction of Shadow View Boulevard.***

Impacts: Alternative 1 would reduce all the significant and unavoidable impacts occurring under the Project to no impact or levels that are less than significant, including with respect to aesthetics, agriculture, operational air quality emissions, and transportation/traffic because the site would not be developed. (Draft EIR, pp. 5-3-5-13.)

Alternative 1 would result in greater impacts to land use/planning than the Project because the existing vacant Project site would remain, which is inconsistent with the General Plan Update (2015) and zoning underlying the Project site. (Draft EIR, p. 5-7.) According to the General Plan Update (2015), the Land Use Designations on the Project site include Neighborhood Center, Suburban Retail District, Urban Neighborhood, General Neighborhood and Suburban Neighborhood (General Plan Update [2015], p. 04-59). The 2013 General Plan Land Use that is used in the Draft EIR has a designation of Entertainment Commercial (Draft EIR, p. 3-12). The current Zoning Classifications are General Commercial, Residential Single-Family, and Manufacturing Service (Draft EIR, p. 3-12). Allowing the site to remain vacant would not achieve development of the land uses envisioned under both the 2013

General Plan and the 2015 General Plan Update, nor would infrastructure be developed consistent with the City's Circulation Element.

Attainment of Project Objectives: Alternative 1 would not meet any of the identified objectives established for the proposed Project. The following are the Project Objectives from Section 3.3 of the Draft EIR (Draft EIR, p. 3-3):

- Create a distinctive “sense of community” unifying areas through high quality design criteria and utilizing the natural surroundings;
- High Connectivity - Implement an aesthetically pleasing and functional community concept by integrating community areas, residential areas, parks and commercial areas through connection of walkways, paseos and trails;
- Provide community focus areas within walking distance between neighborhoods;
- Provide a balanced mix of economically viable commercial and residential land uses that will utilize the Enterprise Zone¹ to promote local job creation;
- Provide a transition blend of rural and suburban lifestyles; and
- Provide a diverse mix of housing options.

No changes would occur to the built environment. Therefore, a distinct “sense of community” would not be created as the site would not be developed. Nor would the community be connected or developed with a balanced mix of economically viable commercial and residential land uses. Housing options would not be provided and there would be no transition between rural and suburban lifestyles, as would be created by the Project. None of these Objectives would be met under Alternative 1.

Findings: The City Council rejects Alternative 1: No Project as (1) failing to meet any of the Project objectives, and (2) the alternative is infeasible. The following provides the grounds which justify the rejection of Alternative 1:

1. Alternative 1 fails to meet most of the basic Project objectives. No changes would occur to the built environment. Therefore, a distinct “sense of community” would not be created as the site would not be developed. Nor would the community be connected or developed with a balanced mix of economically viable commercial and residential land uses. Housing options would not be provided and there would be no transition between rural and suburban lifestyles, as would be created by the Project. None of these Objectives would be met under Alternative 1.
2. Alternative 1 is infeasible for the following specific fact-based reasons:
 - Allowing the site to remain vacant would not achieve development of the land uses envisioned under both the 2013 General Plan and the 2015 General Plan Update, nor would infrastructure be developed consistent with the City's Circulation Element.
 - It will not implement the Goals and Policies of the General Plan. It also will not provide a reasonable development expected, and planned for, by the City (see Impact discussion above as it pertains to the Project site's General Plan Land Use designations and zoning classifications).

Alternative 2: Reduced Residential Density Alternative (RRDA)

Description: A Reduced Density Residential Alternative (RRDA) was chosen to address significant unavoidable impacts associated with implementation of the Project. Unlike the Project that proposes up to 1,640 dwelling units within seven Planning Areas, the RRDA assumes that a total of 909 dwelling units will be developed overall. For purposes of analysis this alternative assumes that all 216.48 acres of residential acreage development will be developed at 4.2 dwelling units per acre under the RRDA. (Draft EIR, p. 5-13.) *It should be noted that the for the purpose of the analysis in the Draft EIR, the*

¹ The Enterprise Zone is being deleted from the Project Objectives per the Final EIR Errata as it is no longer part of the current General Plan and is, therefore, obsolete.

RRDA would require the construction of Shadow View Boulevard for purposes of primary and/or secondary access. The RRDA would also be possible under Alternative 4 (discussed below).

Impacts: The RRDA will result in similar significant and unavoidable aesthetic and agricultural impacts as that of the Project because the Project development overall footprint will be assumed to remain the same, and the scale and amount of development would be comparable. (Draft EIR, pp. 5-13—5-14.) However, it would reduce the Project's significant and unavoidable air quality and transportation impacts as less units would be constructed, and no commercial development would be constructed. Less operational impacts from vehicular traffic would be the primary reason for these reductions. While air quality and transportation impacts would be reduced as compared to the Project, impacts to land use/planning will be greater under the RRDA, as the Project site would not be developed as the City has planned and anticipated (see Impact discussion above as it pertains to the Project site's General Plan Land Use designations and zoning classifications). (Draft EIR, pp. 5-14, 5-16.)

Attainment of Project Objectives: The reduction of the Project size under the RRDA has a comparable negative effect on the ability of the Project to meet Project costs, i.e. development feasibility and certain Project objectives may not be attained because certain infrastructure improvements may not be feasible.

As stated above, the following are the Project Objectives from Section 3.3 of the Draft EIR (Draft EIR, p. 3-3):

- Create a distinctive “sense of community” unifying areas through high quality design criteria and utilizing the natural surroundings;
- High Connectivity - Implement an aesthetically pleasing and functional community concept by integrating community areas, residential areas, parks and commercial areas through connection of walkways, paseos and trails;
- Provide community focus areas within walking distance between neighborhoods;
- Provide a balanced mix of economically viable commercial and residential land uses that will utilize the Enterprise Zone² to promote local job creation;
- Provide a transition blend of rural and suburban lifestyles; and
- Provide a diverse mix of housing options.

In particular, the RRDA will not meet the following Project objectives:

- High Connectivity - Implement an aesthetically pleasing and functional community concept by integrating community areas, residential areas, parks and commercial areas through connection of walkways, paseos and trails. Alternative 2 would reduce the viability of commercial areas and would have fewer parks, walkways, paseos and trails.
- Provide community focus areas within walking distance between neighborhoods. Due to the reduced residential densities, the Project would have fewer residential density options. This would result in fewer Planning Areas and would in turn create longer walking distances between neighborhoods.
- Provide a balanced mix of economically viable commercial and residential land uses that will promote local job creation. With a reduction of overall number of units, the amount and nature of commercial development that can be supported by the Project would be modified such that the mix would be limited, the viability would be compromised and there will be fewer job opportunities.
- Provide a diverse mix of housing options. The reduction in the overall number of units would limit a diverse mix of housing opportunities when compared to the Project. Alternative 2 would result in a Project that is primarily detached single-family residential. No multi-family residential would be developed on the residential land within the Project area, as Alternative 2 assumes residential uses would be developed at 4.2 dwelling units per acre. (Draft EIR, p. 5-17.)

Furthermore, less fees and funding would be provided through the RRDA to upgrade regional transportation infrastructure, public service and utilities.

² The Enterprise Zone is being deleted from the Project Objectives per the Final EIR Errata as it is no longer part of the current General Plan and is, therefore, obsolete.

Finding: The City Council rejects Alternative 2: Reduced Residential Density Alternative, as (1) failing to avoid or substantially reduce environmental impacts, (2) failure to meet most of the basic Project objectives, and (3) Alternative 2 is infeasible. The following provides the grounds which justify the rejection of Alternative 2:

1. Alternative 2 fails to avoid/substantially reduce significant environmental impacts. Alternative 2 will result in similar significant and unavoidable aesthetic and agricultural impacts as that of the Project because the Project development overall footprint will be assumed to remain the same, and the scale and amount of development would be comparable. (Draft EIR, pp. 5-13—5-14.) However, it would reduce the Project's significant and unavoidable air quality and transportation impacts as less units would be constructed, and no commercial development would be constructed. Less operational impacts from vehicular traffic would be the primary reason for these reductions. Impacts to land use/planning will be greater under the RRDA, as the Project site would not be developed as the City has planned and anticipated (see Impact discussion above as it pertains to the Project site's General Plan Land Use designations and zoning classifications). (Draft EIR, pp. 5-14, 5-16.)
2. Alternative 2 fails to meet most of the basic Project objectives as listed below:
 - High Connectivity - Implement an aesthetically pleasing and functional community concept by integrating community areas, residential areas, parks and commercial areas through connection of walkways, paseos and trails. Alternative 2 would reduce the viability of commercial areas and would have fewer parks, walkways, paseos and trails.
 - Provide community focus areas within walking distance between neighborhoods. Due to the reduced residential densities, the Project would have fewer residential density options. This would result in fewer Planning Areas and would in turn create longer walking distances between neighborhoods.
 - Provide a balanced mix of economically viable commercial and residential land uses that will promote local job creation. With a reduction of overall number of units, the amount and nature of commercial development that can be supported by the Project would be modified such that the mix would be limited, the viability would be compromised and there will be fewer job opportunities.
 - Provide a diverse mix of housing options. The reduction in the overall number of units would limit a diverse mix of housing opportunities when compared to the Project. Alternative 2 would result in a Project that is primarily detached single-family residential. No multi-family residential would be developed on the residential land within the Project area, as Alternative 2 assumes residential uses would be developed at 4.2 dwelling units per acre. (Draft EIR, p. 5-17.)
3. Alternative 2 is infeasible for the following specific fact-based reasons:
 - The RRDA is inconsistent with the land use designations set forth in the General Plan Update 2015. According to the General Plan Update (2015), the Land Use Designations on the Project site include Neighborhood Center, Suburban Retail District, Urban Neighborhood, General Neighborhood and Suburban Neighborhood (General Plan Update [2015], p. 04-59). Development of 216.48 acres of the site with a density of 4.2 dwelling units per acre does not comply with the current land use designations. Of the residential land use designations underlying the Project site, the largest is the General Neighborhood designation, which permits 7-25 dwelling units per acre with an average of 12 dwelling units per acre for new projects. The RRDA is substantially below this average. The Urban Neighborhood designation permits 20-35 dwelling units per acre, with a 30 dwelling unit average. The RRDA's 4.2 dwelling units per acre would be inconsistent with this designation. The Suburban Neighborhood designation, making up a smaller portion of the Project site, allows 2-8 dwelling units per acre with a 5 dwelling unit per acre average for new projects. While the RRDA would comport with this designation, it is still below the average number of dwelling units for new projects.
 - The Project site is located within Subarea 11 – Commercial Entertainment District, as set forth in the General Plan Update 2015. The vision for this subarea provides “a range of residential densities and building types should be encouraged in this subarea, provided they are designed to integrate

with the high intensity commercial uses planned for the area. The subarea must also exhibit strong, fine-grained connections to the surrounding neighborhoods of the subarea and the adjacent subareas, allowing community members easy access to shopping and entertainment.” (General Plan Update [2015], p. 04-76.) The RRDA would provide only one type of residential density, not a range of residential densities. Additionally, as set forth above, the reduced number of units in the RRDA would compromise the viability of the commercial areas, limiting future residents’ access to shopping and entertainment.

- The Policy Direction for Subarea 11 provides for up to 25 percent Suburban Neighborhood in the final designation mix. (General Plan Update [2015], p. 04-76.) Development of 216.48 acres of the Project area as Suburban Neighborhood under the RRDA would compromise the final designation mix set forth in the General Plan Update 2015.
- The RRDA would not comply with the current zoning on site, which consists of General Commercial, Residential Single-Family, and Manufacturing Service (Draft EIR, p. 3-12). The RRDA proposes development of 4.2 dwelling units per acre in the area planned for residential uses under the Project. The majority of this acreage is currently designated General Commercial, which does not permit single-family residential uses. Thus, the RRDA is inconsistent with current zoning.
- The alternative is economically infeasible because the reduced dwelling units planned under the RRDA would not support a viable mix of commercial uses.
- Less fees and funding would be provided through the RRDA to upgrade regional transportation infrastructure, public service and utilities.

Alternative 3: Vista Del Sur Alternative (VDSA)

Description: The Vista del Sur Alternative (VDSA) is being analyzed in the event that the westerly extension of Avenue 48/Shadow View Boulevard cannot be completed due to the need for the Project applicant to acquire the necessary right-of-way to install this roadway. Vista del Sur is a dedicated City roadway which connects to the northerly extension of Street “A.” This alternative would allow for the development of the Project as proposed but with another connection to Dillon Road to the west of the Project site. Under the VDSA scenario, approximately 5,834 linear feet of roadway (at 34’ in width) will be constructed. This is in contrast to the Project’s westerly extension of Avenue 48/Shadow View Boulevard that would involve 11,600 linear feet of roadway improvements. (Draft EIR, p. 5-18.) However, there are intersection geometrics which will only allow Vista del Sur to serve as secondary access to the Project site. No left turning movements will be allowed at the intersection of Dillon Road and Vista Del Sur. Vehicles will be required to drive past this intersection and make a U-turn southerly of this intersection. After the U-turn, Vista Del Sur access will be a right-hand turning movement. No improvements to Tyler Street would be required under the VDSA Alternative beyond those previously analyzed in the Traffic Impact Study prepared for Vista Del Agua Project.

Impacts: The VDSA would not involve the removal of aesthetic resources that would occur under the westerly extension of Avenue 48/Shadow View Boulevard, but all other Project impacts to aesthetic resources would remain the same. Accordingly, aesthetic resource impacts from VDSA would be less than that of the proposed Project but would not completely avoid or reduce the significant and unavoidable aesthetic impacts. (Draft EIR, p. 5-18.) With respect to agricultural resources, the VDSA would have less impacts than the Project because it would not involve the removal of agricultural resources that would otherwise occur under the westerly extension of Avenue 48/Shadow View Boulevard if the proposed Project were to proceed. (Draft EIR, p. 5-18.) However, VDSA would not eliminate or reduce the significant and unavoidable impacts on agricultural resources. Similarly, the VDSA would have reduced air quality impacts than the Project, resulting in a 50% reduction in construction emissions, and less cumulative greenhouse gas emissions, but does not eliminate or reduce the significant and unavoidable air quality/greenhouse gas impacts. (Draft EIR, p. 5-18.)

Finally, VDSA would also have significant and unavoidable transportation/traffic issues. (Draft EIR, p. 5-20.) Thus, implementation of mitigation measures would still be required. The configuration of the intersection of Vista Del Sur and Dillon Road will limit turning movements to and from this intersection, which will further impede traffic circulation and emergency vehicle access. There will be no left-turn movement from southbound Dillon Road to Vista Del Sur. A right-turn movement will be allowed from Dillon Road (northbound) onto Vista Del Sur. Vista Del Sur will only allow for a right-turn movement onto

northbound Dillon Road. Under the VDSA, the intersection geometrics will only allow Vista del Sur to serve as secondary access to the Project site. This will actually serve to exacerbate traffic conditions on Dillon Road and at the intersection of Dillon Road and Vista Del Sur. Traffic impacts would be greater due to the inefficient manner in which this intersection will function and the increased number of U-turns that will be required to access the site. This will negatively affect the AM and PM peak hours of this intersection, as well as the Dillon Road segment in proximity of this intersection.

Attainment of Project Objectives: The following are the Project Objectives from Section 3.3 of the Draft EIR (Draft EIR, p. 3-3):

- Create a distinctive “sense of community” unifying areas through high quality design criteria and utilizing the natural surroundings;
- High Connectivity - Implement an aesthetically pleasing and functional community concept by integrating community areas, residential areas, parks and commercial areas through connection of walkways, paseos and trails;
- Provide community focus areas within walking distance between neighborhoods;
- Provide a balanced mix of economically viable commercial and residential land uses that will utilize the Enterprise Zone³ to promote local job creation;
- Provide a transition blend of rural and suburban lifestyles; and
- Provide a diverse mix of housing options.

The VDSA meets all of the Project objectives. (Draft EIR, p. 5-21.)

Findings: The City Council rejects Alternative 3: Vista del Sur Alternative, as (1) failing to avoid or substantially reduce environmental impacts, and (2) Alternative 3 is infeasible. The following provides the grounds justifying the rejection of Alternative 3.

1. Alternative 3 fails to avoid/substantially reduce significant environmental impacts. Alternative 3 would reduce, but not eliminate, the Project’s significant impacts regarding aesthetics, agricultural resources, and air quality/greenhouse gas. Traffic impacts, however, would be exacerbated under Alternative 3. As discussed above, the configuration of the intersection of Vista Del Sur and Dillon Road will limit turning movements to and from this intersection, which will further impede traffic circulation and emergency vehicle access. There will be no left-turn movement from southbound Dillon Road to Vista Del Sur. A right-turn movement will be allowed from Dillon Road (northbound) onto Vista Del Sur. Vista Del Sur will only allow for a right-turn movement onto northbound Dillon Road. Under the VDSA, there are intersection geometrics which will only allow Vista del Sur to serve as secondary access to the Project site. This will actually serve to exacerbate traffic conditions on Dillon Road and at the intersection of Dillon Road and Vista Del Sur. Traffic impacts would be greater due to the inefficient manner in which this intersection will function and the increased number of U-turns that will be required to access the site. This will negatively affect the AM and PM peak hours of this intersection, as well as the Dillon Road segment in proximity of this intersection.
2. Alternative 3 is infeasible for the following specific fact-based reasons.
 - Alternative 3 does not include Shadow View Boulevard, which is set forth in the City’s Circulation Element, as an arterial street (see General Plan, p. O5-7 [Figure 5-1], and p. O5-3 [Table 5-1, Street Typologies]). General Plan Figure 5-1 illustrates that Shadow View Blvd is designated as a Major Arterial with Bicycle Facility (to be developed to a 118-foot right-of-way with six travel lanes) and is planned to connect Dillon Road easterly to Avenue 48.
 - The intersection geometrics necessary to accommodate Alternative 3 make the alternative infeasible as they lead to an exacerbation of traffic impacts. No left turning movements will be allowed at the intersection of Dillon Road and Vista Del Sur.

³ The Enterprise Zone is being deleted from the Project Objectives per the Final EIR Errata as it is no longer part of the current General Plan and is, therefore, obsolete.

- The increased number of U-turns and inefficient functioning of the intersection will negatively affect the AM and PM peak hours of this intersection, as well as the Dillon Road segment in proximity of this intersection.
- Emergency vehicle access will also be negatively impacted. Emergency vehicles will also be restricted from accessing the Project site via a left turning movement at the intersection of Dillon Road and Vista Del Sur. This could negatively impact response times in the event of an emergency.
- Restricted access could result in safety issues for motorists and pedestrians at the Dillon Road and Vista Del Sur intersection due to the increased number of U-turns.

The following, additional alternative, not discussed in the EIR will be analyzed below. This alternative shall be analyzed in accordance with Section 15126.6, Consideration and Discussion of Alternatives to the Proposed Project, of the State CEQA Guidelines.

Alternative 4: Tyler Street Southerly Extension from Avenue 47 to 800' south of Avenue 49 (Primary Access) and Extension of Vista Del Sur to Dillon Road (Secondary Access) Alternative (Alternative 4)

Description: Alternative 4 is being analyzed for Project access without the need for the development of Shadow View Boulevard (for either primary or secondary access to the Project site). Under Alternative 4, Avenue 47 will be extended westerly from Street "A" to Tyler Street and Tyler Street will be extended southerly to 800' south of Avenue 49 (which will tie into the Caltrans State Route 86/Avenue 50 New Interchange Project). This would serve as the primary access to the Project. Avenue 47 and Tyler Street are dedicated City roadways. This 4th alternative was developed in response to comments on the DEIR alternatives analysis. The purpose of this Alternative was to explore an option whereby no portion of the Shadow View Specific Plan, including Shadow View Boulevard would be needed for either primary, or secondary access to the Vista Del Agua Project. Vista Del Sur would become the secondary access. As discussed above in Alternative 3, No left turning movements will be allowed at the intersection of Dillon Road and Vista Del Sur. Vehicles will be required to drive past this intersection and make a U-turn southerly of this intersection. After the U-turn, Vista Del Sur access will be a right-hand turning movement. Traffic impacts would be greater due to the inefficient manner in which this intersection will function and the increased number of U-turns that will be required to access the site. This will negatively affect the AM and PM peak hours of this intersection, as well as the Dillon Road segment in proximity of this intersection.

Vista Del Sur is a dedicated City roadway which connects to the northerly extension of Street "A." Under the Alternative 4 scenario, approximately 13,721 linear feet of roadway (at 34' in width) will be constructed for Avenue 47, Tyler Street and Vista Del Sur (1,762 feet, 6,125 feet and 5,834 feet, respectively). This equals a total of 2.59 miles of roadway with 0.33 mile for Avenue 47, 1.16 mile for Tyler Street, and 1.10 mile for Vista Del Sur. This is in contrast to the Project's westerly extension of Avenue 48/Shadow View Boulevard that would involve 11,600 linear feet of roadway improvements. (Draft EIR, p. 5-18.)

Impacts: The Project, as well as Alternative 2, involves the westerly extension of Avenue 48/Shadow View Boulevard. Alternative 3 would not allow the westerly extension of Avenue 48/Shadow View Boulevard but would, instead, rely on Vista Del Sur for primary and secondary access. Alternative 4 also does not allow the westerly extension of Avenue 48/Shadow View Boulevard, but instead provides primary access to the site via Tyler Street and Avenue 50. Alternative 4 would involve the removal of aesthetic resources that would occur under the westerly extension of Avenue 48/Shadow View Boulevard; however, Project impacts to aesthetic resources would remain the same along the Tyler Street extension. Accordingly, aesthetic resource impacts from Alternative 4 would be less than that of the proposed Project but would not completely avoid or reduce the significant and unavoidable aesthetic impacts. (Draft EIR, p. 5-18.) With respect to agricultural resources, Alternative 4 would have less impacts than the Project because it would not involve the removal of agricultural resources that would otherwise occur under the westerly extension of Avenue 48/Shadow View Boulevard if the proposed Project were to proceed. (Draft EIR, p. 5-18.) However, Alternative 4 would not eliminate or reduce the significant and unavoidable impacts on agricultural resources.

Alternative 4 would have similar air quality impacts as the Project and does not eliminate or reduce the significant and unavoidable air quality/greenhouse gas impacts. (Draft EIR, p. 5-18.) In fact, as set forth in a Supplemental VMT, GHG, & NOx analysis for Alternative 4 (Exhibit "A"), RK Engineering has found that by extending the distance that must be traveled to access the project (2.7 miles under Alternative 4 compared to 1.5 miles under the Project), the annual VMT increases by approximately 3,192,134 vehicles miles traveled per year. This correlates to an *increase* in NOx by approximately 5.3 pounds per day. Oxides of Nitrogen (NOx) are the primary criteria air pollutants of concern because the project was found to exceed the SCAQMD regional thresholds for NOx and cause a significant unmitigable impact to air quality resources. The increase in VMT also correlates to an *increase* in GHG emissions by 1,280.1 MTCO2e per year. Therefore, Alternative 4 not only would not reduce significant and unavoidable air quality and greenhouse gas impacts, but it would actually increase these significant impacts as compared to the Project. (Vista Del Agua Specific Plan EIR Alternative 4 Supplemental VMT, GHG & NOx Analysis, City of Coachella, RK Engineering, March 11, 2020.)

Finally, Alternative 4 would have similar significant and unavoidable transportation/traffic issues as that of the Project. (Draft EIR, p. 5-20.) Thus, implementation of mitigation measures would still be required.

Attainment of Project Objectives: The following are the Project Objectives from Section 3.3 of the Draft EIR (Draft EIR, p. 3-3):

- Create a distinctive "sense of community" unifying areas through high quality design criteria and utilizing the natural surroundings;
- High Connectivity - Implement an aesthetically pleasing and functional community concept by integrating community areas, residential areas, parks and commercial areas through connection of walkways, paseos and trails;
- Provide community focus areas within walking distance between neighborhoods;
- Provide a balanced mix of economically viable commercial and residential land uses that will utilize the Enterprise Zone⁴ to promote local job creation;
- Provide a transition blend of rural and suburban lifestyles; and
- Provide a diverse mix of housing options.

Similar to the VDSA, Alternative 4 meets all of the Project objectives. (Draft EIR, p. 5-21.)

Findings: The City Council rejects Alternative 4 as(1) failing to avoid or substantially reduce significant environmental impacts, and (2) Alternative 4 is infeasible. The following provides the grounds which justify the rejection of Alternative 4:

1. Alternative 4 fails to avoid/substantially reduce significant environmental impacts. Alternative 4 would not eliminate or reduce the significant and unavoidable impacts on agricultural resources. Alternative 4 would not eliminate or reduce the significant and unavoidable air quality/greenhouse gas impacts but would actually increase these impacts due to an increase in VMT to access the Project site. (Draft EIR, p. 5-18; Vista Del Agua Specific Plan EIR Alternative 4 Supplemental VMT, GHG & NOx Analysis, City of Coachella, p. 4) Finally, Alternative 4 would have similar significant and unavoidable transportation/traffic issues as that of the Project. (Draft EIR, p. 5-20.)
2. Alternative 4 is infeasible for the following specific fact-based reasons:
 - Alternative 4 does not include Shadow View Boulevard, which is set forth in the City's Circulation Element, as an arterial street (see General Plan, p. O5-7 [Figure 5-1], and p. O5-3 [Table 5-1, Street Typologies]). General Plan Figure 5-1 illustrates that Shadow View Blvd is designated as a Major Arterial with Bicycle Facility (to be developed to a 118-foot right-of-way with six travel lanes) and is planned to connect Dillon Road easterly to Avenue 48.

Conclusion

⁴ The Enterprise Zone is being deleted from the Project Objectives per the Final EIR Errata as it is no longer part of the current General Plan and is, therefore, obsolete.

The extension of Shadow View Boulevard, as proposed by the Project, is consistent with the City's plan for its ultimate development. Each of the four alternatives analyzed in the EIR or developed in response to comments, is not feasible to provide primary access to the Project site. Alternatives 1 and 2 also fail to meet Project objectives, while Alternative 3 exacerbates significant and unavoidable traffic impacts. Each alternative, including Alternative 4, is also properly rejected due to infeasibility as each involves conflicts with the City's General Plan.